



BOYS & GIRLS CLUBS
OF AMERICA

COMMITMENT

TO SAFETY

Child & Club Safety Handbook



BOYS & GIRLS CLUBS
OF ST. JOSEPH COUNTY

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Safety is Our Number One Priority

At **Boys & Girls Clubs of St. Joseph County**, there is nothing more important than the safety of our youth members. We work every day to create a safe, fun environment to inspire and enable all young people, especially those who need us most, to realize their full potential as productive, caring, and responsible citizens.

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

This handbook is reviewed and revised annually or as needed by our Safety Committee and Board of Directors.

1.0 Board-Led Safety Committee

Boys & Girls Clubs of St. Joseph County maintains a board-led committee that meets regularly and leads our safety agenda, and identifies areas of improvement, and implements solutions to ensure the safety of all members, staff, and volunteers.

The Safety Committee requirements/duties are to:

- Be chaired by an active board member
- Meet quarterly
- Implement solutions to ensure the safety of all members, staff, volunteers, and visitors
- Verify the submission of the annual online safety assessment to BGCA
- Review the results of all safety assessments to identify areas for improvement
- Review safety policies and emergency response plan on an annual basis
- Submit Committee chair name and contact information annually to BGCA

1.1 Emergency Operations Plan

Through the appropriate use of Club and community resources, **Boys & Girls Clubs of St. Joseph County** strive to mitigate the immediate effects of an emergency and its long-term effects on Club operations and mission by being prepared to effectively respond to and recovery from an emergency.

EMERGENCY OPERATIONS PLAN (EOP)

Boys & Girls Clubs of St. Joseph County has adopted and maintains the Boys & Girls Club Movement's national emergency response plan and protocol.

Boys & Girls Clubs of St. Joseph County annually trains staff, volunteers, and members on how to react in an emergency. At minimum, the plan 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 with local first responders, such as fire department and law enforcement agencies.

EOP ANNUAL REVIEW

Boys & Girls Club of St. Joseph County's 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 Safety Committee reviews and updates the Emergency Operations Plan and submits suggestions for additional safety policies to the Board of Directors annually.

FIRST AID AND CPR TRAINING

Boys & Girls Clubs of St. Joseph County always maintains at least one CPR- or first- aid-trained staff on site during all operating hours when members are being served.

KEY DEFINITIONS

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

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

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

2.0 Child Abuse Prevention

Boys & Girls Clubs of St. Joseph County is committed to its members, staff, and volunteers' physical and emotional safety. Boys & Girls Clubs of St. Joseph County maintains a zero-tolerance policy for child abuse.

Boys & Girls Clubs of St. Joseph County 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:

- 1) **One-on-One Prohibition:** **Boys & Girls Clubs of St. Joseph County** prohibits isolated one-on-one interaction between Club participants and staff or volunteers, including board members. This includes prohibiting on-on-one contact at any time at the Club, in vehicles, by phone, text, social media, or any other means.
- 2) **Child Abuse:** This is when an adult or another child, whether through action or 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 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. text or social media.)
- 3) **Grooming:** This is when someone builds an emotional connection with a child to gain their trust for the purposes of sexual abuse, sexual exploitation, or trafficking. Grooming behaviors may include, but are not limited to:

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

4) **Physical Interactions:** Every staff member and volunteer of **Boys & Girls Clubs of St. Joseph County** are 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"> • Inappropriate physical contact; including but not limited to kissing, tickling, long embracing hugs, backrubs, holding hands, sitting on laps, picking up children. • Engaging in any sexual or intimate relationship with a child. • Spending time with a member/child outside of Club.

5) **Verbal Interactions:** Every staff member and volunteer of Boys & Girls Clubs of St. Joseph County are required to maintain appropriate verbal interaction with minors. Appropriate and inappropriate verbal 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"> • Allowing a child to call you by a nickname or pet name. • Disclosing personal information about yourself, co-workers, volunteers, or other children to a member/child. • Giving a child a secretive note of a personal nature or engage in exchanging secrets with a child. •

2.1 Sexual Abuse Prevention

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

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

Adult staff and volunteers shall not:

- Initiate conversations with members about sexual matters. If a member initiates a conversation about sexual matters with a staff or volunteer, the adult shall limit the conversation to the child's immediate concerns and shall provide a written incident report to the supervisor within 24 hours.
- Engage in off-site activities with members. Such interactions may include but are not limited to field trips, meetings, and communications via phone, text, and/or social media.

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

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

2.2 Mandated Reporting

Every staff member or volunteer of **Boys & Girls Clubs of St. Joseph County** who becomes aware of or has a suspicion of child abuse or neglect must immediately reported to the COO. In addition, under Indiana Statute, all childcare personnel are mandated by law to report their suspicions of child abuse, neglect, or abandonment to the Indiana Abuse Hotline. The CEO is responsible for reporting the incident to Boys & Girls Clubs of America (BGCA) within 24 hours via the critical incident system.

2.3 Mandatory Training

Boys & Girls Clubs of St. Joseph County conducts and reports through a Boys & Girls Clubs of America's (BGCA)-approved process the following training (see 9.1 Employee – Onboarding for a complete list of required 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:

- BGCA-approved child abuse prevention
- BGCA-approved mandated reporting
- BGCA-approved grooming prevention

Annually:

- All the policies, including all safety policies and procedures and emergency operation plans for **Boys & Girls Clubs of St. Joseph County**

Display of BGCA's Collateral Safety Information

Boys & Girls Clubs of St. Joseph County 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 youth membership applications.

Safety information is also available for viewing at www.bgcsjc.org.

2.4 Prohibition of Private One-on-One Interaction

The priority of **Boys & Girls Clubs of St. Joseph County** is its members, staff, and volunteers' physical and emotional safety. 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.
- Never transport one Club member at a time. This includes transportation in Club or busses. Exceptions may only be made when delivering medical or counseling services by a licensed, trained therapist or similar professional or in an emergency. All exceptions shall be documented and provided to the COO or CEO in advance.

Staff and volunteers shall immediately inform COO or CEO if a staff member, volunteer, or board member violates this policy. In any such case, the organization will take appropriate disciplinary action, up to and including termination.

Definition of one-on-one interaction

One-on-one interaction is defined as any personal 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, between one youth member and one staff member 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, offices, 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 nonvisible to others.
- One staff member is transporting one member in a vehicle.
- Electronic communications (text, video, social media, etc.) between one member and one adult
- Public contact/communication is any communication or meeting, in person or virtual, 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 plain sight of others (e.g., in a quiet corner of an active games room).
 - Transporting members via public transportation (bus, taxis, train, air, etc.) or transporting multiple members.
 - Electronic communications (text, video, social media, etc.) between multiple members and adults (e.g., group chats).
 - Public places can include but are not limited to buses, airports, shopping malls, restaurants, and schools.

Mentoring Programs

Mentorship is a key component of **Boys & Girls Clubs of St. Joseph County's** programming and has had tremendous positive impacts on members. Prohibition of one-on-one interaction does not have to affect mentor programs and relationship building negatively. 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, 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.

Partnerships with local mentoring organizations

Employees or Volunteers of local mentoring organizations that **Boys & Girls Clubs of St. Joseph County** must ensure mentors abide by Club policies, including background check requirements and prohibition of one-on-one interaction.

- Prior to interacting with a Member, the local mentoring organization shall provide a copy of the completed background check of their employee/volunteer to the Club's Human Resources Department. Records shall be maintained for a period of 5 years after the conclusion of the mentoring partnership.
- External mentors shall be provided a copy of the Club's safety policies and procedures and agree to abide by the policies and procedures.
- A written agreement shall be in place before the start of mentoring 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.
- All mentoring interactions shall be documented and confidentially maintained by the Club.

Travel

When traveling to external events such as field trips, the one-on-one policy shall continue to be followed.

- If the Club shall take responsibility for transporting members at no time shall one single staff member be transporting one single member at any time.
- At all times, there shall be at minimum three people are traveling together (either two staff and one member or two members and one staff)

Exceptions to policy

According to professional guidelines, exceptions may only be made when delivering approved medical or counseling services by a licensed, trained therapist or similar professional. All staff and volunteers are strictly prohibited from meeting Club participants outside of any Club sponsored activities, including minor staff (under age 18). The only

exception to this rule is if the Club participant is a staff member or volunteer child.

When delivering medical or counseling services by a licensed, trained therapist or similar professional (i.e., counselors, social workers). These persons will be required to present ID verifying identity and complete the visitor log during each visit.

In limited circumstances, exceptions can be made to this policy with the prior written approval of the Chief Executive Officer.

- When the emotional or physical safety of a member is at risk and private, one-on-one communication is deemed necessary. After the communication, a written report shall be provided to the COO or CEO.

3.0 Operational Supervision

Boys & Girls Clubs of St. Joseph County are 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 proper 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 two adult staff are 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.
- Immediately notify the COO or CEO and submit written reports detailing supervision issues, accidents, or critical incidents.
- Never use electronic devices such as cell phones, PDAs, or other communication devices while supervising members unless for Club purposes.

4.0 Ratios

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

Type	Adults	Youth
School-Age Programs	1	20
Field Trips	1	20

5.0 Restroom Usage and Monitoring

RESTROOM USAGE

Boys & Girls Clubs of St. Joseph County 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 Director. 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.

Approximately 90% of incidents of youth-to-youth abuse occur in the bathrooms. It is important that all Club staff and volunteers understand the high incidence of abuse that occurs in Club bathrooms across the country: on average, BGCA receives two phone calls a week involving bathroom-related concerns. We all need to be vigilant in monitoring bathrooms and adhering to our policy. The following are the ONLY two available options for bathroom breaks at the Club:

Option 1: Group Bathroom Breaks

- Whenever possible, staff should take groups of two or more youth to the bathrooms for "group bathroom breaks." One adult should not escort one youth; always use the "rule of three" or more. Volunteers should not escort youth to the bathrooms.
- One youth should enter the restroom at a time while the other youth wait outside with staff and volunteers. If there are multiple stalls, staff and volunteers should still only send in one youth at a time.

Option 2: Monitoring Solo Bathroom Breaks

- Group bathroom breaks are not always feasible. In these circumstances, individual youth should ask permission before using the bathrooms and obtain a bathroom pass. This way staff and volunteers know who is going to the restroom and when. Staff should monitor the length of a child's bathroom visit and check-in after a few minutes of absence.
- Staff should randomly and periodically monitor bathrooms to ensure that youth are not lingering there. It is important that staff and volunteers periodically check restrooms so that youth know that an adult could walk in at any time.

When possible, staff and volunteers should use staff-only bathrooms. Thank you for helping to keep our keep our kids safe!

6.0 Entrance and Exit Control

All facility entries and exits shall be controlled and monitored by a staff member 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.

7.0 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 shall be monitored, maintained, well-lit, clean, and free of hazards and obstructions. All storage closets and other unused areas are to be locked during operational hours.

Damages to the facilities shall be repaired in a reasonable time frame. Unit directors shall be responsible for notifying the School's Front Office and notifying the COO. Damages that pose an imminent risk to the health and safety of members, staff, or volunteers shall be repaired immediately. If the immediate repair to damage that poses imminent risk is not possible, the CEO or COO shall determine if 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.

8.0 Food and Drink

Any distribution, preparation, or food consumption 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 stored appropriately.

9.0 Employees - Screening and Reference Checks

Boys & Girls Clubs of St. Joseph County 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 following this policy.

Background Checks

Boys & Girls Clubs of St. Joseph County 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 children.

The background check shall be 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
- Include any additional background check criteria required by 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 annually thereafter.

All background check findings shall be considered when making employment or volunteer decisions.

Barrier Crimes

Boys & Girls Clubs of St. Joseph County will not hire potential staff or engage potential volunteers if such individual:

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

Interviewing

Boys & Girls Clubs of St. Joseph County will conduct in-person behavioral-based interviews with every candidate for employment or program volunteer service. Interview questions shall be pulled from BGCA's behavioral-based interview questions or similar resources.

Reference Checks

Boys & Girls Clubs of St. Joseph County 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 Boys & Girls Club, a confirmation that the candidate is employable must be obtained from all previous Boys & Girls Clubs, the candidate worked at before extending an offer for employment or volunteer service. Additionally, **Boys & Girls Clubs of St. Joseph County** provides reference materials when asked by other Member Organizations within the local, state, and federal law guidelines.

9.1 Employee – Onboarding

Upon acceptance of an offer and passing the Background Check, and Reference Check, each new Club employee shall receive and confirm in writing receipt of an up-to-date Employee Handbook and Child & Club Safety Handbook. In addition, these Handbooks shall be available in the Document section of the Workforce Now portal.

These handbooks shall, at a minimum, articulate current:

- Conditions of employment
- Benefits
- Rights and Responsibilities of employees
- Club safety policies
- 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 description and performance standards for their position;
- The needs and other relevant characteristics of program participants, including cultural and socioeconomic factors;
- 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 following BGCA Spillet Leadership University trainings:

- Core: An Orientation to the Boys & Girls Club Movement
- Youth Development:
 - Boys & Girls Club Basics
 - Ask-Listen-Encourage
 - Developmental Characteristics of Youth

- De-escalating Concerning Behavior
- Staff-to-Youth Interactions
- Providing Informal Guidance & Discipline Techniques
- Reframing Conflict
- Safety:
 - Keeping Your Club Safe
 - Meet SAM
 - Duty to Report: Mandated Reporter
 - Child & Club Safety 101
 - Preventing Bullying in Youth Organizations
- Programming:
 - Introduction to the Formula for Impact
 - Programming in Boys & Girls Clubs
 - Academic Success: Intro to Power Hour
 - Active Learning
 - Cooperative Learning
 - Structure & Clear Limits

9.2 Employee –Drug and Alcohol-Free Workplace

Boys & Girls Clubs of St. Joseph County 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. As such:

- 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 perform his or her job duties safely. Employees taking any legal drugs that potentially affect job safety or performance are responsible for notifying their supervisor and/or Club leadership to determine job performance or a reasonable accommodation can be made. An employee may not be permitted to perform their job duties unless such a determination or reasonable accommodation has been completed.
- 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 termination.

Boys & Girls Clubs of St. Joseph County further reserves the right to take 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 locks, desks, or other suspected areas of concealment, as well as an employee's personal property when the organization has reasonable suspicion that the employee has violated this policy.

Reasonable Suspicion

Staff and or volunteers shall immediately notify COO/CEO 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.

The CEO/COO 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.
 - Repeatedly damaging inventory or failing to meet reasonable work schedules.
 - Being involved in frequent accidents that can be related to the use of drugs or other substances.

Testing

Screening, testing, and security measures may be used as enforcement methods, 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. The examination records will be treated as confidential and held in a separate medical file. However, records of specific examinations will be made available, if required by law or regulation, to the employee, persons designated and authorized by the employee, public agencies, relevant insurance companies, and/or the employee's doctor.

Prescription Medication and Legal Drugs

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

Employees and volunteers taking a legal drug, such as prescription medication or medical marijuana, which potentially affects job safety or performance, are responsible for notifying their supervisor and/or Club leadership to determine 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.

9.3 Employee – Smoking

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

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. The smoking policy applies to employees, volunteers, and members while on Club premises or during Club activities (on or off-site).

Please refer to the Employee Handbook for specific information on the Smoking Policy.

10.0 Incident Management Policy

Staff and volunteers must, as the minimum, immediately report and document all safety incidents that might affect staff, volunteers, members, and others who visit the Club.

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;

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

Internal Incident Reporting

Any employee or volunteer who becomes aware of an incident, as defined by this policy, shall immediately notify the CEO/COO providing as much detail regarding the incident as possible. A written report of the incident shall be submitted as soon as practical.

The following information must be included on the incident report:

- Date, time and location
- Incident details
- Witnesses and contact information

- Names of all involved (youth, staff and volunteers)
- All notifications made (first responders, parents, leadership, etc.) and time of notifications

External incident Reporting

Boys & Girls Club of St. Joseph County follows all applicable mandated reporting statutes and regulations and all applicable federal, state, and local laws for the protection and safety of youth. Types of incidents:

- a) Inappropriate activity between adults (18 or over) and youth.
- b) Inappropriate activity between multiple youth.
- c) Allegations of child abuse.
- d) Any form of child pornography.
- e) Criminal activity, including assault, theft, and robbery.
- f) Or children missing from the premises

Incident Investigation

All incidents are taken seriously. The Club is committed to supporting external investigations of all reported incidents and requires reporting of all incidents to the Safety Committee. The Safety Committee reserves the right to perform an internal investigation when the incident is being investigated by an official external agency. The Safety Committee also reserves the right to secure an external investigator if warranted.

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

If 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

The Club shall immediately report any allegation of abuse or any potential criminal matter to law enforcement. In addition, the Club shall report critical incidents to BGCA within 24 hours.

Critical incidents to be reported shall include, but not be limited to:

- Any major medical emergency involving a child, staff member, or volunteer at a Club site 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 of abuse, including physical, emotional, or sexual abuse; sexual misconduct; harassment; or exploitation (Club-related or not) alleged against any staff member; or any Club-related instance or allegation of abuse, including physical, emotional or sexual abuse; sexual misconduct; harassment; or Club-related exploitation against a volunteer or visitor.
- Failure of an inspection by a childcare licensing agency or organization
- Any known or suspected felony-level criminal act committed at a Club site or during a Club-sponsored activity.
- A misappropriation of organizational funds in the amount 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 brand
- Any other incident deemed critical by the Member Organization.

11.0 Technology Acceptable Use Policy

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

CLUB MEMBER USAGE

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

- **Club devices** shall include 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 all member-owned existing and/or emerging technologies and devices that can take photographs, play and record audio or video, input text, upload and download content and/or media and transmit or receive messages or images.
- **Club purposes** shall include program activities, career development, communication with experts and/or Club peer members, homework, and Club activities. Members are expected to act responsibly and thoughtfully when using technology resources. Members bear the burden of responsibility to inquire with staff when they are unsure of the permissibility of a particular use of technology prior to engaging in its use.
- **Authorized use:** Club devices and personally owned devices are permitted for use during approved Club times for Club purposes and in approved locations only. The Club expressly prohibits the use of Club devices or personally owned devices in locker rooms, restrooms and other areas where there is an expectation of privacy.
- **Appropriate use:** Members may not use any technology to harass, threaten, demean, humiliate, intimidate, embarrass or annoy their peers or others in their community. Any inappropriate use of a Club or personally owned device, as determined by Club staff, can lead to disciplinary action including, but not limited to, confiscation of the device, immediate suspension from the Club, termination of membership or other disciplinary actions determined to be appropriate to the Club's existing disciplinary policies including, if applicable, referral to local law enforcement.

- **Monitoring and inspection:** **Boys & Girls Clubs of St. Joseph County** reserves the right to monitor, inspect, copy, and review any personally owned device that is brought to the Club. Parents/guardians will be notified if such an inspection takes place. Parents/Guardians will be notified before such an inspection takes place and may be present, at their choice, during the inspection. Parents/Guardians may refuse to allow such inspections. If so, the member may be barred from bringing personally owned devices to the Club in the future.
- **Loss and damage:** Members are responsible for always keeping devices with them. Staff are not responsible for the security and condition of the member's personal device. Furthermore, the Club is not liable for the loss, damage, misuse, or theft of any personally owned device brought to the Club.

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

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

Obscene, profane, lewd, vulgar, rude, inflammatory, threatening or disrespectful language or images typed, posted or spoken by members;

- Information that could cause damage to an individual or the Club community or create the danger of disruption of the Club environment;
- Personal attacks, including prejudicial or discriminatory attacks;
- Harassment (persistently acting in a manner that distresses or annoys another person) or stalking of others;
- Knowingly or recklessly posting false or defamatory information about a person or organization; or;
- Communication that promotes the destruction of property, including the acquisition or creation of weapons or other destructive devices;
- If a member is told to stop sending communications, that member must cease the activity immediately.

Cyberbullying

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

Examples of cyberbullying include, but are not limited to:

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

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

Monitoring and inspection: Boys & Girls Clubs of St. Joseph County reserves the right to monitor, inspect, copy and review files stored on Club-owned devices or networks. In addition, Boys & Girls Clubs reserves the right to inspect review personally owned devices that are brought to the Club. Parents/guardians will be notified before such an inspection takes place and may be present, at their choice, during the inspection. Parents/guardians may refuse to allow such inspections, but the member may be barred from bringing personally owned devices to the Club in the future.

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

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

Parental notification and responsibility: While Boys & Girls Clubs of St. Joseph County's Internet Acceptable Use Policy restricts the access of inappropriate material, supervision of internet usage might not always be possible. Due to the wide range of material available on the internet, some material might not fit the particular values of members and their families. Because

of this, it is not considered practical for Boys & Girls Clubs of St. Joseph County's to monitor and enforce a wide range of social values in student use of the internet. If parents/guardians do not want members to access information beyond the scope of the Internet Acceptable Use Policy, they should instruct members not to access such materials.

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

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

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

STAFF AND VOLUNTEER USAGE

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

Club devices shall include 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 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 the 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.

Monitoring and inspection: Boys & Girls Clubs of St. Joseph County 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 face disciplinary action up to, and including, termination.

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

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

Inappropriate communication includes, but is not limited to:

- Obscene, profane, lewd, vulgar, rude, inflammatory, threatening, sexual content or disrespectful
- Language or images typed, posted or spoken by staff or members.
- Information that could cause conflict.
- Personal attacks, including prejudicial or discriminatory attacks.
- Harassment (persistently acting in a manner that distresses or annoys another person) or stalking others.
- Knowingly or recklessly posting false or defamatory information about a person or organization.
- Communication that promotes the destruction of property, including the acquisition or creation of weapons or other destructive devices.

If a staff member is told to stop sending communications, he/she must cease the activity immediately. Staff must be aware of the appropriateness of communications when using Club or personally owned devices. Inappropriate communication is prohibited in any public or private messages, as well as material posted online.

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

Examples of cyberbullying include, but are not limited to:

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

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

Monitoring and inspection: Boys & Girls Clubs of St. Joseph County 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.

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

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

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

Disallowed apps and/or websites: This organization does not allow staff to access the following apps and/or websites during work hours: TikTok, Facebook, Zoomerang, Tellonym, Bigo, IMVU,

House party, Askfm, any website with content that may be deemed offensive. In addition, as our sites are school-based, restrictions regarding access are also controlled by the St. Joseph County School Districts acceptable use policies po7540.03 and po7540.04

12.0 Transportation Policy

This policy applies to the school-age programs, it specifically does not apply to Boys & Girls Clubs of St. Joseph County's licensed Preschool programs. Preschool members may not, at any time, be transported in Club vehicles or staff vehicles.

The Club only transports youth in Club vehicles unless the youth's health or safety requires immediate transportation, and it is approved by the Chief Executive Officer.

Drivers

- Must allow for DMV background check and be cleared to transport youth per the barrier crime policy
- Must keep an updated list of all youth transported to and from the Club and Club related activities.
- Must perform a pre-use safety check of the vehicle.
- Must complete a transportation log to ensure all members are picked up and dropped off at the appropriate time and locations.
- Must submit written reports detailing issues or incidents involving the transportation of members to and from the Club or Club-related activities.
- Must only transport members in official Club vehicles.

Vehicle

Each agency vehicle should meet all local, state, and federal inspection and licensing requirements. Each vehicle shall have a notebook which contains all records related to that vehicle, including:

- Annual Inspections
- Insurance
- Maintenance Performed
- Pre-Use Safety Check of the Vehicle
- Transportation Log

Accident or Emergency Protocol

The driver should immediately notify the COO/CEO if there is a delay or issue (e.g., breakdown, accident, emergency) with transporting members to and from the

Club or Club-related activities. Staff shall immediately inform the COO if a staff member, volunteer, or board member violates this policy. In such case, the organization will take appropriate disciplinary action, up to and including termination.

13.0 Video Surveillance Policy

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

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

PLACEMENT AND NOTIFICATION

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

Video monitors shall not be in an area that enables public viewing. The Club shall notify Club members, parents/guardians, staff, and the public that video surveillance systems are present by signs prominently displayed in appropriate locations throughout the facilities and grounds and provide any other notification or consent as required by applicable law.

ACCESS TO VIDEO IMAGES

The use of video surveillance equipment on Club grounds shall be supervised and controlled by the CEO and COO. The actual recording equipment will be maintained in an area or room that is locked and secure to only be accessed by authorized personnel. Live video monitoring may randomly occur as needed. Video data is recorded and stored digitally. Video recording data is considered confidential and secure. Access to live video is limited to the Front Office Staff and Unit Director of the O.C. Carmichael Site. Access to video recorded data is strictly limited to the following authorized full-time Boys & Girls Club personnel: CEO, COO and Director of Mission Integration. These authorized personnel are trained on the video surveillance policy and how video data should be used during any official investigation.

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

UNAUTHORIZED ACCESS AND/OR DISCLOSURE

Confidentiality and privacy concerns limit the public, including parents and relatives of Club members, from viewing video recording footage and/or data involving Club members, staff, and volunteers. Only the authorized personnel provided above can view and/or export

video recording data. No unauthorized recordings are permitted of video recording data through cell phones, portable devices, or any other means. Any Club personnel who become aware of unauthorized disclosure of video recording data from the Club and/or a potential privacy breach must immediately inform the COO/CEO.

Club personnel and volunteers are prohibited from unauthorized use of, tampering with or otherwise interfering with video surveillance equipment. Violations will be subject to disciplinary action that may include but are not limited to, written reprimand, suspension, demotion, or termination of employment. Video recording data will remain the property of the Boys & Girls Clubs of St. Joseph County and may be reproduced only in accordance with applicable law and board policy.

RETENTION OF DIGITAL IMAGES

Video recording data shall be kept for approximately 60 days except for appropriate still shots or selected portions of the recorded data relating to any incidents under investigation by authorities. The latter shall be retained for one year after the incident or until such time as any legal matters pertaining to the recordings have been resolved. The stored media shall be kept on a secured computer.

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

CLUB MEMBER PRIVACY

Video recording data will not be used directly or indirectly to identify the activities of individual Club members except as viewed concerning a specific event or suspected criminal activity; suspected violation of Club policy or rules; incidents where there is a reasonable basis to believe a claim may be made against the Club for civil liability; or if otherwise compelled by law. Authorized Club personnel may use a still shot or selected portions of recorded data to request law enforcement review for assessing the security risk of a specific individual or for investigating a potential crime on Club property.

DISCLAIMER OF LIABILITY

A copy of this policy will be shared with any Club member, parent/guardian, or staff member upon request.

Child and Club Safety Policy Acknowledgement

I have read them and understand that it is my responsibility to abide by all of the policies outlined therein.

Printed Name

Signature

Date