



**FOR YOUTH DEVELOPMENT®
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY**

CHILD ABUSE PROTECTION

**Policies & Procedures
YMCA OF MONTCLAIR**

Our Commitment to Child Protection

As a youth-serving organization that reaches 8 million children and teens every year, the Y's most important work is creating safe environments for young people. That any child or teen would experience harm in our care is unacceptable. Ensuring the safety and well-being of young people is foundational to everything we do at the Y to help them learn, grow and thrive.

How We Create Safe Spaces for Children and Teens

As an organization, we have taken the following actions to keep kids safe in our Y facilities, camps and programs and maintain the reputation of safety we have built during our 175-year history.

All Y's in the U.S. are required to implement child sexual abuse protection practices and policies to remain a member in good standing with the National Council of YMCAs. These requirements include:

- Completing a child abuse prevention self-assessment (created by a Y-USA-approved vendor) at least every two (2) years and implement an Action Plan to address opportunities for improvement.
- Having a policy that requires criminal background checks for staff and volunteers.
- Providing and requiring annual training for staff and high-access volunteers on preventing and responding to youth-to-youth sexual activity and adult-to-child sexual activity or abuse
- In addition to requiring all staff and volunteers to report child abuse in accordance with applicable laws, all allegations of sexual abuse or victimization of minors (under 18) involving Y staff, volunteers, members, or participants must be reported to the appropriate authorities.
- Having a policy that requires screening all adults against a national sex offender registry and written protocol for how to respond when adults are identified as registered sex offenders
- Implementing policies that define boundaries with youth
- Implementing procedures for identifying and managing high-risk activities
- Assigning youth protection to a leadership staff member's responsibilities and a committee's chart of work
- Reporting the following events to Y-USA:
 - Allegations and/or criminal charges of child abuse, child sexual exploitation, or child sexual misconduct involving a current or former YMCA staff, volunteer, or member (including incidents related to the YMCA and outside of the YMCA)
 - Allegations of sexual abuse, sexual exploitation, or sexual misconduct between youth participants in attendance at a YMCA and/or enrolled in YMCA activities.

The YMCA of Montclair has zero-tolerance for abuse and will not tolerate the mistreatment or abuse of members in our 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.

The YMCA of Montclair has zero-tolerance for abuse, mistreatment, or sexual activity among members, volunteers, employees, and program participants within the organization. Our YMCA is committed to providing all members with a safe environment and will not tolerate the mistreatment or abuse of one member by another member. Conduct by members 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, our organization will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are harmful to the program, participants and the organization will take the necessary steps to eliminate such behavior.

The YMCA Child Abuse prevention policies and procedures are to be regularly communicated with staff members, volunteers, and parents. All YMCA employees and volunteers are to be encouraged to report any deviation from these policies immediately. As a YMCA staff member or volunteer, your understanding and enforcement of these policies and procedures is essential to keeping youth safe at the YMCA!

The YMCA of Montclair requires all employees and volunteers to sign a statement of acknowledgement and compliance with all Child Abuse Prevention policies and procedures upon hire and repeated annually.

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YMCA of Montclair Code of Conduct

To protect YMCA staff members, volunteers, and program participants, all staff members and volunteers must adhere to the code of conduct. While the YMCA does not discriminate against an individual's lifestyle, it does require that staff members and volunteers abide by the standards of conduct set forth by the YMCA in the performance of their job.

Staff members & volunteers are expected to:

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| <ol style="list-style-type: none"> 1. To protect YMCA staff, volunteers, and program participants – at no time at the YMCA or during a YMCA program may an employee or volunteer be alone with a single child where they cannot be observed by others. As staff supervises children, they should space themselves in a way that other staff can always see them. 2. Never leave a child assigned to your care unsupervised. 3. Ensure that restrooms are not occupied by suspicious or unknown individuals before allowing children to use the facilities. <ul style="list-style-type: none"> • Stand in the doorway while children are using the restroom. This policy allows privacy for the children and protection for the staff members and volunteers (not being alone with a child). • If assisting younger children, doors to the facility must remain open. • No child regardless of age should ever enter a bathroom alone on a field trip. • Always take children in groups of at least three. • Volunteers should refrain from supervising restroom activities. 4. Conduct or supervise private activities in pairs (diapering, putting on bathing suits, taking showers, etc.). When this is not feasible, staff members and volunteers should be positioned so that they are visible to others. 5. Use positive techniques of guidance, including redirection, positive reinforcement, and encouragement rather than competition, comparison and criticism. Expectations, guidelines, and environment minimize the need for discipline. Physical restraint is used only in pre-determined situations (necessary to protect the child or other children from harm), is only administered in a prescribed manner and must be documented in writing. 6. Conduct a health check of each child, each day, as they enter the program, noting any fever, bumps, bruises, burns, etc. Questions or comments will be addressed to the parent or child in a non-threatening way. Any questionable marks or responses will be documented. 7. Respond to all, adults, and children alike, with respect and consideration and treat all equally regardless of sex, race, religion, culture, sexual orientation, and/or gender identity. | <ol style="list-style-type: none"> 8. Respect children's rights to not be touched, stared at, or commented about, in ways that make them feel uncomfortable, and their right to say no. Other than diapering, children are not to be touched in areas of their bodies that would be covered by a bathing suit. 9. Appear clean, neat, appropriately attired and present yourself in a respectful and positive manner. 10. Be free of physical, emotional, or psychological conditions that might adversely affect children's physical or mental health. If in doubt, an expert should be consulted. 11. Act as positive role models for youth and are expected to maintain an attitude of respect, loyalty, patience, courtesy, tact, and maturity. 12. Read, sign, and abide by all policies including those related to identifying, documenting, and reporting child abuse and must follow all mandatory reporting requirements. The YMCA cooperates fully with the authorities to investigate all cases of alleged abuse. Any staff members or volunteer shall fully cooperate during any external investigation by outside authorities or internal investigation conducted by the YMCA of Montclair or persons given investigative authority by the YMCA of Montclair. Failure to cooperate fully may be grounds for termination. 13. Stop the mistreatment or abuse of one youth by another youth. In addition, the YMCA of Montclair will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such behaviors are disruptive, will take steps to eliminate such behavior. 14. Report concerns or complaints about other staff members, volunteers, adults, or youth to your YMCA supervisor or to Ethics Point's anonymous hotline at 800-524-1255 toll free or you may file a report online https://secure.ethicspoint.com/domain/en/default_reporter.asp. 15. Staff are required to attend annual child abuse prevention training and to read, sign and abide by all policies and procedures related to child abuse prevention. 16. Act in a manner consistent with Y values in all aspects of life. |
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Staff members and volunteers are prohibited from:

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| <ol style="list-style-type: none"> 1. Engaging in child abuse including: <ul style="list-style-type: none"> • physical abuse – striking, spanking, shaking, slapping • verbal abuse – humiliating, degrading, threatening • sexual abuse – inappropriate touch or verbal exchange • mental abuse – shaming, withholding love, cruelty • neglect – withholding food, water, basic care, etc. • Any type of abuse will not be tolerated and may be cause for immediate dismissal. 2. Being alone with children they meet in YMCA programs outside of the YMCA. This includes babysitting, sleepovers, and inviting children to your home. Any exceptions require a written explanation before the fact and are subject to approval by the Vice President of Human Resources. 3. Keeping secrets with youth and will only give gifts with prior permission. 4. Engaging in intimate displays of affection towards others in the presence of children, parents, and staff. 5. Using, possessing or being under the influence of alcohol during working hours. Should alcohol be served or available at sponsored events or business meals, employees are expected to act responsibly. 6. Using, possessing, or being under the influence of illegal drugs or marijuana during working hours. | <ol style="list-style-type: none"> 7. Smoking or use of tobacco in the presence of children or parents during working hours. 8. Engaging in any private electronic communication between staff/volunteers and youth, including the use of social networking websites and from posting pictures of members under the age of 18 without written permission from parents/guardians & Supervisor 9. Using profanity, telling inappropriate jokes, sharing intimate details of one's personnel life, and any kind of harassment in the presence of children or parents. 10. Transporting YMCA children in their own vehicles and when in YMCA vehicles will follow, at minimum, the two adults or the three-person rule. 11. Releasing, under any circumstances, children to anyone other than their authorized parent, guardian, or other adult listed on their written parent authorization on file with the YMCA. 12. Dating program participants under 18 years of age. 13. Retaliating toward an employee, volunteer or member who has reported any policy violation or reports a violation under federal or state laws. 14. Being convicted of youth abuse, indecency with youth, or injury to a youth. |
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Staff members and volunteers should refer to this document for additional guidance on acceptable and unacceptable practices and seek advice from their YMCA supervisor for further clarification.

II. General Definitions

A. Types of abuse

1. **Physical abuse** is defined as a non-accidental (intentional) delivery of physical harm or trauma that was caused by beating, punching, kicking, burning, biting or otherwise harming a child; as a result of these violent actions, physical abuse is the most tangible form of child abuse or maltreatment.
2. **Sexual abuse** is any contact of a sexual nature that occurs between a youth and an adult or between two youths. This includes any activity which is meant to arouse or gratify the sexual desires of the adult or the other youth.
3. **Emotional abuse** sometimes called psychological abuse, is a pattern of behaviors where one person subjects another person to nonphysical acts that harm another person's overall ability to function and their mental well-being.
4. **Neglect** is the failure to provide for a youth's basic needs or the failure to protect a youth from harm.

B. Volunteer Types

High-Access Volunteer – a volunteer who often interacts or over an extended period with youth in our programs. Such volunteers may be readily known to program participants 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 program participants and members, and such volunteers may have opportunities to develop relationships with consumers over time. Examples include a volunteer program instructor, a regularly scheduled volunteer coach, or a mentor for a program participant or member.

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

III. Policies

Annual Abuse Training –The YMCA of Montclair recognizes the importance of providing training and professional development activities that relate to our employee and volunteer roles and responsibility. All employees are responsible for annually completing training on the following concepts:

- Policies related to preventing and responding to abuse.
- How to maintain appropriate boundaries with youth and other members.
- Additional topics that contribute to employee and volunteers’ skills and knowledge related to child abuse. These may vary according to your role within the Y.

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

Annual Policy Review–The YMCA of Montclair will annually review existing abuse prevention policies and procedures outlined in this manual to ensure the purpose and the goal of the policies are 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 procedures. The YMCA of Montclair will communicate changes to organizational policy manuals and/or procedures in writing within seven days of the change. As applicable the changes will also be communicated to our members and/or parent/guardians. Any training necessary to effectuate policy or procedure changes will be assigned to relevant employees and volunteers and is expected to be completed by the timeline provided.

A. Physical Contact

The YMCA of Montclair’s physical contact policy promotes a positive, nurturing environment while protecting youth, staff members and volunteers. The YMCA of Montclair encourages appropriate physical contact with youth and prohibits inappropriate displays of physical contact. Any inappropriate, physical contact by staff members or volunteers towards youth in the YMCA of Montclair’s programs will result in disciplinary action, which may include termination of employment.

The YMCA of Montclair’s policies for appropriate and inappropriate physical interactions are:

Appropriate Physical Interactions	Inappropriate Physical Interactions
<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 • Verbal praise • Pats on the head when culturally appropriate • Touching hands, shoulders, and arms • Arms around shoulders • Holding hands (with young children in escorting situations) 	<ul style="list-style-type: none"> • Full-frontal hugs • Kisses • Showing affection in isolated area • Lap sitting • Wrestling • Piggyback rides • Tickling • Allowing a youth to cling to an employee’s or volunteer’s leg • Any type of massage given by or to a youth • Any form of affection that is unwanted by the youth or the staff member or volunteer • Compliments relating to physique or body development • Touching bottom, chest, or genital areas except as required for diapering

B. Verbal Interaction

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

The YMCA of Montclair' policies for appropriate and inappropriate verbal interactions are:

Appropriate Verbal Interactions	Inappropriate Verbal Interactions
<ul style="list-style-type: none">• Positive reinforcement• Appropriate jokes• Encouragement• Praise	<ul style="list-style-type: none">• Name-calling• Discussing sexual encounters or in any way involving youth in the personal problems or issues of staff members and volunteers• Secrets• Cursing• Off-color or sexual jokes• Shaming• Belittling• Derogatory remarks• Harsh language that may frighten, threaten or humiliate youth• Derogatory remarks about the youth or his/her family

C. One-on-One Interaction

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

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

Guidelines for One-on-One Interactions

- When meeting one-on-one with a youth, always do so in a public place where you are in full view of others.
- Avoid physical affection that can be misinterpreted. Limit affection to pats on the shoulder, high-fives, and handshakes.
- If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by.
- Inform other staff members and volunteers that you are alone with a youth and ask them to randomly drop in.
- 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.

1. Tutoring/ Private Coaching:

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

- a. Staff members and volunteers must have supervisor approval for any tutoring or private coaching sessions.
- b. Tutoring and coaching sessions with the YMCA of Montclair's youth may not occur outside of the YMCA of Montclair.
- c. Supervisors must keep a schedule of private tutoring and coaching sessions, which should include times, youth involved, and location of sessions.

2. Unplanned One-on-One Interactions:

While the YMCA of Montclair strives to avoid opportunities for staff members or volunteers to be left alone with one child, circumstances may arise where this may occur. In those circumstances, the staff member or volunteer should:

- a. Move to an open, public area where they can be viewed by others.
- b. Immediately contact a supervisor by phone if no other adults are within view. Under these circumstances, a phone or video call is the preferred method of contact. The supervisor should remain on the call with the staff member or volunteer until they are no longer alone with only one child.
- c. Supervisors must document the circumstances that caused the one-on-one situation to occur and take steps to prevent a recurrence.

D. Interactions between Employees and Volunteers Outside of the YMCA

Many cases of organizational abuse occur off-site and outside of regularly scheduled activities. This contact outside of regularly scheduled activities may put staff members, volunteers, and the YMCA of Montclair at increased risk.

The YMCA of Montclair prohibits interactions outside of regularly scheduled program activities unless approved by the YMCA of Montclair's Executive Directors.

Appropriate Outside Contact	Inappropriate Outside Contact
<ul style="list-style-type: none">• Taking groups of youth on an outing• Attending sporting activities with groups of youth• Only with a parents invitation and presence at a youth's home may accept a function invitation.	<ul style="list-style-type: none">• Taking one youth on an outing without the parents' written permission• Visiting one youth in the youth's home, without a parent present• Entertaining one youth in the home of staff members or volunteers• A lone youth spending the night with staff members or volunteers

In addition, when outside contact is unavoidable, or when a relationship with a YMCA youth member exists prior to YMCA employment or volunteer service, staff members and volunteers may request an exception to the YMCA's off-site contact policy. To do so, the following steps must be followed:

1. Staff members and volunteers should immediately report any need for outside contact or pre-existing relationships with youth to their supervisors. Supervisors should discuss the contact or relationship with the staff member or volunteer and review the YMCA's off-site contact expectations.
2. Staff members or volunteers wishing to continue the off-site contact or relationship must submit the request in writing to the supervisor.
3. Supervisors should forward the request for outside contact to the Vice President of Human Resources.
4. The Executive Director of Risk Management will review the request and issue a response. To properly process the request, additional information may be required.
5. Such request will not be approved until the YMCA obtains the parents' permission to engage in outside contact with the youth by requiring the parents to sign a release-of-liability statement.

E. Electronic Communications and Social Media

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

The following are examples of appropriate and inappropriate Electronic Communications and Social Media:

Appropriate Electronic Communications	Inappropriate Electronic Communications
<ul style="list-style-type: none"> • Sending and replying to emails and text messages from youth ONLY when copying in a supervisor or the youth's parent • Communicating through "YMCA of Montclair group pages" on Facebook or other approved public forums • "Private" profiles for staff members and volunteers which youth cannot access 	<ul style="list-style-type: none"> • Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating comments • Sexually oriented conversations • Private messages between staff members and/or volunteers with youth • Posting pictures of YMCA of Montclair participants on social media sites • Posting that you work for the YMCA and your personal social media pages have inappropriate comments, pictures, or unsavory content. • "Friending" participants on social networking sites

In addition, the YMCA of Montclair provides this information to parents so that they know what is considered appropriate and inappropriate electronic communication.

1. Cell Phone & Other Electronic Device Use:

While assigned to work with youth, staff members and volunteers are not permitted to use electronic communications devices except for approved business uses (sign in out, file access, etc.) and during approved breaks and emergency situations. Internet use, text messaging and/or emailing pictures while assigned to work with youth is strictly prohibited regardless of the type of device used and whether for business or personal reasons. Employees need to ensure that friends and family members are aware of this policy.

Contacting YMCA of Montclair members and/or program participants for personal and/ or inappropriate reasons shall be grounds for discipline up to and including termination of employment.

2. Acceptable Use of Cell Phones & Other Electronic Device During Program Hours:

There are occasions in which staff members and volunteers will need to use personal or YMCA of Montclair issued electronic communication devices. In these cases, staff members and volunteers will have explicit direction from supervisors governing use. Situations which may require use of issued or personal electronic communication devices include:

- a. Sign In/Out
- b. Field Trips
- c. Off-site Programs
- d. Emergencies

F. Gift Giving

The YMCA of Montclair strongly encourages employees and volunteers to refrain from personally exchanging gifts with members and program participants. However, gifts to members and program participants 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. The minors parents/guardians must be notified about the gift item and why the minor is receiving the gift.
4. Employees and volunteers are prohibited from giving gifts to individual members/program participants except when the gift is authorized by a supervisor or designated administrator and given to all members/program participants (i.e., celebration of special events/holidays or group recognition).

Gift Acceptance

Sometimes it may be difficult to refuse gifts from members or their families. In many cultures, people give gifts to reflect their appreciation for people or services. In order to be respectful of members/program participants and their families, the YMCA of Montclair makes reasonable allowances for acts of gratitude involving small gifts of appreciation from members and/or their families that have a monetary value not exceeding \$100. Employees must disclose all such gifts to their immediate supervisor. Under no circumstances can money (cash/checks) be accepted from members/program participants or their families as a gift.

G. Mandated Reporting/Cooperating with Investigations

All YMCA staff and volunteers are mandated reporters regarding child abuse. Any evidence of potential child abuse or observation of inappropriate contact by a parent, staff or volunteer member or other child will be reported to the YMCA to the New Jersey Division of Youth and Family Services at 1-800-792-8610 or 1-877-NJ-ABUSE (877-652-2873).

The YMCA of Montclair 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 and volunteers shall cooperate with any external investigation by outside authorities or internal investigation conducted by the organization or persons given investigative authority by the organization. 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.

IV. Monitoring and Supervision

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

A. 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. Designated staff members must complete a site inspection checklist to ensure that all the locations are properly and consistently monitored.

B. Checking Members into a Facility:

1. When anyone (members, guests, contractors, maintenance, cleaning crews, etc.) enters the facility during operational hours, they must check in with the front desk.
2. All unmonitored entry/exit doors must always be locked & secure.

C. General Supervision

General supervision procedures:

1. Administrative and Supervisory Visits to Youth Programs- Youth supervisors and administrators regularly visit all youth programs to ensure that all activities are well-managed and that youth policies are observed by all in attendance. Scheduled and unscheduled visits are to be documented in writing and inspections/evaluations are to be kept in the supervisors office for a minimum of 3 years.
2. Ratios- Each program will follow the ratio requirements that are directly related to the goals of the program and the design of the program area. The staff or volunteer-to-youth ratio should be adjusted for programs that serve youth with special needs.
3. Mixed Age Groups- In most incidents involving one youth abusing another youth, the youth are from different age groups. Each program is responsible for establishing specific guidelines for additional monitoring and supervision of activities that involve youth from different age groups. Staff members and volunteers must be aware that close line of sight supervision is required when monitoring programs that mixed age groups.

D. Inclusive Environment

At the Y, we know communities can be safe, vital, and cohesive, because we have seen it happen — indeed, we have helped make it happen, by respecting all people and creating welcoming environments. As such, the YMCA of Montclair will not tolerate the mistreatment or abuse of one youth by another youth. In addition, the Y will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are harmful, we will take steps needed to eliminate such behavior. Any acts of bullying must be stopped and reported to your supervisor immediately.

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

1. Physical bullying – when one person engages in physical force against another person, such as by hitting, punching, pushing, kicking, pinching, or restraining another.
2. Verbal bullying – when someone uses their words to hurt another, such as by belittling or calling another hurtful names.
3. Nonverbal or relational bullying – when one person manipulates a relationship or desired relationship to harm another person. This includes social exclusion, friendship manipulation, or gossip. This type of bullying also includes intimidating another person by using gestures.
4. Cyberbullying – the intentional and overt act of aggression toward another person by way of any technological tool, such as email, instant messages, text messages, digital pictures or images, or website postings (including blogs). Cyberbullying can involve:
 - a. Sending mean, vulgar, or threatening messages or images.
 - b. Posting sensitive, private information about another person.
 - c. Pretending to be someone else in order to make that person look bad.
 - d. Intentionally excluding someone from an online group.
5. Hazing – an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers that person regardless of that person’s willingness to participate.
6. Sexualized bullying – when bullying involves behaviors that are sexual in nature. Examples of sexualized bullying behaviors include sexting, bullying that involves exposures of private body parts, and verbal bullying involving sexualized language or innuendos.

Anyone who sees an act of bullying, and who then encourages it, is engaging in bullying.

E. Monitoring Youth in Facilities

The YMCA of Montclair does not allow youth under the age of 12 to be alone in the facility without a parent or guardian present unless they are participating in a supervised YMCA program or activity. When dropping youth off to a YMCA program, the YMCA of Montclair expects parents and guardians to follow each program's drop off and pick up procedures. For programs that use informal sign in procedures, the YMCA of Montclair recommends that parents and guardians escort their child to and from program activities until the child is at least 12 years old. By this age, most youth have had the experience of being without immediate parental supervision. In addition, 12-year-old youth are able to use self-protection skills if they are approached inappropriately by another youth or by an adult.

Because the YMCA is responsible for all youth in the facility, we require the following practices:

1. A parent or legal guardian must complete a membership application which includes identifying information, any special medical or behavioral circumstances, any legal indemnifications, the youth's date of birth, and emergency contact information. In addition, all youth must sign-in into the facility and/ or program each time they visit.
2. All youth & parents must sign the YMCA of Montclair Behavior Expectations & Procedures which outlines the YMCA's expectations regarding appropriate and inappropriate interactions and also include a systematic disciplinary policy which explains that youth will be suspended or dismissed from the program for policy violations.
3. While in the facility, youth may be supervised directly, indirectly, or with a combination of the two techniques.
 - e. For direct supervision, the program may offer structured, scheduled activities such as basketball tournaments, swimming activities, arts and crafts, etc. These activities should have one or more staff members and/or volunteers assigned to lead and supervise.
 - f. For indirect supervision, the program must designate certain building areas as authorized areas. 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 staff members. Youth should know that they will be always supervised by staff members, and all staff members should know which areas are authorized and which are not.
4. YMCA Directors must develop supervision standards for the authorized areas. For example:
 - a. Determine how frequently authorized areas should be monitored by staff.
 - b. Assign staff members specific supervision responsibilities over authorized areas.
 - c. Require staff members to record when they monitor authorized areas with checklists or other methods.
5. All program staff members and volunteers must wear nametags and/or identifying clothing so that the youth can easily recognize them as staff.
6. Train all staff members and volunteers:
 - a. To greet youth that enter the facility; to direct youth to the structured activities or authorized areas; and, to redirect youth who are not in an authorized area or who are not participating in a structured activity.
 - b. To be aware of the risks involved with mixing age groups and how to monitor activities involving mixed age groups.
 - c. To routinely monitor high risk areas (such as bathrooms, locker rooms, and unused rooms). Specific staff members should be designated to supervise these areas (i.e., floor staff, membership, aquatics staff, building supervisors). These staff members should document the scheduled and periodic sweeps of high-risk locations.

F. Monitoring High Risk Activities

Most incidents of youth-to-youth abuse occur in the bathrooms and locker rooms. Therefore, the following supervision guidelines are recommended:

1. Bathroom Activities

When supervising bathroom use, adult staff members should first quickly scan the bathroom before allowing youth to enter to ensure the bathroom is vacant.

- a. For group bathroom breaks:
 - Staff members take groups of two or more youth to the bathroom – following the “rule of three” or more.
 - If the bathroom only has one stall, only one youth should enter the bathroom while the others wait outside with the staff member.
 - If there are multiple stalls, only send in as many youths as there are stalls.
 - Minimize youth of different ages using the bathroom at the same time.
 - Staff members must stand outside the bathroom door but remain within earshot.
- b. For bathrooms within a classroom:
 - Require youth to ask permission to use the bathroom.
 - Require all staff members to frequently check bathrooms.
 - Staff members must stand outside the bathroom door but remain within earshot.
- c. Staff members are prohibited from using the bathroom at the same time as youth.
- d. If assisting younger youth in the stalls, the staff members should keep the door to the stall open.

2. Diapering, Toileting and Personal Care Assistance for Young Children

Caring for young children necessitates additional safety measures to protect staff members and children when staff members or volunteers change diapers or assist with toileting.

- a. For diapering
 - Place the changing table in an open area where adult actions can be observed by others.
 - Diapers may only be changed when at least two adults are present, or staff are otherwise observable.
 - Staff members must document each diaper change in writing on the child’s daily sheet or approved document.
 - Staff members who notice anything out of the ordinary or concerning while changing the infant’s diaper must immediately notify the child’s parent/guardian. Staff members working in licensed childcare programs must know and follow all licensing requirements concerning diapering.
- b. For toileting:
 - Staff members must stand in the doorway with the door ajar while children use the restrooms.
 - If staff members must enter the restroom to assist a child, the door to the restroom must remain open.
 - When possible, send in only one child at a time.
 - If that is not possible, send in only as many children as there are stalls.
- c. For Personal Care Assistance:
 - Always use the least intrusive methods possible. For example, allow the member/participant to do as much as they can by themselves. To the degree possible, use verbal prompts, instead of physically touching member/participant, to guide the member/participant in self-assisting tasks.
 - Avoid staring at the member/participant’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.
 - Allow for informal monitoring if it does not infringe on the members/participants right to privacy. For example, keep the bathroom door cracked so passersby can see the adult assisting but not the member/participant.
 - Make every attempt to have employees of the same gender as that of the member/participant to provide personal care.

3. Locker Room Activities

Locker rooms should be regularly and routinely monitored by assigned YMCA staff members (i.e., Floor staff, building supervisors, other staff as directed) when not supervised by staff in a structured YMCA program.

- a. The locker room procedures include:
 - When supervising locker room activities during structured YMCA programs, staff members must stand within earshot of the locker room when in use by youth.
 - Staff members must intermittently and briefly check inside the locker room, so users know the locker room is monitored.
 - Youth of different ages should be discouraged from using locker rooms at the same time.
 - Horseplay, such as towel snapping, is prohibited.
 - When possible, lockers are arranged to minimize unnecessary privacy.

4. Playground and Recreational Activities

Playground and recreational activities can allow mixed age groups of youth to have access to one another and create increased opportunities for inappropriate interactions between youth. To decrease the risk of incidents, implement the following procedures:

The playground procedures require:

- a. Youth must always remain in line-of-site of staff members.
- b. Narrow geographic boundaries should be established around the playground area.
- c. Do not allow other groups to be present when youth are using the playground or recreational area.
- d. Each program's staff to youth ratio must be maintained.
- e. Program Directors must provide staff members with specific instructions on how to monitor barriers of supervision (such as storage sheds, playhouses, tunnels, and shrubs).
- f. Staff members must be assigned specific areas to supervise ("zone monitoring").
- g. Practices during playground activities must ensure bathroom monitoring occurs.
- h. Roll calls should be taken for each age group at designated intervals for the program.
- i. Supervisors must conduct periodic check-ins and assessments of the activity period and of the entire activity area.

Active supervision:

- a. Staff members should position themselves to be able to see and hear all youth to whom assigned.
- b. Anticipate what youth will do and redirect when necessary; listen and notice changes in sound or absence of sound; remain engaged with youth rather than socializing with other staff or volunteers.
- c. Review boundaries and rules with youth prior to the activity, including that they are to remain in line of sight of staff and volunteers at all times and how to report inappropriate behaviors.
- d. PPE/First Aid Kits must be brought to the area.
- e. Review EAP manual for responding to incidents.
- f. Supervisors will conduct documented scheduled and unscheduled check ins of activities.

5. Quiet Time and Nap Time

Our organization has written procedures for managing quiet and nap times. Our employees know and follow these procedures, which at a minimum include:

- a. Employees, volunteers, and other youth should not sit or lie on anyone's bed or be in anyone else's sleeping bag.
- b. Encourage youth to draw an imaginary line around their sleeping space and encourage them to report violations to a staff member or volunteer.
- c. Employees and volunteers will not leave children alone during nap time.
- d. Youth are not permitted to share a sleeping mat, blanket, or sleeping bag.
- e. Pay attention to who is sleeping next to whom.
- f. Arrange sleeping areas with as much space as possible between each child.
- g. Do not let youth nap in areas not visible to employees and volunteers.
- h. Keep the room sufficiently lit so that you can easily observe all youth.

6. Transportation Activities

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

- a. When transporting youth for YMCA programs, the following procedures must be followed:
 - All youth on the trip must have a written parent permission form on file. Staff members must take these permission forms and medical releases with them.
 - Staff members must have a list of the youth on the bus and assign seating when possible. The staff must take roll when boarding the bus, when leaving the bus, periodically throughout the trip, and then again when reboarding the bus.
 - Program staff-to-youth ratios must always be maintained. When possible, do not count the driver in the supervision ratio.
 - Staff members must sit in seats that permit maximum supervision. When traveling on a bus, staff should use the "rule of three" when transporting youth: At least two adults must transport a single youth, or at least two youth must be present if transported by a single adult.
 - Staff members must be spread out throughout the bus and should not sit with youth.
 - Mixed age groups youth and youth of opposite genders are discouraged from sitting together. When possible, high-risk youth are seated by themselves or with two staff members.
 - Drivers are prohibited from making unauthorized stops.
 - Where applicable (such as in mentoring programs), staff must document the beginning and ending time of the trip and the mileage, names of the youth being transported, other employees and volunteers who are involved in transportation, and the destination.
 - Any unusual circumstances must be documented and reported to the supervisor immediately.
 - Youth must be transported directly to their destination. No unauthorized stops may be made.
- b. When public transportation is used:
 - In addition to the transportation procedures listed above, youth should remain in one area of the bus, if possible.
 - Staff members and volunteers that are assigned to a group must remain with that group on the bus.
 - Take a head count or call roll immediately after entering and leaving the bus.

7. Off-Site Activities

When supervising youth during off-site activities, the following procedures must be followed:

- a. All off-site activities require supervisor approval.
- b. All off-site activities require written parental approval.
- c. Each program's staff-to-youth ratio must be maintained.
- d. Requiring staff members, volunteers, and youth to be easily identifiable.
- e. Specific bathroom and locker room procedures applicable to the outing should be reviewed with staff members, volunteers & youth.
- f. Transportation procedures are followed for all off-site activities that require transportation.
- g. The supervisor must regularly observe the off-site activities at scheduled times and random intervals.
- h. Consider specific recommendations based on the location and type of activity (for example, Amusement parks, Water Parks, Arcades, etc.).

8. Teen Leadership Program

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

- a. A teen leader screening process is in place and includes, at least:
 - A standard application
 - An interview with behaviorally based interview questions
 - References (from teachers, counselors, family friends, etc.)
- b. Teen leaders must be trained in their role in programs and on program policies about appropriate and inappropriate interactions. This training should include the following information:
 - Appropriate and inappropriate physical and verbal interactions and the importance of maintaining behavioral boundaries between teen leaders and younger youth and between teen leaders, staff members and volunteers.
 - Prohibiting teen leaders from being one-on-one with youth.
 - Prohibiting teen leaders from escorting youth to the bathrooms.
 - Prohibiting teen leaders from assisting youth with changing their clothes.
- c. The Program Director must ensure a system is in place to monitor the teen leaders.
 - Designate a specific employee or volunteer who oversees the teen leadership program and its participants.
 - Require teen leaders to wear clothing or lanyards that identify them as leaders-in-training and differentiate them from both staff members and volunteers and from younger youth.
 - Require a supervisor to conduct daily check-ins with teen leaders and their program supervisors.
 - Consider requiring teen leaders to keep a log documenting their daily activities and any problems they encounter. The program supervisor should review these logs daily.

G. Supervisors and Administrators Monitoring Program Areas and Facilities

1. Supervisor and site directors are required to schedule times to monitor programs and to also make unscheduled visits. The supervisor will document every program/supervision visits which will include information such as your arrival and departure times, which youth and parents were present, and a summary of the information collected. Provide staff members and volunteers with feedback about visits.
2. 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.
3. Arrive before staff members and volunteers. Check punctuality and the routine that staff members and volunteers follow to prepare for the youth to arrive.
4. Survey the physical environment.
 - a. Is this a suitable location for the activity (e.g. size of area for number of youth, ability to supervise all areas used by youth, landscaping that may inhibit supervision)?
 - b. Are unused rooms, offices, storage areas, and closets locked?
 - c. Do windows permit observation into all program areas? Are any objects preventing information observation through windows?
 - d. Are staff identifiable and dressed in appropriate uniforms?
 - e. Are program activities within designated ratios?
 - f. Are staff spread out and actively supervising youth?
 - g. Are you easily viewed by staff? Are youth able to wander off?
 - h. Are youth checked in or signed in according to policy?
 - i. Are there any safety hazards?
5. Watch activities.
 - a. Are they planned and organized?
 - b. Are the staff members and volunteers monitoring and supervising effectively? During program activities? During transitions? During free or open play?
 - c. Ask to see the schedule of activities and compare with what is happening?
6. Observe bathroom and locker room activities. Observe bathroom and locker room activities to ensure that the staff members and volunteers are complying with the established policies and procedures.
 - a. Are the bathrooms clean?
 - b. Is anyone (adult or youth) loitering in or near the bathrooms?
 - c. Is only one youth allowed per stall?
 - d. When used outside of scheduled breaks do staff follow the rule of three?
7. Observe Interactions.
 - a. Are staff actively interacting with youth?
 - b. Are interactions consistent with the child abuse prevention policies & procedures?
 - c. Do staff greet adults who enter the program space?

V. Responding

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

A. Responding to Red-Flag or Inappropriate Behaviors and/or Policy Violations

Because the YMCA of Montclair is dedicated to maintaining zero tolerance for abuse, it is imperative that every staff member and volunteer actively participates in the protection of youth. If staff members or volunteers observe any red-flag or inappropriate behaviors and/or policy violations on the part of other staff members or volunteers, it is extremely important to immediately report their observations.

Our Child Abuse Prevention policies apply to everyone.

Examples of Red-Flag or Inappropriate Behaviors between Staff Members/Volunteers and Youth

- Violation of the child protection policies
- Seeking private time or one-on-one time with youth
- Buying gifts for individual youth
- Sending unauthorized electronic communication through text messaging, social media, online gaming, etc. in violation of the organizations electronic communication policy
- Making suggestive comments to youth
- Youth disclosing that an employee or volunteer makes them feel uncomfortable.
- Picking favorites

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

1. Staff and Volunteer Response:

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

Guidelines for Staff Members and Volunteers Responding to Red-Flag or Inappropriate Behaviors and/or Policy Violations

- Immediately following the observation, assess the child's current condition and assure safety.
- Report all information to the supervisor immediately. If the supervisor is not available, contact the Executive Director.
- The appropriate action will be taken based upon the information disclosed. Should the nature of disclosure be abuse against a child, the staff and/or volunteers are considered mandated reports in NJ and required to report such acts.
- The staff/volunteer member and a member of management will file a report by calling the New Jersey Division of Youth and Family Services (available 24 hours per day).
- The staff/volunteer will need to provide a written statement of all facts; fill out an Incident report form and use additional paper as needed to attach a written statement as well.
- Confidentiality and professionalism must be maintained at all times.

2. Supervisor and Administrator Response to Red-Flag or Inappropriate Behaviors:

If a supervisor or an administrator receives a report of suspicious or inappropriate behaviors or policy violations from a staff member or volunteer, the supervisor is instructed to do the following:

Guidelines for Supervisors and Executive Directors Responding to Red-Flag or Inappropriate Behaviors and/or Policy Violations

Supervisor/Executive Director

- The supervisor should immediately inform the Executive Director.
- If the accused is a staff member or volunteer, immediately inform Human Resources. The supervisor and Executive Director with consultation from the HR department will suspend the accused employee, with pay, immediately. An accused volunteer will also be suspended immediately.
- The supervisor will assist in getting all facts appropriately documented for the Executive Director. Confidentiality and professionalism must be maintained at all times.

Executive Director

- Inform the COO of the observation or allegation.
- The Executive Director will lead the investigation in consultation with the COO, unless it is related to an employee or volunteer at which time HR will be involved.
- The Executive Director will ensure that all appropriate agencies, such as DYFS, the police, etc. are notified.
- The Executive Director or designee will communicate the situation to the parents or legal guardian of the child (ren) involved.
- The Executive Director will collect all written statements from all parties involved by the close of the day the incident was reported.
- All media inquiries are to be referred to the President/CEO and the Communications Department.

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

- a. Increase monitoring or supervision of the staff member, volunteer, or program.
- b. If policy violations with youth are confirmed, the staff member or volunteer will be subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the Disciplinary Process outlined in the YMCA of Montclair's Employee Handbook.
- c. If more information is needed, interview and/or survey other staff member and volunteers or youth.

3. YMCA of Montclair Response:

After the internal review of the suspicious or inappropriate behaviors or policy violations, the YMCA of Montclair will determine what can be done to prevent a reoccurrence, such as:

Guidelines for YMCA of Montclair Response

- The Executive Management Team will review the need for additional supervision.
- The Executive Management Team will review the need for revised policies or procedures.
- The Executive Management Team will review the need for additional training.

B. Responding to Suspected Allegations or Incidents of Abuse

1. Staff Member or Volunteer Response to Abuse:

As required by mandated reporting laws, staff members and volunteers must report any suspected abuse or neglect of a youth—whether on or off YMCA of Montclair property or whether perpetrated by staff, members, volunteers, or others—to state authorities. Reports may be made confidentially or anonymously. Any evidence of potential child abuse or observation of inappropriate contact by a parent, staff or volunteer member or other child will be reported to the YMCA to the New Jersey Division of Youth and Family Services at 1-800-792-8610 or 1-877-NJ-ABUSE (877-652-2873).

In addition to reporting to state authorities, staff members and volunteers are required to report any suspected or known abuse of youth perpetrated by staff members or volunteers directly to leadership so that immediate and proper steps may be taken to ensure the safety of alleged victims and others who may be at risk. Reports of suspected or known abuse may be made confidentially to immediate supervisors, Directors, or YMCA Administrators, or to Ethics Point's anonymous hotline at 1-800-524-1255.

Guidelines for Staff Members and Volunteers Responding to Incidents or Allegations of Abuse

- Immediately following the observation or accusation, assess the child's current condition and assure safety.
- Report all information to the supervisor immediately (do not investigate the incident). If the supervisor is not available, contact the Executive Director.
- The appropriate action will be taken based upon the information disclosed. Should the nature of disclosure be abuse against a child, the staff and/or volunteers are considered mandated reports in NJ and required to report such acts.
- The staff/volunteer member and a member of management will file a report by calling the New Jersey Division of Youth and Family Services (available 24 hours per day).
- The staff/volunteer will need to provide a written statement of all facts; fill out an Incident report form and use additional paper as needed to attach a written statement as well.
- Confidentiality and professionalism must be maintained at all times.

2. Supervisors and Administrators Response to Abuse:

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

Guidelines for Supervisor and Administrators Responding to Allegations or Incidents of Abuse
<p>Supervisor/Executive Director</p> <ul style="list-style-type: none">• The supervisor should immediately inform the Executive Director.• If the accused is a staff member or volunteer, immediately inform Human Resources. The supervisor and Executive Director with consultation from the HR department will suspend the accused employee, with pay, immediately. An accused volunteer will be suspended immediately.• The supervisor will assist in getting all facts appropriately documented for the Executive Director.• Confidentiality and professionalism must be maintained at all times. <p>Executive Director</p> <ul style="list-style-type: none">• Inform the COO of the observation or allegation.• The Executive Director will lead the investigation in consultation with the COO, unless it is related to an employee or volunteer at which time HR will be involved.• The Executive Director will ensure that all appropriate agencies, such as DYFS, the police, etc. are notified.• The Executive Director or designee will communicate the situation to the parents or legal guardian of the child (ren) involved.• The Executive Director will collect all written statements from all parties involved by the close of the day the incident was reported.• All media inquiries are to be referred to the President/CEO and the Communications Department.

3. YMCA of Montclair Response:

After the internal review of the suspected abuse by staff member, volunteer, adult or other youth, the YMCA of Montclair will determine what can be done to prevent a reoccurrence, such as:

Guidelines for YMCA of Montclair Response
<ul style="list-style-type: none">• The Executive Management Team will review the need for additional supervision.• The Executive Management Team will review the need for revised policies or procedures.• The Executive Management Team will review the need for additional training.

C. Responding to Youth-to-Youth Sexual Activity

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

1. Youth-to-Youth Interactions:

Most serious incidents of youth-to-youth abuse are preceded by more subtle incidents such as name-calling, taunting, or roughhousing. Interrupting these interactions early and establishing and communicating standards of conduct can keep the program environment safe. The following interactions are high risk and should be prohibited:

Prohibited Youth-to-Youth Interactions

- Hazing
- Bullying
- Derogatory name-calling
- Games of Truth or Dare
- Singling out one child for different treatment
- Ridicule or humiliation

To adequately respond to and track incidents, all sexual activity between youth and sexualized behaviors of youth must be consistently documented.

2. Staff Member and Volunteer Response:

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

If staff members/volunteers witness youth-to-youth sexual behaviors, follow these guidelines:

Guidelines for Staff Members and Volunteers Responding to Youth-to-Youth Sexual Activity

- If you observe sexual activity between youth, you should immediately separate them.
- Calmly explain that such interactions are not permitted and separate the youth.
- Notify your supervisor, your supervisor will communicate with the parent/guardian.
- Complete an incident report including what you observed and how you responded.
- Follow your supervisor's instructions regarding notifying the authorities.
- In some cases, if the problem is recurring discipline may be required including not allowing one or both youth to return to the program.

3. Supervisors and Administrators Response:

If a supervisor or administrator receives a report of a youth's sexualized behavior or youth-to youth sexual activity, the supervisor should do the following:

Guidelines for Supervisors and Administrators Responding to Youth-to-Youth Sexual Activity

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

4. YMCA of Montclair Response:

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

Guidelines for YMCA of Montclair Response

- Review the need for additional program supervision.
- Review the need for revised policies or procedures.
- Review the need for additional employee or volunteer training.
- Review the need for additional youth/parent education.

D. Internal Review of Red Flag or Inappropriate Behaviors and Policy Violations

If there is a report of a red-flag or inappropriate behaviors, or policy violations, the VP of Human Resources, Chief Operations Officer, and Executive Director of Risk Management will review the circumstances.

Internal Review Procedures of Red-Flag or Inappropriate Behaviors and Policy Violations

- Define the Problem (Who, What, Where, When).
- Gather all information and data surrounding the problem (Incident Reports; Interview key individuals; review policies; review training curriculum).
- Perform an analysis and determine root cause (What are the causes that allowed the incident to occur).
- Identify corrective action; recommendations to stop the recurrence of the problem in the future (What best practice standards can be put in place to prevent a reoccurrence; what are the needed resources).
- Implement and communicate the necessary solutions.

E. Internal Review of Allegations and Incidents of Sexual Abuse

If there is a report or incident of sexual abuse, VP of Human Resources, Chief Operations Officer, and Executive Director of Risk Management will be responsible for conducting an internal review of the circumstances surrounding the allegation or incident of abuse.

Internal Review of Allegations and Incidents of Sexual Abuse

- Identify the Who, What, When, and Where; review the initial incident reports and documentation.
- Review the initial incident reports and supporting documentation.
- Review personnel file, training records, disciplinary records, video footage as applicable.
- Interview supervisors, witnesses, etc...
- Review policies and training curriculum.

F. Victim Centered Response Plan

1. Be Prepared/Action Steps

- Survivors sometimes take years to come forward.
- Survivors recollection of events may be fuzzy but that does not mean the survivor is not credible.
- Respond by documenting all the details by filling out an Incident Report.
- Thank the individual for reporting. "Thank you for telling me". Inform the reporter/victim that the information will be passed to the VP of Human Resources and the Chief Operations Officer who will follow up with additional support as soon as possible.

2. Once Survivor has been Identified-How do we support them

- VP of HR will offer to meet. If they don't want to meet, ask what would be most helpful to them. What would they like to see happen since coming forward?
- Ask how they you can support them.
- Be clear with the survivor about our mandated reporting requirements.

3. When Meeting with a Survivor

- Listen to all information the survivor provides and be compassionate.
- Tell the survivor they were right to come forward.
- Let the survivor know you believe them.
- Provide confidence that member protection is your highest priority and safeguards are in place.
- Follow mandated reporting requirements.