METROWEST YMCA

ABUSE PREVENTION POLICIES & PROCEDURES

Message from the President and CEO

At the MetroWest YMCA, nothing is more important than the safety and well-being of the children and families we serve. Every child deserves to learn, grow, and thrive in an environment that is safe, nurturing, and supportive.

The Child Protection Handbook reflects our unwavering commitment to protecting youth and ensuring that our programs meet the highest standards of safety and care. We have zero tolerance for abuse of any kind, and we all share the responsibility of safeguarding the children entrusted to us.

By following the practices and guidelines outlined here, you are helping to create a culture of vigilance, accountability, and trust – one where every child feels secure and valued. Thank you for your dedication to this critical responsibility and for joining us in keeping youth safe at the MetroWest YMCA.

Sincerely,
Rick MacPherson
President & CEO
MetroWest YMCA

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Introduction

Our organization provides children with the highest quality services available. We are committed to creating an environment for youth that is safe, nurturing, empowering, and that promotes growth and success.

Our organization has zero tolerance for abuse and will not tolerate the mistreatment or abuse of youth in its programs. Any mistreatment or abuse by an employee or volunteer will result in disciplinary action, up to and including termination of employment or volunteer service and cooperation with law enforcement.

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

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

General Definitions

Abuse: behavior by one person to gain and maintain power and control over another, including physical, sexual, verbal/emotional, and neglect.

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

Youth: any participant, member, or guest under 18 within the MetroWest YMCA.

Bullying: aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power and strength. Bullying can take various forms, including physical, verbal, non-verbal, or relational, cyberbullying, sexualized, and hazing.

Pre-existing Relationship: a relationship with a youth member/participant that was established prior to volunteering or working for the MetroWest YMCA. Examples include family members, the child of an adult

friend, a member/participant who is a friend of the employee's child, or a member or participant in the same civic, social, recreational, or religious organization.

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

Low-Access Volunteer: a volunteer who interacts with youth only in line-of-sight of an employee and only infrequently. Youth may not know low-access volunteers in the program or other volunteers and employees. Low access/occasional volunteers have limited access to youth and have few opportunities to develop youth relationships over time. Examples of low access volunteers include a one-time event volunteer, parents/guardians who assist at a program where their child is a participant, a volunteer who strictly works with adults, a volunteer who helps with business activities and does not interact with youth, or a board member.

Rule of Three: a protocol that requires at least one additional employee/volunteer or two youth to be present with a single employee or volunteer.

Crisis: any occurrence that harms a youth, threatens, and organization's public reputation or immediate financial integrity or may create legal liability to the organization, its directors, or its officers. Examples include allegations or incidents of suspected abuse, including youth-to-youth abuse, arrest of current or former employees or volunteers for child pornography, etc.

Code of Conduct with Youth

The following policies are intended to assist staff and volunteers in making decisions about interactions with youth. For clarification of any guideline, or to inquire about behaviors not addressed here, contact your supervisor.

The MetroWest YMCA provides our youth with the highest quality services available. We are committed to creating an environment for youth that is safe, nurturing, empowering, and that promotes growth and success.

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

All reports of suspicious or inappropriate behavior with youth or allegation of abuse will be taken seriously. The MetroWest YMCA will fully cooperate with authorities if allegations of abuse are made that require investigation.

The Code of Conduct with Youth outlines specific expectations of the staff and volunteers as we strive to accomplish our mission together.

1. Youth will be treated with respect at all times. Youth will be treated fairly regardless of race, creed, religion, mental or physical ability, national origin, color, ancestry, gender, gender identity, age, marital status, citizenship, veteran's status, genetic information, sexual orientation, or ability to pay. Care will be given to respect children's special needs.
2. Staff and volunteers will adhere to uniform standards of displaying affection as outlined by the MetroWest YMCA.
3. Staff and volunteers will avoid affection with youth that cannot be observed by others.
4. Staff and volunteers will adhere to uniform standards of appropriate and inappropriate verbal interactions as outlined by the MetroWest YMCA.
5. Staff and volunteers will not stare at or comment on youths' bodies.
6. Staff and volunteers will not date or become romantically involved with youth.
7. Staff and volunteers will not use or be under the influence of alcohol or illegal drugs in the presence of youth.
8. Staff and volunteers will not have sexually oriented materials, including printed or online pornography, on the MetroWest YMCA's property.
9. Staff and volunteers will not have secrets with youth and will only give gifts with prior permission.
10. Staff and volunteers will comply with the MetroWest YMCA's policies regarding interactions with youth outside of our programs.
11. Staff and volunteers will not engage in inappropriate electronic communication with youth.
12. Parental permission must be given to take photos of YMCA participants. Employees are not permitted to use personal cell phones to photograph YMCA participants without YMCA approval. Employees and volunteers cannot use photographs taken at YMCA programs and/or of YMCA participants for purposes other than those directly related to the program or to the YMCA.
13. Employees and volunteers may not have private outside contact with children they meet in YMCA programs or at the YMCA and should never be alone with children they meet at the YMCA. Employees and volunteers whose children have relationships with other children who participate in YMCA programs should never arrange one-on-one contacts nor put themselves in a position that causes them to be alone with those children. This includes babysitting, sleepovers, inviting children to your home and any contact via electronic means. Employees and volunteers are expected to notify the YMCA if a pre-existing relationship with a child or family exists.
14. Staff and volunteers are prohibited from working one-on-one with youth in a private setting. Staff and volunteers will use common areas when working with individual youth.
15. Within all licensed YMCA programs or other YMCA organized programs where participants are under the age of eleven (11), employees shall never leave a child unsupervised. Children must always be within sight and sound of an employee. Employees will utilize face counts attendance and the "rule of three" (where an employee is one of the three) during all transitions. During YMCA programs, all children must be supervised at all times in order to prevent sexual contact and aggression.
    a. The "rule of three" specifies that there should always be at least three people present – i.e., one employee and two or more children, or two employees and one child, NOT three or more children unsupervised.
16. Staff and volunteers will not abuse youth in any way including, but not limited to the following:
    - Physical abuse: hitting, spanking, shaking, slapping, unnecessary restraints
    - Verbal abuse: degrading, threatening, cursing

- Sexual abuse: inappropriate touching, exposing oneself, sexually oriented conversations
- Mental abuse: shaming, humiliation, cruelty
- Neglect: withholding food, water, shelter

17. The MetroWest YMCA will not tolerate the mistreatment or abuse of one youth by another youth. In addition, the MetroWest YMCA will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, we will take steps needed to eliminate such behavior.

    a. Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength. Bullying can take on various forms, including:

    - Physical bullying – when one person engages in physical force against another person, such as by hitting, punching, pushing, kicking, pinching, or restraining another.
    - Verbal bullying – when someone uses their words to hurt another, such as by belittling or calling another hurtful names.
    - Nonverbal or relational bullying – when one person manipulates a relationship or desired relationship to harm another person. This includes social exclusion, friendship manipulation, or gossip. This type of bullying also includes intimidating another person by using gestures.

    b. Cyberbullying – the intentional and overt act of aggression toward another person by way of any technological tool, such as email, instant messages, text messages, digital pictures or images, or website postings (including blogs). Cyberbullying can involve:

    - Sending mean, vulgar, or threatening messages or images.
    - Posting sensitive, private information about another person.
    - Pretending to be someone else in order to make that person look bad.
    - Intentionally excluding someone from an online group.
    - Hazing – an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers that person regardless of that person's willingness to participate.
    - Sexualized bullying – when bullying involves behaviors that are sexual in nature. Examples of sexualized bullying behaviors include sexting, bullying that involves exposures of private body parts, and verbal bullying involving sexualized language or innuendos.

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

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

    - Be familiar with the symptoms of child abuse and neglect, including physical, sexual, verbal, and emotional abuse.
    - Know and follow organization policies and procedures that protect youths against abuse.
    - Report suspected child abuse or neglect to the appropriate authorities as required by state mandated reporter laws.
    - Follow up to ensure that appropriate action has been taken.

19. Staff and volunteers will report concerns or complaints in accordance with the MetroWest YMCA's Whistleblower Policy and/or its grievance procedures. Staff and volunteers may also utilize Praesidium's Anonymous Helpline at 855-347-0751.

20. The MetroWest YMCA cooperates fully with the authorities to investigate all cases of alleged abuse. Any staff or volunteer shall cooperate to the fullest extent possible in any external investigation by outside authorities or internal investigation conducted by the organization or persons given investigative authority by the organization. Failure to cooperate fully may be grounds for termination.
21. Staff and volunteers may not have engaged in or been accused or convicted of youth abuse, indecency with a youth, or injury to a youth.
22. Employees and volunteers are expected to serve as positive role models for youth by exhibiting professionalism in all interactions, portray an attitude of respect, loyalty, patience, courtesy, tact, maturity and always maintain the confidentiality of children and families.
23. Employees and volunteers must be free of physical and psychological conditions that might adversely affect children's physical or mental health. If in doubt, an expert should be consulted.
24. The MetroWest YMCA has an open-door policy, which encourages parents to drop by and observe at any time the program their child is participating in.

Policies

Physical Contact

The MetroWest YMCA's physical contact policy promotes a positive, nurturing environment while protecting youths and staff. The MetroWest YMCA encourages appropriate physical contact with youth and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by staff towards youths in the organization's programs will result in disciplinary action, up to and including termination of employment.

The organization's policies for appropriate and inappropriate physical interactions are:

Appropriate Physical Interactions	***Inappropriate Physical Interactions***
• Side hugs • Shoulder-to-shoulder or "temple" hugs • Pats on the shoulder or back • Handshakes • High-fives and hand slapping • Verbal praise • Pats on the head when culturally appropriate • Touching hands, shoulders, and arms • Arms around shoulders • Holding hands (with young children in escorting situations)	• Full-frontal hugs • Kisses • Showing affection in isolated area • Lap sitting • Wrestling • Piggyback rides • Tickling • Allowing a youth to cling to an employee's or volunteer's leg • Any type of massage given by or to a youth • Any form of affection that is unwanted by the youth or the staff or volunteer • Compliments relating to physique or body development • Touching bottom, chest, or genital areas that are outside authorized or documented personal care assistance.

Verbal Interaction

Employees and volunteers are prohibited from speaking to youths in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Employees and volunteers must not initiate sexually oriented conversations with youths. Employees and volunteers are not permitted to discuss their own sexual activities with youths.

The MetroWest YMCA's policies for appropriate and inappropriate verbal interactions are:

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

One-on-One Interaction

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

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

Additional Guidelines for One-on-One Interactions
• When meeting one-on-one with a youth, always do so in a public place where you are in full view of others. • Avoid physical affection during one-on-one interactions. If unavoidable, ensure physical and verbal interactions align with the MetroWest YMCA established policies and are limited to the task at hand. • If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by. • Inform other employees and volunteers that you are alone with a youth and ask them to randomly drop in.

- To the extent possible, ensure one-on-one interactions occurring behind closed doors are scheduled in advance or are communicated with the supervisor.
- Ensure one-one-one interactions are documented, especially if behind closed doors. Keep documentation of these meetings (such as in shared calendar, case notes, etc.).
- Document and immediately report any unusual incidents, including disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted.

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

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

Interactions Outside the Organization

Research shows many cases of organizational abuse occur off-site and outside of regularly scheduled activities. Allowing contact outside of regularly scheduled activities may put employees, volunteers, consumers, and our organization at increased risk.

The MetroWest YMCA prohibits interactions between employees and volunteers with consumers outside of regularly scheduled program activities. This includes babysitting, sleepovers, inviting children to your home and any contact via electronic means.

Employees and volunteers whose children have relationships with other children who participate in YMCA programs should never arrange one-on-one contacts nor put themselves in a position that causes them to be alone with those children.

Employees and volunteers are expected to notify the YMCA if a pre-existing relationship with a child or family exists.

Electronic Communication

Any private electronic communication between employees, volunteers, and youths, including the use of social networking websites like - Facebook, Instagram, Snapchat, instant messaging, texting, etc. - is prohibited. All communication between employees, volunteers, and youths must be transparent.

The following are examples of appropriate and inappropriate electronic communication:

Appropriate Electronic Communication	*Inappropriate Electronic Communication*
• Sending and replying to emails and text messages from youths ONLY when copying in a supervisor or the youth's parent • Communicating through "organization group pages" on Facebook or other approved public forums • "Private" profiles for staff and volunteers which youths cannot access	• Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating comments • Sexually oriented conversations • Private messages between staff and volunteers with youths • Posting pictures of organization participants on social media sites • Posting inappropriate comments on pictures • "Friending" participants on social networking sites

In addition, provide this information to your participant's parents so that they know what is appropriate and inappropriate from employees and volunteers.

Gift Giving and Acceptance

Molesters routinely groom youths by giving gifts, thereby endearing themselves to the youth. They might instruct the youth to keep the gifts a secret, which then starts teaching the youth to keep secrets from parents.

The MetroWest YMCA strongly encourages employees and volunteers to refrain from exchanging gifts with consumers. However, gifts to consumers may be given under the following circumstances:

- Gift requests must be submitted to a supervisor and/or a designated administrator prior to being purchased;
- The supervisor and/or designated administrator will determine a cost limit regarding how much can be spent on the gift; and
- Parents/guardians of the consumers are notified about the gift item and why the consumers are receiving the gift.

Employees and volunteers are prohibited from giving gifts to individual consumers except when the gift is authorized by a supervisor or designated administrator and given to all consumers (i.e., celebration of special events/holidays or group recognition). Employees and volunteers must communicate that the gift is given on behalf of the organization not the individual employee or volunteer.

Sometimes it may be difficult to refuse gifts from consumers or their families. In many cultures, people give gifts to reflect their appreciation for people or services. In order to be respectful of consumers and their families, the organization makes reasonable allowances for acts of gratitude involving small gifts of appreciation from consumers and/or their families that have a monetary value not exceeding $10. Employees and volunteers must disclose all such gifts to their immediate supervisor and/or a designated administrator. Under no circumstances can money be accepted from consumers or their families as a gift.

Monitoring and Supervision

Facility Monitoring

When employees are adequately supervised, potential offenders are less likely to act on their impulses because they face detection. When youths are adequately supervised, they too are less likely to engage in inappropriate interactions with others. Similarly, the physical building must be monitored, particularly out-of-the-way locations or locations that might permit an offender undue access to or privacy with a youth. Effective supervision and monitoring require that a variety of methods be used frequently, at both scheduled and random times.

The MetroWest YMCA knows that the obvious presence of employees or volunteers may deter others from engaging in unacceptable or dangerous behavior. The YMCA requires employees and volunteers to wear an employee shirt and/or a nametag that clearly distinguishes them as authorized YMCA representatives.

1. **Facility Monitoring:** Building architecture can increase or mitigate the risk of an incident or accident. Because most incidents of sexual behavior occur in private, the extent to which privacy is managed, risk is managed. In order to ensure that all of the locations are properly and consistently monitored, employee members should complete a facility checklist.

2. **Checking Members into a Facility:** When anyone (members, guests, residents, construction workers, maintenance, cleaning crews, etc.) enters the facility during operational hours, they must check in with the front desk.

3. **Administrative and Supervisory Visits to Youth Programs:** Youth supervisors and administrators will regularly visit all youth programs to ensure that activities are well- managed and that youth policies are observed by all in attendance.

4. **Ratios**: Each program will follow the ratio requirements that are directly tied to the goals of the program and the design of the program area. The employee or volunteer-to-youth ratio should be adjusted for programs that serve youths with special needs. Refer to your supervisor for YMCA adult-to-youth ratios.

5. **Mixed Age Groups:** In most incidents involving one youth abusing another youth, the youths are from different age groups. Each program is responsible for establishing specific guidelines for additional monitoring and supervision of activities that involve youths from different age groups. Employees and volunteers must be aware that close line of sight supervision is required when monitoring programs that mix age groups.

6. **Established Methods for Supervising Consumer to Consumer Interactions:** Employees and volunteers must effectively monitor and supervise consumer-to-consumer interactions to prevent consumer-to-consumer inappropriate behaviors and abuse. When supervising consumers, it is important to remember that adult employee and volunteer behavior sets the tone, and consumers should not determine what is and is not acceptable behavior.

    - **Employees and volunteers should ensure:**
        - Consumer interactions are age and developmentally appropriate.
        - Consumers respect each other's boundaries.

- Consumers are not bullying, teasing, dominating, or displaying sexualized behaviors toward others.
- Consumers solve problems without fighting.

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

- **For children and youth consumers:**
  - Naptime/Sleeping areas
    - Employees, volunteers, and consumers should not sit or lie on anyone's bed or be in anyone else's sleeping bag
    - Encourage consumers to draw an imaginary line around their sleeping space and encourage them to report violations to an employee or volunteer.
    - Employees and volunteers will not leave consumers alone during nap time
    - Do not let consumers share a sleeping mat, blanket, or sleeping bag.
    - Pay attention to who is sleeping next to whom.
    - Arrange sleeping areas with as much space as possible between each consumer.
  - Playgrounds/Recreational Spaces
    - If the space is too large or has obstructions, such as a building corner or a tool shed, limit the play area to where you can see.
    - If you are working with a colleague, make sure you each know the area or which consumer you are watching.
    - Don't get distracted visiting with each other or looking at your phone.

- **For consumers of all ages (when possible):**
  - Bathrooms and locker rooms
    - Require frequent supervision of consumers in locker rooms. If visual supervision compromises consumer privacy or is otherwise not feasible, ensure auditory supervision in/near the locker room.
    - Make it a point to walk through the locker room and let your presence be known, make noise, say hello, or sing a song.
    - Enter the locker room with consumers or let them know you are standing outside the door waiting for them.
    - Limit the number of consumers who enter to the same number of stalls or urinals.
    - Use the "Rule of Three," where you send three or more consumers as a group. The consumers stand outside the door while each consumer uses the bathroom, one-at-a-time.
    - Require consumers to ask permission prior to leaving program space to use the restroom (if age appropriate).
  - Secluded areas

- Lock doors to unused or seldom used rooms and spaces.
- Use signage to deter consumers from trying to access secluded areas.
- Ensure employees and volunteers frequently monitor secluded areas like stairwells and hallways.

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

Monitoring High Risk Activities

Bathroom and Shower Procedures

Bathrooms are high risk locations for sexual activity between consumers, and adult offenders can use the privacy afforded in bathrooms and during shower time to abuse a consumer. Consequently, bathrooms and shower time require close monitoring, and these practices must be carefully managed. Shower time also presents increased risk, because consumers may be nude or partially nude and consumers may engage in horseplay.

When supervising bathroom use, adult employees and volunteers should first quickly scan the bathroom before allowing consumers to enter to ensure the bathroom is vacant.

- **For "Group Bathroom Breaks":**
  - Require employees to take groups of two or more youths to the bathroom – following the "rule of three" or more.
  - If the bathroom only has one stall, only one youth should enter the restroom while the others wait outside with the employee.
  - If there are multiple stalls, only send in as many youths as there are stalls.
  - Minimize youths of different ages using the bathroom at the same time.
  - Require employees to stand outside the bathroom door but remain within earshot using their foot to keep the door open.

- **For single use restrooms:**
  - Youth should ask permission to use the bathroom.
  - All employees are required to frequently check bathrooms.
  - Managers and/or on-duty supervisors will frequently check bathrooms and ensure employees are monitoring bathrooms correctly and at the established intervals.

- **For shower time:**
  - Only one consumer can be in a shower stall at any given time.
  - If there are multiple stalls, only send in as many consumers as there are stalls.

- Shower doors/curtains should not extend all the way to the ground so employees and volunteers can easily glance into the bathroom to see how many feet are in each shower stall.
- Employees and volunteers should stand outside the shower area but remain within earshot.
- Employees and volunteers are prohibited from using the bathroom at the same time as consumers.
- When necessary to assist young consumers in the stalls, employees and/or volunteers should keep the door to the stall open.
- Consumers who require assistance with personal care activities will have this noted within their file and include the level of assistance necessary.
- Employees and volunteers who are authorized to provide assistance with personal care activities need specific training on appropriate diapering and toileting procedures.

Supervising and Monitoring Locker Rooms and Changing Areas

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

The MetroWest YMCA locker room procedures include:

- Requiring employees to stand within earshot of the locker room when in use by youths.
- Requiring employees to intermittently and briefly check inside the locker room so users know the locker room is monitored.
- Encourage employees to provide consumers with a strict time limit of how long they can be in the locker room to limit opportunity for inappropriate interactions and activities.
- Discouraging the use of locker rooms by youths of different ages at the same time.
- Prohibiting the use of locker room horseplay such as towel snapping.
- When possible, arrange lockers to minimize unnecessary privacy.

Monitoring and Supervising Diapering, Toileting, and Personal Care Assistance

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

Personal care procedures, regardless of the setting in which the consumer receives services, should take into consideration the age and development of the consumer as well as the consumer's particular needs for assistance. Ideally, the degree to which employees would be expected to assist in these vulnerable/high-risk activities for each consumer should be documented in the individual consumer's case, behavior, service, or treatment plan.

As much as able (based on age and ability of consumer), employees should use verbal prompts to guide the consumer in self-assisting tasks. If a consumer needs more assistance, then an alternative could be for the employee or volunteer to put their hand on top of the consumer's hand during the personal care activity. The primary goal when providing personal care or hygiene-related activities is to ensure there is guidance and documentation that outlines when and under what circumstances

employees and volunteers may engage in these activities with consumers (beyond identified medical care needs).

- **When assisting consumers with personal care:**
  - Always use the least intrusive methods possible. For example, allow the consumer to do as much as they can by themselves. To the degree possible, use verbal prompts, instead of physically touching consumers, to guide the consumer in self-assisting tasks.
  - Avoid staring at the consumer's body.
  - Document any observed injury, disclosures of abuse, or any interactions that may have been misinterpreted.
  - Make every attempt to have employees of the same gender as that of the consumer to provide personal care.

- **For diapering:**
  - Changing tables will be placed in an open area where adult actions can be observed by others.
  - Diapers will only be changed when at least two adults, or individuals, are present.
  - The Y requires written documentation of diaper changing.
  - Inform supervisors if anything out of the ordinary or concerning is noticed while changing the consumer's diaper.
  - Requiring employees to know and follow all licensing requirements having to do with diapering.

- **For toileting:**
  - Employees are to stand in the doorway with the door ajar while the consumer uses the restroom.
  - If employees must enter the restroom to assist a consumer, ensure that the door to the restroom remains open.
  - When possible, send in only one consumer at a time. When not possible, send in only as many consumers as there are stalls.

Transition Times and Free Times

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

- Require youths to remain in line-of-site of employee at all times.
- Specify the employee-to-youth ratio.
- Specify narrow geographic boundaries in the program areas.
- Ensure that all employees are assigned specific areas to supervise ("zone monitoring").
- Include bathroom procedures.
- Require periodic roll calls for each age group.
- Require supervisors to conduct periodic check-ins and sweeps of the entire activity area.

Playground Activities

The playground procedures require:

- Youths to remain in line-of-site of employees at all times.
- Definition of specific and narrow geographic boundaries around the playground area.
- Specific instructions on how to monitor barriers of supervision (such as storage sheds, playhouses, tunnels, and shrubs).
- That all employees are assigned specific areas to supervise ("zone monitoring").
- Specific bathroom procedures.
- Employees to conduct periodic roll calls for each age group.
- Supervisors to conduct periodic check-ins and assessments of the activity period and of the entire activity area.

Transportation Activities

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

Employees are not allowed to transport children in their own vehicles except for emergencies. Should an emergency occur and personal transportation is necessary, a second person is required to ride along. In such instances, employees must notify and get approval of a management level director before providing transportation.

Permission and Authorization

- Parental/Guardian Consent: All participants must submit a completed and signed parent/guardian permission form and medical release form prior to participation in any trip. Employees are responsible for carrying these forms with them throughout the duration of the trip.
- Supervisor Approval: Advance written approval from a supervisor is required for all long-distance or overnight trips.

Transportation Safety Procedures

- Rule of Three: To ensure safety and transparency, the following guidelines must be followed when transporting participants:
    - A minimum of two employees must be present when transporting a single participant, or
    - A minimum of two participants must be present if only one employee is transporting them.
- Participant Attendance: Employees must have a complete list of all participants on the trip. Attendance must be taken:
    - When boarding the vehicle
    - When leaving the vehicle
    - Periodically throughout the trip
    - When re-boarding the vehicle

- Supervision Ratios: Maintain proper employee-to-participant ratios at all times. Drivers should not be counted in the supervision ratio whenever possible.

Seating and Supervision

- Employees must sit in positions that allow for maximum supervision of participants.
- Employees should not share seats with participants when possible.
- Participants of different ages or developmental levels should not be seated together when avoidable.
- High-risk participants should be seated alone or close to an employee whenever possible.

Transportation Restrictions

- No Unauthorized Stops: Drivers are not permitted to make unscheduled or unauthorized stops.
- No Home Drop-Offs: Participants may not be transported to the home of any employee or any employee's family member under any circumstances.

Documentation Requirements

- Employees must document the following for all transportation events:
  - Start and end time of the trip
  - Mileage at the beginning and end of trip
  - Names of all participants transported
  - Names of employees and volunteers involved
  - Purpose and destination of the trip
  - Any unusual incidents or occurrences

Public Transportation Guidelines

- When public transportation (bus/train) is used:
  - Participants must remain together in one area of the vehicle, if possible.
  - Assigned employees and volunteers must stay with their designated group at all times.
  - During overnight transportation, at least one employee must remain awake and alert at all times while participants are being transported.

Off-Site Activities

Off-site activities, field trips, and outings present unique risks for the safety of consumers and are among the most common settings where adult-to-consumer and consumer-to- consumer sexual misconduct occurs. Some of the special circumstances which cause these to be high-risk environments are that large groups are difficult to monitor, consumers may be more likely to act out in a less structured environment, and organizations cannot screen all other adults who may have access to consumers off-site. It is important that employees and volunteers are aware of these risks and take measures to minimize them.

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

- Visit the destination in advance, when possible, to assist with planning.
- Require prior supervisor approval for all off-site activities.

- Require written parental/guardian approval by disseminating permission slips, including rules for consumers to follow, prior to each off-site activity. Employees and volunteers should keep permission slips on hand during the activity.
- Determine appropriate employee/volunteer-to-consumer ratios before the activity and schedule employees and volunteers accordingly. Considerations for ratios should include:
    - age and number of consumers involved;
    - special or unique consumer needs; and
    - the nature of the activity.
- Require employees, volunteers, and consumers to be easily identifiable (using lanyards, badges, shirts, etc.).
- Review rules and boundaries with consumers prior to the activity, including how to report concerns.
- Assign each employee or volunteer to a specific group of consumers to supervise. Groups should be separated according to age, gender, and/or behavior of consumers.
    - Train employees and volunteers on active supervision techniques:
    - Position themselves to be able to see and hear all consumers to whom they are assigned.
    - Anticipate what consumers will do and redirect when necessary.
    - Listen and notice changes in sound or absence of sound.
    - Remain engaged with consumers rather than socializing with other employees or volunteers.
- Each employee or volunteer must maintain a roll sheet listing all the consumers in his or her group. Name-to-face roll checks should be conducted routinely and whenever moving from one activity or space to another.
- Specific bathroom and locker room procedures for employees and volunteers to follow, as applicable to the outing, ensuring minimum ratios can be maintained at all times. Transportation procedures.
- A means for employees and volunteers to communicate with each other while off-site.
- Prohibit employees and volunteers from using cell phones for personal business while supervising consumers.
- An emergency plan for responding to incidents.
- Instructions for documentation including the purpose of the activity, duration, location, and other critical information.
- Instructions for a supervisor to observe the off-site activities at scheduled times and random intervals.
- Consider utilizing a shared calendar for awareness among teams for various community or home-based service deliveries.
- Consider specific recommendations based on the location and type of activity (for example, amusement parks, water parks, arcades, etc.). If the trip is to a location where consumers will be interacting in a large space and/or it is not possible to assign specific employees and volunteers to specific groups of consumers, then:
- Set boundaries at the location. Tell consumers where they may and may not go. Then post employees and volunteers around the boundaries and at the entrance and exit points.
- Assign remaining employees and volunteers to monitor specific areas. Post at least one employee or volunteer near the bathrooms.
- Consumers should check in at designated meeting points at least once every hour.

Monitoring and Supervising Aquatic Programs

Aquatics programs are considered "high risk" as they can quickly provide opportunity for both adult-to-consumer abuse as well as consumer-to-consumer abuse. Consider the following factors and how they play a role in your aquatics program:

- Easy access to consumers. With many aquatics programs, there are many consumers in one shared space.
- Lack of supervision. Often, there is less parent/guardian supervision during these programs.
- Public access. Many aquatics program participants come into our Y to observe their children in swim lessons.
- Partial nudity. Employees and consumers alike are partially clothed.
- Ease of contact. There is the possibility for inappropriate interactions in aquatic programs.
- Perception of a relaxed environment. Consumers and adults may perceive there is less supervision and more opportunities for inappropriate behavior.

In order to ensure efficient monitoring and supervision of aquatics programs, and in addition to training our employees the MetroWest YMCA follows supervision procedures in the below areas:

- Monitoring for suspicious or inappropriate behavior in the water;
- Monitoring locker rooms, changing areas, and bathrooms;
- Monitoring during swim lessons; and
- Monitoring the pool deck and any lounge areas.

Monitoring for Suspicious or Inappropriate Behavior in the Water

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

- Violating the MetroWest YMCA's policies regarding appropriate and inappropriate physical interactions with consumers (for example, piggyback rides in the water, allowing consumers to hang on them in the water, etc.)
- Loitering during consumer-only lessons or activities
- Watching a consumer or group of consumers for an extended period
- Inappropriate sexual behavior and/or activity by an adult
- It is important to watch for, and respond to, these red flag behaviors in consumers:
- Seeking out unsupervised areas
- Inappropriate physical contact with other consumers (i.e. horseplay, "chicken fights," and dunking)
- Consumers who appear to be uncomfortable with attention they are receiving from an adult or another consumer
- Inappropriate physical contact out of view (i.e. under water or in a slide)

Monitoring Locker Rooms, Changing Areas, and Bathrooms

The MetroWest YMCA will perform quick checks in locker rooms, changing areas, and bathrooms. The schedule will be "random" so that people in the locker room know that someone from the Y could enter at any time.

When monitoring these spaces look for suspicious or inappropriate behavior in locker rooms, changing areas, and bathrooms, including:

Adults:

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

Consumers:

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

Monitoring During Swim Lessons

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

Monitoring the Pool Deck and any Lounge Areas

- Ensure all entrances and exits to the pool deck are appropriately and regularly monitored.
- Designate specific employees responsible for monitoring the pool deck and lounge areas (other than lifeguards). Active supervision of these areas is always critical.
- Monitor consumers to ensure they are following our guidelines for appropriate interactions (including physical interactions, verbal interactions and electronic communications).
- Individuals should not be changing on the pool deck, but in the appropriate locker room or changing area.

Monitoring and Supervising Youth Sports Programs

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

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

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

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

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

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

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

Overnight Activities

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

Supervision Guidelines:

- All overnight activities must be documented and approved in writing by the Program Director.
- Administrators are expected to regularly and randomly observe overnight activities on a scheduled and periodic basis.
- The Director should appoint a "lead" employee to supervise the overnight. A meeting with all employees is conducted to discuss the unique risks of overnight trips, unique elements of the specific overnight trip and to review the specific policies and procedures.
- Provide parents with written information about the overnight activity. All parents must sign a permission slip for their youths to attend the overnight.
- Determine the appropriate employee-to-youth ratios before the event and schedule employees accordingly.
- Meetings with the group should be hosted in open and observable areas; meetings should not be hosted in employee or youth rooms.

Overnights at the Facility:

- Physical boundaries within the organization must be clearly defined and explained to the youths.
- Assign each employee to a specific group of youths to supervise. Each employee should then maintain a role sheet that lists all of the youths in his or her group. Head counts and roll checks should be conducted routinely throughout the evening.
- Assign employees to high risk areas in the MetroWest YMCA's facility, such as the bathrooms, entrances and exits, hallways, etc. If it is not possible to assign specific employee to these areas, assign specific employee to conduct periodic facility "walk-throughs".
- With regards to sleeping arrangements, separate the male and female youths into separate rooms and post employee at the entrances and exits to these rooms. If this is not feasible, separate males and females by as much space as possible.
- When preforming room checks, employees should always go in pairs.
- At least one employee must stay awake overnight.

Overnights Away from the Facility:

- Overnight stays at private homes are prohibited unless approved by the administration.
- Physical boundaries at the off-site location must be clearly defined and explained to the youths.
- Assign each employee to a specific group of youths to supervise. Each employee should then maintain a role sheet that lists all of the youths in his or her group. Head counts and roll checks should be conducted routinely throughout the event.
- If in a cabin type setting, the employees should be placed in bunks to maximize supervision around the cabin and in a way that decreases the chances of youths sneaking out (such as by the door).
- In hotel rooms, assign youths to rooms based on sex and age. Employees should have their own rooms. If employees must share rooms with youths, they must have their own beds and never change in front of youths.
- All employees are to be on duty in the halls or cabins at night until an hour after lights out and all rooms are quiet.

Teen Leadership Program

Older youths who participate in teen leadership programs are still youth participants and not employees or volunteers. Therefore, even though they are often given more responsibility, teens in the leadership programs must be provided with guidelines regarding appropriate behavior, and then supervised accordingly. In addition, employees and volunteers must understand and recognize that these teens are still youths and not their peers. Therefore, the following guidelines are recommended for teen leadership programs:

- Create a screening process for teen leaders which includes:
    - A standard application;
    - An interview with behaviorally based interview questions; and
    - References (from teachers, counselors, family friends, etc.).

- Train teen leaders in their role in programs and on program policies about appropriate and inappropriate interactions. This training should include the following information:
    - Appropriate and inappropriate physical and verbal interactions and the importance of maintaining behavioral boundaries between teen leaders and younger youths and between teen leaders and employee and volunteers.
    - Prohibiting teen leaders from being one-on-one with youths.
    - Prohibiting teen leaders from escorting youths to the bathrooms.
    - Prohibiting teen leaders from assisting youths with changing their clothes.

- Create a system to monitor the teen leaders.
    - Designate a specific employee or volunteer who is in charge of the teen leadership program and its participants.
    - Require teen leaders to wear clothing or lanyards that identify them as leaders-in-training and differentiate them from both employee and volunteers and from younger youths.
    - Require a supervisor to conduct daily check-ins with teen leaders and their program supervisors.
    - Consider requiring teen leaders to keep a log documenting their daily activities and any problems they encounter. The program supervisor should review these logs daily.

Supervisors and Administrators Monitoring On-Site and Off-Site Programs
To ensure the highest standards of child safety, the MetroWest YMCA utilizes a Quick Check System designed to provide regular, predictable monitoring of all youth-serving and high-risk program areas. This system supports our commitment to routine observation of program spaces and documented follow-up on any identified concerns.

The Quick Check System strengthens our culture of safety by increasing visibility, reinforcing supervision expectations, and identifying unsafe conditions or behaviors before they escalate. These checks help ensure that staff are positioned appropriately, interactions are appropriate, and environments are free from risk.

Frequency & Areas Reviewed
Program Directors are required to complete two Quick Checks per week, visiting all operating program spaces over time including: pool and pool deck, locker rooms, Child Watch, Wellness Center, sports programs, swim lessons, the Teen Center, early learning, afterschool and any additional youth or program spaces. Quick Checks typically last 7–10 minutes and occur while programs are in operation so real-time supervision and safety practices can be observed.

What Staff Can Expect
During a Quick Check, a Program Director will enter the space and conduct a visible, friendly walkthrough; observe supervision practices and interactions; monitor for blind spots or isolated situations; assess environmental safety; ensure ratios and expectations are met; and address any immediate concerns. Quick Checks are supportive in nature and reinforce safe practices—they are not punitive.

Documentation
All Quick Checks are recorded through a YMCA-approved digital form. Documentation includes date and time, areas observed, responses to core safety questions, identified concerns, and corrective action taken. This allows the YMCA to identify trends, track actions, strengthen supervision, and maintain compliance with Praesidium standards.

Staff Expectations
Staff working in youth-serving spaces are expected to welcome Program Directors during Quick Checks, demonstrate active supervision and appropriate interactions, maintain safe environments, and immediately address concerns raised during the check. Quick Checks help uphold the YMCA's commitment to keeping children safe and supervised at all times.

Responding

How an organization responds to suspicious or inappropriate interactions, policy violations, and incidents or allegations of abuse can dramatically affect the harm to the individuals involved and the damage to the organization. Once a staff member, volunteer, youth, or parent has expressed a concern or made an allegation about the treatment of a youth, swift and determined action must be taken to reduce any subsequent risk to the youth, to the accused staff member or volunteer, and to the organization. Organizations must establish precise, unequivocal requirements for reporting to the authorities and for adhering to a serious-incident response plan.

Required Reporting of Red-Flag or Inappropriate Behaviors and/or Policy Violations

Our organization has zero tolerance for abuse or neglect. It is imperative that every employee or volunteer actively participates in the protection of youth.
In the event that employees or volunteers observe red-flag or inappropriate behaviors and/or policy violations by other employees or volunteers, it is their professional and personal responsibility to immediately report their observations in accordance with the organization's reporting procedures.

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

Examples of Red-flag or Inappropriate Behaviors that all staff and volunteers are REQUIRED to report
• Violation of the abuse prevention policies described above • Seeking private time or one-on-one time with youths • Seeing or visiting with a youth outside of scheduled programing • Sending unauthorized electronic communications through text messaging, social media, online gaming, etc. in violation of the organization's electronic communication policy • Youth disclosing that an employee or volunteer makes them feel uncomfortable • Buying gifts for individual youths • Making suggestive comments to youths • Picking favorites

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

The MetroWest YMCA's Chief Human Resource Officer will be responsible for investigating and internally reviewing the circumstances regarding red-flag behaviors. In the event that additional support is needed, the Chief Human Resource Office may include the Social Impact and Government Relations Officer for non-employee related matters, or the Chief Operating Officer and/or President and CEO for employee related matters.

Staff and Volunteer Response

If staff witness suspicious or inappropriate behaviors or policy violations from another staff or volunteer, the staff or volunteer is instructed to do the following:

Guidelines for Staff/Volunteers Response to Suspicious or Inappropriate Behaviors and/or Policy Violations
• Interrupt the behavior. • Report the behavior to a supervisor, director, or other member of the leadership team. • If you are not comfortable making the report directly, make it anonymously.

- If the report is about a supervisor or administrator, contact the next level of management or another member of the senior leadership team.
- Document the report but do not conduct an investigation.
- Keep reporting until the appropriate action is taken.

Supervisor and Administrator Response

In the event that a supervisor or an administrator receives a report of suspicious or inappropriate behaviors or policy violations from an employee, volunteer, youth or parent/guardian the supervisor is instructed to do the following:

Guidelines for Supervisors and Administrators Response to Suspicious or Inappropriate Behaviors and/or Policy Violations
• Report to the next level of administration and determine the appropriate administrator to respond to the concern. • Determine the appropriate response based on the report. i. Context of red-flag or inappropriate behavior or policy violation; ii. Severity of red-flag or inappropriate behavior or policy violation; iii. History of red-flag or inappropriate behaviors or policy violations; and iv. Trainability of employee or volunteer. • Speak with the staff or volunteer who has been reported. • Review the file of the staff or volunteer to determine if similar complaints were reported. • Document the report including witness statements. • If at any point in gathering information about a report of suspicious or inappropriate behavior, a concern arises about possible abuse, contact the state authorities and file a report. • If appropriate, notify parents and/or guardians. • Advise the person who reported the behavior that the report is being taken seriously.

Based on the information gathered, the following may be required:

- Increase monitoring or supervision of the staff, volunteer, or program.
- If policy violations with youths are confirmed, the staff or volunteer must be subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the Progressive Disciplinary Process outlined in the Employee Handbook.
- If more information is needed, interview and/or survey other staff and volunteers or youths.

Organizational Response

Guidelines for Organizational Response
• Review the need for increased supervision. • Review the need for revised policies or procedures. • Review the need for additional training.

Responding to Suspected Abuse by an Adult

Staff or Volunteer Response to Allegations or Incidents of Abuse or Neglect

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

In order to ensure the well-being of the children in our care, our staff have a continuing duty under state law to report incidents of possible neglect or abuse, including physical, sexual, and psychological abuse, to the Department of Children and Families as well as regulatory authorities such as the Department of Early Education and Care and local Board of Health when appropriate. We are also required by law to cooperate in any investigation of such possible neglect or abuse. (Massachusetts General Laws Chapter 119, Section 51A). We do not have discretion in this matter but must make such referrals whenever we have reasonable cause to believe that a child might have been harmed by anyone, including non-family members, and we may be subject to criminal penalties if we fail to report such possible harm. Moreover, in grievous cases, we may refer the matter directly to the police or consult with the District Attorney as well.

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

- Immediate Supervisor;
- Directors;
- Branch Executives; and/or
- Senior Leadership Team Members.

Additional Guidelines for Staff/Volunteer Response to Incidents or Allegations of Abuse
• If you witness abuse, interrupt the behavior immediately. • If abuse is disclosed to you, assure the individual disclosing that he or she was correct to tell to you. • Protect the alleged victim from intimidation, retribution, or further abuse.

- Immediately report the allegation or incident to the proper organization authorities (based on mandatory reporting requirements) and the designated authority.
- Be sure to document the incident, disclosure, or any circumstances causing your suspicion of abuse. State only the facts.
- It is not your job to investigate the incident, but it **IS** your job to report the incident to your supervisor in a timely manner.
- Check back to make sure appropriate steps were taken. If not, report again to your supervisor or the designated organization authority.
- This is sensitive confidential information and staff and volunteers should treat it as such by only discussing with their supervisor.

Supervisors and Administrators Response to Abuse

In addition to the above response procedures, supervisors and administrators should ensure the following:

Guidelines for Supervisor and Administrators Responding to Allegations or Incidents of Abuse
• First, determine if the youth is still in danger and if so, take immediate steps to prevent any further harm. • Gather as much information about the allegation as you can without completing an investigation. For example, who made the report, who was allegedly abused, who was the alleged abuser, what was the nature of the alleged abuse, where and when did the alleged abuse occur, etc. • Accurately record everything you learn in as much detail as you can. Remember your notes may be read by others. Stick to the facts. • The Director of Inclusion or the Social Impact and Government Relations Officer will contact DCF to file the report. For licensed programs, the program director or branch exec will contact the appropriate licensing agency such as the Department of Early Education and Care or local Board of Health. They will note the case number as well as the name and contact information of the person with whom they gave the report. They will also maintain a copy of the written report in case it is needed in the future • If the alleged abuse involves a staff member or volunteer, notify your Chief Human Resource Officer and follow your crisis management plan. • Suspend the accused employee or volunteer until the internal investigation is completed and external regulatory authorities state that the employee or volunteer is eligible to return to work in their original role or with responsibilities modified to restrict access to children. • Ensure that youth's parents/guardians are notified (when applicable).

Responding to Youth-to-Youth Sexual Activity

The thought that one youth may sexually abuse another youth does not occur to many people. Unfortunately, abuse between peers has increased 300% in the past few years. Youth-to-youth sexual activity and sexualized behaviors often remain unreported in organizations because staff and volunteers are not comfortable documenting these situations or may not know how.

Youth-to-Youth Interactions

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

If employees or volunteers witness youth-to-youth sexual behaviors that are contrary to developmentally appropriate behavioral expectations between youth, they are instructed to follow these guidelines:

Guidelines for Staff and Volunteers Responding to Youth-to-Youth Sexual Activity
• If you observe sexual activity between youths, you should immediately separate them. • Calmly explain that such interactions are not permitted and separate the youths. • Notify your supervisor and parent/guardian (when applicable) • Complete the necessary paperwork including what you observed and how you responded. • Follow your supervisor's instructions regarding notifying the authorities and informing the parents of the youth involved. • Do not attempt to determine whether the youth's behavior was "sexual curiosity." There is not a standard definition of what normal sexual curiosity looks like. An external body, such as law enforcement, utilizes criterion to investigate and determine whether the youth's behavior is sexual curiosity. • Identify how youth will be managed or supported to prevent further occurrences of sexual activity. • In some cases, if the problem is recurring discipline may be required including not allowing one or both youths to return to the program.

Supervisors and Administrators Response

In the event that a supervisor or administrator receives a report of a youth's sexualized behavior or youth-to-youth sexual activity that is not developmentally appropriate, they should do the following:

Guidelines for Supervisors and Administrators Responding to Youth-to-Youth Sexual Activity
• Meet with the staff or volunteer who reported the sexual activity to gather information. • Confirm that the youths involved have been separated or placed under increased supervision. • Notify the authorities if appropriate. • Review the immediate steps taken by the staff on duty. • Review the incident report to confirm it is accurately and thoroughly completed. • Meet with parents of the youths involved. • Determine what actions should be taken to make sure there is no recurrence, including assessing the suitability of the program for the children involved. • Develop a written corrective action or follow-up plan in response to the incident

Based on the information gathered, the following may be required:

- Assessing the suitability of the program for the youth involved;
- Review the need for additional youth or program supervision;
- Review the need for revised policies or procedures;
- Review the need for additional employee or volunteer training; and/or
- Review the need for additional youth education.

Organizational Response

After the internal review of the sexualized behavior or youth-to-youth sexual activity, the organization will determine what can be done to prevent a reoccurrence, such as:

Guidelines for Organizational Response
• Review the need for additional supervision. • Review the need for revised policies or procedures. • Review the need for additional training. • Alert others in the organization.