

**BOYS & GIRLS CLUBS OF LAREDO**



**POLICES FOR THE PROTECTION OF YOUTH**

# Policies for the Protection of Youth Packet

## 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 policy drafts 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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# Child Abuse Prevention Policy (Page 1 of 2)

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

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

## DEFINITIONS

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

Exceptions may only be made when delivering approved medical or counseling services by a licensed, trained therapist or similar professional according to professional guidelines. All staff and volunteers, including minor staff (under age 18), are strictly prohibited from meeting Club participants outside of any Club-sponsored activities. The only exception to this rule is if the Club participant is a child or sibling of a staff member or volunteer.

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

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

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

## MANDATED REPORTING

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

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

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

# Child Abuse Prevention Policy (Page 2 of 2)

## Annually:

- All the policies, including all safety policies, for Boys & Girls Clubs Laredo.

## PHYSICAL INTERACTIONS

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

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

## VERBAL INTERACTIONS

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

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

## ABUSE AND SAFETY RESOURCES

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

# Prohibition of Private One-on-One Interaction Policy (Page 1 of 3)

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

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

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

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

## ONE-ON-ONE INTERACTION POLICY GUIDANCE

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

### Definition of one-on-one interaction

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

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

# Prohibition of Private One-on-One Interaction Policy (Page 2 of 3)

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

## Impact on mentoring programs

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

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

## Impact on partnerships with local mentoring organizations

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

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

- When travelling to external events such as Keystone, Youth of the Year or other off-site events, the 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 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.
  - Travelling with additional staff or members.
- Parents and guardians should also provide written consent in each instance in which a member travels to any off-site event. NOTE: Parents or guardians are never allowed to provide consent for one-on-one interaction.
- Similar practices should be in place when coordinating field trips.

## Impact on transportation to and from the Club

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

# Prohibition of Private One-on-One Interaction Policy (Page 3 of 3)

- Modify staff schedules to ensure multiple staff are present.

## Exceptions to policy

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

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

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

- Disclosing the meeting to Club leadership and regularly checking in with the member and adult during conversations.
- Placing time limits on conversations.
- Meeting in rooms with clear sight lines (e.g., rooms with windows or glass doors).
- Documenting the interaction.
- In an emergency, disclosing the situation to another staff member before engaging in one-on-one interaction.

# Supervision and Facilities Policy (Page 1 of 2)

## SUPERVISION

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

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

## RESTROOM USAGE

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

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

## RESTROOM MONITORING

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

- Implementing procedures to limit the number of children using restrooms at the same time.
- Prohibiting younger children and teens from sharing a restroom.
- 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.

## ENTRANCE AND EXIT CONTROL

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

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

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

# Supervision and Facilities Policy (Page 2 of 2)

## FACILITY CONDITION

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

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

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

## FOOD AND DRINK

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

# Screening and Onboarding Policy (Page 1 of 2)

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

## BACKGROUND CHECKS

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

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

- Verify the person's identity and legal aliases through verification of a social security number.
- Provide a national Sex Offender Registry search.
- Provide a comprehensive criminal search that includes a national search.
- Provide a comprehensive local criminal search that includes either a statewide or county level criminal search, depending on jurisdiction (*a current list of jurisdictions can be found at [www.bgca.net/childsafety](http://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.

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

- a. Refuses to consent to a criminal background check.
- b. Makes a false statement in connection with such criminal background check.
- c. Is registered, or is required to be registered, on a state or national sex offender registry.
- d. Has been convicted of a felony consisting of:
  1. Murder
  2. Child abuse
  3. Domestic violence
  4. Abduction or human trafficking
  5. A crime involving rape or sexual assault
  6. Arson
  7. Weapons
  8. Physical assault or battery
  9. Drug possession, use or distribution in the last five years
- e. Has been convicted of any misdemeanor or felony against children, including child pornography.

## INTERVIEWING

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

# Screening and Onboarding Policy (Page 2 of 2)

## REFERENCE CHECKS

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

## STAFF AND VOLUNTEER ONBOARDING

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

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

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

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

# Drug- and Alcohol-Free Workplace Policy (Page 1 of 2)

## DRUG AND ALCOHOL POLICY

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

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

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

## SMOKING POLICY

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

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

Smoking is prohibited at all Boys & Girls Clubs properties except for external areas 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.