



**BOYS & GIRLS CLUB
OF PAWTUCKET**

Policy & Procedures Manual



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OVERVIEW

Current Approach to Safety Policies

The current safety membership requirements for Boys & Girls Clubs state that all member organizations are required to adopt and adhere to safety policies that protect youth. Furthermore, all staff and volunteers must be trained on these policies annually.

Proposed Approach to Safety

The Child Safety & Quality Assurance (CSQA) department has historically provided suggested policy templates for Clubs to use in meeting current membership requirements. We are proposing a strategic shift away from that practice to increase clarity, consistency, and compliance with Club safety practices.

Upon adoption and annually thereafter, the National Council would review and approve minimum safety policies authored by CSQA for adoption by all Clubs. These policies will provide the foundation for Club safety policies and operations but can be supplemented with additional operational detail and procedures specific to each individual organization. Core consistency and minimum standards across safety policies will strengthen organizations, improve monitoring, and support compliance.

The proposed key policies listed below are included in this packet. Ultimately, these policies would become part of a Child & Club Safety Handbook. Under the proposed strategy, Club organizations would be required to adopt the entire handbook of policies that address safety and risk prevention and supplement them according to the needs of each organization.

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INTRODUCTORY PERIOD

The first 90 days of employment for new employees of the Club is considered an introductory period. The introductory period provides a new employee with the opportunity to become familiar and acquainted with the Club and for the Club to observe and evaluate the employee's skills and work ethic. During this time, a new employee's work hours, skills, attitude/behaviors and general work performance may be evaluated.

Neither the designation nor the successful completion of the introductory period constitutes an employment contract for any period (including the introductory period) or a guarantee of continued employment. Employment with the Club is at will.

CLUB STANDARDS AND POLICIES

CHILD ABUSE PREVENTION

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

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



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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 the Boys & Girls Club of Pawtucket who becomes aware of or has suspicion of child abuse or neglect must immediately report to Club leadership. Club leadership is responsible for reporting the incident immediately to the appropriate authorities according to statewide mandated reporting laws, as well as to Boys & Girls Clubs of America (BGCA) within 24 hours via the critical incident system.

Required Training

Boys & Girls Club of Pawtucket 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 after that:

1. BGCA-approved child abuse prevention
2. Club Policies and Procedures
3. Any other pertinent Club Handbooks, policies, and regulations

Annually:

- All Club policies, including all safety policies, for Boys & Girls Club of Pawtucket.

Physical Interactions

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

Appropriate	Inappropriate
<ul style="list-style-type: none"> • Side hugs • Handshakes • High-fives and hand slapping • Holding hands (with young children in escorting situations) 	<ul style="list-style-type: none"> • Full-frontal hugs or kisses • Showing affection in an isolated area • Lap sitting • Wrestling or piggyback/shoulder rides • Tickling • Allowing youth to cling to an adult’s leg



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Verbal Interactions

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

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

ABUSE AND SAFETY RESOURCES

Boys & Girls Club of Pawtucket prominently displays BGCA-approved collateral that shares ethics hotline, crisis text line 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.

PROHIBITION OF PRIVATE ONE-ON-ONE INTERACTION POLICY

Boys & Girls Club of Pawtucket provides 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.



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- 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 gamesroom).



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- Transporting members via public transportation (bus, taxis, train, air, etc.) or transporting multiple members.
- Electronic communications (text, video, social media, etc.) between multiple members and adults (e.g., group chats).
- Public places can include but are not limited to buses, airports, shopping malls, restaurants and schools.

Impact on mentoring programs

Mentorship is a key component of Boys & Girls Club of Pawtucket 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.
- 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 traveling to off-site events and activities

- When traveling to external events such as the Keystone Conference, Youth of the Year or other off-site events, the one-on-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



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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:
 - Inviting parents or guardians to attend and/or chaperone their child.
 - Including additional youth (e.g., Junior Youth of the Year) and/or staff in travel plans.
 - Coordinating with other Clubhouses or nearby organizations to travel together.
 - Traveling 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 aren't picked up first or dropped off last.
 - Use a bus aide if available.
 - Pick up and drop off children in groups.
 - 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 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 and regularly checking in with the members and adults 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.
- In an emergency, disclosing the situation to another staff member before engaging in one-on-one interaction



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TECHNOLOGY ACCEPTABLE USE POLICY

The Club 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; 2023 Boys & Girls Club of Pawtucket Employee Handbook - page 8.

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, 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 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 aren't 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.

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.



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- Personal attacks, including prejudicial, retaliatory, 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 the organization.
- Violations of the Club's prohibition on one-on-one interactions
- 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, abuse, 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. This also includes overnight events such as Keystone Conferences and Youth of the Year events.

Monitoring and inspection: Boys & Girls Club of Pawtucket 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 be subject to disciplinary action up to and including termination.

Password and access: To prevent unauthorized access, devices must automatically lock and be password protected.



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Use of Technology Devices

In general, the use of electronic devices (including but not limited to cell phones, smart watches, tablets, cameras, Bluetooth hearing devices, audio listening devices, etc.) during work time is prohibited. Use includes but is not limited to texting, e-mailing, searching the web, using the camera or other applications, as well as voice calls. There may be work times when use of an employee-owned device(s) is allowed to meet life safety requirements (e.g.- a cell phone may be used as the primary means of communication when a radio or other two-way device is not available or to clock in and out of scheduled shifts) at the discretion of the supervisor or Chief Executive Officer; 2023 Employee Handbook - page 10. During these designated times, personal electronic devices are to be used solely for work-related matters; personal use remains unallowable.

Cell phones are NOT allowed in the restrooms or locker rooms at any time; if a personal device has been designated as allowable by a supervisor as the primary means of communication, it should be stored in a pocket or bag when supervising bathroom use.

Should a family member need to reach you in an emergency while you are working, they may call the Membership Desk, and staff will notify you. Please note that Club leadership staff may use their cell phones during program time for business and communication purposes.

Employees who bring cell phones or other electronic devices to work are solely responsible for the safety and security of those devices. The Boys & Girls Club of Pawtucket accepts no responsibility for cell phones or other electronic devices that are lost, damaged, or stolen at work or while traveling to and from work.

Failure to adhere to this policy may result in disciplinary action up to and including termination.

SUPERVISION & FACILITIES POLICY

SUPERVISION

Boys & Girls Club of Pawtucket 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 (age 18 or over). To ensure appropriate supervision, staff and volunteers:

- Must abide by the prohibition of private one-on-one interaction policy. This includes youth and staff, volunteers, or Board members.
- Must abide by all the organization’s disciplinary policies and procedures.
- Must ensure that at least one adult staff (age 18 and over) is present when supervising members.
- Must always maintain proper supervision ratios. Supervision ratios are listed below.
 - Kindergarten/age 5- 1:13



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- Ages 6-12- 1:13
- Ages 13-18/seniors in high school 1:15
- Pool supervision requires a 1:6 ratio for Childcare programs
- Must be trained on appropriate supervision tactics and behavior patterns.
- Must ensure that all youth staff and volunteers are supervised by an adult (age 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.

Youth Guidance

Staff must use positive techniques of guidance, including redirection, positive reinforcement and encouragement rather than competition and criticism. Staff will have age appropriate expectations and set up guidelines and environments that minimize the need for discipline.

- All staff members are expected to handle the discipline of the children in their charge. A child is sent to a Director when:
 - The staff person has used all resources at his/her disposal and the member still refuses to cooperate. Before a child is sent to a Director, it is expected that the staff member has made the following efforts to solve the problem:
- Give the child an opportunity to explain their behavior.
- Warn the child to correct his/her behavior.
- Use fair judgment in deciding the consequence, ex: Removal from activity, formal discipline report to parent or guardian.
- In the event that a child commits an act which calls for his/her immediate removal from the activity, either to maintain control or to protect the safety of the group, the child is taken to or sent to the office of a Director. The Director, after considering the facts, will take the appropriate action.
- In the event of serious breaches of discipline policy, dismissal from any program or activity will be served with due process, but dismissal by a Director (pending the hearing) will be enforced where necessary. The Director will, in the final analysis, exercise the authority and assume the responsibility for the proper application of all rules. The Operations Director will also be notified of the situation to have open communication.
- The following are several simple rules and consequences to be followed by all children who are involved in any of the programs offered at the Boys & Girls Club of Pawtucket:
 - Swearing: Consequence: 1st time- warning, 2nd time- 15-minute separation from activity
 - Abuse or misuse of games/equipment: Consequence: 1st time- warning, 2nd time- lose the privilege of said game or equipment for one day
 - Disrespect to Counselor: Consequence: 1st time- warning, 2nd time- report to the Director
 - Fighting: Consequence: 1st time- automatic dismissal from the activity, 2nd time-



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written notice to parent or guardian and automatic suspension from the program for one day

- Stealing: Consequence: 1st time- written notice to parent or guardian / automatic dismissal from activity, 2nd time- written notice to parent or guardian / automatic suspension from the program for one day
- Repeated episodes of any of the above will be handled individually, keeping in mind that dismissal from a program will be applied only in extreme cases, where all efforts to improve behavior have failed.
- All suspensions will be reviewed by the appropriate program director and the Director of Operations.
- If a child is suspended for more than one day, parents or guardians must meet with the suspending program director.
- Incident/Accident Reports: An Incident/Accident report must be filled out at the time of the incident/accident. It must be signed by the parent on the day the event occurs and must be kept in the member's file. The injury, any first aid administered, and parent communication must be maintained in a program health log. The health log is kept at the front desk and has a red cover.
- Member Health Check: Staff will 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.
- Release of Members to Parent/Guardian:
 - When directed by the parent or guardian, under no circumstances should staff release children to anyone other than the authorized parent, guardian, or other adult authorized by the parent or guardian.
 - Staff should never release a child to anyone who is under the influence.

Staff Expectations

- A. Staff Performance Evaluation Process:** All employees will receive a performance evaluation every three months. After the evaluation, the direct supervisor to the individual will go over every evaluated area with the employee and provide support to the employees on what he or she needs to do to improve in that area. Employees can respond in writing to anything that they feel is unfair and this appeal will be placed in the employee's permanent record file.
- B. Staff Use of Club Equipment:** Staff will not use Boys & Girls Club equipment or facilities without prior permission given by the Director of Operations.
- C. Personal Belongings:** The Boys & Girls Club of Pawtucket is not responsible for any lost or stolen property. Club management reserves the right to seize any equipment or tools or personal belongings that are deemed a safety concern or inappropriate.
- D. Keep the Club Clean:** The ongoing maintenance of the Club is everyone's responsibility. Everyone is expected to leave areas used clean and neat. Broken equipment must be reported to your supervisor as soon as possible.



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- E. Vehicles:** Personal vehicles are to be locked and parked in the designated area. Care and caution are to be used while driving in and out of the Club. The speed limit on Club property is 5mph.
- F. Keys:** Staff will be issued keys to those program areas necessary to their program. Staff must accept full responsibility for the keys issued in their names and are required to replace at their own expense the locks for which the assigned keys are lost.
- G. Visitors:** All visitors are to check in at the front desk. Visitors at the Club who are not accompanied by a staff member are to be stopped and identified. Staff are not allowed visitors.
- H. Food/Drinks:** You are not to eat or drink when working with kids, unless you are participating in the Kids Café program.
- I. Interaction with other staff, members and parents:**
- Staff will refrain from intimate displays of affection towards others in the presence of children, parents and staff.
 - Profanity, inappropriate jokes, sharing intimate details of one's personal life, and any kind of harassment in the presence of children or parents is prohibited.
 - Staff will portray a positive role model for youth by maintaining an attitude of respect, loyalty, patience, courtesy, tact and maturity.
 - Staff may not be alone with children they meet in Boys & Girls Club programs outside of the Boys & Girls Club. This includes sleepovers and inviting children to your home. Any exceptions require a written explanation before the fact and are subject to administrative approval. Additionally, staff should not post any pictures or videos of Club members in a public way including any form of social media (e.g. Facebook, Twitter, Instagram, YouTube, Snapchat, etc.)
 - Staff are not allowed to transport children in their own vehicles.
 - Staff may not date program participants.
- J. Attire:** Staff must be clean, neat and appropriately attired in a staff shirt at all times. Pants/shorts are appropriate and all shoes must be closed toe. Alterations of Club Attire is strictly prohibited.

RESTROOM USAGE

Boys & Girls Club of Pawtucket 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.
- The 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.



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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.
- 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

- 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, with at least two youth and an adult walking to the restrooms and 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" sign outside of the door to alert others that they must wait until Club members have exited the restroom before they can enter.

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.



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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 and hallways 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 RI Department of Health inspection certificates shall be posted. Any dangerous kitchen utensils, including knives, shall be properly and securely stored.

TRANSPORTATION POLICY

The Boys & Girls Club of Pawtucket is committed to providing a safe environment and enforces the following transportation policy for members, staff, volunteers and other adults. The Boys & Girls Club of Pawtucket 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.

DRIVERS:

- Must allow for DMV background check and be cleared to transport youth per the barrier crime policy of the organization.
- Must maintain a current appropriate license for their job function as required by applicable law.
- 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); the log must be signed daily to ensure compliance.



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- 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.
- 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.
- May only use cell phones, or other communication devices while transporting members to and from the Club facilities or Club-related activities as permitted under applicable law and only in hands-free mode.

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.

SCREENING & ONBOARDING POLICY

Boys & Girls Club of Pawtucket 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, including phone screens and reference checks are conducted in accordance with this policy.



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BACKGROUND CHECKS

Boys & Girls Club of Pawtucket conducts criminal background checks of all employees, including board volunteers and others who serve on a standing committee; and all other volunteers, including partners, where applicable, 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.

Written Crime Barrier Policy

All background check findings shall be considered when making employment or volunteer decisions, and the Club will not employ potential staff or engage potential volunteers if such individual:

- Refuses to consent to a criminal background check.
- Makes a false statement in connection with a criminal background check.
- Is registered, or is required to be registered, on a state or national sex offender registry.
- Has been convicted of a felony consisting of:
 - Murder
 - Child abuse
 - Domestic violence
 - Abduction or human trafficking
 - A crime involving rape or sexual assault
 - Arson
 - Weapons
 - Physical assault or battery
 - Theft
 - Alcohol or drug related offense committed within the last five years; or
- Has been convicted of any misdemeanor or felony against children, including child pornography.



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DRUG- & ALCOHOL- FREE WORKPLACE POLICY

Boys & Girls Club of Pawtucket 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 DrugFree 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 alcohol-free workplace policy. Any violation of this policy might result in disciplinary action, up to and including discharge.

Boys & Girls Club of Pawtucket 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 Club of Pawtucket 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 wellbeing 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 properties except for external areas



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where it is specifically authorized. 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.

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 & Testing

Boys & Girls Club of Pawtucket 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.



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Prescription Medication & 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 or medical marijuana, 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.

INCIDENT MANAGEMENT POLICY

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

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 in an Incident Report:

- Date and location
- Incident details (if applicable)
- Witnesses and contact information
- Names of all involved (youth and staff if applicable)



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- All notifications made (first responders, parents, leadership, etc.)

External Incident Reporting

Boys & Girls Club of Pawtucket 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 Investigation

Boys & Girls Club of Pawtucket 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:

- 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.
- 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.
- Any child who might have been abducted or reported missing from a Club site or Club-sponsored activity.
- Any major medical emergency involving a child, staff member or volunteer at a Club site



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or during a Club-sponsored activity leading to extended hospitalization, permanent injury or death; or a mental health crisis with a child requiring outside care.

- Any instance or allegation of abuse, including physical, emotional or sexual abuse, sexual misconduct, harassment or exploitation (Club-related or not) involving any staff 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.
- Any failure to comply with requirements set forth by childcare licensing agencies or organizations.
- Any known or suspected felony-level criminal act committed at a Club site or during a Club-sponsored activity.
- Any misappropriation of organizational funds of \$10,000 or greater, or any amount of federal funds.
- 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.
- 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.

NOTE: Whenever a significant crisis or safety issue is identified, contact and report the issue immediately to BCGA by the CEO, or their appointed agent.

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.
- **Please reference our National Emergency Response and Protocol Plan as well as our Emergency Operations Plan.**

Employee Conduct and Disciplinary Policy

The Club expects all of its employees to conduct themselves in a manner which is in the best interests of the organization and its employees.

The Club has established policies and procedures for the convenience and protection of all its employees. Violations of any of these policies and procedures are considered misconduct and



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appropriate disciplinary procedures may be initiated. Disciplinary action may include, but is not limited to, the following: oral warnings, written warnings, suspension with or without pay, and termination. Disciplinary actions are noted in the personnel file. Serious misconduct, within the sole opinion and discretion of the Club, may result in immediate suspension and/or immediate discharge, without notice. The appropriate disciplinary action will be determined by Management. There is no guarantee that one form of disciplinary action will necessarily precede another.

It is impossible to list all possible infractions. By example, the following is a partial list of examples of misconduct which may be cause for disciplinary action, up to and including termination:

- Violation of the Club's equal opportunity or harassment policy
- Disclosure of confidential Club or employee information to unauthorized parties
- Behavior resulting in Club member, vendor or employee complaints
- Supplying false or misleading information or falsifying any Club record
- Possession of weapons on or off premises or while performing Club duties
- Immoral or indecent conduct; soliciting persons for immoral purposes
- Insubordination, including but not limited to, refusing to obey an order or directive of a supervisor or Club official
- Disruptive conduct, including: gambling; fighting; horseplay; coercion; intimidation or threats against Club employees; vulgarity; abusive treatment to the public or fellow employees
- Theft or unauthorized possession or removal of office supplies, property or money belonging to the Club, employees, or a third party
- Making or publishing false, vicious or malicious statements concerning an employee, supervisor, Club official, or its products
- Destruction or misuse of property
- Unauthorized use of equipment, building and surrounding Club property
- Any other conduct which violates any Club policy or which is not in the best interests of the organization

All instances of discipline shall become a permanent part of each employee's personnel file, unless otherwise authorized and approved by the Chief Executive Officer. Disciplinary action, will state, as applicable, any areas requiring improvement, the time period during which said improvement is expected, and the date of re-evaluation.

While it is the Club's hope and intent that the majority of employee problems can be corrected at an early stage, benefiting the employee and the Club, notwithstanding the foregoing, the Club reserves the right to terminate the employment relationship at any time, with or without notice, for cause or otherwise, and for any reason or no reason, in the Club's sole discretion.



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EMERGENCY OPERATIONS PLAN

The Boys & Girls Club of Pawtucket shall create and maintain an Emergency Operations Plan (EOP). At a 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 Pawtucket 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 Pawtucket always maintains a minimum of one CPR- or first-aid-trained staff on-site during all operating hours when members are being served.

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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.