

Abuse Prevention Policies and Procedures



YMCA OF WESTERN STARK COUNTY

If you have any concerns or suspicions related to child abuse, you **MUST** immediately contact **at least one** of these:

- your supervisor or branch executive director and/or
- the YMCA of Western Stark County's CEO (Chief Executive Officer) at **330-837-5116** and/or
- the State of Ohio anonymous line at **855-642-4453** (855-O-H-CHILD) and/or
- the anonymous form on WestStarkY.org/youth-protection and/or
- the local or state authorities

Praesidium Helpline - **855-347-0751**

The Praesidium Helpline is a consultation line anyone can call to discuss any abuse prevention questions and issues. Reports can be anonymous if you prefer.

In this document, the designation "consumer" encompasses individuals who are YMCA members, program participants, family members, guests, and/or visitors.

"Adult Consumer" refers to a person aged 18 and older.

"Youth Consumer" refers to a person aged 17 and younger.

Note: Some divisions of the YMCA have division-specific policies/procedures because of their unique clientele. When any policy or procedure in this document conflicts with a policy or procedure from the division, **the most stringent of the two shall prevail.**

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POLICIES AND PROCEDURES

P1. Policy Prohibiting the Abuse or Mistreatment, of Consumers

This YMCA of Western Stark County ("the YMCA") 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.

P2. Policy Prohibiting the Abuse or Mistreatment of One Consumer by Another Consumer

The YMCA has **zero tolerance** for abuse, mistreatment, or sexual activity among consumers within the YMCA. This YMCA is committed to providing all consumers with a safe environment and will not tolerate the mistreatment or abuse of one consumer by another consumer. Conduct by consumers that rises to the level of abuse, mistreatment, or sexual activity will result in intervention or disciplinary action, up to and including, dismissal from the program.

In addition, the YMCA will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, the YMCA will take the necessary steps to eliminate such behavior.

P3. Policy Requiring Annual Review of Association Youth Protection Policies

Annually in the month of September, the CEO (Chief Executive Officer) and the Abuse Prevention Committee will review existing abuse prevention policies to:

- Ensure the purpose and goal of the policy is still relevant;
- Determine whether a policy should be combined with another policy or rescinded;
- Determine if the policy is up to date with current laws; and to
- Determine whether changes are required to improve the effectiveness or clarity of the policy and/or procedure.

Once a policy (or policies) has been identified for review, the policy owner or department responsible for enforcement will:

- Develop a draft update in consultation with relevant stakeholders;
- Review the draft with relevant stakeholders for relevance, clarity, and effectiveness;
- Submit the draft policy for review by the Vice President of Membership Branch Operations.
- Once the committee has reviewed and edited the policy, submit final version to the President and CEO.
- This YMCA will announce and communicate all policy changes to employees, volunteers, consumers, and parent/guardians through written or electronic methods, and YMCA methods such as employee meetings, trainings, and supervision discussions.

P4. Policy Requiring Adherence to Association Policies

All employees/volunteers with access to consumers shall confirm that they have read and agree to comply with the YMCA's abuse prevention policies, Code of Conduct, and consumer protection standards by signing a written acknowledgment upon hire and annually thereafter. The YMCA will keep signed acknowledgement forms in personnel files.

P5. Policy Defining Appropriate and Inappropriate Physical Contact

The YMCA's physical contact policy promotes a positive environment while protecting consumers, employees, and volunteers. The YMCA encourages appropriate physical contact with consumers and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by employees/volunteers towards consumers in the YMCA's programs will result in disciplinary action, up to and including termination of employment.

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

Appropriate Physical Interactions	Inappropriate Physical Interactions
<p>Contact initiated by the consumer such as:</p> <ul style="list-style-type: none"> • Side hugs • Shoulder-to-shoulder or “temple” hugs • Pats on the shoulder or back • Handshakes • High-fives and hand slapping • Pats on the head when culturally appropriate • Touching hands, shoulders, and arms • Arms around shoulders • Holding hands (with young children in escorting situations) 	<ul style="list-style-type: none"> • Full-frontal hugs • Kisses • Showing affection in isolated areas or while one-on-one • Lap sitting • Wrestling • Piggyback rides • Tickling • Allowing a consumer to cling to an employee’s or volunteer’s leg • Allowing consumers, older than kindergarten, to sit on an employee or volunteer’s lap • Any type of massage given by or to a consumer outside of accepted and documented medical treatment • Any form of affection that is unwanted by the consumer, employee, or volunteer • Touching bottom, chest, or genital areas that is outside authorized and documented personal care assistance

P6. Policy Defining Appropriate and Inappropriate Verbal Interactions

Employees/volunteers are prohibited from speaking to consumers in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.

Employees/volunteers must not initiate sexually oriented conversations with consumers. Employees/volunteers are not permitted to discuss their own sexual activities with consumers.

The YMCA’s policies for appropriate and inappropriate verbal interactions include but are not limited to:

Appropriate Verbal Interactions	Inappropriate Verbal Interactions
<ul style="list-style-type: none"> • Positive reinforcement • Appropriate jokes • Encouragement • Praise • Strength-based conversations • Self-disclosure as a supervised therapeutic tool by licensed clinicians, medical professionals, and pastoral counseling 	<ul style="list-style-type: none"> • Name-calling • Discussing sexual encounters or in any way involving consumers in the personal problems or issues of employees/volunteers • Cursing • Off-color or sexual jokes • Shaming, belittling • Oversharing personal history • Derogatory remarks • Harsh language that may frighten, threaten, or humiliate consumers • Derogatory remarks about the consumer or his/her family

P7. Policy for Managing One-on-One Interactions Between Employees, Volunteers, and Consumers

One-on-one interactions may occur as part of this YMCA's programming under authorized circumstances. The purpose of this policy is to ensure the YMCA clearly communicates expectations for employees/volunteers and gives examples of appropriate behavior when one-on-one interactions may occur. In those situations where one-on-one interactions are authorized, employees/volunteers should observe the following guidelines to limit the risk of abuse or false allegations of abuse:

- Meet consumers in a public place where they are in full view of others.
- Avoid physical affection during one-on-one interactions. If unavoidable, ensure physical and verbal interactions align with this YMCA's 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.
- To the extent possible, ensure one-on-one interactions occurring behind closed doors with **ADULT** consumers are scheduled in advance or are communicated with the supervisor.
- One-on-one interactions occurring behind closed doors with **YOUTH** consumers is prohibited.
- Employee/volunteer will 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.

P8. Policy for Managing Interactions between Employees, Volunteers, and Youth/Teen Consumers Outside the Association

Research shows many cases of abuse occur off-site and outside of regularly scheduled activities. Allowing contact outside of regularly scheduled activities may put employees, volunteers, consumers, and our YMCA at increased risk. This document is created to manage the risk of abuse and false accusations arising from contact with youth and teens outside the YMCA's regularly scheduled programming.

Examples of contact outside of regularly scheduled program activities:

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

It is the policy of the YMCA to prohibit employees/volunteers from meeting outside of the YMCA with youth whom they have met in YMCA programs. This includes baby-sitting, sleepovers, and inviting children to the employee's/volunteer's home, emailing, telephoning, texting, or having any other type of correspondence with the children unless one of the following conditions exists:

- The employee/volunteer and the child's family or custodian have a relationship that predates the beginning of employment or volunteering at the YMCA,

- The employee/volunteer and the child's family or custodian have a relationship which predates the child's enrollment in a YMCA program, or
- The employee/volunteer and the child, the child's family, or the child's custodian are related

For exceptions to be permitted, the child's parent or custodian must sign a waiver authorizing contact with the specific employee/volunteer. The waiver must be kept on file by the program manager.

An employee/volunteer who has a pre-existing relationship with a child will have the parent/guardian sign the waiver to document the relationship.

After a consumer's participation in programming has ended, an employee/volunteer may only initiate contact with the consumer for authorized YMCA business.

P9. Electronic Communication and Social Media Policy

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

It is mandatory that all programs that require communication with youth and parents/guardians use a group communication app, to be used exclusively for communication about program details.

This YMCA does not permit employees/volunteers to use electronic communication and/or social media using their own personal sites/accounts with consumers. However, if these interactions are part of programming or otherwise unavoidable, employees/volunteers will:

- A. Require employees/volunteers to sign the Employee/Volunteer Handbook which contains the Social Media Policies which explain guidelines about appropriate and inappropriate communication with consumers.
- B. Employees/volunteers are required to use a YMCA-authorized communication platform to allow communication to be seen by all consumers and parents/guardians.
- C. Employees/volunteers may not electronically contact a consumer under the age of 13 outside of the YMCA-approved app.
- D. Employees/volunteers should keep communications professional in nature and limit discussion to programmatic purposes.
- E. Employees/volunteers will respond to private electronic communication from youth consumers stating that this is prohibited under the Code of Conduct.
 - a. Exceptions may be made under emergency situations wherein private messages may occur to locate consumers and secure their safety, but all such contact must be documented accordingly.
 - b. If a consumer reveals abuse or inappropriate interactions with an adult or child, the employee/volunteer must report this information to a supervisor and child protective services or law enforcement immediately.
- F. Employees/volunteers may choose to or may be required to include a supervisor or the YMCA leadership in their direct communications with a consumer.
- G. Provide consumers and parents/guardians with information about how to respond to inappropriate communication from employees/volunteers. The responding procedure includes:
 - a. Contact information for the administration.

- b. An anonymous method for reporting concerns.
- H. Requests to discontinue – Parents/guardians may request in writing that a consumer not be contacted by the YMCA through any form of electronic communication or social media.

P10. Gift-Giving and Gift Acceptance Policy

Gifts from Employee/Volunteer to Consumers

Offenders routinely groom consumers by giving gifts, thereby endearing themselves to the consumers. They might instruct the consumers to keep the gifts a secret, which then encourages keeping other bigger or more harmful secrets from trusted adults.

The YMCA strongly encourages employees/volunteers to refrain from giving gifts to consumers. However, gifts to consumers may be given under the following circumstances:

1. Gift requests must be submitted to a supervisor and/or a designated administrator prior to being purchased;
2. The supervisor and/or designated administrator will determine a cost limit regarding how much can be spent on the gift; and,
3. Parents/guardians of the consumers must be notified about the gift item and why the consumers are receiving the gift.
4. Employees/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).
5. Require employees/volunteers to communicate that the gift is given on behalf of the YMCA not the individual employee or volunteer.

Gifts from Consumers to Employee/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.

To be respectful of consumers and their families, the YMCA makes reasonable allowances for acts of gratitude involving small gifts of appreciation from consumers and/or their families that fall under the following parameters:

1. Employees/volunteers may not accept gifts, payments, or favors valued greater than **\$100.00** from any individual or organization that is providing goods or services to the YMCA or receiving goods or services from the YMCA.
2. If someone approaches an employee or volunteer with a gift that exceeds \$100.00, the employee or volunteer must politely decline the gift and refer to this policy.
3. Employees/volunteers must disclose all such gifts to their immediate supervisor and/or a designated administrator.
4. At no time should an employee solicit, request, or otherwise indicate that gifts, payments, or favors are expected.

P11. Policy Regarding Sexually-Explicit Materials

Everyone in the YMCA is prohibited from accessing, displaying, producing and/or distributing pornography or sexually-explicit materials on our YMCA's property or involved in our services.

P12, P14. Policy Requiring Cooperation with Investigations

The YMCA takes every allegation of abuse or misconduct seriously and will fully cooperate with the authorities to investigate all cases of alleged abuse or misconduct.

Employees/volunteers shall cooperate with any external investigation by outside authorities or internal investigation conducted by the YMCA or persons given investigative authority by the YMCA.

Cooperation with investigations includes, but is not limited to:

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

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

P13. Policy Governing Mandatory Reporting Requirements for Employees and Volunteers

All employees/volunteers must follow state specific mandatory reporting requirements.

Employees/volunteers must be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse.

Employees/volunteers will:

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

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

The State of Ohio's rules on reporting child abuse or neglect can be found here:

<https://codes.ohio.gov/ohio-revised-code/section-2151.421>

The State of Ohio's rules on reporting elder abuse or neglect can be found here:

<https://codes.ohio.gov/ohio-revised-code/section-5101.63>

SCREENING AND SELECTION

S1. Policy Requiring employees and high-access volunteer applicants to complete a standardized application designed to assess for abuse risk

The YMCA requires employees and high-access volunteers to complete a standardized application designed to assess for abuse risk which collects information about the applicant's work history, education history, volunteer history and suitability for a position of trust with consumers. Applications cannot be accepted until all required information is supplied by the applicant.

S2. Policy Requiring face-to-face interviews that include behaviorally based interview questions designed to assess employee and high-access volunteer applicants for abuse risk

The YMCA requires face-to-face interviews with all employees and high-access volunteers utilizing standardized, behaviorally based questions designed to assess level of abuse risk. Interviewers must also communicate the organizations commitment to protect consumers and keep documentation of interview notes.

S3. Policy Requiring at least three reference checks, including one personal or family reference, designed to assess employee and high-access volunteer applicants for abuse risk

The YMCA requires conducting a minimum of three references before an employee or high-access volunteer applicant is offered a position, including one personal or family reference, utilizing standardized, behaviorally based questions designed to assess level of abuse risk. The interviewer is required to follow up on red flags or missing information and keep documentation of completed reference checks.

S4. Policy Requiring applicants to read and sign a Code of Conduct as part of the screening and selection process

The YMCA requires employees and high-access volunteers to read and sign a Code of Conduct that includes information about behavioral expectations with consumers as part of the screening and selection process. A copy of the signed statement must be kept on file.

S5, S6. Policy Requiring Repeat Background Checks

The YMCA requires a background check for each employee and high-access volunteer at the following intervals:

1. Upon hire;
2. Upon re-hire if longer than six months;
3. Return from seasonal absence or furlough longer than six months; and
4. Once every two years, or more frequently if required by local, state, or federal law.

Documentation is kept that the checks have been completed and reviewed.

S7. Policy Requiring Notification of Conviction

Any employee or volunteer who is convicted of (including pleas of guilty and nolo contendere/no contest) a misdemeanor or felony offense must notify their supervisor within five business days of such conviction. Supervisors must immediately notify the YMCA's Human Resources department who will notify legal counsel.

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

The conviction of an employee or volunteer may result in corrective action. Corrective action depends upon a review of all factors involved - including whether the crime was work-related, the nature and severity of the act, or any resultant circumstances that adversely affect the employee or volunteer's ability to function in their role. Such corrective actions may include termination.

Any employee, or volunteer, or independent contractor who fails to report a conviction for a misdemeanor or felony within five days or who misrepresents the circumstances of a conviction, will result in disciplinary action up to and including termination of employment or (in the case of volunteers and independent contractors) will have their relationship terminated immediately. Documentation will be kept of these instances.

S8. Policy Ensuring an Alcohol and Drug-Free Environment

The YMCA recognizes the adverse effect a staff member's use of drugs or alcohol could have on other staff members, members, guests, visitors and the community at large. Therefore, the YMCA is committed to maintaining a drug free environment. The YMCA will not tolerate any drug or alcohol use that might imperil the health and wellbeing of its staff members, the public we serve, or threaten its business or reputation.

The YMCA requires that every staff member be free of alcohol or drug abuse. Whenever the YMCA suspects that a staff member's work performance or on-the-job behavior may have been affected in any way by alcohol or drugs, or that a staff member may have contributed to an injury or serious accident as a result of drug or alcohol use, the YMCA may require the staff member to submit to an alcohol and/or drug test, which could include a urine and/or blood sample. The YMCA also reserves the right to unannounced drug testing. In accordance with State law, if a staff member tests positive for drugs or alcohol following a work-related injury or refuses to submit to testing, the staff member may lose eligibility for compensation and benefits under State's workers' compensation laws. The burden of proof would be on the staff member to prove that the presence of alcohol or a controlled substance was not the proximate cause of the work-related injury.

Under the YMCA's policies, the following actions are prohibited, and will result in discipline up to and including termination:

- Being under the influence of, use, possession or sale of illegal drugs or drug paraphernalia, controlled substances, (including the presence of these substances in a staff member's system) while on YMCA premises or on YMCA business, or at any time during working hours;
- Use or consumption of alcohol during working hours, whether or not on YMCA premises, which, in the judgment of the YMCA, impairs a staff member's professional conduct, demeanor, performance or judgment;
- Use of alcohol off YMCA premises or possession, use, manufacture, distribution, dispensation or sale of illegal drugs or controlled substances off YMCA premises, where that conduct adversely affects the staff member's attendance, work performance, the staff member's or others' safety at work, or the YMCA's reputation in the community;
- Testing positive for alcohol/drugs, as a result of a YMCA-required drug or alcohol test, or refusing to submit to an alcohol or drug test.

S9. PROCEDURE: Criminal Background Check Review

In the interests of preserving the safety and security of employees, clients, and members of the public, as well as ensuring a high-quality workforce, the YMCA operates a background screening program. This document outlines the steps that the YMCA's management and human resources employees are expected to take to facilitate criminal background checks.

Step #1: Make each offer of employment contingent upon the results of a criminal background check.

Step #2: Once a candidate has received a conditional offer of employment, arrange for the candidate to: (1) receive all necessary background screening disclosures and (2) provide written consent for the background check to be run. **Note: Only approved background screening disclosure and consent paperwork may be used. Such materials shall comply with all applicable federal, state, and local laws.**

Step #3: Wait for the background screening firm to prepare the background screening report.

Step #4: Once the screening report has been returned to the YMCA, assess whether the report reflects any criminal convictions.

- a. If it does, move to Step #5.
- b. If it does not, continue with the hiring process.

Step #5: If the screening report contains a criminal conviction, assess whether any federal, state, or local laws require the candidate to be automatically disqualified (e.g., state law indicates that an individual in X position cannot have a conviction for Y).

- a. If federal, state, or local law requires automatic disqualification, move to Step #8.
- b. If not, move to Step #6

Step #6: If the screening report contains a criminal conviction, but it does not result in automatic disqualification under federal, state, or local law, make a preliminary assessment of whether there is a substantial relationship between the job and the crime. To make this assessment, analyze: (1) the nature of the job, (2) the nature of the crime, and (3) the amount of time that has passed since the conviction. Refer to EEOC Enforcement Guidance on the Consideration of Arrest and Conviction Records in Employment Decisions for more details.

- a. If there appears to be a substantial relationship between the job and the crime, move to Step #7.
- b. If there does not appear to be a substantial relationship between the job and the crime, continue with the hiring process.

NOTE: If non-criminal conviction information in a screening report is used to deny employment, retention, promotion or any other adverse decision, employer must follow adverse action procedures.

Step #7: If a substantial relationship between the job and crime exists, double-check that there are no federal, state, or local laws that preclude the YMCA from making a decision based on the criminal conviction at issue (e.g., based on the amount of time that has passed since the offense).

- a. If there is no legal restriction prohibiting the YMCA from making a decision based upon the criminal conviction, move on to Step #8.
- b. If there is a legal restriction prohibiting the YMCA from making a decision based upon the criminal conviction, continue with the hiring process.

Step #8: If the YMCA's preliminary review finds that the candidate likely needs to be disqualified, send the candidate: (1) a pre-adverse-action letter, (2) the relevant background screening report, (3) a governmental notice entitled "A Summary of your Rights Under the Fair Credit Reporting Act," and (4) Required state or local notices (if applicable)(5) a written questionnaire/invitation for the candidate to provide the YMCA more context about the potentially disqualifying criminal matter as well as additional information about how he or she has grown/matured/functioned since the time of the crime. **Note: Only approved background screening pre-adverse action paperwork and related materials may be used. Such materials shall comply with all applicable federal, state, and local laws.**

Step #9: Wait at least five business days from the date of the pre-adverse-action letter to allow the candidate to dispute the accuracy of the report and/or provide the YMCA additional information related to the matters covered in the report.

Step #10: After the waiting period has elapsed, assess whether the candidate has disputed the accuracy of the report.

- a. If the candidate has disputed the accuracy of the report, allow the screening firm to reinvestigate the information and resolve the dispute before taking any further steps.
- b. If the candidate has not disputed the accuracy of the report, move to Step #11.

Step #11: Review any additional information submitted by the candidate about the crime and their actions since the crime.

- a. If the additional information submitted by the candidate sufficiently allays concerns related to the crime, continue with the hiring process.
- b. If not, move to Step #12.

Step #12: If the YMCA reaches a final determination that the candidate will not be hired, send the candidate an adverse action letter communicating the decision. **Note: Only approved adverse action letters and materials may be used. Such materials shall comply with all applicable federal, state, and local laws.**

Step #13: Document the reason why the candidate was not hired (e.g., "Candidate has criminal conviction that is substantially related to the job. Criminal Conviction Questionnaire responses did not reflect reduced risk.")

S10. Process to Systematically Review and Utilize All Applicant Information Throughout the Screening Process to Assess for Abuse Risk

The YMCA involves those in the screening process to help guide the decision and systematically considers information from all sources (the application, references, criminal background and sex offending check and interviews) before extending an offer of employment or high-access volunteer service.

TRAINING

T1. The organization requires all employees and high-access volunteers to complete foundational abuse prevention training prior to having access to consumers.

The YMCA requires that employees and high-access volunteers be trained on the following foundational abuse prevention topics prior to having access to consumers:

- The YMCA's policies related to preventing and responding to abuse;
- How to maintain appropriate boundaries with consumers;
- Definitions of abuse;
- Types of offenders;
- How offenders operate
- How to manage high-risk activities (i.e., restroom and locker room activities, diapering and toileting, transportation, camps);
- How to prevent false allegations;
- How to recognize and respond to suspicious or inappropriate behaviors and policy violations; and
- How to recognize and respond to suspicions or allegations of abuse.

All employees and high-access volunteers will receive this training upon hire or prior to having access to consumers.

The YMCA keeps documentation of training records for all employees and high-access volunteers.

T2. The organization requires all employees and high-access volunteers to complete abuse prevention training annually.

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

Annual abuse prevention training refreshes previously learned concepts and provides additional knowledge and skills to enhance the ability of employees/volunteers to protect consumers.

In the YMCA, all employees/volunteers will complete their abuse prevention training upon hire and, thereafter, **annually in the month of April**. Tracking and documentation of training will be kept.

All employees are responsible for annually completing training on the following concepts:

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

Failure to complete required training will result in disciplinary actions up to and including termination of employment.

T3. The organization requires all employees and high-access volunteers to complete training in how to respond to boundary violations and allegations or incidents of abuse.

The YMCA has zero tolerance for abuse. It is imperative that every employee or volunteer actively participates in the protection of consumers.

If employees/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 YMCA's reporting procedures.

Remember, at the YMCA, the policies apply to everyone.

The following are examples of red-flag or inappropriate behaviors that all employees/volunteers are required to report:

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

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

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

- Interrupt the behavior.
- Report the behavior to a supervisor, the branch Executive Director, or the CEO at 330-837-5116.
- People who are not comfortable making the report directly may make it anonymously by completing the form on WestStarkY.org/youth-protection or calling the State of Ohio anonymous line at 855-642-4453 (855-O-H-CHILD).
- If the report is about a supervisor or administrator, contact the next level of management.
- Complete an internal report but do not investigate.
- Keep reporting until the appropriate action is taken

T4. The organization requires all employees and high-access volunteers to complete training on effective monitoring and supervision practices for managing consumers and high-risk activities.

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. The YMCA will systematically identify facility locations that allow for unnecessary privacy or limited line of sight or supervision. The YMCA has implemented a formal system to manage these identified architectural risks, which includes:
 - Ensuring employees/volunteers are aware of these locations and circumstances.
 - Ensuring unused rooms, offices, and closets remain locked.
 - Ensuring that all doors' locks are locked with a key and not solely a flip lock.
 - Ensuring visibility in rooms without windows.
 - Ensuring employees routinely walk through out of the way locations.
 - Requiring Director on Duty (DOD) to regularly walk through out of the way locations on an unpredictable schedule and to routinely check that doors to unused rooms are locked.

Youth Restroom Monitoring

Children who are participating in YMCA programs are not to be sent to restrooms without a YMCA staff member present. The buddy system or three children together are not acceptable practices and are not permitted at the YMCA.

For single stall restrooms, the YMCA staff will be positioned outside of the restroom to make sure no one else enters the restroom.

Entrance doors to multi-stall restrooms must be kept open when youth are inside.

At minimum, when multiple children are in the restroom or locker room, YMCA staff members will stand in the doorway so they can have at least auditory supervision of the children.

Staff members can and are encouraged to be inside the facilities so they can be easily seen by the children, and so they are able to immediately stop any inappropriate activity. This is best done with multiple staff members so individual staff are not subjected to unwarranted allegations.

Protocols that address the variety of unusual circumstances possible during outdoor or off-site activities shall be established and made part of that program/activity's operating guidelines.

T5. The organization requires all supervisors to complete training in effective supervision practices related to abuse risk management.

See T2

T6. The organization requires those involved in the hiring process to complete screening and selection training.

Ensures those who make hiring decisions are trained on the following screening and selection topics:

- Why screening and selection is important;
- Managing the organization's screening resources;

- Techniques for screening out protentional offenders;
- The limitations of criminal background checks;
- How to use the application to assess for abuse risk;
- Behavioral interviewing techniques using questions designed to assess for abuse risk;
- Standards in conducting reference checks; and
- How to identify red flags at any point in the screening process.
- Has clearly defined, written abuse prevention training requirements that are readily available for review; and
- Keeps documentation of training records for all employees and high-access volunteers.

T7. The organization requires supervisors who respond to inappropriate behaviors or allegations of abuse to complete specialized training.

Individuals in supervisory positions over employees or volunteers must be trained in effective supervision practices to oversee and support their program teams. Supervisor training should be provided to individuals who initially enter a supervisory position upon hire as well as employees who are internally promoted into a supervisory position.

Require training for supervisors who oversee employees/volunteers on effective supervision practices related to abuse risk management, including:

- Overview of supervisor's role in abuse prevention
- Supervision strategies that can reduce risk
- Importance of having increased presence and observation of programs and locations
- Using teaching moments in supervision
- How to provide corrective feedback

For supervisors who respond to suspicious or inappropriate behaviors or allegations of abuse, the training should also address

- How to create a culture for responding and reporting, and
- Steps to take when employees or volunteers report suspicious or inappropriate behaviors.

Supervisor and Administrator Response

- Supervisors who are responsible for responding to reports of suspicious or inappropriate behaviors or allegations of abuse should be trained in sound progressive discipline and investigation practices that yield accurate findings while protecting the rights of everyone involved.
- Supervisors who respond to inappropriate behaviors or allegations of abuse should be trained in the following topics:
- How to recognize red-flags and boundary violations;
- High risk circumstances for boundary violations;
- Steps for how to respond to boundary violations, inappropriate interactions, or policy violations;
- Creating a culture for responding and reporting;
- Steps to take when employees/volunteers report suspicious or inappropriate behaviors; and
- How to conduct internal investigations.

MONITORING AND SUPERVISION

M1. Employee, Volunteer, and Visitor Identification Nametag Policy **Identification While Present at the YMCA's Facility**

Employees and Volunteers

Every employee and volunteer of the YMCA is required to wear an identification badge at all times while present at the YMCA's facility unless the YMCA determines that identification presents a safety risk to the employee or volunteer, or to the youth(s). The identification badge must be worn on the person's clothing at or above the waist level and in such a fashion to be clearly visible to other employees, volunteers, and security personnel at all times.

When an employee or volunteer, whom the welcome center staff does not recognize, arrives at the facility without an appropriate identification badge, the welcome center staff will assist that person as provided in subparts (a) and (b) below.

- a) A person without a badge shall present photo identification to the welcome center staff. The welcome center staff will check the name against the current employee or volunteer roster and, if the identification is verified, the welcome center staff will require the person to sign in and then issue a temporary "Employee" or "Volunteer" identification badge, which they must return at the end of the workday.
- b) If the welcome center staff is unable to verify employment or volunteerism, the welcome center staff will contact the person's department or office by phone to seek verification. If employment or volunteerism is verified, the welcome center staff will require the person to sign in and then issue a temporary identification badge. If employment or volunteerism cannot be verified, the person will be denied access.
- c) Employees or volunteers without badges, but who are known by the welcome center staff, will be required to sign in and then be issued a temporary "Employee" or "Volunteer" badge, which they must return at the end of the workday.

Visitors to Youth Development Sites

When a visitor arrives at a Youth Development location without an authorized identification nametag, the YMCA site director will issue the person a "Visitor" identification nametag. Visitors are required to always wear the identification nametag while in the facility.

Identification in Programming Away from the Facility

Our employees and volunteers wear YMCA attire or ID badges that clearly distinguish them as authorized representatives when chaperoning off-site trips or when they are in other places where being identifiable is necessary. With prior approval from a supervisor, employees and volunteers may choose to not wear identifiable attire or badges when meeting with youth in the community or public places, particularly when it may compromise safety.

M2. Procedures for Supervisors and Administrators Monitoring Employees/Volunteers at On-Site Programs

Our supervisors and administrators use scheduled and random observations of all programs, program locations and buildings; engage in spontaneous and scheduled conversations with employees, volunteers, and consumers; conduct group and individual supervision and training meetings; and review program documentation, to ensure that safety standards are always in place.

Supervisors and administrators are encouraged to adhere to the following guidelines:

Keep a record. Document your supervision visits. Include information like your arrival and departure times, which consumers and parents/guardians were present, and a summary of the information collected. Provide employees/volunteers 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/volunteers. Check punctuality and the routine that employees/volunteers follow to prepare for the consumers to arrive.

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

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

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

Observe employees/volunteers' interaction with consumers.

- Do employees/volunteers use the proper voice tone with consumers?
- Do employees/volunteers give praise to consumers?
- Do employees/volunteers follow the physical affection guidelines?
- Do employees/volunteers know the consumers by first and last name?
- Do employees/volunteers sound enthusiastic?
- Do employees/volunteers set limits and boundaries with consumers?
- Do employees/volunteers interact with all consumers?
- Do employees/volunteers pay undue attention to any consumers?
- Do employees/volunteers listen to the consumers when they make reports or express concerns?

Observe employees/volunteers' interactions with each other.

- Do employees/volunteers pay more attention to the consumers than to each other?
- Are employees/volunteers spread out and monitoring the entire facility?
- Do employees/volunteers know who is supervising which consumers?
- Do employees/volunteers communicate to each other when one must leave the area?
- Do employees/volunteers use polite voice tones with one another?
- Do employees/volunteers share responsibilities around the program?

Observe employees/volunteers' interactions with parents/guardians.

- Do employees/volunteers greet the parents/guardians?
- Do employees/volunteers know the parents/guardians by name?
- Do employees/volunteers provide adequate information to the parents/guardians?
- Do employees/volunteers ask the parents if they have any questions?

- Do employees/volunteers spend too much time with any particular parent/guardian?

Ask parents/guardians questions, such as:

- Are you satisfied with the care your child is receiving here?
- What can we do to make it better?
- Does your child ever say anything about his or her (title of employees and volunteers)?
- Have employees/volunteers ever contacted you or your child about anything other than the program?
- Do you ever have a chance to observe your child at the program?
- What does your child say about the time he/she spends here?

Ask employees/volunteers how they would respond to “what if” situations that you describe, such as:

- A consumer is not picked up by a parent/guardian at the end of the program
- Another employee or volunteer shakes a consumer for hitting another consumer
- A parent/guardian confides in you that he/she thinks one of the employees/volunteers does not have appropriate boundaries with consumers.

M3. Procedures for Supervisors and Administrators Monitoring Employees/Volunteers at Off-Site Programs

Off-site activities and programs 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, organizations cannot screen all other adults who may have access to consumers off-site, and many off-site programs include one-on-one interactions. It is important that supervisors and administrators are aware of these risks and take measures to minimize them through effective monitoring and supervision practices.

Our supervisors and administrators use scheduled and random observations of all off-site activities and programs; engage in spontaneous and scheduled conversations with employees, volunteers, consumers, and other stakeholders; conduct group and individual supervision and training meetings before and after offsite activities or programs; and review relevant program documentation and records, to ensure that safety standards are always in place.

Supervisors and administrators are encouraged to adhere to the following guidelines:

Keep a record. Supervisors must approve all off-site and overnight activities, programs, or outings. Document your supervision observations and program visits. Include information like your arrival and departure times, which consumers and parent/guardians were present, and a summary of the information gathered. Provide employees/volunteers with feedback about visits.

Survey the physical environment. Is this a safe and suitable location to take consumers and for the activity (e.g., size of area for number of consumers, ability to supervise all areas used by consumers)?

Watch activities. Are the employees/volunteers actively involved? Ask to see the schedule of activities and compare with what is happening at a given time.

Observe restroom and locker room activities. Observe restroom and locker room activities to ensure that the employees/volunteers are complying with the established policies and procedures even when off-site.

Observe employees/volunteers' interaction with consumers.

- Do employees/volunteers use the proper voice tone with consumers?
- Do employees/volunteers give praise to consumers?
- Do employees/volunteers follow the physical affection guidelines?
- Do employees/volunteers know the consumers by first and last name?
- Do employees/volunteers sound enthusiastic?
- Do employees/volunteers set limits and boundaries with consumers?
- Do employees/volunteers interact with all consumers?
- Does an employee/volunteer pay undue attention to any consumers?
- Do employees/volunteers listen to the consumers when they make reports or express concerns?

Observe employees/volunteers' interactions with each other.

- Do employees/volunteers pay more attention to the consumers than to each other?
- Are employees/volunteers spread out and monitoring the entire location or facility?
- Do employees/volunteers know who is supervising which consumers?
- Do employees/volunteers communicate to each other when one must leave the area?
- Do employees/volunteers use polite voice tones with one another?
- Do employees/volunteers share responsibilities around the program?

M4. Policy Requiring Job Descriptions and Performance Evaluations to Include Items Related to Risk management

The YMCA requires risk management items be included in job descriptions and performance evaluation.

Job Descriptions

Abuse Risk Management language for Job Descriptions:

Employees and volunteers who directly supervise consumers will:

- Adhere to policies related to boundaries with consumers.
- Attend required abuse risk management training.
- Adhere to procedures related to managing high-risk activities and supervising consumers.
- Report suspicious or inappropriate behaviors and policy violations.
- Follow mandated abuse reporting requirements.

Employees and volunteers who do not directly supervise consumers will:

- Adhere to policies related to boundaries with consumers.
- Attend required abuse risk management training.
- Report suspicious and inappropriate behaviors and policy violations.
- Follow mandated abuse reporting requirements.
- Adhere to job specific abuse risk management responsibilities.
 - Maintenance employees and volunteers—ensure unused rooms and closets remain locked; routinely monitor high-risk locations (locker-rooms and bathrooms), etc.

- Front desk personnel—ensure consumers are properly signed in and signed out, ensures only authorized adults are allowed in the facility, etc.

Supervisors and administrators will:

- Follow employees and volunteers screening requirements and use screening instruments to screen for abuse risk.
- Provide employees and volunteers with on-going supervision and training related to abuse risk.
- Provide employees and volunteers with regular feedback regarding their boundaries with consumers.
- Require employees and volunteers to adhere to policies and procedures related to abuse risk.
- Respond quickly to policy and procedure violations using the organization’s progressive disciplinary procedures.
- Respond seriously and confidentially to reports of suspicious and inappropriate behaviors.
- Follow mandated reporting requirements.
- Communicate to all employees and volunteers the organization’s commitment to protect their consumers from abuse.
- Report essential abuse risk management information to the board of directors.

Performance Evaluations

Abuse Risk Management Items for Performance Evaluations:

- **Trainability:** Attends all required trainings. Able to comprehend and behaviorally incorporate new information and skills. Willing to utilize training and supervision to modify and improve performance. Keeps required training hours current.
- **Teaching:** Able to identify opportunities for teaching and to use these opportunities to help others develop and maintain new ideas and skills.
- **Team Interaction:** Able to communicate with others in a helpful manner while simultaneously building credibility and rapport. Able to accept the suggestions and feedback of others and provide suggestions and feedback in a manner that is conducive to success.
- **Policy Adherence:** Able to conform to established policies and procedures in all functions of job performance, both with clients and with colleagues.
- **Judgment:** Able to solve problems by considering all aspects of a situation. Able to balance the desires and needs of consumers with the concerns of parents/guardians. Consistently exhibits good decision-making and a realistic understanding of issues even when dealing with emotional or sensitive topics.
- **Spoken Communication:** Able to verbalize information clearly. Able to influence or persuade others in both positive and negative circumstances. Able to listen well and understand others. Able to communicate directly and appropriately with supervisors, co-workers, parents/guardians, and consumers.
- **Boundaries:** Able to establish rapport with consumers without relinquishing the adult role. Able to separate personal needs and issues from those of the consumers

M5. Policy Requiring Programs to Adhere to Specific Adult-to-Youth Consumer Ratios

Specific employee-to-youth consumer ratios help define the level of supervision necessary to be effective and safe. Ratios also enable employees, volunteers, and supervisors to easily identify when additional personnel are necessary.

Ratios will vary depending on the age of youth in the program and employees and volunteers will always follow the lowest possible ratio when working with mixed-age groups. The YMCA will ensure all programs adhere to the following adult-to-youth ratios:

The majority of YMCA youth programs will follow the adult-to-youth ratios listed below. These ratios may be met through a combination of staff, trained volunteers, or parent participation when appropriate.

YMCA programs that are licensed by the State of Ohio will comply with the staff-to-child ratio requirements established in Ohio Administrative Code Rule 5101:2-12-18, Appendix A. The applicable ratios are as follows:

Age of Children	Child Care Staff Member/Child Ratio	Maximum Group Size
Young Infants (Birth to less than 12 months)	1:5 or 2:12 in same room	12
Older Infants (at least 12 months and less than 18 months)	1:6	12
Young Toddlers (at least 18 months and less than 2 ½ years)	1:7	14
Older Toddlers (at least 2 ½ years and less than 3 years)	1:8	16
Young Preschoolers (at least 3 years and less than 4 years)	1:12	24
Older Preschoolers (at least 4 years and not enrolled in or eligible to be enrolled in kindergarten)	1:14	28
Young Schoolagers (enrolled in or eligible to be enrolled in kindergarten or above and less than 11 years)	1:18	36
Older Schoolagers (at least 11 years and less than 15 years)	1:20	40

M6. Procedure for Monitoring & Supervising Consumers While Entering and Exiting Programs

Standard procedures for monitoring consumers help organizations identify who is present in programming and allow employees and volunteers to document when and with whom consumers exit programming. Such procedures allow employees to quickly identify any consumer who may be missing and decrease opportunities for consumers to be left unsupervised.

Guidelines for monitoring consumer entry/exit from facilities or programming include:

- The organization will have a procedure defining expectations for consumer sign in/out of programming.
- When possible, create a single point of entry and exit in the facility or program.
- If there is more than one entrance or exit, ensure these other points of access are consistently monitored, secured, and/or alarmed.
- Consumers must check in with the front desk, or with the employee/volunteer they are meeting at the facility or program.
- Utilize headcounts or conduct attendance checks to ensure continuous awareness of which consumers are in programming.
- Maintain written or electronic documentation of attendance in programming.

M7. Training Content Points on Effective Monitoring and Supervision Practices for Managing Consumers and High-Risk Activities

Many incidents of abuse in organizations can be linked to lapses in monitoring of program activities and environments or to inadequate supervision of consumers. Organizations must provide employees and volunteers with training in effective monitoring and supervision practices for managing consumers and high-risk activities.

All training must be documented, and records kept for each employee and volunteer. Those who fail to meet training requirements must be subject to the organization's progressive discipline policy.

Training for employees and volunteers should include an overview of their role in abuse prevention as well as monitoring and supervision strategies that can reduce risk of abuse:

- 1) Certain activities and environments create a higher risk for adult-to-consumer and consumer-to-consumer abuse. These include:
 - a) Restrooms and locker rooms
 - b) Personal care assistance
 - c) Playgrounds and recreation areas
 - d) Electronic communication
 - e) Off-site activities
 - f) One-on-one interactions
 - g) Nap time and overnight activities
 - h) Transportation
 - i) Transition and free times
 - j) Mixed age groups
 - k) Consumers supervising consumers
 - l) Isolated or unmonitored areas like stairwells and classrooms
- 2) Strategies to lower risk of abuse or false allegations of abuse should focus on mitigating access, privacy, and control with consumers and include:
 - a) Best practice policies and procedures for managing high risk programs or activities, including increased supervision. Maintain structured activities, appropriate ratios, and line of sight supervision.
 - b) Employees and volunteers should understand the relationship between policies governing interactions with consumers, including those for appropriate physical and verbal interactions.
 - c) Employee and volunteer behavior set the tone for appropriate consumer behavior.
 - d) Understanding red flag behaviors in adults.
 - e) Understanding characteristics of consumers at high risk to offend and/or be victimized.
 - f) Zero tolerance for sexual activity between consumers.
- 3) Consistent documentation and reporting of any policy violations, concerns of abuse, or sexual activity between consumers.

Ages?
12

M8. Procedure for Monitoring & Supervising Consumers in the Facility

1. Require a parent or legal guardian to complete a membership application which includes identifying information, the consumer's date of birth, and emergency contact information. In addition, require all consumers to sign-in to the facilities so that the program has a record of the consumers who are in the facility at all times.

2. Require consumers to sign a Code of Conduct that outlines the program's behavioral expectations and policies regarding appropriate and inappropriate interactions. This Code of Conduct should also include a systematic disciplinary policy which explains that consumers will be suspended or dismissed from the program for policy violations. Require parents/guardians to sign this Code of Conduct as well, so that they are aware of the program's policies and progressive disciplinary procedures. If the consumer is a guest of a program member, the visiting consumer must sign the Code of Conduct.

3. While in the facilities, consumers can be supervised directly, indirectly, or with a combination of the two techniques.
 - For direct supervision, the program may offer structured, scheduled activities like basketball tournaments, swimming activities, arts and crafts, etc. These activities should have one or more employees assigned to lead and supervise.
 - For indirect supervision, the program must designate certain building areas as **authorized areas for consumers**. Authorized areas could include a gymnasium, a game area, or a classroom for doing homework and so on. Authorized areas must be easily visible and routinely and systematically checked by employees. Consumers should know that they will be supervised by employees at all times, and all employees should know which areas are **authorized and which are not**.
4. Develop **supervision best practices** for the authorized areas. For example:
 - Determine how frequently authorized areas should be monitored by employees.
 - Assign employee and volunteer-specific supervision responsibilities over authorized areas.
 - Require employees to record when they monitor authorized areas: this may be accomplished by using checklists.
5. All program employees should wear nametags or identifying clothing so that the consumers can easily recognize them as employees.
6. Train all employees:
 - To greet consumers that enter the facility; to direct consumers to the structured activities or authorized areas; and to redirect consumers who are not in an authorized area or who are not participating in a structured activity.
 - To be aware that free and unstructured activities can include transitional times, such as waiting for transportation.
 - To be aware of the risks involved with mixing age groups and developmental levels and how to monitor activities involving mixed levels – including increasing supervision when necessary.
 - To routinely monitor high risk areas (such as bathrooms, locker rooms, and unused rooms). These employees should document the scheduled and periodic sweeps of high-risk locations.

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

This organization will establish age and developmentally appropriate expectations and behavioral guidelines for consumers. To the extent that discipline of a consumer is warranted, this organization will apply discipline in a professional, fair, and consistent manner. Employees or volunteers engaging in any discipline beyond verbal redirection should document the behavior and disciplinary method. This organization retains the option to exclude participants from future programs based on disciplinary issues.

In all cases, employees and volunteers are prohibited from using physical contact for disciplinary purposes. This prohibition includes spanking, slapping, pinching, hitting, or any other physical force as retaliation or correction for inappropriate consumer behaviors.

Below are some examples of appropriate and inappropriate disciplinary practices:

Appropriate Discipline Practices

- Develop rules and consistently enforce them
- Remain calm but firm
- Remind consumers of appropriate actions
- Address the consumer's behavior, not the character of the consumer
- Loss of privileges
- Consider program or activity restrictions, such as sitting out or suspension

Inappropriate Discipline Practices

- Hitting
- Spanking
- Shaking
- Slapping
- Using extreme or unreasonable (in length or type) physical exercise as a consequence
- Withholding food, light, or medical care
- Name-calling
- Shoving or pulling hair or ears
- Biting
- Pinching
- Shaming
- Derogatory remarks
- Ostracizing
- Mechanical tape or rope restraints
- Angry yelling directed at the consumer

M9. Procedure for Monitoring & Supervising Unique Consumer Needs

Certainly, every effort should be made to serve consumers already participating in programs. However, not all programs can meet the needs of all consumers. When the demands placed on employees and volunteers by particular consumers exceed the skills of the employees and volunteers or the scope of the program, accidents or abuse may occur.

We understand each consumer is different and responds differently in certain situations. Through behavior management, we will try preventing problems, using redirection, having clear rules, which are developmentally appropriate, and giving positive reinforcement. Discipline problems may still arise; if these occur, we will be using progressive discipline.

Progressive discipline refers to increased severity if a consumer repeatedly violates rules or becomes harmful to self or other consumers. Behavior standards will be broken into three categories, Level I, Level II and Level III. Each category carries its own series of consequences. Below you will find the definition of each violation.

Level I:

Disrespectful towards employees and volunteers
Disrespectful towards other consumers
Disruptive Behaviors
Repeatedly not following direction
Repeatedly not following program/game rules
Excessive Horseplay

First Level I violation results in verbal notice to the parent/guardian describing the behavioral problem.

Second Level I violation results in written notice to the parent/guardian describing the behavioral problem.

Third Level I violation results in a written notice to the parent/guardian describing the behavioral problem and a parent/guardian conference.

Fourth Level I violation results in a suspension.

Fifth Level I violation results in termination.

Level II:

Pushing

Tripping

Hitting

Kicking

Spitting

Threatening Comments or gestures

Uncontrollable Behaviors

Inappropriate Language

Aggressive behavior towards other consumers/ employees and volunteers Teasing or embarrassing others

Willful destruction of the program property

First Level II violation results in verbal and written notice to the parent/guardian describing the behavioral problem.

Second Level II violation results in a written notice to the parent/guardian describing the behavioral problem and a parent/guardian conference.

Third Level II violation results in a suspension.

Fourth Level II violation results in termination.

Level III:

Fighting

Leaving assigned area without permission

Biting

Harassment, Intimidation, Bullying

First Level III violation results in suspension and/or termination.

*Determination of the violation is at the discretion of the supervisor. Violation determination may escalate to immediate suspension or expulsion based on severity of violation. Please discuss this behavior management policy with your consumers

Sample Questions for supervisors, employees and volunteers to ask when deciding if a program fits a consumer's unique needs:

- Can my employees and volunteers adequately supervise this particular consumer without compromising the interactions with other consumers?
- Has this consumer previously posed a threat to others?

- Have we made a solid attempt to meet this consumer's needs while ensuring the safety of others enrolled in the program?
- Does this consumer pose a risk to the safety and well-being of others?

If supervisors and employees answer these questions and conclude the program is not the right program for a particular consumer, schedule a meeting with the consumer's parents/guardians, caseworker, etc. to discuss your conclusions. If possible, try to locate an alternative resource for the family.

M10. Policy Addressing Employee and Volunteer Cell Phone Use During Program Hours or While on Duty

Employees/volunteers may bring personal electronic communication devices to work, but these devices must not be in view or in use for personal or unauthorized functions when the individual is expected to be serving or supervising consumers. Failure to adhere to the policy will result in progressive discipline.

Acceptable Use of Cell Phones While Working at the YMCA

There are occasions in which employees/volunteers will need to use personal or YMCA-issued electronic communication devices. In these cases, employees/volunteers will have explicit direction from supervisors governing use.

Situations which may require use of personal or YMCA-issued electronic communication devices include:

1. Field Trips
2. Off-site Programs
3. Emergencies
4. Official authorized YMCA business
5. Using the device to supply music or timing in programming
6. Using an app on the device to serve a specific program need (i.e., metronome in CPR classes, BMI calculator in personal training, instructional games in youth programs, etc.)
7. When the employee/volunteer is on an approved break and/or is in an area that is not in public view.

M11. Policy for Managing One-on-One Interactions Between Employees, Volunteers, and Consumers

One-on-one interactions may occur as part of this YMCA's programming under authorized circumstances. The purpose of this policy is to ensure the YMCA clearly communicates expectations for employees/volunteers and gives examples of appropriate behavior when one-on-one interactions may occur. In those situations where one-on-one interactions are authorized, employees/volunteers should observe the following guidelines to limit the risk of abuse or false allegations of abuse:

- Meet consumers in a public place where they are in full view of others.
- Avoid physical affection during one-on-one interactions. If unavoidable, ensure physical and verbal interactions align with this YMCA's 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.
- To the extent possible, ensure one-on-one interactions occurring behind closed doors with **ADULT** consumers are scheduled in advance or are communicated with the supervisor.

- One-on-one interactions occurring behind closed doors with **YOUTH** consumers is prohibited.
- Employee/volunteer will 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.

M12. Procedure for Supervising and Monitoring 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
 - 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.
- Follow procedures for safely entering and exiting vehicles, seating arrangements and placing employees/volunteers strategically throughout the vehicle to monitor all consumers
- 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.

M13. Procedures for Monitoring and Supervising its Mentoring Program

The YMCA has written procedures for monitoring and supervising its mentoring program and mitigate opportunities for privacy with consumers and between consumers and include:

- Requiring supervisors to contact mentors in face-to-face meetings at least once a month to monitor progress and safety, check in about goals and provide support for mentors
- Requiring supervisors to contact consumers via face-to-face meetings once a month and their families once a month
- Requiring mentors to maintain a weekly log documenting all activity with the youth. This log is reviewed and signed by supervisors bi-monthly at minimum
- Requiring family members and youth to review and confirm records of contact and activities as reported by the mentor
- Requiring supervisors to ask youths questions relevant to the detection of improper conduct or policy violations on a monthly basis
- Requiring that a supervisor must interview the youth and interview the family to discuss the mentoring relationship at the end of a mentoring relationship. These interviews should include questions that assess abuse risk.
- Requiring that the organization provides community partners (schools, recreation centers, etc.) with information about what is appropriate and inappropriate in the mentoring program so that the community partners can assist in the monitoring of the match.

M14. Procedure for Monitoring & 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 most 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.** Some aquatics facilities do not require sign-in or out and it is relatively easy to drop into programming.
- **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.

To ensure efficient monitoring and supervision of aquatics programs, and in addition to training our employees, our organization follows supervision procedures in the below areas:

1. Monitoring for suspicious or inappropriate behavior in the water
2. Monitoring locker rooms, changing areas, and restrooms
3. Monitoring during swim lessons
4. Monitoring the pool deck and any lounge or viewing areas

1. 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 your organization'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 **youth**:

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

2. Monitoring Locker Rooms, Changing Areas, and Restrooms

- Identify the unique high-risk areas of these locations in your organization that might be accessible for aquatics programs.
- Develop a schedule for consistent locker room, changing area, and restroom monitoring which includes specific instructions for monitoring the high-risk areas. The schedule should appear to be "random" so that people in the locker room know that someone from the organizations could enter at any time.
- Create a system to ensure locker room checks are consistently completed.
- Train employees on how to recognize suspicious or inappropriate behavior in locker rooms, changing areas, and restrooms, 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
 - Youth:
 - Consumers seeking out unsupervised areas
 - Mixed age groups of consumers
 - Making inappropriate comments to other consumers in locker rooms, changing areas, and restrooms.

3. Monitoring During Swim Lessons

- Ensure instructors 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.
- Require instructors, when assisting a child during the lessons, to explain aloud where they will touch the child – "I am going to put my hand under your back to help you float."
- When possible, encourage parents/guardians to observe swim lessons.

4. Monitoring the pool deck and any lounge or viewing 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/viewing areas (other than active supervision lifeguards). Active supervision of these areas is always critical.
- Monitor consumers to ensure they are following your organization's guidelines for appropriate interactions (including physical interactions, verbal interactions and electronic communications).
- Have a plan of action for responding to any deck changing (individuals changing on the pool deck and not in the appropriate locker room or changing area).

M15. Procedures for Monitoring and Supervising Youth Sports Programs

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

Supervisors and administrators are encouraged to adhere to the following guidelines:

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

Observe employee interactions with youth.

- Do employees use the proper voice tone with youth?
- Do employees give praise to youth?
- Do employees follow the physical affection guidelines?

- Do employees know the youth by first and last name?
- Do employees sound enthusiastic?
- Do employees set limits and boundaries with youth?
- Do employees interact with all the youth?
- Do any employees pay undue attention to any youth?
- Do employees listen to the youth when they make reports or express concerns?
- Do employees exhibit inappropriate power dynamics with certain youth?
- Are employees aware of and actively supervising high-risk situations (i.e., mixed age groups, off-site events, isolated areas)?
- Are employees prepared for and following organization procedures for transportation?

Observe employee interactions with each other.

- Do employees pay more attention to the youth than to each other?
- Are employees spread out and monitoring the entire facility?
- Do employees know who is supervising which youth?
- Do employees communicate with each other when one must leave the area?
- Do employees use polite voice tones with one another?
- Do employees share responsibilities around the program?
- Do employees have stress management methods that they implement appropriately?

Observe employee interactions with parents/guardians.

- Do employees greet the parents/guardians?
- Do employees know the parents/guardians by name?
- Do employees provide adequate information to the parents/guardians?
- Do employees ask the parents/guardians if they have any questions?
- Do employees spend too much time with any parent/guardian?

Take youth aside (but stay within view) and ask them questions, such as:

- How do you like coming here?
- What kinds of things do you do when you are here?
- Is the (title of employees) nice to you?
- Have you ever gotten hurt here?
- Has anyone ever been mean to you here?
- Do you feel that your coach treats you and all other youth fairly?

Ask parents/guardian questions, such as:

- Are you satisfied with the care your youth is receiving here?
- What can we do to make it better?
- Does your youth ever say anything about his or her (title of employees)?
- Have employees ever contacted you or your youth about anything other than the program?
- Do you ever have a chance to observe your youth at the program?
- What does your youth say about the time he/she spends here?

M16. Guidelines for Monitoring and Supervising overnight and residential activities

Overnight activities and residential settings can present unique risks to consumers and employees and volunteers. Overnight and residential settings often involve changing clothes; consumers of different ages interacting in a more intimate atmosphere than regular

program activities; more unstructured and novel activities; and increased opportunities for a consumer to avoid supervision and for employees and volunteers to be distracted.

Supervision Guidelines for Overnight Activities

- All overnight activities must be documented and approved in writing by the Program Director or Supervisor. Include a written/structured schedule of events.
- Administrators are expected to regularly and randomly observe overnight activities on a scheduled and periodic basis.
- The Program Director or Supervisor should appoint a “lead” employee to supervise the overnight activity. A meeting with all employees should be conducted to discuss the unique risks of overnight trips, unique elements of the specific overnight trip, and to review the specific policies and procedures that apply to the overnight activity.
- Provide parents/guardians with written information about the overnight activity. Information should include the location, duration, and type of activities to take place during the overnight. All parents/guardians must sign a permission slip for their consumers to attend the overnight activity
- Determine the appropriate employee-to-consumer ratios before the event and schedule employees accordingly. Consider increasing the employees needed for supervision depending on the overnight activity details.
- Meetings with the group should be hosted in open and observable areas; meetings should not be hosted in employees or consumer rooms.

Overnight Activities at a Facility

- Authorized areas within the facility must be clearly defined and explained to the consumers.
- Assign each employee to a specific group of consumers to supervise. Each employee should then maintain a roll sheet that lists consumers in his or her group. Head counts and roll checks should be conducted routinely throughout the overnight activity.
- Assign employees to high risk areas in your organization’s facility, such as the bathrooms, entrances and exits, hallways, etc. If it is not possible to assign specific employees to these areas, assign specific employees to conduct periodic facility “walk-throughs”.
- With regards to sleeping arrangements, separate the male and female consumer into separate rooms and post employees at the entrances and exits to these rooms. If this is not feasible, separate males and females by as much space as possible.
- When performing room checks, employees should always go in pairs.
- For overnight activities, where sleeping is not part of the activity (i.e. a lock-in), require at least three employees to stay awake overnight.

Overnight Activities 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 consumer.
- Assign each employee to a specific group of consumers to supervise. Each employee should then maintain a roll sheet that lists the consumers 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 consumers sneaking out (such as by the door).
- In hotel rooms, assign consumers to rooms based on gender and age. Employees should not share rooms with consumers. If employees must share rooms with consumers, employees must have their own beds and never change in front of consumers.

- 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.
- Include structured guidelines for conducting overnight room checks.

Residential Settings

- Require employees/caregivers to remain awake as long as consumers are awake and/or enact 24/7 "awake-night supervision" procedures as required by licensing or external regulations.
- Specify adult-to-consumer ratios for awake and overnight hour timeframes.
- Develop a written/structured schedule of events.
- Develop structured guidelines for conducting overnight room checks, including the documentation of these conducted checks.
- Require supervisors to observe overnight shifts regularly and randomly on a scheduled and periodic basis.
- Supervisors will monitor video surveillance regularly in real-time, especially during high-risk times or activities (if available).

M17. Guidelines for Monitoring and Supervising Resident and Overnight Camps

The YMCA requires employees and volunteers to adhere to established methods for monitoring and supervising resident and overnight camps that manage and mitigate opportunities for privacy with consumers and between consumers and include:

- How to monitor cabins/tents and sleeping areas
- How to monitor evening activities
- How to supervise youth participants who take on leadership positions

Bedtime (Overnight Camp) Campers should never be left unsupervised. After the campers have finished at the KYBO (bathroom) and when cabin chats are done, it's time for the campers to go to sleep. At least one staff member must remain **IN** the cabin. This makes sure that campers can settle down as well as provides easy access to support should they need help.

Nighttime Bathroom (Overnight Camp) When getting the cabin ready for bed it is important to keep supervision ratios in mind. Best practice is having the cabin go to the restroom together with necessary toiletries, and sleepwear in hand. Provide structure and clear instructions about what the campers must do and where to go while in the restrooms. While their campers are in the KYBO (bathhouse) staff should be in a central location within the KYBO. As campers finish in the KYBO staff should move to the doorway to monitor campers inside as well as outside until the cabin group is ready to return to their cabin.

Buddies/Supervision At Camp Y-Noah, any camper leaving their group, whether going to the Health Lodge, KYBO, office, or cabin **MUST** be accompanied by at least two others, either staff members or campers. Campers may not leave an area without a group of three or more. Counselors are responsible for instructing campers on the importance of this rule. Staff members must avoid being in a 1:1 situation with any camper.

Supervision General Here's a couple of quick references to help you and your campers stay safe. Counselors should avoid a one on one situation with a camper. Buddy groups should be maintained when campers are traveling, or going to the bathroom. Counselors should keep their cabin groups together when traveling, doing activities including evening programs. Leadership staff can support unique situations in which a cabin counselor may need an additional staff present.

CIT's and LIT's Counselors in Training and Leaders in Training are two programs offered at camp. These programs are for older campers who are interested in leadership, or in some day becoming a staff member at camp. During their program there will be times in which these campers will have some programmatic responsibility. A couple things you should remember, one, they are still campers and should never have supervision responsibility of other campers. Two, they do not count as a staff member in a buddy group, they are still campers. Three, you should not share personal information which includes personal details, phone numbers, address, emails, or social contacts with them.

M18. Guidelines for Supervising and Monitoring Bathrooms

Children who are participating in YMCA programs are not to be sent to restrooms without a YMCA staff member present. The buddy system or three children together are not acceptable practices and are not permitted at the YMCA.

For single stall restrooms, the YMCA staff will be positioned outside of the restroom to make sure no one else enters the restroom.

Entrance doors to multi-stall restrooms must be kept open when youth are inside.

At minimum, when multiple children are in the restroom or locker room, YMCA staff members will stand in the doorway so they can have at least auditory supervision of the children.

Staff members can and are encouraged to be inside the facilities so they can be easily seen by the children, and so they are able to immediately stop any inappropriate activity. This is best done with multiple staff members so individual staff are not subjected to unwarranted allegations.

Protocols that address the variety of unusual circumstances possible during outdoor or off-site activities shall be established and made part of that program/activity's operating guidelines.

M19. Guidelines for 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.

Our locker room and changing areas procedures include:

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

- Require all employees (including maintenance) and volunteers to also watch for suspicious or inappropriate locker room conduct.

M20. Guidelines for Supervising and Monitoring 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).

The following are additional procedures to consider.

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.
- Avoid giving physical affection. If physical affection is necessary, limit it to handshakes or high fives. Avoid more intimate forms of physical affection such as hugs.
- Allow for informal monitoring as long as it does not infringe on the consumer's right to privacy. For example, if possible, keep the bathroom or bedroom door cracked so passersby can see the adult assisting but not the consumer.
- Make every attempt to have employees of the same gender as that of the consumer to provide personal care.

For diapering:

The YMCA of Western Stark County does not provide diapering services in its programs, including Child Watch drop-in babysitting. Parents/guardians will be contacted if a child requires diapering.

For programs that are licensed by the State of Ohio and where diapering is required under licensing regulations, the following practices must be followed:

- Placing the changing table in an open area where adult actions can be observed by others.
- Encouraging that diapers only be changed when at least two adults, or individuals, are present.

- Requiring written documentation of diaper changing.
- Informing supervisors if employees notice anything out of the ordinary or concerning while changing the consumer's diaper.
- Requiring employees to know and follow all licensing requirements having to do with diapering.

For toileting:

- Require employees to stand in the doorway with the door ajar while the 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.

M21. Guidelines for Supervising Playground and Recreational Activities

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

Playgrounds may have blind spots or equipment which obstruct supervision. To reduce risk, procedures for playgrounds and recreational activities require:

- Minimum employee/volunteer to consumer ratios, which should mirror other activity ratios and consider:
 - age and number of consumers present;
 - special or unique consumer needs;
 - type of structures and equipment and the number of distinct activities occurring simultaneously;
- Size and configuration of playground/recreation area, i.e., barriers to supervision, whether physical boundaries like fences exist, geography and location, whether other outside groups will also be present. Definition of specific authorized areas and boundaries, including:
 - if and how outside groups can be cleared from activity areas during programming
 - if outside groups or mixed ages are using facilities at the same time, delineate boundaries so that different groups do not intermix.
- Specific instructions on how to monitor barriers to supervision (such as storage sheds, playhouses, tunnels, and shrubs):
 - identify in advance any blind spots or equipment that obstruct line of sight supervision and designate them off limits or plan regular walk throughs of those areas
 - station employees/volunteers near playground equipment such as tunnels and slides in order to reduce the appearance of privacy.
- Employees/volunteers assigned to specific areas to supervise, i.e., zone monitoring
 - ensures recreation supervisors are adequately spaced around the whole area;
 - they should continuously move within their assigned zone;
 - position them around the perimeter of the recreation area to ensure ample supervision and that consumers remain in approved spaces.
- Active supervision

- employees/volunteers should position themselves to be able to see and hear all consumers to whom they are assigned
- anticipate what consumers will do and redirect when necessary
- listen and notice changes in sound or absence of sound
- remain engaged with consumers rather than socializing with other employees/volunteers.
- Reviewing boundaries and rules with consumers prior to the activity, including that they are to remain in line of sight of employees/volunteers at all times and how to report inappropriate behaviors.
- Specific bathroom procedures to be defined, ensuring there are enough recreation supervisors to maintain ratios at all times.
- Employees/volunteers periodically scan and conduct name to face roll calls for each age group and whenever moving from one activity or space to another.
- Prohibiting employees/volunteers using cell phones for personal business.
- Means of communicating with other recreation supervisors, including inside employees if possible, so they can get assistance when needed without exceeding ratios.
- An emergency plan for responding to incidents.
- Supervisors conduct periodic check-ins and assessments of the activity period and of the entire activity area.

M22. Guidelines for Supervising Transportation Activities and Transporting Consumers

General guidelines:

- Require written parent/guardian permission from all consumers on the trip. Employees take these permission forms and medical releases with them on the trip.
- Supervisors should provide advance approval for any long-distance or overnight trips.
- Use the “rule of three” when transporting consumers: At least two employees must transport a single consumer, or at least two consumers must be present if transported by a single employee.
- Require employees to have a list of the consumers on the trip. The employees take roll when boarding the bus, when leaving the bus, periodically throughout the trip, and then again when boarding the bus.
- Specify employee-to-consumer ratios. When possible, do not count the driver in the supervision ratio.
- Require employees to sit in seats that permit maximum supervision. If possible, employees should not share seats with consumers.
- Discourage mixed age groups or developmental levels from sitting together. When possible, high risk consumers are seated by themselves or in close proximity to an employee.
- Prohibit drivers from making unauthorized stops.
- Consumers may not be brought to the employee’s home or the home of any employee’s family member.
- Where applicable, require employees to document the beginning and ending time of the trip and the mileage, names of the consumers being transported, other employees/volunteers who are involved in transportation, purpose of the transportation, and the destination.
- Require documentation of any unusual occurrences.

When public transportation is used (in addition to the transportation procedures listed above):

- Consumers should remain in one area of the bus/train, if possible.
- Employees/volunteers that are assigned to a group should remain with that group.
- When transporting consumers overnight, employees must remain awake.

When transporting consumers in employee personal vehicles (in addition to procedures listed above):

- Employees must notify supervisors of all transportation activities.
- Employees must follow established organization policies on physical interactions with consumers while in vehicles.
- When possible, employees should avoid engaging in sensitive conversations with consumers.

M23. Guidelines for Monitoring and Supervising Quiet Time and Naptime for Young Consumers

The YMCA requires employees and volunteers to adhere to established methods for monitoring and supervising quiet time and naptime for young consumers that manage and mitigate opportunities for privacy with consumers and between consumers. Please refer to ODJFS eManual 5101:2-12-20 Sleeping and Napping Requirements for a Licensed Child Care Center for requirements.

M24. Guidelines for Managing and Monitoring All Visitors in the Facility

The YMCA uses a variety of methods for supervising visitors in the facility which includes actively monitoring visitors, identification and signage and prohibiting access to unauthorized spaces.

M25. Guidelines for Supervising and Monitoring Facility

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. The YMCA will systematically identify facility locations that allow for unnecessary privacy or limited line of sight or supervision. The YMCA has implemented a formal system to manage these identified architectural risks, which includes:

- Ensuring employees/volunteers are aware of these locations and circumstances.
- Ensuring unused rooms, offices, and closets remain locked.
- Ensuring that all doors' locks are locked with a key and not solely a flip lock.
- Ensuring visibility in rooms without windows.
- Ensuring employees routinely walk through out of the way locations.

M26. Guidelines for Supervising and Monitoring Internet Use

The YMCA supervises internet use in the organization's facilities and programs. It closely monitors employees, volunteer and consumer computer and internet use and uses technological protections such as filtering, firewalls and encryption.

INTERNAL FEEDBACK SYSTEMS

I1. Open Door Policy for Employees/Volunteers

The YMCA maintains an open-door policy for all employees/volunteers and encourages them to share opinions; suggestions; concerns or questions about our policies; personnel issues and/or other workplace matters; and offer suggestions for improvement.

Employees/volunteers may discuss any concerns with their supervisor. However, to the extent the concerns relate to their direct supervisor, or to the extent the employee believes that their direct supervisor did not fully address the matter, employees may direct their opinions, work-related concerns, and offer suggestions for improvement, to their supervisor's supervisor or Human Resources.

Employees may report any suspected illegal activities in the organization following the procedure in the Whistleblower Policy. Illegal activities may include but are not limited to corporate fraud, unethical business conduct, violations of State or Federal law, or substantial and specific danger to an employee's/volunteer's or member's health and safety.

Procedure

Verbal complaints are acceptable; however written complaints are preferred. To ensure a timely and effective response, complaints should include the following information, to the extent possible:

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

Timeline

The YMCA shall endeavor to finalize a response to the complaint within 15 (fifteen) calendar days. This may take longer depending on the nature of the complaint.

In the instance where a complaint is delivered to an employee's/volunteer's supervisor, the supervisor shall investigate the concern and respond to the employee within the 15 (fifteen) day limit. The results of the investigation shall be shared with the complainant.

In the instance where a complaint is delivered to the next level in the organization (the supervisor's supervisor) or Human Resources, an investigation shall be conducted by the Department of Human Resources within the 15 (fifteen) day limit. The results of the investigation shall be shared with the complainant.

If the YMCA determines that a violation of policy or law has occurred, the YMCA will take appropriate disciplinary action, up to and including termination of employment.

Retaliation

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

Employees/volunteers should report any suspected retaliation to their direct supervisor immediately after becoming aware of it. Any report of retaliatory conduct will be objectively, timely, and thoroughly investigated. If a report of retaliation is found to be valid, the YMCA will take appropriate remedial action, up to and including the discharge of the employee(s)/volunteer(s) responsible.

This YMCA will not retaliate against any employee/volunteer for raising a complaint and will not knowingly permit retaliation by management or other employees/volunteers.

This policy is shared with employees and volunteers.

12/I5/I6/I7. Policy for Follow-Up with Individuals who Report Concerns or Complaints

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

1. They will be given the time and attention necessary to allow them to share their thoughts in person.
2. They will be thanked for sharing their concerns with the YMCA and for contributing to maintaining a healthy and safe environment for everyone.
3. They will be advised that we will never dismiss their concern, that their concern is being taken seriously, and that action will be taken.
4. They will be reassured that they have done the right thing by reporting and that their communication is valued.
5. They will be informed, in general statements, of the steps that the YMCA will take in addressing the matter.
6. They will be given contact information for someone in the YMCA with whom they can contact should they become aware of additional information.
7. They will be provided follow-up information as appropriate.
8. The YMCA will protect them from any form of retaliation.
9. They can report anonymously by going to WestStarkY.org/youth-protection.

13. Open Door Policy for Consumers

The YMCA maintains an open-door policy for all consumers and encourages them to share opinions; suggestions; concerns or questions about our policies; personnel issues and/or other workplace matters; and offer suggestions for improvement.

Consumers may discuss any concerns with the program leadership or branch Executive Director. However, to the extent the consumer believes that their branch staff did not fully address the matter, consumers may direct their opinions and offer suggestions for improvement, to the Vice President of Membership Branch Operations.

Consumers may report any suspected illegal activities in the organization to the branch Executive Director or Vice President of Membership Branch Operations. Illegal activities may include but are not limited to corporate fraud, unethical business conduct, violations of State or Federal law, or substantial and specific danger to a person's health and safety.

Procedure

Verbal complaints are acceptable; however written complaints are preferred. To ensure a timely and effective response, complaints should include the following information, to the extent possible:

- The name(s) of the people involved;
- The date(s) the behavior occurred;
- The name(s) of any known witnesses;
- The name(s) of the conduct meriting the complaint, including:

- The behavior complained of and/or the alleged policy or legal violation(s).
- Direct quotes when relevant and available; and
- Any relevant documentation.
- The outcome sought by the consumer

Timeline

The YMCA shall endeavor to finalize a response to the complaint within 15 (fifteen) calendar days. This may take longer depending on the nature of the complaint.

When a complaint is delivered to the branch Executive Director or the CEO, they shall investigate the concern and respond to the consumer within the 15 (fifteen) day limit. The results of the investigation shall be shared with the complainant. The CEO can be reached at 330-837-5116. Consumers can also report anonymously at WestStarkY.org/youth-protection.

If the YMCA determines that a violation of policy or law has occurred, the YMCA will take appropriate corrective or disciplinary action.

Retaliation

The YMCA strictly prohibits retaliation against consumers for reporting, filing, testifying, assisting, or participating in any manner in any investigation, proceeding, or hearing conducted by the YMCA or a federal or state law enforcement agency or court.

Consumers should report any suspected retaliation to the branch Executive Director or the CEO immediately after becoming aware of it. Any report of retaliatory conduct will be objectively, timely, and thoroughly investigated. If a report of retaliation is found to be valid, the YMCA will take appropriate remedial action.

The YMCA will not retaliate against any consumer for raising a complaint and will not knowingly permit retaliation by management, employees/volunteers, or other consumers.

Publication and Communication to Consumers and Parents/Guardians

This Open-Door Policy must be shared with all consumers and parents/guardians through inclusion in the YMCA website. Any changes to this policy will be communicated in writing to consumers and parents/guardians via the YMCA website.

14. Policy Requiring Confidentiality of Reports

The YMCA will attempt to protect the confidentiality of anyone who reports allegations or disclosures of abuse, or other violations of law or policy to the extent possible under law, but cannot guarantee it in order to conduct a meaningful investigation. Information would be shared only on a need-to-know basis. Legal and civil authorities (police, child, or adult protective services) may require confidential information to investigate any report of illegal conduct, but this does not eliminate the requirement to maintain confidentiality within the YMCA and its employees, volunteers, and consumers.

The YMCA will provide written communication of any changes to this policy to all employees, volunteers, consumers, and parents/guardians.

18. Policy for an Anonymous Reporting Mechanism for Employees/volunteers

While we hope that our employees/volunteers feel that they can openly communicate any concerns, complaints, or grievances directly to someone in the YMCA, we understand that doing so can often be difficult. Because it is important to us that everyone be able to share

their concerns, we provide the following mechanisms through which employees/volunteers can make an anonymous report:

The following are ANONYMOUS reporting methods:

1. Call the State of Ohio anonymous line at 855-642-4453 (855-O-H-CHILD).
2. Complete the form on WestStarkY.org/youth-protection

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

What is the State of Ohio anonymous line?

The State of Ohio's Department of Job and Family Services operates this reporting line. It is an automated telephone directory that links callers directly to a child welfare or law enforcement office in their county. Reports can be anonymous if the caller prefers.

When submitted, the form will be directed to the Child Abuse Prevention Committee for investigation. Reporting on the form can be anonymous if the submitter prefers.

I9. Methods to report concerns, complaints, or grievances are widely publicized.

Methods for publicizing the organization's mechanisms for reporting concerns, complaints, or grievances may include but are not limited to:

- Providing information in Employee Handbooks and other documentation provided to employees at hire or throughout their employment;
- Posting signage in "employee only" areas;
- Making announcements at trainings and employee meetings;
- Updating employee newsletters;
- Displaying magnets and posters; or
- Sending emails and posting on the organization's website.

I10. Collecting Data Relevant to the Prevention and Detection of Abuse

The YMCA collects data relevant to the prevention and detection of abuse from a variety of sources including employees/volunteers, parents/guardians and consumers. The YMCA collects data from complaints, licensing violations from licensing authorities, incident reports and information regarding internal program quality standard compliance.

I11. Compiling and Analyzing Data to Identify Increased Risk for Abuse

The YMCA compiles and analyzes data to identify increased risk for abuse. The YMCA looks for trends over time or across locations, identifies programs that appear to have increased problems or need additional attention, inform polices and highlight training or supervision needs.

I12. Utilizing Data Analysis to Inform Organizational and Programmatic Changes to Decrease Risk for Abuse

The YMCA utilizes data analysis to inform organizational and programmatic changes to decrease risk for abuse to inform policy changes, highlight training needs, identify supervision needs and respond to drift from standards.

CONSUMER PARTICIPATION

C1. The organization provides consumers with developmentally appropriate and age-appropriate information about protecting themselves from abuse.

The YMCA's top priority is keeping members safe. Any form of abuse or mistreatment of members, employees, and volunteers is prohibited. Use of abusive, obscene, or profane language, including racial, religious, gender identity, or sexual references will not be tolerated.

C2. The organization provides consumers with information on the organization's policies and procedures related to abuse prevention.

The YMCA will maintain its website with a current version of its abuse prevention policy.

C3. The organization uses a variety of methods for maintaining ongoing awareness of abuse risk and prevention amongst consumers.

The YMCA will maintain its website with information on abuse risk and prevention.

The YMCA will announce and communicate all policy changes to employees, volunteers, members, and parent/guardians through written or electronic methods, and YMCA methods such as employee meetings, trainings, and supervision discussions.

C4. The organization provides parents and guardians with information about how to protect their consumers from abuse.

One-on-One Interactions with Youth - Most child abuse occurs when an adult is alone with a youth, or when a youth is alone with another youth. Our YMCA aims to reduce or eliminate these situations, and thus we prohibit private one-on-one interactions unless approved in advance by the YMCA administration and parent. If you observe one-on-one interactions between employees/ volunteers and youth, you should report this. Any romantic or otherwise sexual relationship between a youth or teen and an employee/ volunteer is strictly prohibited.

If you observe, suspect, or learn of any suspicious or inappropriate behaviors and/or policy violations on the part of employees, volunteers, or other consumers, it is your personal responsibility to immediately report your observations.

Report any suspicions to the branch Executive Director, and/or to the CEO at 330-837-5116, and/or to the State of Ohio anonymous line at 855-642-4453 (855-OH-CHILD), and/or by completing the anonymous form on WestStarkY.org/youth-protection and/or by contacting the local or state authorities.

C5. The organization provides parents and guardians with information on the organization's policies and procedures related to abuse prevention.

For additional information regarding our policies and procedures related to child abuse prevention please visit our website at WestStarkY.org/youth-protection.

C6. The organization uses a variety of methods for maintaining ongoing awareness of abuse risk and prevention among parents and guardians.

Policy: The YMCA will strive to educate our members on abuse risk and prevention in a variety of ways. We will maintain online information online as well as through our member code of conduct. Should our policy change we will communicate electronically with our members to make them aware of any changes.

RESPONDING

R1, R5. PROCEDURE: Employee/Volunteer Response to Reporting or Witnessing Red-Flag, Inappropriate Behaviors, Allegations/Incidents of Abuse and/or Policy Violations

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

- Interrupt the behavior immediately.
- Within 24 hours, report the behavior to a supervisor, the branch Executive Director or the CEO at 330-837-5116.
- People who are not comfortable making the report directly may make it anonymously by completing the form on WestStarkY.org/youth-protection or calling to the State of Ohio anonymous line at 855-642-4453 (855-O-H-CHILD).
- If the report is about a supervisor or administrator, contact the next level of management.
- Complete an internal report but do not investigate.
- Keep reporting until the appropriate action is taken.
- See P5 and P6 for examples of red-flag/inappropriate behaviors, allegations/incidents of abuse and/or policy violations.

R2, R3, R7. PROCEDURE: Supervisor and Administrator Response to Reports of Red-flag or Inappropriate Behaviors and/or Policy Violations

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

- Within 24 hours, report to the next level supervisor or administrator.
- Within 24 hours, speak with the employee or volunteer who has been reported.
- Within 24 hours, report to Human Resources, which will review the file of the employee or volunteer to determine if similar complaints were reported.
- Determine the appropriate response based on the report.
- Take into consideration factors such as:
 - Context of red-flag or inappropriate behavior or policy violation;
 - Severity of red-flag or inappropriate behavior or policy violation;
 - History of red-flag or inappropriate behaviors or policy violations; and
 - Trainability of employee or volunteer.
- Document all details and submit to Human Resources.
- If a concern arises to the level of possible abuse, contact the CEO at 330-837-5116 and/or state authorities at 855-642-4453 (855-O-H-CHILD).
- If appropriate, notify parents/guardians.
- Advise the person who reported the behavior that the report is being taken seriously.
- Based on the information gathered, the following may be required:
 - Increase monitoring or supervision of the employee, volunteer, and/or program.
 - If policy violations with consumer(s) are confirmed, the employee or volunteer must be subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the Progressive Disciplinary Process outlined by the YMCA.
- If more information is needed, interview and/or survey other employees/volunteers or consumers.

Association Response – After the internal review of the red-flag or inappropriate behaviors or policy violations, determine if system changes are necessary, such as:

- Review the need for increased supervision.
- Review the need for revised policies or procedures.
- Review the need for additional training.

R4. PROCEDURE: Procedure for Progressive Disciplinary Process Outlining the Consequences for Policy Violations and Other Inappropriate Conduct with Consumers

See M9.

R6. PROCEDURE: Procedure for Supervisors and Administrators Responding to Allegations or Incidents of Abuse

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

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

- First, determine if the consumer is still in danger and if so, take immediate steps to prevent any further harm.
- If receiving report from employee or volunteer, be sure to verify they have followed mandated reporting requirements by contacting the State of Ohio line at 855-642-4453 (855-O-H-CHILD) or will follow immediately after making internal report.
- Report to any applicable external licensing or governing bodies. This includes YMCA of the USA (via report form on the homepage <https://www.ymca.org/>).
- Gather as much information about the allegation as you can. For example, who made the report, who was allegedly abused, who was the alleged abuser, what was the nature of the alleged abuse, where and when did the alleged abuse occur, etc.
- Accurately record everything you learn in as much detail as you can. Remember your notes may be read by others. Stick to the facts.
 - Make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency.
- If the alleged abuse involves an employee or volunteer, immediately notify the CEO at 330-837-5116.
- Suspend the accused employee or volunteer until the investigation is completed.
- Ensure that consumer’s parents/guardians are notified (when applicable).
- Deploy communication plan.

R8. Guidance for Creating a Victim-Centered Response Plan

Be Prepared

- Branch Executive Directors (or their designee) will serve as victim assistance coordinators. In Youth Development sites, the site director will serve in that function.
- Understand the dynamics of disclosure and why survivors sometimes take years to come forward.
- Understand that certain aspects of the survivor’s recollection of events may be fuzzy but that does not mean the survivor is not credible.

- Ensure your organization's response plan includes outreach to those affected.
- Train front line employees on how to respond appropriately:
 - Document all details provided including the name of the reporter, when they made their report and who took the report.
 - Thank the individual for reporting. "Thank you for telling me." Inform the reporter that the information will be passed to the designated organization point person who will follow up with additional support as soon as possible.

Once a Survivor Has Been Identified

- Proactively reach out and offer to meet. If they do not want to meet, ask what would be most helpful to them. What would they like to see happen as a result of coming forward?
- Ask how you can support them. Do not assume you know what they want and why.
- Consider offering resources to meet the needs of those affected (i.e., counseling, therapeutic services, pastoral assistance)
- Do not be afraid to apologize for what happened in the past.
- Be clear with the survivor about your reporting requirements.

When Meeting with a Survivor

- Listen to all information the reporter provides and be compassionate.
- Tell the survivor they were right to come forward.
- Let the survivor know you believe them.
- Assure the survivor the abuse was not their fault.
- Provide confidence that consumer protection is your highest priority and safeguards are in place.
- Avoid expressing shock or outrage.
- Avoid questions that could make the survivor feel responsible (i.e., Why did you take so long for you to report?)
- Follow mandated reporting requirements.
- Inform the survivor that the organization will provide transparent updates on the investigation and next steps as much as possible.

R9. Crisis Management Plan for Responding to Incidents of Abuse

A crisis is defined as any occurrence that harms a youth, threatens the public reputation or immediate financial integrity of the YMCA, or that may create a situation of legal liability to the YMCA or its directors or officers. Examples include allegations or incidents of suspected abuse including adult-to-youth abuse, youth sexualized behaviors, arrest of current or former employee or volunteer for child pornography, etc. Below is a crisis response plan that may include any of the following actions as appropriate to the specific situation.

Crisis Management Objectives

The YMCA Crisis Management team consists of the senior leadership team (CEO, branch director, Human Resources, and/or department heads). This team is responsible for ensuring the following objectives are met during a crisis:

- Prioritize youth protection, safety, support, and comfort.
- Be proactive, timely, transparent, accurate, consistent, and unified in the messages presented internally and to media, stakeholders, and the public.
- Maintain strong relationships with various stakeholders.
- Evaluate the YMCA's policies and protocols and demonstrate to stakeholders and the public how the YMCA is evolving to correct past challenges and improve the YMCA's safeguarding efforts.
- Prepare for a potential crisis year-round, not just when one occurs.

Crisis Management Procedures

First, focus on securing immediate safety and minimizing access.

- To the extent possible, ensure the survivor is secure and safe from additional harm or abuse.
- Follow all mandated reporting requirements and contact the authorities as appropriate.
- If the accused person is an employee, follow progressive discipline policy accordingly. This may involve suspending the accused during the investigation.
- Where applicable, prevent the accused from having further access to youth until a thorough incident review and/or investigation is completed. Before beginning an internal incident review, verify with local authorities that this will not interfere with their investigation.
- When applicable, notify other employees that there has been a critical incident and the crisis management plan has been activated.

Initial Communication Plan

- The CEO is responsible for responding to all inquiries from parents/guardians, the media, and other stakeholders.
 - Prepare a short media statement in advance or anticipation of receiving a media or public inquiry.
 - All oral and written communication should speak with a voice of compassion and confidence.
 - All employees and volunteers should know how to refer media inquiries to the appropriate spokesperson.
- As soon as possible, meet in person (not over the phone) with identified survivors and their parents/guardians, if applicable.
 - Reassure them that they were right to tell you, and you are taking the allegation or incident seriously.
 - Find out what response they desire and be prepared to explain what support you will offer, such as counseling or therapeutic services.
- Consider reaching out in writing to parents/guardians of all youth attending the YMCA or the specific program in which the accused offender was involved or had contact with youth.
 - The message should communicate:
 - **Empathy:** Begin by stating that such incidents run counter to the YMCA's values.
 - **Facts:** Include a summary of the incident, including information about any suspensions, investigations, arrests, etc. Keep the names of those involved confidential, especially during the investigation process.
 - **Contact Request.** Ask parents/guardians to contact the YMCA or the specified authorities if they suspect their youth may have been abused.
 - **The Response:** Explain that the YMCA is fully cooperating with the authorities. Describe proactive steps the YMCA is taking such as offering resources to individuals, hosting a parent/community meeting, training employees and volunteers, and plans to conduct an independent investigation to learn from this incident so the YMCA can prevent it from happening again.
- Host a parent/community meeting to speak directly with concerned families and directly answer any questions before rumors or misinformation is spread.
 - Communicate as much information as you can about the incident, while maintaining the confidentiality of those involved.
 - Provide information regarding the proactive steps leadership is taking in response to the incident.

- Describe resources the YMCA is providing families and give parents/guardians a chance to ask questions.
- Provide parents/guardians with information about how to talk to their youth about abuse.

Ongoing Communication and Response

- Determine how to manage ongoing relations with authorities, parents/guardians, the community, and media relations.
 - Consider adding a designated page to the website with updated details about the incident.
 - Designate specific individuals in the YMCA to handle various communications and outreach efforts.

Promote Prevention at All Levels of the YMCA

- Educate parents/guardians on abuse prevention information. Offer a workshop during which parents/guardians can learn how to protect their youth from abuse. This is an educational session that is different from the parent meeting described above.
- Provide a youth education program to all youth involved with the YMCA on how to protect themselves from abuse and how to express concerns.
- Train (or re-train) all employees and volunteers on how to identify and report red flag behaviors that do not rise to the level of suspected abuse. This is an important part of the overall response and ongoing prevention effort.

R10. Procedure Outlining Appropriate Employee and Volunteer Response to Consumer-to-Consumer Sexual Activity

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

If employees or volunteers witness youth sexualized behaviors that are contrary to defined behavioral expectations between youth, they are instructed to follow these guidelines:

- If you observe sexual activity between youth, you should safely separate them as soon as possible.
- Calmly explain that such interactions are not permitted and separate the youth.
- Notify your supervisor and the parent/guardian (when applicable).
- Complete an incident report and any other necessary documentation including what you observed and how you responded.
- Follow your supervisor's instructions regarding notifying the authorities and informing the parents/guardians of the 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. Any sexual activity between youth is inappropriate at the YMCA's facilities or during any program activities. If there are concerns of sexual abuse or assault, an external body, such as child protective services, utilizes criterion to investigate and determine whether the youth's behavior is sexual curiosity.
- Follow mandated reporting requirements, if appropriate.
- If the problem is recurring, additional action may be required including not allowing one or both youth to return to the program.

Identify how youth will be managed or supported to prevent further occurrences of sexual activity (i.e., safety or behavioral plans including additional supervision requirements).

R11. Procedure Outlining Appropriate Supervisor and Administrator Response to Consumer-to-Consumer Sexual Activity

If a supervisor or administrator receives a report of a youth's sexualized behavior, they are instructed to follow these guidelines:

- Meet with the employee or volunteer who reported the sexual activity to gather additional information.
- Confirm that the youth involved have been separated or placed under increased supervision.
- Notify the proper authorities and follow mandated reporting requirements, if appropriate.
- Review the incident report to confirm it is accurately and thoroughly completed.
- Meet with parents/guardians of the youth involved (when applicable).
- Review the immediate steps taken by the employee or volunteer who initially responded.
- Determine what additional actions should be taken to ensure there is not a recurrence, including following the Youth Progressive Discipline Policy.
- In some cases, youth behavior can be managed through a safety or behavior management plan.
- Develop a written corrective action or follow-up plan in response to the incident.

Based on the information gathered, it may be required to review the need for:

- Assessing the suitability of the program for the youth involved.
- Additional youth or program supervision.
- Revised policies or procedures.
- Additional employee or volunteer training.
- Additional youth education.
- Alerting others in the YMCA.

ADMINISTRATIVE PRACTICES

A15. The organization has a defined process for identifying if a volunteer is considered a low-access or high-access volunteer.

There are three categories of volunteers: **High-Access**, **Mid-Access** and **Low-Access**. The category of volunteer determines the level of screening, training, and supervision the volunteer requires.

*If uncertain what particular volunteer opportunity is, pick High-Access because this category provides the greatest protection for consumers and for the YMCA.

High-Access Volunteers

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

High-Access Volunteer screening process:

- An application with the Code of Conduct attached;
- In-person interview with behaviorally based interview questions;
- References; and
- Background checks as defined by S5.

High-Access Volunteer training process:

- Initial and Annual Abuse Prevention Training required of employees in similar position

Mid-Access Volunteers

Youth Sports Coaches are considered **Mid-Access Volunteers**. They are given a volunteer handbook and complete the code of conduct in that document and are also screened via a background check. A screened and trained staff person must be present in the area volunteer youth sports coaches are working with kids for them to not have to complete an interview, references and abuse prevention training. These volunteers that are not screened/trained should not participate in high risk activities such as helping with bathroom/locker room monitoring unless also accompanied by a staff member.

Low-Access Volunteers

Low-Access Volunteers typically interact with consumers only in line-of-sight of an employee and only infrequently. Such volunteer might be a parent/guardian who is helping at a one-time event, or someone who only works with adults, not consumers. Low Access Volunteers may not be known by the consumers in the program or to other volunteers and employees. Low Access/Occasional Volunteers have limited access to consumers and have few opportunities to develop relationships with consumers over time.

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

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

If not already in Daxko, the Low Access Volunteer's name, contact information, date of birth, etc. must be placed into the Daxko database. Low Access Volunteers are screened via the DOJ National Sex Offender Registry Search.

A16. The organization has a screening and selection process in place for its low-access volunteers designed to screen for the potential to abuse.

The YMCA will complete a National Sex Offender Registry check on all employees/volunteers upon hire, re-hire, return from seasonal absence or furlough longer than six months, and prior to working or volunteering with consumers. The applicant must be screened through the National Sex Offender Registry.

All employees and members are screened through the National Sex Offender Registry daily through Daxko.

A17. The organization has a training delivery system for low-access volunteers that ensures abuse prevention training is available, completed, and documented as required.

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

Annual abuse prevention training refreshes previously learned concepts and provides additional knowledge and skills to enhance the ability of employees/volunteers to protect consumers.

In the YMCA, all employees/high-access volunteers will complete their abuse prevention training upon hire and, thereafter, **annually in the month of April**. Tracking and documentation of training completion will be stored in Praesidium Academy or the employee's file.

All employees are responsible for annually completing training on the following concepts:

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

Failure to complete required trainings will result in disciplinary actions up to and including termination of employment.