

Policies for the Protection of Youth Packet

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Preamble: Policies for the Protection of Youth

Safety Policies:

We will provide physical, social and emotionally safe places for all to learn and grow because the safety and well-being of young people is our Number One Priority.

We will work every day to create a safe, fun environment so kids can have every opportunity to be successful in life. We have ZERO tolerance for inappropriate behavior of any kind, including child sexual abuse, grooming, or misconduct; and we put resources behind that stance.

Culture of Safety:

Boys & Girls Clubs of Central Minnesota continually updates robust safety policies, programs, and training for our staff and volunteers that are designed to promote child safety and protect young people from threats that are present in our society.

We believe it is the responsibility of every staff and volunteer to continuously improve our culture of safety as well as to achieve our goal of providing physically, socially, and emotionally safe places for all to learn and grow.

Child Abuse Prevention Policy

The priority of Boys & Girls Clubs of Central Minnesota is the physical, social and emotional safety of its members, staff, and volunteers. Boys & Girls Clubs of Central Minnesota maintains a zero-tolerance policy for child abuse, grooming, or misconduct.

Boys & Girls Clubs of Central Minnesota implements policies and procedures for members, staff, volunteers, visitors, or any victims of sexual abuse or misconduct to report any suspicion or allegation of abuse.

Definitions

One-on-One Contact Prohibition:

Boys & Girls Clubs of Central Minnesota prohibits isolated one-on-one interaction between Club participants and staff or volunteers, including board members. This includes prohibiting one-on-one contact at any time at the Club, in vehicles, by phone, text, social media, or any other means.

Exceptions:

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 Club participants outside of any Club-sponsored activities. The only exception to this rule is if the Club participant is a child or sibling of a staff or volunteer.

Child Abuse:

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:

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

Mandated Reporting

Boys & Girls Clubs of Central Minnesota follows all applicable mandated reporting statutes and regulations and all applicable federal, state statutes (including Minnesota Statute **§626.556**), and local laws (including those around licensing, for licensed organizations) for the protection and safety of members.

Minnesota law requires that any person who works with youth and who knows or has reason to believe that a child is being neglected or physically or sexually abused (or has been within the past 3 years) *shall report* the suspected incident to Social Services or the local police within 24 hours. Failure to do so may result in a criminal misdemeanor conviction. If the child is in danger, the call must be made as soon as possible.

Any staff or volunteer of Boys & Girls Clubs of Central Minnesota who becomes aware of or has suspicion of child abuse or neglect; that has taken place within Club spaces or programs; must immediately report to Designated Club leadership. Club 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.

Perpetrators can be anyone including leadership, staff, members, parents, volunteers, and/or community members.

Additional details on mandated reporting found in the Incident Reporting section of this document.

Required Trainings

Boys & Girls Clubs of Central Minnesota conducts and reports through a BGCA-approved process the following training for all staff and volunteers who have direct, repetitive contact with young people (at the intervals noted for each).

Before providing services to young people, and annually thereafter:

- BGCA-Child Safety Sexual Abuse Prevention
 - Employees must complete and pass all modules within the Spillett Leadership University (SLU) Sexual Abuse Prevention training series
 - Volunteers must complete and pass all modules within the SLU Redwoods Training, Child Sexual Abuse Prevention (this training meets BGCA’s requirement for approved grooming, prevention, and mandated reporting).

Annually:

- All policies, including all safety policies, for Boys & Girls Clubs of Central Minnesota.

Physical Interactions

Every staff and volunteer of Boys & Girls Clubs of Central Minnesota is required to maintain appropriate physical contact. Appropriate and inappropriate interactions include but are not limited to the following:

Appropriate	Inappropriate
<ul style="list-style-type: none"> ● Side hugs ● Handshakes ● High-fives and hand slapping ● Holding hands (with young members in escorting situations) 	<ul style="list-style-type: none"> ● Full-frontal hugs or kisses ● Showing affection in isolated area ● Lap sitting ● Wrestling or piggyback/shoulder rides ● Tickling ● The use of mechanical restraints, including tying ● Physical restraints ● Withholding or forcing of food and other basic needs ● Corporal punishment including: rough handling, shoving, hair pulling, ear pulling, shaking, slapping, kicking, biting, pinching, hitting, and spanking. ● Allowing members to cling to an adult’s leg

Verbal Interactions

Every staff and volunteer of Boys & Girls Clubs of Central Minnesota is required to maintain appropriate verbal interactions. Appropriate and inappropriate interactions include but are not limited to the following:

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

Abuse and Safety Resources

Boys & Girls Clubs of Central Minnesota prominently displays BGCA-approved resources sharing ethics hotline, crisis text line and safety helpline information with members, staff, volunteers, and families. We also make all safety policies available to parents and guardians upon receiving a member's membership application; if requested.

Prohibition of Private One-on-One Interaction Policy

Boys & Girls Clubs of Central Minnesota 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 Club members and staff and volunteers (including board members). All staff and volunteers must abide by the following:

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

Rule of Three 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 Club member and staff or volunteers - including adult staff, minor staff, volunteers, board members, and others who might encounter members during regular programming and activities.

Private contact/communication

Private contact/communication is any communication, in person or virtual, that is between one member and one adult (18 or over) staff or volunteer 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 transporting one member in a vehicle.
- Electronic communications (text, video, social media, etc.) between one member and one staff or volunteer.

Public contact/communication

Public contact/communication is any communication or meeting, in person or virtual, that is between at least three individuals, including two staff/volunteer and one member, one staff/volunteer 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 Boys & Girls Club 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 Club hours and at the Club site.
- Documenting interactions between mentors and members.

Impact on Partnerships with Local Mentoring Organizations

- All mentors are required to abide by Club policies, including background check requirements and prohibition of one-on-one interaction.
- External mentors are required to abide by all Club 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. (Parents have to provide a written document for the site to allow the youth to leave with an external organization.)
- Every interaction between mentor and member will be documented and maintained in Odyssey (member database tracking system, this is a record of who has checked out a member).

Impact on travelling to off-site events and activities

- When travelling to external events such as Keystone, Youth of the Year, or other off-site events, the one-on-one policy shall continue to be followed.
- When transporting members to and/or from an event, accommodations shall be made to ensure at least three people (two staff and one member) are together when traveling. As an alternative, public transportation may be used (e.g., taxi, Uber, public transport). (If in a Club vehicle, two staff must be present in the vehicle).
- 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 Club

- When transporting members to and/or from a Club-sponsored event or activity, single members should not be transported alone with one staff person; there must always be two staff members in the van regardless of the number of members.

Exceptions to policy

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

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 Club 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 Club could be a safety risk).

Should exceptions need to be made, the following must be followed:

- Disclosing the meeting to Club leadership and regularly checking in with the member and adult during conversations.
- Placing time limits on conversations.
- Documenting the interaction.
- In an emergency, disclosing the situation to another staff before engaging in one-on-one interaction.

All instances of exceptions should be communicated with Club leadership and documented. If medical care is given, Clubs should reference HIPPA for state-specific guidance.

Minnesota law shall supersede all language within this policy, and nothing in this policy shall be read or interpreted to be in conflict with Minnesota law.

Supervision and Facilities Policy

Supervision

Boys & Girls Clubs of Central Minnesota is committed to providing a safe environment. All Club 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 members.
- Must always maintain proper supervision ratios.
- Must be trained on appropriate supervision tactics and behavior patterns.
- Must ensure that all minor staff and volunteers are supervised by an adult (18 and over) staff.
- Must immediately notify Club leadership and/or submit written reports detailing supervision issues, accidents, or critical incidents.
- Must never use electronic devices such as cell phones, or other communication devices while supervising members unless for Club purposes, as defined in the Acceptable Technology Use Policy.

Recommended Ratios

Type	Adults	Youth
Units	1	20
KIDSTOP	1	15
KIDSTART	1	10
Day Trips	1	8
Overnight	1 (with minimum of 2 adults present)	6
Swimming	1 lifeguard (plus additional staff as required for a day trip)	20 Swimmers

Restroom Usage

Boys & Girls Clubs of Central Minnesota 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 members never utilize a restroom at the same time.
- Clubs will either 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 members will be escorted by one staff, 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 Club Management. Monitoring includes walk-throughs, inspections and/or any of the best practices outlined below:

- Implementing procedures to limit the number of members using restrooms at the same time; best practice is using bathroom passes and announce over the radio.
- Prohibiting mixed age groups (elementary members, teen members, and adults) from sharing a restroom.
- Positioning staff near restroom entrances to maintain auditory supervision of space, when using the restrooms as a group.
- Designing or renovating multi-user restrooms to eliminate outer doors, while maintaining privacy with individual stalls whenever possible.
- KIDSTART (PreK) staff must visually monitor the restroom entrance.

Staff observing unacceptable restroom conditions or incidents shall:

- Immediately notify Club leadership of the incident.
- Written documentation of restroom conduct incidents and report them to Club leadership as soon as possible in compliance with the Club's Incident Reporting Policy.

Paid Staff Shall

- Only use designated staff restrooms. Should separate restrooms be unavailable, staff shall use restrooms at designated intervals to ensure they are not using restrooms at the same time as members.
- Abide by all staff codes of conduct.
- Enforce the Club's restroom usage policy.
- Intervene and notify Club leadership should inappropriate conduct be observed.
- Ensure restrooms are regularly cleaned and disinfected.

Entrance and Exit Control

All facility entries and exits shall be controlled and monitored by paid staff or an approved and trained adult volunteer during all hours of operation, along with a system to monitor and track everyone who is in the facility or program space in the schools.

All exit doors in the Clubs that are not monitored by an individual staff shall have an audible alarm to discourage unauthorized use to exit or enter the facility. In the school facilities, staff are trained to monitor who is in the building and approach people who are not part of the program and communicate with site Management.

Only designated adult staff (18 or over) shall be authorized to possess keys and/or badges to open any facility. Staff supervising a scheduled activity are responsible for the security of their program space.

Facility and Equipment 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. In the school programs, we have staff bring members to programs, use the two-way radios to communicate when members need to leave areas.

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; school programs will work with school personnel to make sure spaces are locked in the program areas.

Damages to facilities and equipment 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, designated Club leadership shall determine whether temporary or permanent closure of the facility may be required. Any damage to a facility and equipment that results in an incident deemed critical to the organization, designated Club leadership shall report 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.

All Boys & Girls Club program sites will adhere to the recommended practices for schools and out of home care settings to provide a safe environment for children with severe food allergies. Food sharing between members will be discouraged due to the risk of food cross contamination risk factors to those with severe food allergies, known or unknown.

Screening and Onboarding Policy

Boys & Girls Clubs of Central Minnesota is committed to selecting and retaining effective staff and volunteers to serve our members. As part of the selection process and in accordance with state background check regulations and BGCA, background checks and screening procedures are conducted in accordance with this policy.

Background Checks

Boys & Girls Clubs of Central Minnesota conducts criminal background checks of all staff, including minors; and all volunteers, including board members, those who serve on a standing committee, and any volunteer with direct, repetitive contact with minors.

Name-based or fingerprint-based record searches may be used in any combination, but the background check shall at a minimum:

- Verify the person's identity and legal aliases through verification of a social security number and picture ID.
- Provide a national Sex Offender Registry search.
- Provide a comprehensive criminal search that includes a national search.
- Provide a comprehensive local criminal search that includes either a statewide or county level criminal search, depending on jurisdiction (*a current list of jurisdictions can be found at www.bgca.net/childsafety*).
- Include any additional background check criteria required by organizational policies, funding or licensing agencies or required in the applicable jurisdiction, such as motor vehicle records, child abuse registry or credit checks.

Background checks will be conducted prior to employment or volunteering and at regular intervals with continuous monitoring, not to exceed twelve months or the length of the background check. All background check findings shall be considered when making employment or volunteer decisions, and Boys & Girls Clubs of Central Minnesota will not employ potential staff or engage potential volunteers 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 is required to be registered, on a state or national sex offender registry.
- Has been convicted of:
 - Murder
 - Child abuse
 - Domestic violence
 - Abduction or human trafficking
 - A crime involving rape or sexual assault
 - Arson
 - Weapons
 - Physical assault or battery
 - Drug possession, use or distribution in the last five years
- Has been convicted of any misdemeanor in the last 5 years involving physical assault or battery, drugs or controlled substances, or cruelty to animals
- Has been convicted of any misdemeanor or felony against minors, including child pornography

With respect to convictions for crimes not listed above, any applicant with such a conviction shall be evaluated on an individual basis to determine whether they should be excluded from consideration based on the conviction. In doing so, along with utilizing a Decision Matrix, BGCMN shall consider the following factors:

- The nature and gravity of the offense;
- The time that has passed since the offense or completion of sentence;
- The nature of the job sought or held;
- The facts and circumstances surrounding the offense or conduct;
- The number of offenses for which the individual was convicted;
- The age of the individual at the time of conviction or release;
- Evidence that the individual performed the same type of work, post-conviction, with the same or a different employer with no known incidents of criminal conduct;
- The length and consistency of employment history before and after the offense or conduct;
- Rehabilitation efforts, e.g. education and/or training;
- Employment or character references and any other information regarding fitness for the particular position;
- And whether the individual is bonded under a federal, state, or local bonding program.

Any pending cases must be resolved and reviewed before employment or volunteering can start.

Boys & Girls Clubs of Central Minnesota shall alert the applicant to the possibility of his or her exclusion due to past criminal conduct and provide the applicant an opportunity to submit an explanation. All personal data, background check data, and adverse action letters shall be treated as confidential and maintained in a secure location.

Questionable Background Check Findings

Background check findings with questionable results will be given to the CEO/President by the Human Resource professional who is authorized to process background checks for the Club. Questionable results will be reviewed by a three-person panel, comprised of the CEO/President, Chair of the Board and the Senior Director of Human Resource or VP of Operations. If the CEO/President or the Chair of the Board needs to have his/her background reviewed, the Chair of the Human Resources Committee will serve as the third person on the three-person panel. The findings and decision of the panel will be shared with the applicant as soon as reasonably possible.

Interviewing

Boys & Girls Clubs of Central MN will conduct in-person behavioral-based interviews for all full time positions when possible, a virtual interview will be permitted, in-person is the preference. Part time interviews are permitted via phone or virtually as needed with the preference of in-person whenever possible.

Rehires

Rehires employed 3 years ago or less do not require a new interview as long as current management staff can give a good recommendation for rehire and a review of personnel file.

Volunteers

Current volunteers wanting to shift to a paid position will only need to interview if the new position is different than their current volunteer position. A positive recommendation from a direct supervisor is required for promotions without an interview.

Reference Checks

Boys & Girls Clubs of Central Minnesota 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, information on the candidate's eligibility for rehire/volunteering must be obtained from all previous Boys & Girls Clubs for which the candidate worked prior to extending an offer for employment or volunteer service. Additionally, Boys & Girls Clubs of Central Minnesota provides reference materials when asked by other Member Organizations.

Part time candidates require a minimum of one positive professional reference, however two is preferred with one being a positive personal reference.

Full time candidates require a minimum of two positive references one being professional and one personal, however three references is preferred with the third being an additional professional reference.

Staff and Volunteer Onboarding

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

- Conditions of employment;
- Benefits;
- Rights and responsibilities of staff;
- Code of Ethics;
- Policies for the Protection of Youth; and
- Any other important employment-related information.

Before working with any Club members, all staff and ongoing 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;
- Proactive discipline methods including Conscious Discipline, Restorative Practices, and Trauma Informed Practices.
- 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.;
- Completion of the required **Child Abuse Prevention Trainings** approved by BGCA
 - BGCA approved Mandated Reporting
 - Grooming Prevention
 - Child Safety
- Completion of Head Trauma Training;
- Completion of CPR Training (not a certification training – positions in program/site management require actual CPR certification training);
- Completion of Active Threat Training;
- Mandated Reporting requirements per Minnesota/DHS/BGCA;
- Infection Control.

Drug- and Alcohol-Free Workplace Policy

The Boys & Girls Club of Central Minnesota is committed to the goal of maintaining a safe and healthy workplace free from the influence of alcohol and other drugs. Achieving this goal is necessary to maintain the safety and quality of the work environment and the safety and health of employees, volunteers, and members.

Staff are expected to report for work with no illegal drugs or alcohol in their bodies and to refrain from ingesting illegal drugs or alcohol during work time. Compliance with this requirement is considered an essential qualification for all job assignments. All staff are required to participate in, consent; and comply with the terms of this Policy as a condition of employment and continued employment.

Definitions

Drug

Drug means a controlled substance identified under MN Statutes, chapter 152, or prescription drug which is taken without a physician's order, as well as alcohol, marijuana, THC, or other substances which may alter mental or physical capacity. These drugs do not include the use of a drug obtained and taken under the supervision by and in accordance with prescriptions or other instructions issued by a licensed healthcare professional.

Under the influence of alcohol or appearing to be under the influence of alcohol

Under the influence of alcohol or appearing to be under the influence of alcohol means (1) presence of alcohol in the individual's system, or (2) behavior, appearance, speech, or bodily odors that lead a supervisor or manager to reasonably suspect that the staff is impaired by alcohol or is using alcohol during working time.

Under the influence of drugs/chemical or appearing to be under the influence of drugs/chemicals

Under the influence of drugs/chemical or appearing to be under the influence of drugs/chemicals means the presence of any detectable amount of an illegal, or a legal drug taken without a prescription, or its metabolites demonstrated by a verified positive drug test result, or (2) behavior, appearance, speech or bodily odors that lead a supervisor or manager to reasonably suspect that a client or staff is impaired by illegal drugs, cannabis or THC or is using illegal drugs during working time.

Drug Free Workplace Act

The Boys & Girls Club of Central Minnesota abides by the Drug Free Workplace Act (1988), which requires all federal grantees to provide a drug-free workplace as a condition for receiving federal funds. This policy maintains a drug and alcohol free workplace and anyone who tests positive for any illegal substance will not stay employed. Although Minnesota has legalized the use of marijuana it remains illegal under federal law therefore, the company will handle all marijuana positives according to federal law.

During working time

During working time means time during which the staff is being paid to work for the Club and is in fact representing the Club's interests. The term also includes all paid breaks and meal periods.

Types of Testing Required

The Club has implemented three situations for drug and alcohol testing: (1) Reasonable Suspicion; (2) Post-Accident; (3) Substance Abuse Evaluation including Return-to-Work and Follow-up Testing.

Reasonable Suspicion

Staff and or volunteers shall immediately notify Club leadership of any action by a staff or volunteer who demonstrates an unusual pattern of behavior suggesting that they are under the influence of drugs or alcohol. Club leadership will determine whether the staff should be examined by a physician or clinic and/or tested for drugs or alcohol in accordance with the Club's drug-testing policies. Staff and volunteers believed to be under the influence of drugs or alcohol will be required to leave the premises and asked to undergo drug and/or alcohol testing according to policy. Any illegal drugs or drug paraphernalia will be turned over to the appropriate law enforcement agency and may result in criminal prosecution.

Examples of behavior suggesting under the influence of drugs or alcohol

Examples of behavior suggesting that staff 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.

Additional Reasonable Suspicion may also be present when staff:

- Violate the Club's written work rules prohibiting the use, possession, sale, or transfer of drugs or alcohol while the staff is working or while the staff is on the Club's premises or operating the Club's vehicle, machinery, or equipment; or
- Sustain a personal injury or has caused another staff to sustain a personal injury.

Staff suspected of being under the influence through a reasonable suspicion assessment are required to consent to, take, and participate in a drug test. Staff who test positive must successfully complete the drug or alcohol counseling or rehabilitation program recommended, at the staff's expense or under a staff benefit coverage program.

Boys & Girls Clubs of Central Minnesota 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 a staff's personal property when the organization has reasonable suspicion to believe that the staff has violated this drug- and alcohol-free workplace policy.

Post-Accident

Staff will be subject to post accident testing if they have caused or been involved in a work-related accident while driving a vehicle or operating any machine or piece of equipment causing property damage and or/personal injury.

Substance Abuse Evaluation Including Return-to-Work and Follow-up Testing

Staff who have tested positive and have been removed from their job duties, and are undergoing treatment recommendations, must submit to and furnish a negative drug and /or alcohol test result prior to returning to their job duties. Any staff who as a result of a positive test, has been referred for chemical dependency treatment or evaluation or is participating in treatment under a staff benefit plan, may be required to submit to testing during the course of participation in the evaluation or treatment, and for a period of two years following the completion of any prescribed chemical dependence treatment program. The Club does not guarantee the staff will return to their same position should he/she regain qualified status.

Procedures

Under no circumstances will staff be allowed to drive themselves to the testing facility or be allowed to leave the premises unless they have a safe ride. A member of management and one other staff in a leadership role must transport the staff or arrange for a cab. If a cab is used a member of management or leadership will follow to the facility. Either way, at least one member of management or staff in a leadership role will remain at the facility throughout the testing process. Transportation home will be arranged by BGC if the staff is unable to arrange that on their own.

All testing will be conducted in accordance with the following procedures:

- Each staff will be provided a copy of this policy to read and will sign and date the Acknowledgement form.
- Each test will be conducted by a laboratory which is authorized by law to conduct such tests and which confirms to BGC that its procedures are in accordance with Minnesota law.
- All samples, which test “positive” on an initial screening test, will be subject to a confirmatory retest by the laboratory before the results are reported to the staff.
- Results will be reported to each individual in writing within three (3) working days of the receipt of the results.
- An individual may submit additional information for explaining test results or may request a confirmatory retest at his or her own expense. (Initial test, confirmatory test and confirmatory retests will all be conducted using the same sample.) Any such additional information or request for a retest must be submitted in writing to the Senior Director of Human Resources within five (5) working days after notice of the test results.
- An individual who has been referred to testing because of reasonable suspicion may be temporarily suspended from all duties without pay pending the outcome of the testing. If the outcome of the confirmatory test, or confirmatory retest is negative, the employee will be reinstated with back pay.
- An individual who has been referred to testing because of Post-Accident will continue to work pending the outcome of the testing.
- A positive result on the final confirmatory test pursuant to this policy will result in the following consequences:
 - The first time an employee tests positive on a confirmatory test for alcohol or drugs, they will be given an opportunity to participate in, at their expense or pursuant to an applicable employee benefit plan, a drug or alcohol counseling or rehabilitation program and future testing requirements as outlined in this policy. If the employee refuses to participate or fails to successfully complete the counseling program, they may be subject to termination.
 - The second time an employee tests positive they may be subject to termination.
- All tested employees will be entitled to receive a signed document by the medical review officer.
- Individuals who receive negative diluted results will be required to repeat the test. If the test result is negative dilute again, it will be treated as a positive.

Right of Refusal

Staff have the right to refuse to submit to an alcohol or drug test under this policy. However, such a refusal will subject an employee to immediate termination.

Any intentional act or omission by the employee that prevents the completion of the testing process constitutes a refusal to test.

A staff who substitutes, attempts to substitute, alters, or attempts to alter a testing sample is considered to

have refused to take a drug and/or alcohol test. In such a case, the employee is subject to immediate termination of employment.

Staff must report their use of over-the-counter or prescribed medications to their supervisor if the use might impair their ability to perform their job safely and particularly if the drug has a warning concerning the safe operation of vehicles or equipment.

The management of Boys & Girls Club will notify the appropriate law enforcement agency when they have reasonable suspicion to believe that an employee may have illegal drugs in their possession while on duty during work hours.

Last Chance Agreement

In lieu of terminating employment of a staff who tests positive for illegal substances on the first test, requested by the Boys & Girls Club, the Boys & Girls Club will offer to provide the staff with a single opportunity to participate in, at the staff's own expense or pursuant to coverage under the staff's health insurance plan, either a drug or alcohol counseling or rehabilitation program, whichever is more appropriate, as determined by the Boys & Girls Club after consultation with a certified chemical use counselor or a physician trained in the diagnosis and treatment of chemical dependency, and agree to thereafter comply with all company policies and practices.

Smoking Policy

Boys & Girls Clubs of Central Minnesota 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 staff. Smoking in the workplace can adversely affect members, staff, and volunteers. Accordingly, smoking is restricted at all its facilities as well as company vehicles.

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 Club properties except for external areas where it is specifically authorized. The smoking policy applies to staff, volunteers, and members while on Club premises or during Club activities (on or off site).

Incident Management Policy

Incident Investigation

Boys & Girls Clubs of Central Minnesota takes all incidents seriously and is committed to supporting external investigations of all reported incidents and allegations or internal investigations by appropriate members of 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, volunteer, or Club member, the Club shall suspend that individual immediately and maintain the suspension throughout the course of the investigation.

External Incident Reporting

Boys & Girls Clubs of Central Minnesota follows all applicable mandated reporting statutes and regulations and all applicable federal, and state statutes, including Minnesota Statute **§626.556**, and local laws (including those around licensing, for licensed organizations) for the protection and safety of members.

Minnesota law requires that any person who works with members and who knows or has reason to believe that a member is being neglected or physically or sexually abused (or has been within the past 3 years) shall immediately report the suspected incident to Social Services or the local police within 24 hours. Failure to do so may result in a criminal misdemeanor conviction.

What is considered abuse or neglect under the law?

- Physical or mental injury inflicted on a child other than by accidental means or which can't be reasonably explained. Discipline which is not reasonable.
- Sexual assault or abuse.
- Neglect: depriving a child of necessary food, clothing, shelter, health care, or supervision appropriate to the child's age or failure to protect a child from conditions which endanger the child's health.

What does it mean to “know or have reason to believe” that abuse or neglect has occurred?

- The child tells you about an incident that meets the criteria of abuse or neglect.
- You observe physical or behavioral signs of abuse or neglect of the child that cannot be reasonably explained, or receive an explanation that doesn't seem believable based on the age of the child or other circumstances.

What must I do if a child tells me about abuse?

- Be calm. If you appear to be angry, upset, or very emotional, the child will be frightened.
- Let the child tell you about what happened in his/her own words and then reassure him that you believe him/her.
- **DO NOT ASK A LOT OF DETAILED QUESTIONS OF THE CHILD AS THIS MAY INTERFERE LATER WITH AN OFFICIAL INVESTIGATION.** Believe them.
- Tell the child that s/he is not in trouble and that s/he did the right thing to tell you about what happened.
- Tell the child that you want to make sure that s/he will be safe. Let him/her know that you are going to get help so that this doesn't happen again.
- Immediately report what the child told you to your Site Manager/Sr. Site Manager or other Director/Cabinet team member. Then, work with them to make a verbal report to Social Services or the police. **The verbal report must be made within 24 hours!** Document in writing what the child told you.
- Work with your Site Manager/Sr. Site Manager (or their delegate) to complete a written report. This must be submitted within 72 hours.
- **Do not promise to keep secrets!** If a child asks you to keep a secret, tell them that you will if you can, but you might have to tell someone else in order to keep the child safe.

What do I do if I'm not sure if the situation is serious enough to report?

- Without using names or other identifying information, describe the situation to child protection or the police.
- Allow them to assist you in determining whether to make the report.

If the allegation of child abuse cannot be proven, will I get into trouble for making the report?

- Anyone who makes a report in good faith (with a reasonable belief) may not be criminally prosecuted or sued in civil court for libel, slander, defamation, invasion of privacy, or breach of confidentiality.

Making a report in good faith will also not adversely affect the staff or volunteer's employment or volunteer status with Boys & Girls Clubs of Central Minnesota.

General Incident Description

Safety incidents can include but are not limited to:

- Inappropriate activity between adults (18 and over) and members;
- Inappropriate activity between multiple members;
- Allegations of abuse;
- Academic dishonesty;
- Possession of/use of alcohol, drugs, tobacco, etc.;
- Damaging personal, other member's, or Club property;
- Theft;
- Verbal harassment;
- Bullying behavior;
- Inappropriate electronic communications between adults (18 or over) and members;
- 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 members;
- Criminal activity, including theft and robbery; and
- Other incidents as deemed appropriate by Club leadership.

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

Internal Incident Reporting

Any staff or volunteer who becomes aware of an incident, as defined in this policy, shall immediately complete an incident report, and submit the incident to Site Management, Director of KIDSTOP, Director of Clubs or VP of Operations.

The following information shall be included in an Incident Report:

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

BGCA Critical Incident Reporting

Boys & Girls Clubs of Central Minnesota will immediately report any allegation of abuse or potential criminal matter to law enforcement. In addition, Boys & Girls Clubs of Central Minnesota will report the following critical incidents to BGCA within 24 hours:

- Any instance or allegation of child abuse, including physical, emotional, or sexual abuse; sexual misconduct or exploitation (Club-related or not) against any child by a current staff or volunteer; or any Club-related instance by a former staff or volunteer.
- Any instance or allegation of child abuse, including physical, emotional, or sexual abuse; or sexual misconduct or exploitation by a member towards another member at a Club site or during a Club-sponsored activity.
- Any child who might have been abducted or reported missing from a Club site or Club-sponsored activity.
- Any major medical emergency involving a child, staff or volunteer at a Club site or during a Club-sponsored activity leading to extended hospitalization, permanent injury, or death; or a mental health crisis with a child requiring outside care.
- Any instance or allegation of abuse, including physical, emotional, or sexual abuse, sexual misconduct, harassment, or exploitation (Club-related or not) involving any staff; or any Club-related instance or allegation of abuse, including physical, emotional, or sexual abuse, sexual misconduct. Harassment, or exploitation against a volunteer or visitor.
- Any failure to comply with requirements set forth by child care licensing agencies or organizations.
- Any known or suspected felony-level criminal act committed at a Club site or during a Club-sponsored activity.
- Any misappropriation of organizational funds in the amount of \$10,000 or greater, or any amount of federal funds.
- Any criminal or civil legal action involving the organization, its staff, or volunteers, as well as any changes in the status of an open organization-related legal action.
- Negative media attention that could compromise the reputation of the Member Organization or the Boys & Girls Clubs of America brand.
- Any other incident deemed critical by the Member Organization.

Boys & Girls Clubs of Central Minnesota recognizes that failure to report safety incidents to Boys & Girls Clubs of America could result in a funding hold or the organization being placed on provisional status.

Technology Acceptable Use Policy

Boys & Girls Clubs of Central Minnesota is committed to providing a safe use of technology and online safety for members, staff, and volunteers. The technology acceptable use policy provides the framework for those safety practices and procedures.

Club Member Usage

Before a member will be allowed to use Club technology equipment or their personal device, each member will need to read and sign the Technology Acceptable Use policy and return it to the Club. Under the Technology Acceptable Use policy, the following relevant principles shall apply:

Club Devices

Club devices shall include any and all Club-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

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.

Club Purposes

Club purposes shall include program activities, career development, communication with experts and/or Club peer members, homework, and Club 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

Club devices and personally owned devices are permitted for use during approved Club times for Club purposes and in approved locations only. The Club expressly prohibits the use of Club 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 Club or personally owned device, as determined by Club staff, can lead to disciplinary action including but not limited to confiscation of the device, immediate suspension from the Club, termination of membership, or other disciplinary actions determined to be appropriate to the Club's existing disciplinary policies including, if applicable, referral to local law enforcement.

Members must be aware of the appropriateness of communications when using Club 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 Club community or create the danger of disruption of the Club 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.

Monitoring and Inspection

Boys & Girls Clubs of Central Minnesota reserves the right to monitor, inspect, copy, and review any personally owned device that is brought to the Club. 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 Club in the future.

Loss and Damage

Members are responsible for keeping devices with them at all times as appropriate or encouraged to leave devices at home. Personal devices may be restricted in club programming and may be required to be checked in at the front desk. Staff are not responsible for the security and condition of the member's personal device. Furthermore, the Club is not liable for the loss, damage, misuse, or theft of any personally owned device brought to the Club.

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 Club, Club members, Club 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.

Unauthorized Access

Members may not attempt to gain unauthorized access to the Club's network, or to any other computer system through the Club's network. This includes attempting to log in through another person's account or accessing another person's files. Members may not use the Club'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.

Internet Access

Personally owned devices used at the Club must access the internet via the Club's content-filtered wireless network and are not permitted to directly connect to the internet through a phone network or other content service provider. Boys & Girls Clubs of Central Minnesota 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 Club procedures to access the Club's internet service.

Parental Notification and Responsibility

While the Boys & Girls Clubs of Central Minnesota 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 Boys & Girls Clubs of Central Minnesota 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

Club members shall conduct themselves online in a manner that is aligned with the Boys & Girls Clubs of Central Minnesota 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 Boys & Girls Clubs of Central Minnesota Code of Conduct, that member shall face the same discipline policy and actions they would if their behavior had happened within the physical Club environment.

Club-owned-and-operated technology

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

Digital Citizenship and Technology Safety Training

All members who wish to use a Boys & Girls Clubs 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 who use Club technology annually.

Staff and Volunteer Usage

Please note: if not specified, this section of the policy applies to both staff and volunteers.

Before a staff can use Club technology equipment or a personal device, he/she shall read and sign the Technology Acceptable Use policy as part of the staff handbook. Under the Technology Acceptable Use policy, the following relevant principles shall apply:

Cell Phone Use

We recognize that cell phones (and smartphones especially) have become an integral part of everyday life. Our organization expects staff to use their cellphones prudently during working hours. If staff use of a personal cell phone causes disruptions or becomes a distraction to the work, the staff may become subject to corrective action.

The following are the organization's basic guidelines for proper staff cell phone use during work hours. In general, cell phones should not be used when they could pose a security or safety risk, or when they distract from work tasks:

- Never use a cell phone when directly supervising members.
- Never use a cell phone while driving with the exception of hands free navigation if/when necessary.
- Never use a cell phone while operating equipment.
- Do not use cell phones for surfing the internet or gaming during work hours.
- Do not use cell phones to record confidential information.

Use of Electronic Devices

The Club may provide computers, printers, and other electronic devices to its staff to perform their job functions. These devices and all related materials, including software, are Club property and may be used for Club business only. Only software that is authorized by the Club may be used, copied, or installed on the Club equipment. All data contained on the Club's electronic devices belong to the Club and cannot be altered without specific written authorization. No data stored on the Club's electronic devices is to be released to any person or outside organization with the exception of surveillance data as outlined in that policy. Employees who use computers at home for Club business must virus check any CD's, external drives or other media storage devices before using them on Club computers.

Outside computer services such as the Internet, e-mail, instant messaging etc., may be accessed and used for Club business only and only with proper authorization. Incidental personal use may be tolerated. The Club's electronic devices and/or services may not be used to solicit or create any offensive or disruptive messages. The Club devices and/or services shall not be used to send (upload) or receive (download) copyrighted materials, trade secrets, proprietary financial information, or similar materials. All messages composed, or any data sent or received on the Club's electronic devices are and remain the property of the Club; they are not the private property of any staff. The Club may review, audit, intercept, access, remove, and disclose all messages, or other data created, received, or sent over the Club's systems for any purpose without the permission of the staff; the confidentiality of any electronic message should not be assumed.

Computer-related passwords and security codes assigned to staff may not be communicated to any other staff or third party unless specifically authorized by the President/CEO. Employees may not retrieve or read any electronic messages that are not sent to them. Employees who access electronic files from remote locations are governed by the terms of this policy and must return all files and file copies to the Club at the conclusion of their employment. Any exception to this policy must receive prior approval from the President/CEO.

Social Media

The Club recognizes the value of online social media tools for connecting with family, friends, coworkers, donors, and volunteers. Our web presence should project a positive image that is reflective of our overall brand and is consistent with our mission and code of ethics. However, in order to ensure we maintain a values-oriented, positive, professional image, and to protect the safety and privacy of our members and staff, all staff and volunteers must abide by the following expectations when using social media for work or for personal purposes. This policy has been established to maintain the integrity of our brand with respect to communication frequency, strategy, message, and appearance.

Staff and volunteers are solely responsible for what they post online. Before creating online content, consider some of the risks and rewards involved. Conduct that adversely affects job performance, the performance of fellow staff, or otherwise adversely affects staff, volunteers, members, donors, or community partners may result in disciplinary action, up to and including termination of employment or volunteer agreement. This policy will not be applied or construed in a manner that violates or improperly interferes with staff rights under Section 7 of the National Labor Relations Act (NLRA).

In the rapidly expanding world of electronic communication, social media can mean many things. Social media includes all means of communicating or posting information or content of any sort on web logs or blogs, journals or diaries, personal websites, social networking or affinity websites, web bulletin boards or chat rooms, as well as any other form of electronic communication. The Club has established these guidelines for appropriate use of social media; staff and volunteers should carefully read these guidelines, the Club's Code of Ethics Policy, Confidentiality Policy, and the Equal Employment Opportunity Policy to ensure postings are consistent with these policies.

Social Media Guidelines

- Personal sites that identify Club staff or volunteers must be consistent and should not undermine the Club's mission or code of ethics.
- Staff/volunteers should not post content, including texts, pictures, logos, and images regarding the Club that can be reasonably deemed as disparaging or offensive to the Club, its members, staff, volunteers, or community.
- Staff/volunteers must make responsible decisions in disclosing any information about the Club (the organization, its members, volunteers, staff, donors, community partners, etc.) and adhere to all applicable policies regarding confidentiality and proprietary information.
- Staff/volunteers should recognize that they are personally responsible for the content they publish on social media sites. Additionally, staff/volunteers will be disciplined for commentary, content, or images that are defamatory, pornographic, proprietary, harassing, discriminatory, libelous, or that can create a hostile work environment.
- Staff/volunteers should express only their personal opinions and should never represent themselves as a spokesperson for the Club. If the Club is a subject of the content being created, staff/volunteers must be clear and open that their views do not represent those of the Club, volunteers, members, donors, or community partners, etc. Staff/volunteers publishing a blog or post online related to the work done or subjects associated with the Club, must make it clear they are not speaking on behalf of the Club. It is best to include a disclaimer such as "The postings on this site are my own and do not necessarily reflect the views of the Club".
- Social media should not be used for anything other than work purposes while on the clock.

Friending Members/Parents

Sometimes members may ask staff/volunteers to become their “friend” on social media sites. This is not allowed. Employees/volunteers should also consider creating a more limited profile for general or work-related purposes and reserve their full profile for friends and family only. Employees/volunteers are strongly discouraged from friending members’ parents.

Communication with Club Members

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

Photos and Videos of Club Activities

Whenever possible, Club-issued cameras should be used to take any photos and/or video (images) of Club activities. If a personal device must be used, only a full-time Site Manager, Sr. Site Manager, Director, or Cabinet staff may take images using their personal device. These images must be immediately transferred to the Boys & Girls Club network via email or sent to the Marketing/Development and then immediately deleted from the personal device. Other full-time staff may be given permission to take images using their personal device under special circumstances by Cabinet or Director staff; however, part-time staff and volunteers are strictly prohibited from taking images of Club activities using their personal devices.

Images of Club activities may only be posted on the Boys & Girls Clubs of Central Minnesota’s social media platforms with prior permission from the Cabinet leadership team. Posting images of Club activities on any sites without permission is strictly prohibited.

The following guidelines must be met in order to post content on social media:

- Members featured in the image have media consent
- Images are approved by the Cabinet team before uploading.
- If deemed inappropriate, the Cabinet team reserves the right to remove content at any time.
- Staff/Volunteers can share posts made by Marketing/communications on their personal pages.

Club Devices

Shall include any and all Club-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.

Club Purposes

Shall include but are not limited to the delivery of program activities, accessing sanctioned training or career development opportunities, communication with experts and/or authorized Club staff, and for Club purposes or management of other Club 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 are not 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 Club times for Club purposes and in approved locations only. The Club 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 Club, termination of employment or volunteer assignment, or other disciplinary actions determined to be appropriate to the Club's existing disciplinary policies including, if applicable, referral to local law enforcement.

Monitoring and inspection

Boys & Girls Clubs of Central Minnesota reserves the right to monitor, inspect, copy, and review a personally owned device that is brought to the Club. Staff may refuse to allow such inspections. If so, the staff may face disciplinary action up to and including termination.

Loss and Damage

Staff are responsible for keeping devices with them; staff are not to be on their device during member time unless it is deemed an emergency. Supervisors and the Club at large are not responsible for the security and condition of the staff's personal device. Furthermore, the Club is not liable for the loss, damage, misuse, or theft of any personally owned device brought to the Club.

Inappropriate or Unauthorized Use

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 Club, termination of employment or volunteer assignment, or other disciplinary actions determined to be appropriate to the Club'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, 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 is told to stop sending communications, he/she/they must cease the activity immediately.

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

Cyberbullying

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 Club, Club staff, Club 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 media sites.
- Use of embarrassing pictures, videos, websites, or fake profiles.

Internet Access

Personally owned devices used at the Club must access the internet via the Club's content-filtered wireless network and are not permitted to directly connect to the internet through a phone network or other content service provider. Boys & Girls Clubs of Central Minnesota 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 Club procedures to access the Club's internet service.

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.

Disallowed apps and/or websites

Boys & Girls Clubs of Central Minnesota reserves the right to block websites that may contain inappropriate material, excess data usage, or other sites as deemed necessary.

Transportation Policy

Boys & Girls Clubs of Central Minnesota is committed to providing a safe environment and enforces the following transportation policy for members, staff, volunteers, and other adults. Boys & Girls Clubs of Central Minnesota only provides transportation to and from the Clubhouse and various approved off-site locations. The Club only transports members in Club vehicles or other vehicles approved by Club leadership.

Please note: If not specified, the entire policy applies to both personal and Club vehicles used for work purposes.

Driver Authorization

A staff whose job routinely requires him/her to operate a motor vehicle, whether staff-owned or company-owned, will be required to comply with the guidelines set forth in this policy, as well as all State laws.

It is the goal of the Club that all rules pertaining to van use will meet or exceed objectives to provide optimum safety for all passengers, maintain proper maintenance; therefore, increasing the useful life expectancy of the Club vehicles and to financially account for and expense the proper accounts for said use. The company vehicle is a company asset and may not be used for personal use.

All staff must complete the Van/Motor Vehicle Record Authorization Form. Personal-owned vehicles used on company business by staff will be required to have insurance. Owners of personal vehicles used regularly in the course of their employment will be required to present a certificate of insurance to Human Resources upon hire and every time they renew either on a six month or yearly basis depending on when the employee renews insurance.

Employees requesting to become an approved driver of an organization's vehicle must meet certain approval criteria. This includes but is not limited to; possession of a valid driver's license of which a photocopy must be kept on file at the administrative office, having no DWI or DUI violations within the past 5 years and/or other moving violations are determinants of whether a person becomes an approved driver. The decision to grant approval will happen within 5 business days of applying for driver approval. After approval, violations of these rules must be reported to Human Resources and could be subject to possible termination of employment at the Boys & Girls Club. Violations may represent an incident with a personal or company vehicle.

Upon approval for driving privileges, the operator shall at all times drive in a defensive manner, using the best judgment skills possible and abiding by all pursuant laws of the State of Minnesota. Courtesy shall be given to pedestrians at all intersections and crosswalks. Prior to leaving, the driver conducts a brief safety check of turn signals, etc. and reports any deficiencies to Club owned vehicles to the Director of Staff Development and Facilities where they will be corrected before the vehicle will be placed into service. The vehicle promotes the Club's image and it is imperative to promote a positive image at all times.

When transporting children in an organization owned vehicle there must be two adults. If the round trip is under 200 miles the driver must have Club vehicle authorization and the second adult must be a paid adult staff member. If the round trip is over 200 miles both adults must be Club vehicle authorized staff.

Vehicle Operation

Vehicle:

- Each agency vehicle should meet all local, state, and federal inspection and licensing requirements.
- Each vehicle should be inspected by staff before every trip for which members are being transported; any problems with the vehicle must be addressed promptly.
- Quarterly 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.

Driver:

- Must allow for DMV background check and be cleared to transport members per the barrier crime policy of the organization as described in the Screening & Onboarding Policy.
- Must keep an updated list of all members who are transported to and from the Club and Club-related activities.
- Must confirm that no members are left on a vehicle after every trip (based on a seat-by-seat scan of each vehicle); log must be signed to ensure compliance.
- A vehicle (van or other) seating chart must be filled out for each trip and turned in to the Director of Clubs; each member should be in the same seat both to and from a trip.
- Must submit written reports detailing issues or incidents involving transportation of members to and from the Club or to and from Club-related activities.
- Must only transport members in official Club vehicles.
- There must be two paid adult staff in the Club vehicle at all times while transporting youth. If the trip is over 200 miles round trip both staff must be authorized drivers. The second staff must be positioned in the back 1/3 of the van when youth are present.
- Must never transport Club members in personal vehicles.
- To follow all state laws; NO usage of cell phones is allowed while driving a Club vehicle or personal vehicle with the exception of hands-free GPS software, hands-free devices in personal vehicle are allowed. Violation may result in termination of employment.

Authorization:

- Driver must have Human Resource Department approval before driving a company vehicle.
- Vehicle must be checked, complete with time, date, location and destination.
- In case of severe weather, authorization to use company vehicle may be suspended.
- Staff who operate motor vehicles are required to view the Club's Safety Driving Videos.

Traffic Violations:

The Boys & Girls Clubs of Central Minnesota does not approve of or condone any traffic violation that takes place during the operation of the van by its staff. The Club's policy, therefore, states any staff involved in a traffic violation will assume all costs and fines associated with said violations.

- All persons in a Club vehicle will be required to wear safety belts while the vehicle is in motion.
- All loading and unloading of passengers is to be conducted in an orderly manner always on the curbside and away from heavy traffic areas.
- Passengers must remain seated until the vehicle is completely stopped and members should refrain from hanging hands or arms out windows.
- No litter may be thrown from windows and the vehicle should return clean. **No snack or food is allowed in the vehicle at any time.**
- The insurance card, emergency first aid supplies, fire extinguisher, and the vehicle handbook are kept in the front of the vehicle for easy access should a need arise.

Vehicle Checklist:

- Complete interior and exterior inspection of the vehicle before driving. Note observations in the vehicle folder and report problems to your supervisor immediately.

Member Pick-up or Drop-off:

- When approaching to stop, check all mirrors, signal and pull over to the curb or roadside.
- Check surrounding traffic and signal your intentions. Show courtesy to other motorists.

- Activate the hazard warning signals. The hazard warning signals are a message to other motorists to slow down and use caution.
- Come to a complete stop. Place transmission in park, turn off ignition, and remove key before loading and unloading members.
- Never move until certain of a member's safety. Make certain all members have their safety belt on and place transmission in gear keeping foot on brake.
- Check mirrors to make sure no people are nearby.
- Ensure all members have exited the vehicle prior to leaving the vehicle.

Smoking in Vehicles:

- No tobacco usage or vaping is allowed in vehicles.

Seat Belts:

- All persons must wear seat belts and no more than one person per belt is allowed.
- Passengers shorter than 4'8" and/or under the age of 9 must utilize appropriate booster seats.

Returning the Club Vehicle:

- Before returning the vehicle to the Club, it must be filled with gas, if less than $\frac{3}{4}$ full. The gas receipt must be turned in promptly. **There should not be any members in the vehicle while the gas tank is being filled!**
- Complete vehicle log and vehicle notification form.
 - Confirm no child is left in the vehicle.

Accident or Emergency Protocol

Incident/Collision Management

- Drivers should immediately notify Club leadership if there is a delay or issue (e.g., breakdown, accident, emergency) with transporting members to and from the Club or Club-related activities.
- If your vehicle is in an accident, the most important steps to take are to assure passenger safety and to prevent further incidents. **Then:**
 - Call 911
 - Take action to prevent further collision involvement or injury by moving the vehicle out of traffic if possible. Display four-way hazard lights if operational and safety triangles.
 - Tend to injured passengers. If assisting injured passengers, act in a reasonable way depending on the extent of their injuries and their condition.
 - Exchange information with other driver(s); that could possibly include name, insurance information, phone number, and address.
 - Get names and addresses of witnesses.
 - Do not admit guilt, fault or liability to anyone at the scene.
 - Fill out an accident report form, located in the vehicle folder. Turn into VP of Operations as soon as possible.
 - Get a list of names of passengers in the vehicle and the seat they sat in.
 - **Notify your supervisor as soon as possible!!**
- Staff shall immediately inform Club leadership if a staff, volunteer, or board member violates this policy. In such case, the organization will take appropriate disciplinary action, up to and including termination.

Shared-use Restrooms

On a field trip or when using a public restroom, members shall never enter the restroom alone unless it is a single-stall restroom that is empty.

Members shall follow the "rule of three" in using public restrooms, with at least three members and an adult walking to the restrooms and three members 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 members not involved in the Club program – before allowing members to use the facilities. Alternatively, staff 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.

Emergency Operations Plan Policy

Emergency Operation Plan (EOP)

Boys & Girls Clubs of Central Minnesota maintains an Emergency Operations Plan (EOP) that outlines mitigation, preparedness, response, and recovery for the following types of emergencies:

- Fire
- Weather (tornado, flooding, snow, cold, etc.)
- Containment (for interior or exterior threat)
- Bomb threat
- Suspicious package
- Other

The EOP will include:

- Training/drill schedule
- Floor plan
- Developed and shared with local first responders, such as fire department and law enforcement agencies.

Key Definitions

Emergency: An emergency is any event, whether natural or man-made, expected or unexpected, that places life or significant Club assets in danger, or threatens the ability to conduct normal business operations. It typically 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.

EOP Annual Review

Boys & Girls Club of Central Minnesota 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

Boys & Girls Clubs of Central Minnesota always maintains a minimum of one CPR- or first-aid-trained staff on site during all operating hours when members are being served. In addition, all staff and volunteers must review the American Red Cross Hands-Only CPR training annually.

Video Surveillance Policy

Use of Video Surveillance

The Boys & Girls Clubs of Central Minnesota, (Club), recognizes that maintaining the safety and security of Club members, staff, volunteers, and Club property is best implemented with a multifaceted approach. Modern technology, including video surveillance, can provide tools to maintain safety and security. While video surveillance does not replace appropriate supervision by Club personnel, it can provide an additional layer of protection.

Video surveillance, with or without audio recording capabilities, may be utilized in and around the Club facility, on Club property, and on Club transportation vehicles. Video surveillance shall be in accordance with all applicable laws pertaining to such use.

Placement and Notification

Video surveillance equipment may be installed in and around Club facilities, property, and vehicles. The system may provide constant monitoring 24/7 (is activated and records when motion is detected). Video surveillance equipment **will not be** used or installed in areas where Club Members, staff, volunteers and parents/guardians have a reasonable expectation of privacy, such as locker rooms and restrooms.

Video surveillance equipment may always be in operation, whether the Club is operational and whether the facilities or buildings are in use at all. The Club will determine the operation schedule of any video surveillance equipment in its discretion.

Video monitors shall not be in an area that enables public viewing.

The Club shall notify Club members, parents/guardians, staff, and the public that video surveillance systems are present by signs prominently displayed in appropriate locations throughout the facilities and grounds and provide any other notification or consent as required by applicable law.

Access to Video Images

The use of video surveillance equipment on Club grounds shall be supervised and controlled by the CEO, VP of Operations and Directors. The actual recording equipment will be maintained in an area or room that is locked and secure to only be accessed by authorized personnel. Live video monitoring may occur as needed.

Video data is recorded and stored digitally. Video recording data is considered confidential and secure. Access to live and video recorded data is strictly limited to the following: CEO, personnel directly reporting to the CEO, Directors, the Executive Committee, outside data processing or video experts, legal representatives, Club service providers, law enforcement, and other(s) as deemed appropriate by the CEO.

Video recording data may be used as evidence that a Club member, parent/guardian, staff member, volunteer, or other person has engaged in behavior that may violate state or local law, policies, and/or Club rules. Responses to requests to observe video footage from individuals or entities who are not listed in this Policy as having a right to access is subject to production by a valid subpoena or other court order and will not be otherwise released to unauthorized third parties.

Unauthorized Access or Disclosure

Confidentiality and privacy concerns limit the general public, including guardians and relatives of Club members, from viewing video recording footage and/or data involving Club members, staff, and volunteers. Only the authorized persons provided above can view and/or export video recording data. No unauthorized recordings are permitted of video recording data through cell phones, portable devices, or any other means. Any Club personnel who becomes aware of unauthorized disclosure of video recording data from the Club and/or a potential privacy breach must immediately inform the CEO.

Club personnel, members and volunteers are prohibited from unauthorized use of, tampering with or otherwise interfering with video surveillance equipment. Violations will be subject to disciplinary action that may include, but are not limited to, written reprimand, suspension, demotion, or termination of employment or membership. Video recording data will remain the property of the Boys & Girls Clubs of Central Minnesota and may be reproduced only in accordance with applicable law and board policy.

Retention of Digital Images

Video recording data shall generally be kept for approximately 30-90 days except for appropriate still shots or selected portions of the recorded data relating to any incidents under investigation by the Club or authorities. The latter may be retained for one year after the incident or until such time as any legal matters pertaining to the recordings have been resolved, whichever is the last to occur. The stored media shall be kept in a secured folder or flash drive.

In situations involving banned parents/guardians, members, former employees or volunteers, or visitors, stored still images may be shared with Club appropriate personnel and appropriate officials.

Club Member Privacy

Video recording data will not to be used for the purpose of directly or indirectly identifying the day-to-day activities of individual Club members, employees or guests except as viewed in relation to a specific event or suspected criminal activity; suspected violation of Club policy or rules; incidents where there is reasonable basis to believe a claim may be made against the Club for civil liability; or if otherwise compelled or permitted by law.

Authorized Club personnel may use a still shot or selected portions of recorded data to request law enforcement review for assessing the security risk of a specific individual or for investigating a potential crime on Club property. Law enforcement may have remote access to live and recorded data in the case of an active threat or other emergency situation.

Disclaimer of Liability

THE CLUB'S DECISION TO INSTALL AND USE VIDEO SURVEILLANCE EQUIPMENT NOTWITHSTANDING, THE CLUB MAKES NO REPRESENTATION IN THIS POLICY OR OTHERWISE THAT CLUB FACILITIES ARE OR WILL BE FREE OF HAZARDS FOR WHICH VIDEO SURVEILLANCE SYSTEMS ARE TYPICALLY INSTALLED TO MONITOR AND PREVENT. IT IS THE INTENT OF THIS POLICY TO SET THE STANDARDS FOR THE USE OF VIDEO SURVEILLANCE AT THE CLUBS AND FOR THE ACCESS TO SUCH SURVEILLANCE INFORMATION IN ACCORDANCE WITH THIS POLICY. INDIVIDUALS ARE ENCOURAGED TO MAKE THEIR OWN JUDGMENTS REGARDING THE SAFETY OF THE CLUBS AND THEIR DECISION TO USE THE CLUBS PROGRAMS AND FACILITIES.

A copy of this policy will be shared with any Club member, parent/guardian, volunteer or staff member upon request.

Minor/Youth Worker Policy

The Boys & Girls Club of Central Minnesota (BGCMN) is committed to providing a safe environment for youth workers. As part of that commitment, the organization implements policies, procedures, and training for the protection of youth workers.

Youth Worker Definitions

“Youth worker” is used as an umbrella term to describe all minors, defined as youth under the age of 18, who work with BGCMN programs as official staff/employees, non-member youth volunteers, or work-based learning participants. The language below describes how youth workers will be permitted to work at BGCMN.

Minor Employees

- BGCMN may hire minor employees who are no less than 16 years of age.
- Minor youth workers who are under the age of 18 will be assigned a KIDSTOP site and will be included in the 15:1 ratio.
- Minor youth workers will be placed with another staff member 18 years of age or older and they may plan and lead their own program area with an older staff member in the same location.
- BGCMN will implement a work-based learning program for members who are 16 years old or older.
- Work-Based Learning Program participants will gain employment skills, exposure and experience while working through the work-based learning program.
- Current BGCMN members are not eligible to work in the Unit programs; they would be eligible to work in the KIDSTOP programs.

Non-Club Member Teen Volunteers

- BGCMN will allow non-Club member teens who are 15 to 17 years of age to volunteer.
- Members under the age of 15 should not be working directly with youth.
- Non-club youth volunteers will be encouraged to sign up for a membership and utilize the program offerings at the Units.
- Youth volunteers will not be allowed to volunteer at Unit programs unless assigned to a staff member who will monitor the youth during the volunteer hours.
- Youth who are assigned to a KIDSTOP location will be assigned to a staff member who will monitor and coach the youth in the program.
- Volunteers will assist a staff with programs and activities, participate in program cleanup needs, and may help with all aspects of snack and meal duties.
- Non-member teen volunteers can volunteer at BGCMN programs to support one-time or infrequent events at which BGCMN members are present without having to complete training requirements and must always be under the supervision of paid adult staff.
- Background checks of all volunteers will be needed prior to volunteering for BGCMN events.
- BGCMN is committed to providing a safe environment for members, staff, and volunteers.
- To further ensure youth worker safety, the organization follows and adheres to all child labor laws when working with all youth workers.

Child Labor Laws

The federal child labor provisions authorized by the Fair Labor Standards Act (FLSA) of 1938, also known as child labor laws, were enacted to ensure that when young people work, the work is safe and does not jeopardize their health, well-being, or educational opportunities. When it comes to the legal aspects of managing youth workers, BGCMN always follows the stricter law or regulation if more than one applies.

Actions and Implementation

To make sure we enforce this policy, BGCMN is committed to:

- Educating our staff on youth work laws and showing them how to report child labor violations if they see or suspect any.

- Requiring hiring managers and HR to avoid hiring minors under the legal age for working. We also expect them to know and follow this policy and laws on wages and hours on all staff.
- Keeping and validating documentation verifying our employees' ages after they are hired. If we discover that we have hired a minor, we will review applicable laws and adjust as necessary.

Background Checks on Minors

BGCMN conducts criminal background checks of all employees, including minors: board volunteers and others who serve on a standing committee; and all other volunteers, including partners and minors, who have direct, repetitive contact with members per the Background Check policy.

- This applies to all minor employees as well as non-Club member teen volunteers.
- Club Member or Youth Member participants of work-based learning programs are not staff.
- Because the minor does not have legal authority to enter into an agreement or give consent in his or her own capacity, it is necessary to acquire parent or legal guardian consent to authorize the background check.

Training for Supervisors and Coordinators

BGCMN ensures that all supervisors and coordinators of youth workers understand their rights and responsibilities. All BGCMN staff who supervise or coordinate the youth worker program, or work directly in the same space as youth workers – which includes minor employees, work-based learning participants, and non-member teen volunteers – shall complete BGCA developed training annually, after which they will:

- Understand and communicate the roles and responsibilities of minor employees, volunteers, and work-based learning participants.
- Provide leadership, supervision, training, and coaching to staff as relates to organizational role, responsibilities, policies, and procedures for youth workers.
- Maintain current knowledge about, communicate, and follow child labor laws.
- Assess the individual and collective strengths of youth workers against the knowledge, skills, and information needed to fulfill their roles safely.
- Identify training for youth workers to ensure they understand and can fulfill their role.
- Prepare and supervise youth workers for their roles in the Club.
- Ensure that systems, practices, and procedures are in place for the documentation and notification of suspected child abuse, neglect, and physical, verbal, or sexual harassment when reported by youth workers – in accordance with state laws and organizational policies.

Training and Onboarding for Youth Workers/Supervisor Training

BGCMN is committed to providing a safe environment for members, staff and volunteers, including youth workers. All employees under 18 years of age who directly serve BGCMN members on a repetitive basis must complete mandatory safety training along with all other onboarding requirements before they begin working with BGCMN youth.

BGCMN has put systems in place to prevent one-on-one interactions between youth members and all BGCMN staff and volunteers. All youth workers (including minor employees, work-based learning participants, and non-member teen volunteers) shall abide by the organization's policy to prohibit one-on-one contact at any time at Units, KIDSTOP sites, in vehicles or by phone, text, social media or any other means.

All staff and volunteers, including minor employees and non-Club member volunteers, are strictly prohibited from meeting BGCMN members outside of any BGCMN-sponsored activities, unless BGCMN participant is the child or sibling of said staff member or volunteer.

Adult-to-Youth Interactions

All staff, whether they supervise youth workers or not, will understand and adhere to the organization's policy governing one-on-one interactions. Staff will remember to treat youth workers as youth in and outside the BGCMN environment. This includes making sure that adult staff will not:

- Carpool with youth workers for any reason.
- Invite youth workers to after-work non-BGCMN-sponsored events.
- Text, use social media, or participate in online gaming with teens.

- Interact with youth workers one-on-one or outside of BGCMN.
- Teens who are 18 years old but still in high school and enrolled in the work-based learning program or KIDSTOP should be treated as teens, not adults, and treated accordingly under the prohibition of one-on-one contact policy.

Supervision of Youth Workers

Supervisors and coordinators should remain cognizant of the fact that youth workers, despite being under the age of 18, must not violate the prohibition of one-on-one contact with BGCMN members or other youth served. All meeting and communications will utilize either a team or a group supervision approach. Team supervision involves two or more adults working together as a team to supervise and communicate with youth workers and is utilized for digital communication with youth workers. This is specifically advised when a direct supervisor needs to talk confidentially with a youth worker. Group supervision is led by a facilitator in a group setting so youth workers can reflect on their work.

Supervisors must ensure that assigned tasks adhere to this policy and do not inadvertently create a situation where minors are alone with another staff member.

Mandated Reporting

BGCMN is committed to providing a safe environment for members, staff and volunteers, including youth workers. Every staff member, volunteer, and youth worker who becomes aware of or has suspicion of child abuse or neglect shall immediately report to the organization's designated leadership. In such cases, youth workers may report the incident to their supervisor or another designated BGCMN employee, who will report to the appropriate authorities.

All adult staff and volunteers will be educated on the protocols and procedures for reporting before youth workers become involved. BGCMN will provide support mechanisms for youth workers to access once their report has been submitted to help limit any traumatic effects. Youth workers will receive such support on a timely basis.

Internal Reporting Policies and Procedures for Youth Workers

BGCMN is committed to providing a safe environment for members, staff, and volunteers, including youth workers. As part of this commitment, any minor employee, work-based learning participant, or non-Club member teen volunteer who becomes aware of any incident, as defined in this policy, shall immediately report and submit the incident to BGCMN leadership. BGCMN leadership will assist youth workers in completing an incident report

