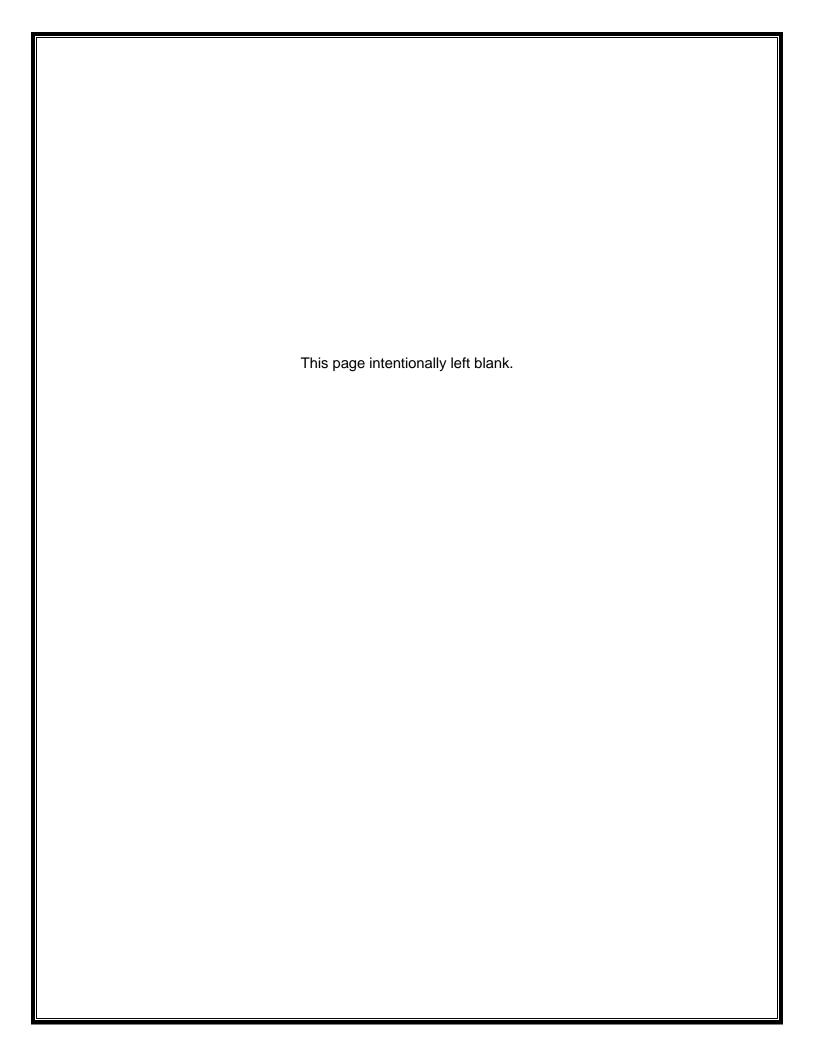


# Child & Club Safety Handbook



BOARD APPROVED FEBRUARY 16, 2022



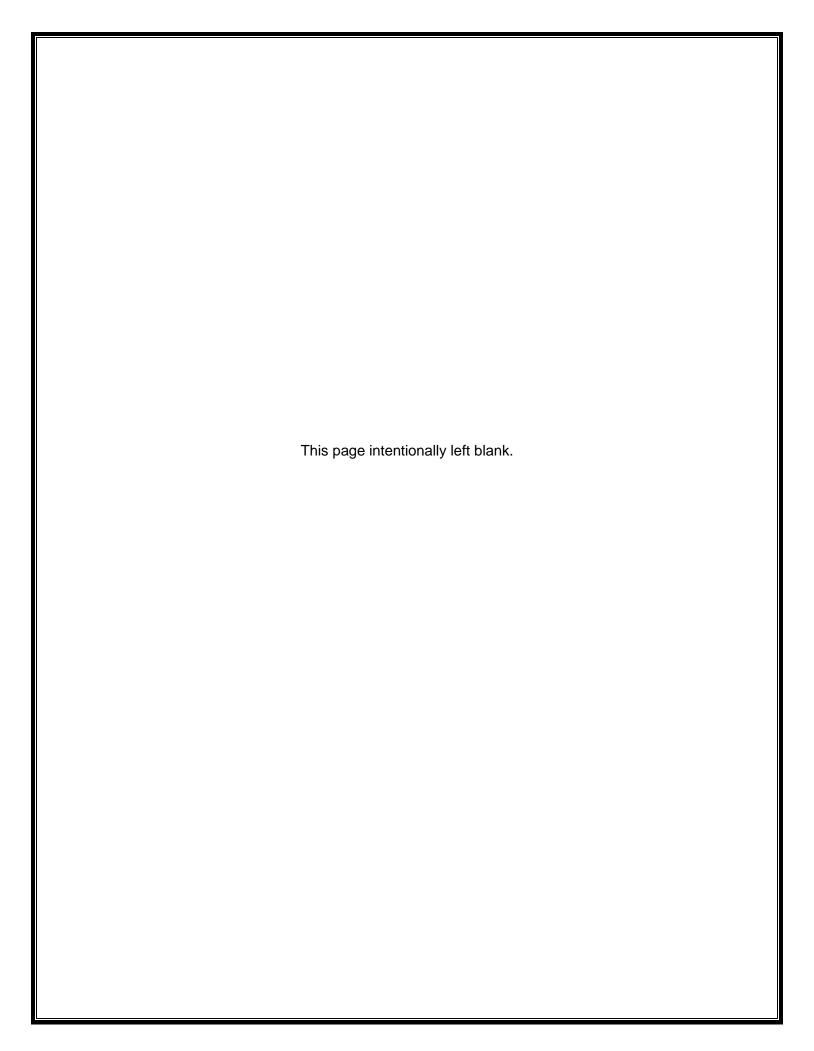


### **Safety is Our Number One Priority**

At **Boys & Girls Clubs of Central Florida**, there is nothing more important than the safety of our youth members. We work every day to create a safe, fun environment, so kids can have every opportunity to be successful in life.

We do not tolerate inappropriate behavior of any kind, including child sexual abuse or misconduct. From strict adherence to policies and guidelines within Club facilities and staffing structure, to equipping young people with the critical thinking and social-emotional skills to make healthy, safe choices, ensuring Club members are safe is the first step to their success.

This handbook is reviewed and revised annually or as needed by third-party child safety subject matter experts, our Safety Committee and Board of Directors.





### **MEMBERSHIP**

Boys & Girls Clubs of Central Florida are open to membership to young people ages 6 - 18. A birth certificate may be requested to verify the youth enrolling into membership is between the ages of 6-18. Memberships expire on the  $19^{th}$  birthday. However, if a young person turns 19 during the school year, their membership expires at the end of the school year. If a young person ages out of the Club and wants to stay involved, they may seek employment with us or become a registered volunteer.

Some Clubs may serve a specific age range due to grant requirements, for instance middle school only or elementary and middle school only.

#### **YOUTH VISITORS**

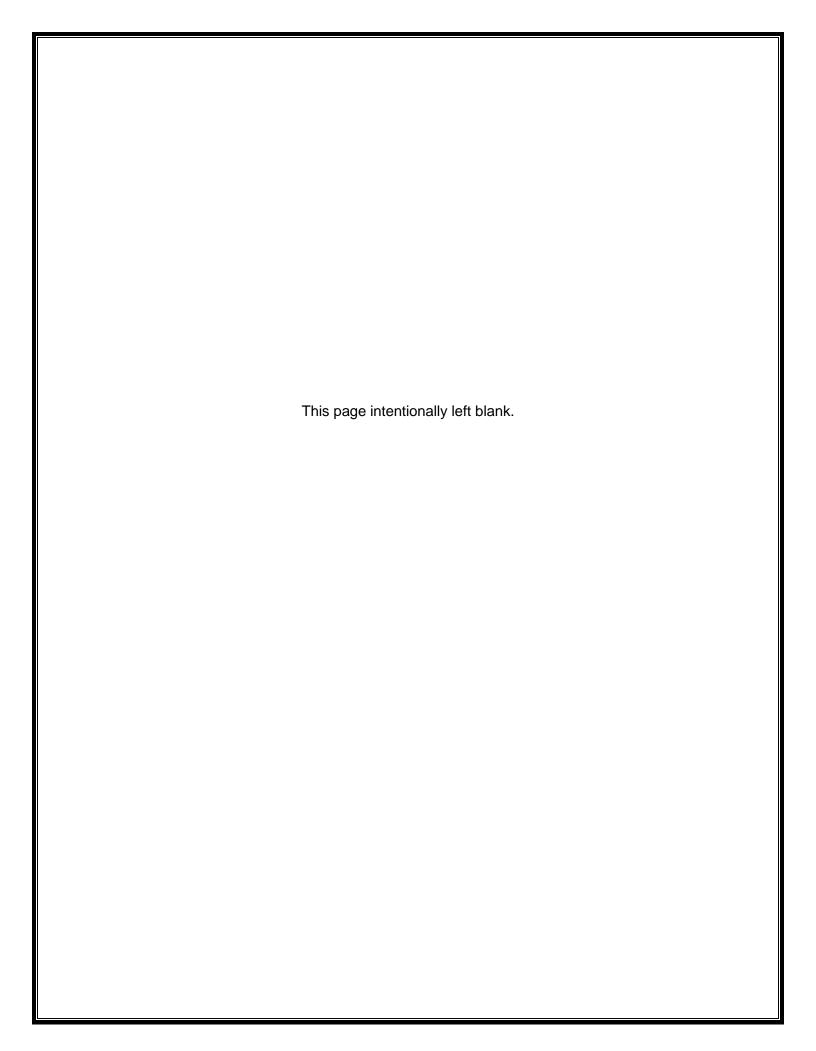
Boys & Girls Clubs of Central Florida does not allow youth to participate in the Club without a membership form signed by a parent/guardian on file at the Club. Youth may attend as a visitor for one day in the Club. In order to return, they will need to bring in a signed membership form.

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### **Child Abuse Prevention Policy**

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

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

#### **DEFINITIONS**

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

Exceptions may only be made when delivering approved medical or counseling services by a licensed, trained therapist or similar professional according to professional guidelines. All staff and volunteers, including minor staff (under age 18), are strictly prohibited from meeting Club participants outside of any Club-sponsored activities. The only exceptions to this rule are: (1) if the Club participant is a child or sibling of a staff member or volunteer or (2) if the Club participant had an established relationship with the staff or volunteer prior to any of them being enrolled, working, or volunteering with Boys & Girls Clubs of Central Florida. Examples of such preestablished relationships include, but are not limited to, extended family, neighbors, family friends, attend same places of worship. In such instances, staff or volunteers must declare their pre-established relationship via the "Pre-Existing Relationship with Children Form."

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

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

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

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

#### MANDATED REPORTING

Every staff member or volunteer of Boys & Girls Clubs of Central Florida is a Mandated Reporter and is required by Florida law to report immediately to the central abuse hotline at the Florida Department of Children and Families at 1-800-962-2873 or online at https://reportabuse.dcf.state.fl.us/ if he or she knows, or has reasonable cause to suspect, that any of the following has occurred:

- Child abuse, abandonment, or neglect by a parent or caregiver.
- Child abuse by an adult other than a parent, legal custodian, caregiver, or other person responsible for the child's welfare.
- Sexual abuse or juvenile sexual abuse.

### **Child Abuse Prevention Policy**

Any staff member or volunteer of Boys & Girls Clubs of Central Florida who knowingly or willfully fails to immediately report any knowledge or suspicion of abuse, abandonment, or neglect commits a felony in the third degree. Club leadership may assist with the filing of any report, but ultimately the individual with knowledge or suspicion of abuse is responsible for reporting the incident immediately to the Florida Department of Children and Families. Organization leadership is responsible for reporting these incidents to the Boys & Girls Clubs of America (BGCA) within 24 hours via the critical incident system.

#### REQUIRED TRAINING

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

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

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

#### **Annually:**

All the policies, including all safety policies, for Boys & Girls Clubs of Central Florida.

#### PHYSICAL INTERACTIONS

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

Appropriate	Inappropriate
Side hugs Handshakes High-fives and hand slapping Holding hands (with young children in escorting situations)	Full-frontal hugs or kisses Showing affection in isolated area Lap sitting Wrestling or piggyback/shoulder rides Tickling Allowing youth to cling to an adult's leg

#### **VERBAL INTERACTIONS**

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

Appropriate	Inappropriate
Positive reinforcement Child-appropriate jokes (no adult content) Encouragement Praise	Name calling Inappropriate jokes (adult-only content) Discussing sexual encounters or personal issues Secrets Profanity or derogatory remarks Harsh language that may frighten, threaten, or humiliate youth

### **Child Abuse Prevention Policy**

#### ABUSE AND SAFETY RESOURCES

Boys & Girls Clubs of Central Florida prominently displays BGCA-approved collateral that shares ethics hotline, crisis textline and safety helpline information with members, staff, volunteers, and families. We also share all safety policies with parents and guardians upon receiving a youth membership application.

#### SEXUAL ABUSE PREVENTION

Boys & Girls Clubs of Central Florida is committed to providing a safe and respectful environment for our members, and will not tolerate any sexual abuse or sexual misconduct toward or by any member.

Sexual abuse and sexual misconduct shall be interpreted to mean any sexual interaction between a child and another person (including another child) in a position of power over the child. Specific acts may include but are not limited to inappropriate physical contact, viewing pornography, exposing oneself to another person, enticing others to expose themselves, inappropriate language, or any other behavior that is a violation of the **Boys & Girls Club of Central Florida's Code of Conduct or Employee Handbook.** 

Adult staff and volunteers shall not:

- Initiate conversations with members about sexual matters. If a member initiates a conversation about sexual matters with a staff or volunteer, the adult shall limit the conversation to the child's immediate concerns and shall provide a written incident report to the supervisor within 24 hours; or
- Engage in off-site activities with members. Such interactions may include but are not limited to field trips, meetings, and communications via phone, text, and/or social media.
  - Exception: Club staff may attend, as audience members, events to support Club members such as graduations, athletic events, dramatic productions, or shows, etc. in which Club members are competing, performing, or in which they are showcased. Staff must be identifiable as BGCCF personnel and should be accompanied by other BGCCF staff or volunteers, when possible. Further, such participation must be reported to supervisor before attending such an event and the prohibition on any private one-to-one interactions in person or via electronic communications must be strictly followed when planning or attending such events.

All persons are prohibited from the access, display, production, possession, or distribution of pornography on Club premises or equipment.

Any suspected sexual abuse or misconduct will be treated as a serious matter and documented by a written incident report within 24 hours. When applicable, the incident will be reported to the appropriate authorities. All incident reports and information shall be maintained in a confidential manner. The Chief Executive Officer's written authorization for release shall be required.

# Prohibition of Private One-on-One Interaction Policy

Boys & Girls Clubs of Central Florida is committed to providing a safe environment for members, staff, and volunteers. To further ensure their safety, the organization prohibits all one-on-one interactions between Club members and staff and volunteers (including board members). All staff and volunteers must abide by the following:

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

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

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

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

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

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

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

- Private contact/communication is any communication, in person or virtual, that is between one youth
  member and one adult (18 or over) that takes place in a secluded area, is not in plain sight and/or is done
  without the knowledge of others. Private places can include but are not limited to vehicles, rooms without
  visibility to others, private homes, and hotel rooms. Examples of private contact include but are not limited
  to:
  - Meeting behind closed doors (in rooms without windows or visible sightlines) or any spaces that are not visible to others.
  - One staff member transporting one member in a vehicle.
  - Electronic communications (text, video, social media, etc.) between one member and one staff member or volunteer.
- **Public contact/communication** is any communication or meeting, in person or virtual, that is between at least three individuals, including two staff and one member, one staff and two members or variations of these combinations. Examples of public contact include but are not limited to:
  - Meeting in plain sight of others (e.g., in a quiet corner of an active games room).
  - Transporting members via public transportation (bus, taxis, train, air, etc.) or transporting multiple members.
  - Electronic communications (text, video, social media, etc.) between multiple members and adults (e.g., group chats).

# Prohibition of Private One-on-One Interaction Policy

 Public places can include but are not limited to buses, airports, shopping malls, restaurants, and schools.

#### Impact on mentoring programs

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

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

#### Impact on partnerships with local mentoring organizations

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

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

- When travelling to external events such as Keystone, Youth of the Year or other off-site events, the oneon-one policy shall continue to be followed.
- Should the Club take responsibility for transporting members to and/or from an event, one staff member should not transport one single child at any time in a vehicle. Accommodations shall be made to ensure at least three people (two staff and one member or one staff and two members) are together when traveling. As an alternative, public transportation may be used (e.g., taxi, Uber, public transport).
- If this arrangement presents staffing or budget challenges, consider the following:
  - o Inviting parents or guardians to attend and/or chaperone their child.
  - o Including additional youth (e.g., Junior Youth of the Year) and/or staff in travel plans.
  - o Coordinating with other Clubhouses or nearby organizations to travel together.
  - o Travelling with additional staff or members.
- Parents and guardians should also provide written consent in each instance in which a member travels to any off-site event. NOTE: Parents or guardians are never allowed to provide consent for one-on-one interaction.
- Similar practices should be in place when coordinating field trips.

#### Impact on transportation to and from the Club

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

# Prohibition of Private One-on-One Interaction Policy

Modify staff schedules to ensure multiple staff are present.

#### **Exceptions to policy**

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

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

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

- Disclosing the meeting to Club leadership (e.g., Service Director or Site Coordinator) and regularly checking in with the member and adult during conversations.
- Placing time limits on conversations.
- Meeting in rooms with clear sight lines (e.g., rooms with windows or glass doors).
- Documenting the interaction and providing a copy of documentation to supervisor by end of day.
- In an emergency, disclosing the situation to another staff member before engaging in one-on-one interaction.

#### **SUPERVISION**

Boys & Girls Clubs of Central Florida is committed to providing a safe environment. All Club activities and program spaces shall always be under continuous supervision by sight or sound (for restroom supervision) by an appropriate adult staff (18 or over). To ensure appropriate supervision, staff and volunteers:

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

#### **RATIOS**

All Club activities shall be under continuous supervision by an appropriate adult (18 and over), and reasonable ratios shall be maintained when supervising youth (never to exceed one staff to 20 youth). Ratios are based on the organization's experience, standards set by Club leadership, and local agencies or authorities' standards. Required ratios are below:

<u>Type</u>	<u>Staff</u>	<u>Youth</u>
Club-based activities	1	20
Field trip (6 -12 years old)	1	10
Field trip (teens, 13 years or older*)	1	15
Field trip (water parks, theme parks for ALL ages, 6-18 years old)	1	10
Overnight	1	6

#### **RESTROOM USAGE**

Boys & Girls Clubs of Central Florida is committed to providing a safe, clean environment and enforces the following restroom policy for members, staff, volunteers, and other adults.

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

#### **RESTROOM MONITORING**

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

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

Staff observing unacceptable restroom conditions or incidents shall:

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

#### SHARED-USE RESTROOMS

- On a field trip or when using a public restroom, youth shall never enter the restroom alone unless it is a single-stall restroom that is empty.
- Youth shall follow the "rule of three" in using public restrooms on field trips, with at least three youth and an
  adult walking to the restrooms and three youth entering a multi-stall facility together. The adult will remain
  outside the restroom door to provide auditory surveillance.
- Whenever possible, staff/volunteers will monitor and clear public restrooms before use by members to
  ensure that the facility is free of adults and clear of youth not involved in the Club program before
  allowing youth to use the facilities. Alternatively, staff members will stand in the restroom doorway and/or
  hold the door at least partially open when supervising member use of public restrooms. Staff may position
  themselves inside the restroom near the sinks if positioning at the door is not feasible or is deemed
  ineffective.
- In a shared-use facility, Boys & Girls Clubs will utilize the best practice of shutting the exterior door to the restroom and using an "Occupied" or similar-type of sign or a physical barrier outside of the door to alert others that they must wait until Club members have exited the restroom before they can enter. In shared-use facilities where this is not possible, staff will send three youth at a time and provide monitoring.

#### **SAFE PASSAGE**

For all children's safety, members are not permitted to come and go from the Club as they wish. Once youth leave for the day, they may not return until the next day. Please review this policy with your child(ren).

- Members must scan in and out of the facility with their Club card each day.
- Members under the age of 12 must be retrieved from the Club by a parent, guardian, or other authorized adult. In the case of a parent with a disability, staff will make accommodations to safely bring the Club members out to the adult picking up the members.
- Members age 12 or older may leave the Club unescorted with written permission from a parent or guardian and signed release of liability.
- Members 12 and older may also escort other members of their household from the Club (with written permission).
- No member, regardless of age, will be allowed to return to the Club once they leave the premises for the day. Exceptions may be made in the case of doctor appointments where parent or guardian picks up and returns child(ren) to the Club. The Club's Service Director/Site Coordinator must approve in advance.
- Members that leave unescorted without written permission will face disciplinary actions up to and including suspension and termination of membership.

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#### **OVERNIGHT FIELD TRIPS**

Boys & Girls Clubs of Central Florida is committed to ensuring the safety of our Club members while on trips away from the Club on overnight field trips.

- Overnight trips must be approved in advance by BGCCF leadership (CEO or COO).
- Staff and other adult chaperones are prohibited from sharing the same hotel or dorm room as Club members and will follow guidelines prohibiting private one-on-one interactions with Club members.
- Club members will share rooms with those of a similar gender,
- Teen members are prohibited from sharing rooms with youth members.
- When multiple Club members are participating in an overnight field trip a minimum of three Club members will share a room, when possible.

#### **ENTRANCE AND EXIT CONTROL**

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

All exit doors shall have an audible alarm to discourage unauthorized use to exit or enter the facility.

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

#### **FACILITY CONDITION**

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

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

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

#### **FOOD AND DRINK**

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

#### **HEALTH INFORMATION / MEDICATION**

In order to maintain a healthy environment, we will not permit sick children in the Club. If a child becomes ill during programming, a parent, guardian or authorized person will be called to pick the child up. In case of a communicable illness (e.g., ringworm, pink eye, lice, chicken pox), the member will not be able to return until an administrator has received a release note from the doctor. If your child has allergies, asthma, or any other medical need, please provide an emergency plan for staff to follow in order to better assist your child.

It is the policy of Boys & Girls Clubs of Central Florida that we do not administer any form of medication.

#### **Emergency Medication**

Policy prohibits Boys & Girls Clubs of Central Florida to administer prescription or over-the-counter medications of any kind. This includes skin cream, sunscreen, and insect repellant. If your child requires emergency medication, such as an inhaler or Epipen, you are required to provide the medicine in its original packaging and a medical form, provided by Boys & Girls Clubs of Central Florida, must be completed by parent and doctor prior. All emergency medications are locked up at your child's Club. (Medicines that are out-of-date or not in the clearly labeled original container will not be permitted.) Should a situation arise where your child needs emergency medication, Club staff will then allow him or her access to their emergency medication and allow him or her to administer the medication themselves. Club staff will not administer medication to a child unless your child is unable to physically administer the medication, i.e., a severe asthma attack or anaphylactic shock.

Parents will be notified immediately when a child needs access to their emergency medication.

### **Transportation Policy**

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

#### **DRIVERS**

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

#### **VEHICLE**

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

#### ACCIDENT OR EMERGENCY PROTOCOL

- Driver should immediately notify Club leadership if there is a delay or issue (e.g., breakdown, accident, emergency) with transporting members to and from the Clubhouse or Club-related activities, after calling 911 in case of vehicle emergency requiring immediate assistance.
- Staff shall immediately inform Club leadership if a staff member, volunteer, or board member violates this
  policy. In such case, the organization will take appropriate disciplinary action, up to and including
  termination.

Transportation Policy	
Through the appropriate use of Club and community resources, Boys & Girls Clubs strive to mitigate the immediate effects of an emergency and its long-term effects on Club operations and mission by being prepared to effectively respond to and recovery from an emergency.	
See "Transportation Emergency" section of Crisis Management and Emergency Response Plan for list of specific action steps depending on the magnitude of the accident or vehicular emergency.	
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### **Incident Management Policy**

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

#### **GENERAL INCIDENT DESCRIPTION**

Safety incidents can include but are not limited to:

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

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

#### INTERNAL INCIDENT REPORTING

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

The following information shall be included on an Incident Report:

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

#### EXTERNAL INCIDENT REPORTING

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

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

### **Incident Management Policy**

#### INCIDENT INVESTIGATION

Boys & Girls Clubs of Central Florida takes all incidents seriously and is committed to supporting external investigations of all reported incidents and allegations or internal investigations by the Safety Committee when not an externally reportable incident.

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

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

#### **BGCA CRITICAL INCIDENT REPORTING**

Each Member Organization shall immediately report any allegation of abuse or potential criminal matter to law enforcement. In addition, each Member Organization shall report the following critical incidents to BGCA within 24 hours:

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

### **Screening and Onboarding Policy**

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

#### **BACKGROUND CHECKS**

Boys & Girls Clubs of Central Florida conducts criminal background checks of all employees, including minors; board volunteers and others who serve on a standing committee; and all other volunteers, including partners and minors, who have direct repetitive contact with minors.

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

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

Such checks will be conducted prior to employment and at regular intervals not to exceed twelve months and will include:

- (1) A Federal Bureau of Investigation fingerprint check using Next Generation Identification;
- (2) A search of the National Crime Information Center's National Sex Offender Registry; and
- (3) A search of the following registries, repositories, or databases in the State where the child care staff member resides and each State where such staff member resided during the preceding five years:
- (i) State criminal registry or repository, with the use of fingerprints being:
  - (A) Required in the State where the staff member resides;
  - (B) Optional in other States;
- (ii) State sex offender registry or repository; and
  - (iii) State-based child abuse and neglect registry and database.

All background check findings shall be considered when making employment or volunteer decisions, and Boys & Girls Clubs of Central Florida will not employ potential staff or engage potential volunteers if such individual:

- a. Refuses to consent to a criminal background check.
- b. Makes a false statement in connection with such criminal background check.
- c. Is registered, or is required to be registered, on a state or national sex offender registry.
- d. Has been convicted of a felony consisting of:
  - 1. Murder
  - 2. Child abuse
  - 3. Domestic violence
  - 4. Abduction or human trafficking
  - 5. A crime involving rape or sexual assault
  - 6. Arson
  - 7. Weapons

### **Screening and Onboarding Policy**

- 8. Physical assault or battery
- 9. Drug possession, use or distribution in the last five years
- 10. See full list of barrier crimes at:
  <a href="http://www.leg.state.fl.us/Statutes/index.cfm?App">http://www.leg.state.fl.us/Statutes/index.cfm?App</a> mode=Display Statute&Search String=&URL=0 400-0499/0435/Sections/0435.04.html
- e. Has been convicted of any misdemeanor or felony against children, including child pornography.

#### INTERVIEWING

Boys & Girls Clubs of Central Florida will conduct in-person behavioral-based interviews with every candidate for employment or program volunteer service. BGCA will provide behavioral-based interview questions for local use.

#### REFERENCE CHECKS

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

#### STAFF AND VOLUNTEER ONBOARDING

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

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

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

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

### **Youth Worker Policy**

Boys & Girls Clubs of Central Florida is committed to providing a safe environment for youth workers. As part of that commitment, the organization implements policies, procedures and training for the protection of youth workers.

#### **DEFINITIONS**

"Youth worker" is used as an umbrella term to describe all minors, defined as youth under the age of 18, who work in Clubs as official staff/employees, non-member youth volunteers or work-based learning participants.

#### TRAINING AND ONBOARDING FOR YOUTH WORKERS

Boys & Girls Clubs of Central Florida is committed to ensuring that youth workers understand the safety implications of working in the Club. All youth workers, including minor employees and work-based learning participants, will participate in the required number of hours of safety training each year before they work with any Club members. These trainings will be incorporated into the onboarding of youth workers.

#### ADULT-TO-YOUTH INTERACTIONS

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

- Carpool with youth workers for any reason.
- Invite youth workers to after-work non-Club-sponsored events.
- Text, use social media or participate in online gaming with teens.
- Interact with youth workers one-on-one or outside of the Club or Youth Center.

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

#### PEER-TO-PEER INTERACTIONS

Boys & Girls Clubs of Central Florida is committed to providing a safe environment for members, staff and volunteers, including youth workers. Youth who are working and/or volunteering in the Club may already have relationships and interactions with other youth in the program. Accordingly, the organization realizes the importance of making clear distinctions whenever peer-to-peer interactions are involved.

**Distinction of Youth Workers on Duty:** Clear distinctions will be maintained between youth workers on duty and not on duty. These distinctions will leave no gray lines between the times when youth workers are working and when they are not.

**Assignment of Youth workers:** Youth workers will be assigned to work with youth outside of their age group.

**Interactions with Youth Outside of Assigned Duties:** Youth who work in the Club as employees or volunteers may have pre-existing relationships with Club members. Youth are expected to disclose those relationships with the human resources manager or volunteer coordinator at the beginning of their service.

Minor employees and non-Club member teen volunteers should not interact with youth outside of their Club peer group outside of the Club environment, unless the youth in question are siblings or a pre-existing relationship has been disclosed to the supervisor and/or coordinator before work begins.

Youth Worker Policy	
Work-based learning participants are participants in a Club-sanctioned program and therefore are not affected by this protocol.	
See Youth Worker Policy and Procedures Handbook for further guidance on youth workers.	
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### **Drug- and Alcohol-Free Workplace Policy**

#### DRUG AND ALCOHOL POLICY

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

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

Boys & Girls Clubs of Central Florida further reserves the right to take any and all appropriate and lawful actions necessary to enforce this drug- and alcohol-free workplace policy, including but not limited to the inspection of organization-issued lockers, desks, or other suspected areas of concealment, as well as an employee's personal property when the organization has reasonable suspicion to believe that the employee has violated this policy.

#### **SMOKING POLICY**

Boys & Girls Clubs of Central Florida will comply with all applicable federal, state, and local regulations regarding non-smoking in the workplace in order to provide a work environment that promotes productivity and the well-being of its employees. Smoking in the workplace can adversely affect members, employees, and volunteers. Accordingly, smoking is restricted at all its facilities.

Smoking is defined to include the use of any tobacco-containing products, including cigarettes, cigars, and pipes, as well as the use of electronic cigarettes (e-cigarettes) and vaporizers.

Smoking is prohibited at all Boys & Girls Clubs of Central Florida properties. The smoking policy applies to employees, volunteers, and members while on Club premises or during Club activities (on or off site).

#### REASONABLE SUSPICION

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

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

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

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

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

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

#### **INSPECTION AND TESTING**

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

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

#### PRESCRIPTION MEDICATION AND LEGAL DRUGS

Employees and volunteers are prohibited from reporting to work or working when using any legal drugs, except when the use is pursuant to a doctor's orders and the doctor has advised the employee or volunteer that the substance does not adversely affect the employee's or volunteer's ability to safely perform his or her duties.

Employees and volunteers taking a legal drug, such as prescription medication, that potentially affects job safety or performance are responsible for notifying their supervisor and/or Club leadership so that a determination of job performance or reasonable accommodation can be made. An employee/volunteer may not be permitted to perform his or her job duties unless such a determination or reasonable accommodation is made.

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

#### **CLUB MEMBER USAGE**

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

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

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

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

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

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

Parents/guardians will be notified before such an inspection takes place and may be present, at their choice, during the inspection. Parents/guardians may refuse to allow such inspections, but the member may be barred from bringing personally owned devices to the Club in the future.

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

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

- Obscene, profane, lewd, vulgar, rude, inflammatory, threatening, or disrespectful language or images typed, posted, or spoken by members;
- Information that could cause damage to an individual or the Club community or create the danger of disruption of the Club environment;
- Personal attacks, including prejudicial or discriminatory attacks;
- Harassment (persistently acting in a manner that distresses or annoys another person) or stalking of others;

### Technology Acceptable Use Policy CONTINUED

- Knowingly or recklessly posting false or defamatory information about a person or organization; or
- Communication that promotes the destruction of property, including the acquisition or creation of weapons or other destructive devices.

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

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

Examples of cyberbullying include, but are not limited to:

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

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

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

**Monitoring and inspection:** Boys & Girls Clubs of Central Florida reserves the right to monitor, inspect, copy, and review files stored on Club-owned devices or networks. In addition, Boys & Girls Clubs of Central Florida reserves the right to inspect and/or review personally owned devices that are brought to the Club.

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

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

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

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

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

#### STAFF AND VOLUNTEER USAGE

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

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

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

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

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

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

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

Inappropriate communication includes but is not limited to:

- Obscene, profane, lewd, vulgar, rude, inflammatory, threatening, or sexual content or disrespectful language or images typed, posted, or spoken by staff or members.
- Information that could cause conflict.
- Personal attacks, including prejudicial or discriminatory attacks.
- Harassment (persistently acting in a manner that distresses or annoys another person) or stalking others.
- Knowingly or recklessly posting false or defamatory information about a person or organization.

 Communication that promotes the destruction of property, including the acquisition or creation of weapons or other destructive devices.

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

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

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

Examples of cyberbullying include but are not limited to:

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

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

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

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

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

**Password and access:** To prevent unauthorized access, devices must lock themselves and require authentication using the strongest features available on the device. A minimum standard would require a typed password of at least six characters or numbers, though some devices utilize fingerprint or other biometric technologies.

**Disallowed apps and/or websites:** This organization does not allow staff to access the following apps and/or websites during work hours: social media, online dating, sites that are adult or violent in nature. This is not a comprehensive list and is subject to change.

#### **GUARDING ONLINE/INTERNET INFORMATION**

Internet postings must not disclose any confidential or proprietary information pertaining to any and all aspects of Boys & Girls Clubs of Central Florida, its members and its partners. Employees should disclose only information that had been made publicly available by the organization through external communications/marketing. It is permissible, and encouraged when relevant, for employees to "Share" content created by Boys & Girls Clubs of Central Florida's Marketing Department and posted to the organization's social media channels.

Internet postings may **NOT** contain any of the following information relating to BGCCF:

- Confidential information of any kind (information and photos on our members, employees, etc.)
- There will be **NO** personal online interaction between employees and members. Employees are not allowed to "friend" members on their personal pages.
- All posts and online communications on BGCA or BGCCF sites must be available for all who
  visit the site to view. (Just as one should never take a child into a room without another
  employee, one should not have a private conversation online with members.)
- Non-Public legal communications.
- Any information on activities, programs, members, employees, etc., including photos should NOT be posted on personal social media sites.
- If employees are contacted by a member of the media or by an elected official about their social media postings related to BGCCF, they should contact the Marketing and Communications team for further instructions.

### **Video Surveillance Policy**

#### **USE OF VIDEO SURVEILLANCE**

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

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

#### PLACEMENT AND NOTIFICATION

Video surveillance equipment may be installed in and around Club facilities, property, and vehicles. The system provides constant monitoring 24/7 (is activated and records when motion is detected). Video surveillance equipment **will not be** used or installed in areas where Club Members, staff, and parents/guardians have a reasonable expectation of privacy, such as locker rooms and restrooms. Video surveillance equipment may always be in operation, whether the Club is operational and whether the facilities or buildings are in use at all. The CEO or COO will determine the operation schedule of any video surveillance equipment in its discretion.

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

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

#### **ACCESS TO VIDEO IMAGES**

The use of video surveillance equipment on Club grounds shall be supervised and controlled by the CEO, Chief Operations Officer, Director of Club Operations, Director of Informational Technology, Director of Facilities & Fleet Services, and Club Service Directors. The actual recording equipment will be maintained in an area or room that is locked and secure to only be accessed by authorized personnel. Live video monitoring may randomly occur as needed.

Video data is recorded and stored digitally. Video recording data is considered confidential and secure. Access to live and video recorded data is **strictly limited** to the following authorized full-time Boys & Girls Club personnel: CEO, Chief Operations Officer, Director of Club Operations, Director of Informational Technology, Director of Facilities & Fleet Services, and Club Site Directors. These authorized personnel are trained on the video surveillance policy and how video data should be used during any official investigation.

Permission may be granted for partners such as school districts, governmental agencies, law enforcement, etc. to access footage should they request it and Boys & Girls Clubs of Central Florida's CEO or COO deem it appropriate to share.

Video recording data may be used as evidence that a Club member, parent/guardian, staff member, volunteer, or other person has engaged in behavior that violates state or local law, policies, and/or Club rules. Video footage is subject to production by a valid subpoena or other court order.

### **Video Surveillance Policy**

#### UNAUTHORIZED ACCESS AND/OR DISCLOSURE

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

Club personnel and volunteers are prohibited from unauthorized use of, tampering with or otherwise interfering with video surveillance equipment. Violations will be subject to disciplinary action that may include, but are not limited to, written reprimand, suspension, demotion, or termination of employment.

Video recording data will remain the property of the Boys & Girls Clubs of Central Florida and may be reproduced only in accordance with applicable law and board policy.

#### RETENTION OF DIGITAL IMAGES

Video recording data shall be kept for approximately 30 days except for appropriate still shots or selected portions of the recorded data relating to any incidents under investigation by authorities. The latter shall be retained for one year after the incident or until such time as any legal matters pertaining to the recordings have been resolved. The stored media shall be kept on a secured computer.

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

#### **CLUB MEMBER PRIVACY**

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

Authorized Club personnel may use a still shot or selected portions of recorded data to request law enforcement review for assessing the security risk of a specific individual or for investigating a potential crime on Club property. A copy of this policy will be shared with any Club member, parent/guardian, or staff member upon request.

### **Emergency Operations Plan Policy**

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

Boys & Girls Clubs shall create and maintain an Emergency Operations Plan (EOP). At minimum, the plan shall encompass the following elements:

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

#### **EOP ANNUAL REVIEW**

Boys & Girls Club of Central Florida leadership will maintain a board-led safety committee that regularly focuses on safety and will have oversight and responsibility for the emergency operations plan. The board-led safety committee will be responsible for reviewing and updating the emergency operations plan annually.

#### FIRST AID AND CPR TRAINING

Boys & Girls Clubs of Central Florida always maintains a minimum of one CPR- or first-aid-trained staff on site during all operating hours when members are being served.

#### **KEY DEFINITIONS**

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

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

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