



FOR YOUTH DEVELOPMENT®
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY

CHILD ABUSE PREVENTION

YMCA at ACRC Handbook

Child Abuse Prevention Policies and Procedures	4
Responding to Violations.....	4
Policy Requiring Reporting of Red-Flag or Inappropriate Behaviors and/or Policy Violations...	4
Supervisor and Administrator Response to Red-flag or Inappropriate Behaviors and/or Policy Violations.....	5
Procedure for Internal Review of Red-flag or Inappropriate Behaviors and Policy Violations	5
Progressive Discipline Policy	7
Policy Allowing Suspension for Employee Misconduct	9
Procedures for Employee and Volunteer Response to Allegations or Incidents of Abuse	10
Procedure for Supervisors and Administrators Responding to Allegations or Incidents of Abuse	11
Procedures for Internal Review of Allegations and Incidents of Sexual Abuse	12
Guidance for Creating a Victim-Centered Response Plan	14
Procedure for Employee and Volunteer Responding to Consumer-to-Consumer Sexual Activity	15
Procedure for Supervisors and Administrators Responding to Consumer-to-Consumer Sexual Activity	16
Policies	17
Treatment of Consumers	17
Policy Prohibiting the Abuse or Mistreatment of Consumers	17
Policy Prohibiting the Abuse or Mistreatment of One Consumer by Another Consumer	17
Review of Policies	18
Policy Requiring Annual Review of Organizational Policies	18
Policy Requiring Written Communication of Policy Changes & Training	18
Policy Requiring Adherence to Organization Policies	18
Acknowledgment of Policies, Code of Conduct, or Standards	18
Defining Types of Contact and Interactions	20
Policy Defining Appropriate and Inappropriate Physical Contact	20
Policy Defining Appropriate and Inappropriate Verbal Interactions	21
Policy for Managing One-on-One Interactions Between Employees, Volunteers, and Consumers	22
Policy for Managing One-on-One Interactions Between Employees, Volunteers, and Consumers in Virtual Programming	23

Policy for Managing Interactions between Employees, Volunteers, and Consumers Outside the Organization.....	23
Social Media	25
Electronic Communication and Social Media Policy	25
Acknowledgment of Electronic Communication and Social Media Code of Conduct	25
Gift Giving.....	26
Gift-Giving Policy.....	26
Gift and Gratuities Acceptance Policy.....	26
Technology Usage.....	27
Use of Technology Code of Conduct	27
Expectation of Privacy	30
Use of Technology Code of Conduct Acknowledgement.....	30
Investigations and Reporting	31
Policy Requiring Cooperation with Investigations	31
Policy Governing Mandatory Reporting Requirements for Employees and Volunteers.....	32
Consumer Participation	33
Consumer Code of Conduct.....	33
Adult Consumer Code of Conduct	38
Content Guidance for Discussions with Consumers.....	40
Guidelines for Providing Consumers with Organizational Policies on Abuse Prevention	41
Procedures for Providing Parents/Guardians with Organizational Policies on Abuse Prevention	42
Internal Feedback Systems.....	43
Employee Grievance Policy.....	43
Written Complaint Required.....	43
Timeline	43
Investigation	44
Retaliation.....	44
Publication and Communication with Employees	44
Grievance Policy for Volunteers	45
Written Complaint Required for Formal Process.....	45
Timeline	45
Investigation	46

Retaliation.....	46
Publication and Communication to Volunteers	46
Grievance Policy for Parents/Guardians and Consumers.....	47
Written Complaint Required for Formal Process.....	47
Timeline.....	47
Investigation	48
Retaliation.....	48
Publication and Communication to Consumers and Parents/Guardians.....	48
Policy Requiring Confidentiality of Reports	49
Policy for Follow-Up with Individuals Who Report Concerns or Complaints	50
Anonymous Reporting Mechanism for Employees and Volunteers	51
Appendix I: Praesidium Helpline	52
Methods for Publicizing Ways to Report Concerns, Complaints, or Grievances	53
Guidance for Collecting Data Relevant to Abuse Prevention.....	54

Child Abuse Prevention Policies and Procedures

Responding to Violations

Policy Requiring Reporting of Red-Flag or Inappropriate Behaviors and/or Policy Violations

The YMCA of Austin Minnesota has zero tolerance for abuse. It is imperative that every employee or volunteer actively participates in the protection of consumers.

If employees or volunteers observe red-flag or inappropriate behaviors and/or policy violations by other employees or volunteers, it is their professional and personal responsibility to immediately report their observations in accordance with the organization's reporting procedures.

The following are examples of red-flag or inappropriate behaviors that all employees and volunteers are required to report:

- Any violation of the organization's abuse prevention policies
- Seeking unauthorized private time or one-on-one time with consumers
- Seeing or visiting with a consumer outside of scheduled programming
- Buying gifts for individual consumers
- Sending unauthorized electronic communications through text messaging, social media, online gaming, etc. in violation of the organization's electronic communication policy
- Making suggestive comments to consumers
- Showing favoritism towards a consumer or type of consumer
- Consumers disclosing that an employee or volunteer makes them feel uncomfortable

All reports of suspicious or inappropriate behavior with consumers will be taken seriously. Our procedures will be carefully followed to protect the rights of all those involved.

If employees or volunteers witness suspicious or inappropriate behaviors or policy violations from another employee or volunteer, the individual is instructed to do the following:

- Interrupt the behavior.
- Report the behavior to a supervisor, director, or other authority.
- If you are not comfortable making the report directly, make it anonymously
- If the report concerns a supervisor or administrator, contact the next management level.
- Complete an internal report but do not conduct an investigation.
- Keep reporting until the appropriate action is taken.

Supervisor and Administrator Response to Red-flag or Inappropriate Behaviors and/or Policy Violations

If a supervisor or an administrator receives a report of suspicious or inappropriate behaviors or policy violations from an employee, volunteer, consumer, or parent/guardian, the supervisor is instructed to do the following:

- Report to the next-level supervisor or administrator.
- Speak with the employee or volunteer who has been reported.
- Review the file of the employee or volunteer to determine if similar complaints were reported.
- Determine the appropriate response based on the report.
 - i. Take into consideration factors such as:
 1. Context of red-flag or inappropriate behavior or policy violation;
 2. Severity of red-flag or inappropriate behavior or policy violation;
 3. History of red-flag or inappropriate behaviors or policy violations;
and
 4. Trainability of employee or volunteer.
- Document the report on the appropriate form.
- If at any point in gathering information about a report of red-flag or inappropriate behavior, a concern arises about possible abuse, contact the state authorities and file a report.
- If appropriate, notify parents/guardians.
- Advise the person who reported the behavior that the report is being taken seriously.

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

- A. Increase monitoring or supervision of the employee, volunteer, and/or program.
- B. If policy violations with the consumer(s) are confirmed, the employee or volunteer must be subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the Progressive Disciplinary Process outlined by the organization.
- C. If more information is needed, interview and/or survey other employees and volunteers or consumers.

Organizational Response – After the internal review of the red-flag or inappropriate behaviors or policy violations, determine if system changes are necessary, such as:

- a. Review the need for increased supervision.
- b. Review the need for revised policies or procedures.
- c. Review the need for additional training

Procedure for Internal Review of Red-flag or Inappropriate Behaviors and Policy Violations

If there is a report of red flags or inappropriate behaviors or policy violations, the Director of Operations and/or CEO will be responsible for reviewing circumstances surrounding red flags or inappropriate behaviors and should be trained to conduct internal reviews or investigations so that larger or system-wide implications may be identified. Additionally, it is

recommended, when possible, that these internal reviews occur collaboratively outside of the program involved so that an objective and thorough review can be conducted. The designated employees are instructed to do the following:

Evaluate the root cause of the red-flag or inappropriate behaviors or policy violations:

1. Define the problem.
 - a) Identify the Who, What, When, and Where.
2. Gather all information and data surrounding the problem.
 - a) Review the Incident
 - b) Review Documentation
 - c) Interview Key Individuals
 - d) Review Policies
 - e) Review Training Curriculum
3. Perform the Analysis and determine the root cause(s).
 - a) Ask Why?
 - b) What are the system-wide causes that allowed the incident to occur?
4. Identify Corrective Action—recommendations to stop the recurrence of the problem in the future.
 - a) What operation(s) in Praesidium's Safety Equation was found to be deficient?
 - b) What best practice standards can be put in place to prevent a reoccurrence?
 - c) What are the resources needed to implement the best practice standard?
 - d) How are we going to implement and ensure compliance?
5. Implement the necessary solutions.

Progressive Discipline Policy

The YMCA of Austin Minnesota values the contributions of all employees and strives to provide an environment where those contributions can be acknowledged. To that end, regular and open communication between employees and supervisors is necessary to provide the necessary information and tools to ensure that each employee has the opportunity for success on the job.

Performance Expectations

This organization expects a high level of performance, professionalism, and accountability from employees. Communication between a supervisor and employee regarding performance-related issues should occur on a regular basis and a formal performance review, including a plan for employee development, should be conducted annually.

Coaching and Counseling

Employees are encouraged to ask questions and request guidance from their supervisors whenever needed, and, through coaching, supervisors are encouraged to provide regular feedback to employees on their performance and on their continued development.

When performance falls below expectations, supervisors may use a more formal counseling approach to address the performance issue. Counseling should be documented in writing and kept in the supervisor's files for future reference.

Corrective Action Process

When coaching, counseling, and development plans fail to assist an employee in achieving the expected level of performance, or when behavior or conduct is severe enough to require immediate corrective action, this organization follows a policy of progressive discipline for employees consisting of a four-step process:

- Verbal Warning
 - The first level warning is an informal method of informing an employee of a relatively minor violation of organization policy or of failure to perform job duties in an acceptable manner. Such feedback could be as simple as a conversation but could also include a brief note to file to Human Resources or email documentation of the verbal conversation. Consider including the following items in your documentation of Verbal Warnings:
 - The policy violation or issue giving rise to the written document.
 - For example, is this a concern regarding performance or behavioral issues, or is it an attendance-related concern.
 - Specific examples of the behavior
 - Include dates and times where available. Utilize documentation from other Verbal Warnings to build this timeline.
 - Spotlight past counseling discussions or corrective action steps, if any.
- Written Warning
 - When performance and/or attendance problems persist or when the offense is so serious that a first-level warning is not appropriate, the supervisor should consult

with Human Resources or legal counsel to draft a written document to share with the employee noting the violations and dates giving rise to the supervisor's concern. A copy of this written document should be placed in their personnel file. Consider including the following items in the written document:

- The policy violation or issue giving rise to the written document.
 - For example, is this a concern regarding performance or behavioral issues, or is it an attendance-related concern.
- Specific examples of the behavior
 - Include dates and times where available. Utilize documentation from Verbal Warnings to build this timeline.
- Spotlight past counseling discussions or corrective action steps, if any.
- Describe how the employee's behavior negatively impacts the organization.
 - How does what they're doing (or not doing) affect your organization's ability to achieve its goals/operate programming?
- Clearly set expectations and established time frame to be achieved.
 - Include objectively ascertainable steps and tasks to indicate compliance and/or behavior changes.
- Describe the consequences of the infraction at hand.
 - Consider discipline provided to you per policy such as a performance improvement plan, suspension with/ without pay, etc.
- Describe the consequences of failure to improve behavior.
 - Include a statement that failure to correct behavior will lead to further corrective action up to and including termination.
- Supervisor's signature.
- Employee's signature
 - Include the following statement: "Employee signature indicates receipt of this memorandum and does not indicate agreement to the factual statements made herein."
 - If the employee declines to sign it, this should be noted on the memo.

- **Termination**

- Termination of employment is the final action when all other appropriate steps have failed to achieve desired improvements. As such, ensure you speak to legal counsel and Human Resources prior to termination. In addition to the guidelines previously stated in this document, there may be additional considerations when the termination of an employee becomes necessary. For example:
 - Consider having a management witness present and/or security personnel on standby during the termination meeting.
 - Collect their organization-provided equipment or make plans to do so.

Policy Allowing Suspension for Employee Misconduct

The YMCA of Austin Minnesota will use the following question to determine the propriety of the employee's continued presence at our organization after an allegation of misconduct or abuse has been made and/or during an investigation for misconduct or abuse:

1. If the organization, using all evidence available to guide decision-making, determines there is no risk, the employee should remain in the workplace.
2. If the organization, using all evidence available to guide decision-making, determines risk does exist but can reasonably be avoided by temporarily reassigning the employee to an available position, the organization should make the effort to do so.
3. If the organization, using all evidence available to guide decision-making, determines risk is present and cannot be avoided by reassignment, or where an appropriate position is not available, an indefinite suspension or administrative leave should be used until the resolution of the matter.

This organization will communicate any decision to suspend or place an employee on administrative leave in writing. The written document announcing suspension or administrative leave must be shared with the employee, consistent with the requirements set forth in the organization's progressive discipline policy for written discipline, and a copy must be placed in the employee's personnel file.

Procedures for Employee and Volunteer Response to Allegations or Incidents of Abuse

As required by mandated reporting laws, employees, and volunteers must report any suspected abuse or neglect of a consumer—whether on or off organization property or whether perpetrated by employees, volunteers, or others—to state authorities. Reports may be made confidentially or anonymously. A person who mistakenly reports suspected abuse is immune from civil or criminal liability as long as the report was made in good faith and without malice.

In addition to reporting to state authorities, employees and volunteers are required to report any suspected or known abuse of consumers perpetrated by employees or volunteers directly to leadership so that immediate and proper steps may be taken to ensure the safety of alleged victims and others who may be at risk. Reports of suspected or known abuse may be made confidentially to the following:

1. Immediate supervisor
2. Directors
3. Administrators

Additional guidelines for employee and volunteer response to incidents or allegations of abuse:

- If you witness abuse, safely interrupt the behavior immediately.
- If abuse is disclosed to you, assure the individual disclosing that he or she was correct to tell you.
- Protect the alleged victim from intimidation, retribution, or further abuse to the extent possible.
- Immediately report the allegation or incident to the proper organization authorities (based on mandatory reporting requirements) and the designated authority.
- Be sure to document the incident, disclosure, or any circumstances causing your suspicion of abuse according to incident reporting and documentation requirements. State only the facts.
- It is not your job to investigate the incident, but it is your job to report the incident to your supervisor in a timely manner.
- Check back to make sure appropriate steps were taken. If not, report again to your supervisor or the designated organization authority.

Procedure for Supervisors and Administrators Responding to Allegations or Incidents of Abuse

As mandated reporting laws require employees and volunteers must report any suspected abuse or neglect of a consumer—whether on or off organization property or perpetrated by employees, volunteers, or others—to state authorities. Reports may be made confidentially or anonymously. A person who mistakenly reports suspected abuse is immune from civil or criminal liability as long as the report was made in good faith and without malice.

Guidelines for supervisors and administrators responding to allegations or incidents of abuse:

- First, determine if the consumer is still in danger, and if so, take immediate steps to prevent any further harm.
- If receiving a report from an employee or volunteer, verify they have followed mandated reporting requirements or will follow immediately after making an internal report.
- Report to any applicable external licensing or governing bodies.
- Gather as much information about the allegation as you can. For example, who made the report, who was allegedly abused, who was the alleged abuser, what was the nature of the alleged abuse, where and when did the alleged abuse occur, etc.
- Accurately record everything you learn in as much detail as you can. Remember your notes may be read by others. Stick to the facts.
- Contact the appropriate local authorities as indicated by your mandatory reporting procedures. Ensure you get a case number and the name and contact information of the person you speak with at the reporting agency.
- If the alleged abuse involves an employee or volunteer, notify your crisis management team and follow your crisis management plan.
- Suspend the accused employee or volunteer until the investigation is completed.
- Ensure that the consumer's parents/guardians are notified (when applicable).
- Deploy communication plan.
- Provide resources for victims, families, and other stakeholders.

Procedures for Internal Review of Allegations and Incidents of Sexual Abuse

Written procedures that include mandated reporting requirements as well as internal and external documentation are important for several reasons. First, having these procedures written and implemented ensures compliance with state laws regarding mandated reporting. Second, documentation of allegations and disclosures of abuse ensures transparency both internally and externally in the organization. Lastly, having these procedures in a written format ensures that all employees and volunteers understand their role in reporting.

If there is a report or incident of sexual abuse, the Director of Operations will be responsible for conducting an internal review or investigation of the circumstances surrounding the allegation or incident of abuse. The employees tasked with this responsibility should be trained to adequately fulfill their responsibilities in a manner that will help them identify larger or system-wide implications. Additionally, it is recommended, when possible, that these internal reviews are led and conducted by an employee outside of the program involved or by a professional, external investigator so that an objective and thorough review can be conducted.

In the case of potential sexual abuse, the organization will conduct an internal review or investigation only after reporting to the civil authorities and with their consent. If the authorities investigate, the organization will cooperate fully with them and will not take any steps that may interfere with the said investigation.

If the civil authorities do not proceed with an investigation or if they consent to the organization conducting a simultaneous internal review, the designated employees are instructed to do the following:

1. Define the problem.
 - a. Identify the Who, What, When, and Where by reviewing the initial allegation report (if written) and interviewing the potential victim-survivor.
2. Gather all information and data surrounding the circumstances and the accused.
 - a. Review the initial allegation report
 - b. Review additional documentation and materials (personnel file, documentation completed by others with respect to the incident, training records, disciplinary records, video footage, etc.)
 - c. Interview additional key individuals (accused, supervisors, witnesses, etc.)
 - d. Review Policies
 - e. Review Training Curriculum
3. Perform the Analysis and determine the root cause(s).
 - a. Ask Why?
 - b. What are the system-wide causes that allowed the incident to occur?
4. Identify Corrective Action—recommendations to stop the recurrence of the problem in the future.
 - a. What operation in Praesidium's Safety Equation was found to be deficient?
 - b. What best practice standards can be put in place to prevent a reoccurrence?
 - c. What are the resources needed to implement the best practice standard?
 - d. How are we going to implement and ensure compliance?
5. Elaborate a report to document your findings and corrective actions.
6. Implement the necessary solutions.

Additional Guidelines for Employees Conducting Internal Reviews:

1. The employee will advise any interviewees that he/she represents the organization and that conversations with the employee are not subject to any attorney/client privilege.
2. The employee will strive to maintain the rights of all concerned in the process.
3. If the internal review results in additional information that may suggest an incident of sexual abuse has occurred, the civil authorities shall be re-contacted and a follow-up report will be submitted if requested.

Who Should be Designated to Conduct Internal Reviews of Allegations of Abuse:

1. Someone from the Human Resources Department and/or Leadership.
2. Employees who have training in conducting interviews.
3. Employees responsible for abuse prevention initiatives.
4. External professional investigator.

Guidance for Creating a Victim-Centered Response Plan

Be Prepared

- Designate a victim assistance coordinator.
- Understand the dynamics of disclosure and why survivors sometimes take years to come forward.
- Understand that certain aspects of the survivor's recollection of events may be fuzzy but that does not mean the survivor is not credible.
- Ensure your organization's response plan includes outreach to those affected.
- Train front-line employees on how to respond appropriately:
 - Document all details provided including the name of the reporter, when they made their report, and who took the report.
 - Thank the individual for reporting. "Thank you for telling me." Inform the reporter that the information will be passed to the designated organization point person who will follow up with additional support as soon as possible.

Once a Survivor Has Been Identified

- Proactively reach out and offer to meet. If they don't want to meet, ask what would be most helpful to them. What would they like to see happen as a result of coming forward?
- Ask how you can support them. Don't assume you know what they want and why.
- Consider offering resources to meet the needs of those affected (i.e., counseling, therapeutic services, pastoral assistance)
- Don't be afraid to apologize for what happened in the past.
- Be clear with the survivor about your reporting requirements.

When Meeting with a Survivor

- Listen to all information the reporter provides and be compassionate.
- Tell the survivors they were right to come forward.
- Let the survivor know you believe them.
- Assure the survivor the abuse was not their fault.
- Provide confidence that consumer protection is your highest priority and that safeguards are in place.
- Avoid expressing shock or outrage.
- Avoid questions that could make the survivor feel responsible (i.e. Why did you take so long for you to report?).
- Follow mandated reporting requirements.
- Inform the survivor that the organization will provide transparent and regular updates on the investigation and next steps as much as possible.

Procedure for Employee and Volunteer Responding to Consumer-to-Consumer Sexual Activity

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

If employees or volunteers witness consumer-to-consumer sexual behaviors that are contrary to defined behavioral expectations between consumers, they are instructed to follow these guidelines:

- If you observe sexual activity between consumers, you should safely separate them as soon as possible.
- Calmly explain that such interactions are not permitted and separate the consumers.
- Notify your supervisor and parent/guardian (when applicable)
- Complete the necessary documentation including what you observed and how you responded.
- Follow your supervisor's instructions regarding notifying the authorities and informing the parents/guardians of the consumers involved.
 - i. Do not attempt to determine whether the consumer's behavior was "sexual curiosity". There is no standard definition of what normal sexual curiosity looks like. An external body, such as law enforcement, utilizes criteria to investigate and determine whether the consumer's behavior is sexual curiosity.
- If the problem is recurring, additional action may be required including not allowing one or both consumers to return to the program.
- Identify how consumers will be managed or supported to prevent further occurrences of sexual activity (i.e., safety or behavioral plans including additional supervision requirements)

Procedure for Supervisors and Administrators Responding to Consumer-to-Consumer Sexual Activity

In the event that a supervisor or administrator receives a report of a consumer's sexualized behavior or consumer-to-consumer sexual activity, they are instructed to follow these guidelines:

- Meet with the employee or volunteer who reported the sexual activity to gather additional information.
- Confirm that the consumers involved have been separated or placed under increased supervision.
- Notify the proper authorities.
- Review the incident report to confirm it is accurately and thoroughly completed.
- Meet with parents/guardians of the consumers involved (when applicable).
- Review the immediate steps taken by the employee or volunteer who initially responded.
- Determine what additional actions should be taken to ensure there is no recurrence.
- In some cases, consumer behavior can be managed through a safety or behavior management plan.
- Develop a written corrective action or follow-up plan in response to the incident.

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

- Assessing the suitability of the program for the consumers involved.
- Review the need for additional consumer or program supervision
- Review the need for revised policies or procedures
- Review the need for additional employee or volunteer training
- Review the need for additional consumer education
- Alert others in the organization

Policies

Treatment of Consumers

Policy Prohibiting the Abuse or Mistreatment of Consumers

The YMCA of Austin Minnesota has zero tolerance for abuse and will not tolerate the mistreatment or abuse of consumers in its programs. Any mistreatment or abuse by an employee or volunteer will result in disciplinary action, up to and including termination of employment or volunteer service and cooperation with law enforcement.

Policy Prohibiting the Abuse or Mistreatment of One Consumer by Another Consumer

The YMCA of Austin Minnesota has zero tolerance for abuse, mistreatment, or sexual activity among consumers within the organization. This organization is committed to providing all consumers with a safe environment and will not tolerate the mistreatment or abuse of one consumer by another consumer. Conduct by consumers that rises to the level of abuse, mistreatment, or sexual activity will result in intervention or disciplinary action up to and including dismissal from the program and/or this organization.

In addition, our organization will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, the organization will take the necessary steps to eliminate such behavior.

Review of Policies

Policy Requiring Annual Review of Organizational Policies

The YMCA of Austin Minnesota will annually review existing abuse prevention policies to:

1. Ensure the purpose and goal of the policy are still relevant.
2. Determine whether a policy should be combined with another policy or rescinded.
3. Determine if the policy is up to date with current laws; and to
4. Determine whether changes are required to improve the effectiveness or clarity of the policy and/or procedure.

Once a policy (or policies) has been identified for review, the policy owner or department responsible for enforcement will:

1. Develop a draft update in consultation with relevant stakeholders.
2. Review the draft with relevant stakeholders for relevance, clarity, and effectiveness.
3. Submit the draft policy for review by the Policy Review Committee.

Once the Policy Review Committee has reviewed and edited the policy, submit the final version to the Promotion/IT Coordinator and Program Directors responsible for updating and publishing policy manuals.

The YMCA of Austin Minnesota will announce and communicate all policy changes to employees, volunteers, consumers, and parents/guardians through written or electronic methods, and organizational methods such as employee meetings, training, and supervision discussions.

Policy Requiring Written Communication of Policy Changes & Training

The YMCA of Austin Minnesota will communicate changes to organizational policy manuals and/or procedures in writing within fourteen (14) days of the change. The organization will determine an official mode of communication and will use that to communicate any changes to policy or procedures. The organization will make efforts to communicate changes to consumers, and parents/guardians.

Any training necessary to effectuate policy or procedure changes will be assigned to relevant employees and volunteers and is expected to be completed as soon as practicable.

Policy Requiring Adherence to Organization Policies

The YMCA of Austin Minnesota requires all employees and volunteers to sign a statement of acknowledgement and compliance with all organizational policies upon hire and repeated annually.

Acknowledgment of Policies, Code of Conduct, or Standards

All employees and volunteers with access to consumers shall confirm that they have read and agree to comply with the YMCA of Austin Minnesota's abuse prevention policies, Code of

Conduct, and consumer protection standards by signing a written acknowledgment upon hire and annually thereafter.

The YMCA of Austin Minnesota shall ensure that all employees and volunteers have signed a written acknowledgment upon hire and annually thereafter by keeping signed acknowledgment forms in personnel files.

Defining Types of Contact and Interactions

Policy Defining Appropriate and Inappropriate Physical Contact

Our physical contact policy promotes a positive, nurturing environment while protecting consumers, employees, and volunteers. The YMCA of Austin Minnesota encourages appropriate physical contact with consumers and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by employees or volunteers towards consumers in any of the YMCA of Austin Minnesota programs will result in disciplinary action, up to and including termination.

The YMCA of Austin Minnesota's policies for appropriate and inappropriate physical interactions include but are not limited to:

<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
Contact initiated by the consumer such as: • Side hugs • Shoulder-to-shoulder • Pats on the shoulder or back • Handshakes • High-fives and hand-slapping • Pats on the head when culturally appropriate • Touching hands, shoulders, and arms • Arms around shoulders • Holding hands (with young children in escorting situations) • Allowing consumers, kindergarten or younger, to sit on an employee or volunteer's lap. • Allowing a consumer, kindergarten or younger, to cling to an employee's or volunteer's leg.	• Full-frontal hugs • Kisses • Showing affection in isolated areas or while one-on-one • Wrestling • Piggyback rides • Tickling • Allowing a consumer, older than kindergarten, to cling to an employee's or volunteer's leg. • Allowing consumers, older than kindergarten, to sit on an employee or volunteer's lap. • Any type of massage given by or to a consumer outside of accepted and documented medical treatment. • Any form of affection that is unwanted by the consumer or the employee or volunteer. • Touching bottom, chest, or genital areas that are outside authorized and documented personal care assistance

Policy Defining Appropriate and Inappropriate Verbal Interactions

Employees and volunteers are prohibited from speaking to consumers in a way that is or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.

Employees and volunteers must not initiate sexually-oriented conversations with consumers. Employees and volunteers are not permitted to discuss their own sexual activities with consumers.

The YMCA of Austin Minnesota's policies for appropriate and inappropriate verbal interactions include but are not limited to:

Appropriate Verbal Interactions	Inappropriate Verbal Interactions
• Positive reinforcement • Appropriate jokes • Encouragement • Praise • Strength-based conversations • Self-disclosure as a supervised therapeutic tool by licensed clinicians, medical professionals, and pastoral counseling	• Name-calling • Discussing sexual encounters or in any way involving consumers in the personal problems or issues of employees and volunteers • Secrets • Cursing • Off-color or sexual jokes • Shaming, belittling • Oversharing personal history • Derogatory remarks • Harsh language that may frighten, threaten, or humiliate consumers. • Derogatory remarks about the consumer or his/her family • Compliments relating to physique or body development.

Policy for Managing One-on-One Interactions Between Employees, Volunteers, and Consumers

One-on-one interactions with consumers should only occur during programming under authorized circumstances. The purpose of this policy is to ensure The YMCA of Austin Minnesota clearly communicates expectations for employees and volunteers and gives examples of appropriate behavior when one-on-one interactions may occur. In those situations where one-on-one interactions are authorized, employees and volunteers should observe the following guidelines to limit the risk of abuse or false allegations of abuse:

- Meet consumers in a public place where you are in full view of others.
- Avoid physical affection during one-on-one interactions. If physical interactions occur, ensure appropriate physical and verbal interactions align with The YMCA of Austin's established policies, See P5 Policy Defining Appropriate and Inappropriate Physical Contact and P6 Policy Defining Appropriate and Inappropriate Verbal Interactions, and are limited to the task at hand. Immediately share the nature and extent of physical interactions that occurred during the one-on-one interaction with your supervisor after the interaction has ended.
- If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by.
- Inform other employees and volunteers that you are alone with a consumer and encourage them to randomly drop in or pass by the interaction.
- To the extent possible, ensure one-on-one interactions occurring behind closed doors are scheduled in advance, occurring in a room with windows or glass in the door, and/or are communicated with the supervisor.
- Ensure one-on-one interactions are documented, especially if behind closed doors. Keep documentation of these meetings (such as in shared calendar, case notes, etc.).
- Document and immediately report to your immediate Supervisor or Director any unusual incidents, including disclosures of physical interactions, abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted or that made you uncomfortable.

Policy for Managing One-on-One Interactions Between Employees, Volunteers, and Consumers in Virtual Programming

The YMCA of Austin Minnesota prohibits all electronic and social media communication directly with consumers.

- Employees and volunteers are prohibited from sending text messages to consumers and/or replying to text messages from a consumer. If a consumer attempts to communicate with an employee or volunteer via text, a supervisor must be notified immediately.
- All e-mail communications with consumers who are minors must be directed to the consumer's parents/guardians and should be done using an organizational email instead of a personal email. An organization may also designate an employee to be copied on all electronic communication with consumers. Employees and volunteers are prohibited from all other forms of electronic communications and instant messaging with consumers.
- Employees and volunteers are prohibited from communicating with consumers using social networks, including direct messaging through social media and gaming platforms.
- Personal social media accounts and blogs of employees and volunteers must be private and inaccessible to consumers. Employees and volunteers with profiles on social media sites may not request to be friends with or follow consumers or approve friend/follow requests from consumers.
- Any responses to social media or emails on behalf of The YMCA of Austin Minnesota will come from the Marketing/IT Coordinator or CEO.

Policy for Managing Interactions between Employees, Volunteers, and Consumers Outside the Organization

Research shows many cases of organizational abuse occur off-site and outside of regularly scheduled activities. Allowing contact outside of regularly scheduled activities may put employees, volunteers, consumers, and The YMCA of Austin Minnesota at increased risk. This document offers various options for managing the risk of abuse and false accusations arising from contact outside the organization's regularly scheduled programming.

Examples of contact outside of regularly scheduled program activities:

- Babysitting arrangements
- Tutoring
- Private lessons/coaching
- Mentorship
- Social interactions between employees' or volunteers' children and children served by The YMCA of Austin Minnesota:
 - Playdates and birthday parties
 - Sleepovers
 - Overnight trips and vacations
 - Rides to/from an organization or extracurricular activities and events
- Attending public events in a shared community (like graduation, sports events, and

- religious ceremonies)
- Continued contact with the consumer after a consumer's participation in a program has ended.

The YMCA of Austin Minnesota strongly encourages employees and volunteers to refrain from outside contact with consumers with whom they do not have a preexisting familial or social relationship (i.e., children are friends at school, families attend the same religious institution). However, if interactions with consumers outside of regularly scheduled program activities are part of programming or otherwise unavoidable, this organization offers the following guidelines:

- If there is a pre-existing social or familial relationship, ensure proper boundaries are drawn by the employee or volunteer while in organization programming.
 - For example, if Emily Employee is best friends with Consumer Charlie's mom such that Consumer Charlie calls Emily by her first name in social settings, ensure Emily communicates to Consumer Charlie that while in organization programming Consumer Charlie needs to call Emily, Ms. Employee. This helps reinforce the boundary and makes clear that Emily's role as an employee or volunteer is different than her role as Consumer Charlie's mom's best friend and the relationship should reflect that.
 - If Emily has children who are friends with Consumer Charlie, she can give Consumer Charlie a ride if her children are also in the car. Even in that interaction, make sure Consumer Charlie is sitting in the back seat. The same rules apply for trips to McDonald's/the park/etc. that occur as part of the preexisting social relationship.
 - To increase transparency, consider texting or emailing an administrator when interactions like transportation and social outings occur.
 - If Emily allows other young consumers to spend the night with her children, ensure administrators are notified to increase transparency and consider keeping the number of consumers at the gathering small (1-3). Ensure that rules prohibiting one-on-one interactions apply in this setting and that consumers are not going into Emily's bedroom or vice versa.
 - If consumers are going to join Emily and her children on a vacation or other trip, make sure the Rule of Three applies so there are no one-on-one interactions. Consider requiring Emily to get some sort of written confirmation from the consumer's parents/guardians that they have allowed their child to go (can be as simple as a text).
- Consider utilizing a preexisting relationship form (i.e. if someone has a familial or social relationship with a consumer or will be hiring them to babysit/housesit/tutor/etc.) have them notify the organization ahead of time. This helps ensure transparency and protects the employee or volunteer from rumors. For example, if Coach Jones has hired Morgan to babysit and someone sees Morgan leaving Coach Jones' house at 10 pm on a Friday night, it is much easier for the employee or volunteer and organizational leadership to respond to those concerns if they have been notified that interaction was going to take place. It is not a foolproof system, as abuse can certainly still happen in the situation given, but it adds an extra layer of protection for employees, volunteers, and consumers.

Social Media

Electronic Communication and Social Media Policy

The YMCA of Austin Minnesota prohibits all electronic and social media communication directly with consumers. All employees and volunteers are to follow these guidelines:

- Employees and volunteers are prohibited from sending text messages to consumers and/or replying to text messages from a consumer. If a consumer attempts to communicate with an employee or volunteer via text, a supervisor must be notified immediately.
- All e-mail communications with consumers who are minors must be directed to the consumer's parents/guardians. An organization may also designate an employee to be copied on all electronic communication with consumers. Employees and volunteers are prohibited from all other forms of electronic communications and instant messaging with consumers.
- Employees and volunteers are prohibited from communicating with consumers using social networks, including direct messaging through social media and gaming platforms.
- Personal social media accounts and blogs of employees and volunteers must be private and inaccessible to consumers. Employees and volunteers with profiles on social media sites may not request to be friends with or follow consumers or approve friend/follow requests from consumers.

Acknowledgment of Electronic Communication and Social Media Code of Conduct

I have received a copy, read, and voluntarily agree to comply with this organization's Electronic Communication and Social Media Code of Conduct. I understand that failure to comply with these policies will result in disciplinary actions up to and including termination.

(Please Print)

Name _____

Program or

Department: _____

Signature _____
Date _____

Parent/Guardian Name *(if applicable)*

Signature _____
Date _____

Gift Giving

Gift-Giving Policy

The YMCA of Austin Minnesota strongly encourages employees and volunteers to refrain from exchanging gifts with consumers. However, gifts to consumers may be given under the following circumstances:

1. Gift requests must be submitted to a supervisor and/or a designated administrator prior to being purchased.
2. The supervisor and/or designated administrator will determine a cost limit regarding how much can be spent on the gift (\$3-\$5 per consumer/ per event); and,
3. Parents/guardians of the consumers must be notified about the gift item and why the consumers are receiving the gift.
4. Employees and volunteers are prohibited from giving gifts to individual consumers except when the gift is authorized by a supervisor or designated administrator and given to all consumers (i.e., a celebration of special events/holidays or group recognition).
5. Require employees and volunteers to communicate that the gift is given on behalf of the organization, not the individual employee or volunteer.

Gift and Gratuities Acceptance Policy

To be respectful of consumers, parents, vendors, potential vendors, or other outside parties, the YMCA of Austin Minnesota makes reasonable allowances for acts of gratitude involving small gifts of appreciation from consumers and/or their families that have a monetary value not exceeding \$25.00. Employees and volunteers have an obligation to act solely in the YMCA of Austin Minnesota's best interest; therefore, employees and volunteers should not accept any gift, favor, or entertainment valued at more than \$25.00 from a consumer, parent, vendor, potential vendor, or other outside party. Under no circumstances can money be accepted

However, if consumers, parents, vendors, potential vendors, or other outside parties approach an employee or volunteer with a gift that exceeds \$25.00, the employee or volunteer should politely decline the gift and refer to this policy. The employee or volunteer can also encourage the consumer, parent, vendor, potential vendor, or other outside party to speak with an immediate supervisor and/or a designated administrator if they have any questions.

Employees and volunteers may accept meals, refreshments, or entertainment of a nominal value (\$25.00 limit) in connection with business discussions; for instance, occasional luncheons or dinner meetings, held to

conserve time and build relationships. All employees and volunteers have a personal responsibility to ensure that their acceptance of such gifts, meals refreshments, or entertainment is proper and not reasonably construed as an attempt by others to secure favorable treatment.

Artwork and letters of appreciation written by consumers for employees or volunteers may only be accepted if these items are displayed in a public area at the organization. Employees and volunteers may not take consumer artwork or letters away from the organization whether to their personal homes or any other location.

Technology Usage

Use of Technology Code of Conduct

The YMCA of Austin Minnesota utilizes technology in nearly every facet of programming, communication, and operation. This policy outlines expectations for the use of technology, both provided by the organization and personally owned (during programming), by employees, volunteers, and consumers ("Users"). Technology is a comprehensive term including, but not limited to, all organization and personally owned computers, projectors, televisions, iPads, tablets, multimedia players, cameras, cell phones, smartwatches, and/or other technologies.

All members of our community have a responsibility to use both personal and organization-owned technology in a responsible, lawful, and ethical manner. User use of technology during programming must be consistent with our organization's philosophy, goals, and ethical standards. This organization will educate Users regarding the acceptable and responsible use of technology, appropriate online behavior and interaction on social networking websites, and an awareness of, and response to, cyberbullying.

Use of Filters on Organization-Owned Technology

The YMCA of Austin Minnesota will block or filter content over its internet and technology that the organization considers inappropriate. This includes pornography, obscene material, and other material that may be harmful to consumers or against the mission and standards of this organization. The YMCA of Austin Minnesota reserves the right to block or filter other content deemed to be inappropriate, lacking educational or work-related content, or that poses a threat to the network. At its discretion, the organization may disable such filtering for certain users for bonafide research or other lawful educational or business purposes. Users shall not use any website, application, or methods to bypass filtering of the network or perform any other unlawful activities.

Standards of Electronic Communication

All communication that takes place using personally owned (during programming) or organization-owned technology must reflect the mission and values of our organization. This includes but is not limited to emails, texts, messages, and posts online. Additionally, User communications must be through official organizational email accounts for all programmatic and organization-related business. Official organization email accounts will be provided for Users for such purposes. Email is intended for use for programmatic purposes only.

To responsibly communicate online Users MAY NOT:

1. Access, send, receive, download, produce, or distribute any offensive, profane, threatening, pornographic, or sexually explicit material at any time, for any reason.
2. Access websites, newsgroups, or chat areas that contain material that is counter to the organization's mission or that promotes illegal acts.

When using technology, Users are expected to:

1. Use technology tools and hardware for programmatic purposes only.
2. Refrain from using personal or organization-owned devices in restrooms, locker rooms, or other areas where there is a reasonable expectation of privacy.
3. Refrain from using cell phone cameras and/or any recording functions, on the cell phone or within apps, during programming unless permission is granted. If permission is granted, the camera or recording feature is only to be used as directed by the employee or volunteer only for that particular purpose.
4. Use the network for any activity or to transmit any material that violates federal, state, or local laws.
5. Refrain from harassing, bullying, taunting, hazing, or otherwise acting in a manner toward employees, volunteers, and consumers that is counter to the organization's mission, including its prohibition against bullying and hazing. The **YMCA of Austin Minnesota has zero tolerance for cyberbullying.**
6. Refrain from engaging in personal attacks, harassing others, posting confidential and/or personal information about others, or posting in a libelous, disrespectful, or harassing manner **will result in disciplinary action, up to and including termination.**

Expectation of Privacy

Users do not have an expectation of privacy in communications transmitted through organization devices or technology. Our organization reserves the right to monitor and track online behaviors and interactions via organization-owned technology. Emails, messages, and other information sent through the organization's network can be inspected and files saved onto organization computers may be reviewed at any time.

In addition, Users have a limited expectation of privacy when using their own technology, particularly when activity violates the law or organization policy, and/or compromises the safety and well-being of other members of the organization. We will investigate reports of inappropriate posts or other online activity, and hold employees, volunteers, and consumers accountable for online activity that violates the law or organization policy, and/or compromises the safety and well-being of other members of the organization.

Use of Technology Code of Conduct Acknowledgement

I have received a copy, read, and voluntarily agree to comply with our organization's Use of Technology Code of Conduct. I understand that failure to comply with these policies will result in disciplinary actions up to and including termination.

Please Print

Name _____

Role/Title _____ Program _____

Signature _____
_____ Date _____

Investigations and Reporting

Policy Requiring Cooperation with Investigations

The YMCA of Austin Minnesota takes every allegation of abuse or misconduct seriously and will fully cooperate with the authorities to investigate all cases of alleged abuse or misconduct. Employees and volunteers shall cooperate with any external investigation by outside authorities or internal investigation conducted by the organization or persons given investigative authority by the organization.

Cooperation with investigations includes, but is not limited to:

- Promptly acknowledging and responding to requests for information;
- Making oneself available for meetings with investigating officials;
- Providing full, accurate, and truthful information;
- Keeping confidential information learned or transmitted during the investigation, unless directed by legal authorities, and
- Preserving relevant information and documents.

An employee or volunteer's failure to cooperate with an investigation will result in disciplinary action up to and including termination.

Acknowledgment of Cooperation with Investigations

I have received a copy, read it, and voluntarily agree to comply with The YMCA of Austin Minnesota's Cooperation with Investigations. I understand that failure to comply with these policies may result in my removal from this organization.

Name (Please Print) _____

Program or Department: _____

Signature_____Date_____

Policy Governing Mandatory Reporting Requirements for Employees and Volunteers

All employees and volunteers must follow state-specific mandatory reporting requirements.

Employees and volunteers must be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. Employees and volunteers will:

1. be familiar with the symptoms of abuse and neglect, including physical, sexual, verbal, and emotional abuse;
2. know and follow organization policies and procedures that protect against abuse;
3. report suspected abuse or neglect to the appropriate authorities as required by state-mandated reporter laws; and
4. follow up to ensure that appropriate action has been taken.

Employees and volunteers will read and sign the Code of Conduct documenting the employee's or volunteer's understanding of the legal and ethical duty to report suspected mistreatment or abuse.

For a complete list of each state's mandated reporting requirements and contact information, please see the *US Department of Health & Human Services* guidelines for reporting abuse:

<https://www.childwelfare.gov/topics/can/>

Additionally, refer when applicable to your state's adult protective services and elder abuse reporting agencies:

<https://www.hhs.gov/answers/programs-for-families-and-children/how-do-i-report-elder-abuse/index.html>

Consumer Participation

Consumer Code of Conduct

The Code of Conduct for Consumer Participants outlines specific expectations of consumers.

Abuse or Mistreatment

The YMCA of Austin Minnesota's top priority is keeping consumers safe. Any form of abuse or mistreatment of consumers, children, employees, and volunteers is prohibited.

Consumers shall not abuse or mistreat employees, volunteers, or other consumers in any way. Use of abusive language, obscene or profane language, including racial, religious, or sexual references directed at other people will not be tolerated. It is important to treat others as you would like to be treated.

Consumers shall not engage in verbal or emotional abuse or mistreatment of other consumers, employees, or volunteers.

<i>Appropriate Verbal Interactions for Adolescent and Teenage Consumer</i>	<i>Inappropriate Verbal Interactions for Adolescent and Teenage Consumer</i>
• Appropriate jokes • Encouragement • Praise	• Name-calling • Bullying • Ridicule or Humiliation • Discussing sexual encounters • Cursing • Hazing • Off-color or sexual jokes • Shaming • Belittling • Derogatory remarks • Harsh language that may frighten, threaten, or humiliate other consumer • Derogatory remarks about another consumer or his/her family • Inappropriate games like <i>Truth or Dare</i> and <i>Never Have I Ever</i>

Consumers shall not engage in the physical abuse or mistreatment of other consumers, employees, or volunteers.

<i>Appropriate Physical Interactions for Adolescent and Teenage Consumer</i>	<i>Inappropriate Physical Interactions for Adolescent and Teenage Consumer</i>
▪ Side hugs ▪ Shoulder-to-shoulder or “temple” hugs ▪ Pats on the shoulder or back ▪ Handshakes ▪ High-fives and hand slapping ▪ Verbal praise ▪ Pats on the head when culturally appropriate ▪ Touching hands, shoulders, and arms ▪ Arms around shoulders	• Full-frontal hugs • Kisses • Showing affection in isolated areas • Lap sitting • Wrestling • Piggyback rides • Tickling • Exposing oneself • Any type of massage given by or to a consumer • Any form of affection that is unwanted by the consumer or the employee or volunteer • Compliments relating to physique or body development • Touching bottom, chest, or genital areas • Hitting • Spanking • Shaking • Slapping • Unnecessary restraints • Viewing or showing others pornographic materials

Personal Relationships

Appropriate personal relationships between consumers are encouraged. However, our organization strongly discourages romantic relationships between consumer participants while in programming. Consumers are not permitted to hold hands, sit on others’ laps, use full-frontal hugs, or kiss other consumer participants while in programming.

There should never be, under any condition, a romantic or otherwise personal relationship between a consumer participant and an employee or volunteer.

One-on-one Interactions

Most abuse occurs when an adult is alone with a consumer, or when a consumer is alone with another consumer. Our organization aims to eliminate or reduce these situations and prohibits private one-on-one interactions unless approved in advance by The YMCA of Austin Minnesota's administration. If you observe one-on-one interactions between employees and consumers, you should report this to the Director of Operations at 507-433-1804 or kwinkels@ymcaatacrc.org or the Anonymous Forms site link at <https://fs22.formsite.com/kEyPb3/njz1ycq6tc/index> Password: YmcA@9622!YmcA

Electronic Communication

All communication between employees/volunteers and consumers must be approved by a consumer's parents/guardians and must be in an open electronic environment. The "Rule of Three" must be observed in all electronic communications between consumers and employees/volunteers. For example, there should be two employees/volunteers included in text messages and emails with consumers. Direct, private messaging between consumers and employees/volunteers is not allowed.

Consumer participants will comply with the organization's policies governing the use of personal mobile communication devices. Consumer participants are not permitted to share cell phones with other consumer participants.

Alcohol, Drugs, and Tobacco

Possession and/or use of alcoholic beverages, drugs, and tobacco products while at the organization is strictly prohibited. Consumers will not be permitted to participate in any program while under the influence of alcohol, drugs, or illicit substances. Parents/guardians will be notified as appropriate.

Weapons

We want our organization to be a safe place for consumers, children, and families. Weapons and items that may be considered weapons are prohibited. Anyone found to be in possession of such items will be required to leave and the items will be confiscated. This includes laser pointers. Parents/guardians, and/or the authorities will be notified as appropriate.

Violence

Our organization seeks to provide a safe environment for individuals in our community. Violence and threats of violence will not be tolerated at The YMCA of Austin Minnesota. On our grounds, in organization facilities, in other facilities being utilized by our organization, or during The YMCA of Austin Minnesota-sponsored activities and events. Employees are available to assist in the resolution of differences.

Disruptive Behavior

We take pride in the appearance of our organization and we always want to ensure members are safe. Inappropriate or disruptive behavior is not permitted in our organization. This includes but is not limited to, graffiti, littering, spitting, or throwing objects that could intentionally or unintentionally harm others or cause disorder.

Bullying

Our organization will not tolerate the mistreatment or abuse of one consumer by another consumer. Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength. Bullying can take on various forms including:

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

Anyone who sees an act of bullying, and who then encourages it, is engaging in bullying. This policy applies to all consumers, employees, and volunteers.

Reporting

Because our organization is dedicated to maintaining zero tolerance for abuse, it is imperative that everyone, including consumers, actively participates in the protection of consumers. If consumers observe any suspicious or inappropriate behaviors and/or policy violations on the part of other employees, volunteers, or other consumers, it is their personal responsibility to immediately report their observations. Remember, at our

organization, the policies apply to everyone.

Examples of Suspicious or Inappropriate Behaviors Between Employees/Volunteers and Consumer

- Violation of any abuse prevention policies outlined by the organization
- Seeking private time or one-on-one time with consumer
- Buying gifts for individual consumer
- Making suggestive comments to consumer
- Picking favorites

Consumers are encouraged to report concerns or complaints about other employees and volunteers, other adults, or consumers to a supervisor who can be reached at 507-433-1804 or the Anonymous Forms site link at

<https://fs22.formsite.com/kEyPb3/njz1ycq6tc/index> Password: YmcA@9622!YmcA

Adult Consumer Code of Conduct

This Code of Conduct outlines specific behavioral expectations for adult consumers.

Abuse or Mistreatment

Our organization's top priority is keeping consumers safe. Any form of abuse or mistreatment of consumers, employees, and volunteers is prohibited. Consumers shall not abuse or mistreat employees, volunteers, or other consumers in any way. Use of abusive language, obscene or profane language, including racial, religious, or sexual references directed at other people will not be tolerated. It is important to treat others as you would like to be treated.

Consumers shall not engage in verbal, emotional, physical, or sexual abuse or mistreatment of other consumers, employees, or volunteers.

Bullying

Our organization will not tolerate the mistreatment or abuse of one consumer by another consumer. Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength. Bullying can take on various forms including physical bullying, verbal bullying, nonverbal or relational bullying, cyberbullying, sexualized bullying, and hazing.

Anyone who sees an act of bullying, and who then encourages it, is engaging in bullying. This policy applies to all consumers, employees, and volunteers.

Personal Relationships

Appropriate and supportive personal relationships between consumers are encouraged. However, our organization strongly discourages romantic relationships between consumers while engaged in programming. Consumers may not hold hands, sit on others' laps, kiss, or engage in other physical or sexual contact with other consumers while in programming.

Additionally, there should never be, under any condition, a romantic or otherwise sexual relationship between a consumer and an employee or volunteer.

Electronic Communication

Direct or text messaging between consumers and employees/volunteers is not allowed unless approved by a program supervisor and administrator. Employees and volunteers are not permitted to befriend/follow consumers on social networking or social media sites. Consumers will comply with the organization's policies governing the use of personal mobile communication devices while in programming.

Alcohol, Drugs, and Tobacco

Possession and/or use of alcoholic beverages, drugs, and tobacco products while at The YMCA of Austin Minnesota is strictly prohibited. Consumers will not be permitted to participate in any program while under the influence of alcohol, drugs, or illicit substances.

Weapons

We want our organization to be a safe place for all individuals. Weapons, and items that may be considered weapons, are prohibited. Anyone found to be in possession of such items will be required to leave and the items will be confiscated. The authorities may be notified as appropriate.

Violence

The YMCA of Austin Minnesota seeks to provide a safe environment for individuals in our community. Violence and threats of violence will not be tolerated at our organization, on our grounds, in our facilities, in other facilities being utilized or visited by our organization, or during organization-sponsored activities and events. Employees are available to assist in the resolution of differences.

Disruptive Behavior

We take pride in the integrity of our organization and we always want to ensure individuals are safe. Inappropriate or disruptive behavior is not permitted in our organization. This includes but is not limited to, graffiti, littering, spitting, or throwing objects that could intentionally or unintentionally harm others or cause disorder.

Reporting

Because the YMCA of Austin Minnesota is dedicated to maintaining zero tolerance for abuse, it is imperative that everyone actively participate in the protection of consumers. If a consumer observes or learns of any suspicious or inappropriate behaviors and/or policy violations on the part of other employees, volunteers, or other consumers, it is their personal responsibility to immediately report their observations or concerns.

Consumers are encouraged to report concerns or complaints about other employees, volunteers, and other consumers to a supervisor who can be reached at 507-433-1804 or the Anonymous Forms site link at <https://fs22.formsite.com/kEyPb3/njz1ycq6tc/index>
Password: YmcA@9622!YmcA

Content Guidance for Discussions with Consumers

Style of Presentation

- The tone is not frightening or tense.
- The presenter and materials are sensitive to the possibility that there may be consumers in the audience who have been sexually abused.
- The format allows for questions and discussion.
- Stereotypes of race, ethnicity, age, and gender are not used.
- The material is culturally relevant.

Structure

- All trainers have been trained in abuse recognition, prevention, and response. They should be comfortable and knowledgeable about the material. When trainers are not knowledgeable, they may have difficulty responding to questions. When trainers are not comfortable, they can make consumers feel uncomfortable as well. Untrained trainers are also often too vague to be understood by consumers.
- Training is provided periodically on an ongoing basis. Consumers do not learn well from one-time presentations. They require reinforcement throughout their development to achieve maximum benefit.
- Training involves parents/guardians, when applicable and possible. For children under the age of six, training should be provided for parents/guardians only. Younger children have difficulty understanding or making use of the information. For consumers ages six and older, parents/guardians should be informed about what their children are learning so that they can support and enhance their child's education.
- Organizations that provide training should be prepared to respond to reports of abuse. The organization that provides the training may be the adult's or consumer's only link to safety. Even when the perpetrator is not involved with the organization, systems should be in place to respond to an outcry.

Content

- Training includes a definition of abuse that is developmental and age-appropriate, clear, and understandable to consumers. For example: If someone makes you feel scared or uncomfortable...Or, if someone touches you in a way that makes you feel unsafe or uncomfortable... Or, if someone touches you in your private areas, the places where your bathing suit covers.
- Training includes information about what to do if someone makes the consumer feel uncomfortable. For example: get away from the person as fast as you can. Or ...you can say "no" to the person, but even if they don't listen to you, try to leave the room as soon as you can.
- Training includes the importance of reporting the incident to their parent/guardian and/or a trusted adult in the organization. For example, the most important thing for you to remember is to tell the teacher and your parents/guardians. Even if you're scared, you should tell one of us.

Guidelines for Providing Consumers with Organizational Policies on Abuse Prevention

The YMCA of Austin Minnesota will provide consumers with age and developmentally-appropriate information explaining our organization's policies and procedures related to abuse prevention. This document should, at a minimum, include the following:

- Code of conduct for employees/volunteers.
- Policies regarding appropriate and inappropriate displays of physical affection.
- Policies regarding appropriate and inappropriate verbal communication.
- Policies regarding one-on-one interactions and outside contact between employees/volunteers and consumers.
- Policies regarding electronic communication between employees/volunteers and consumers.
- Policies regarding gift giving and receiving between consumers and employees/volunteers.
- Policies regarding appropriate and inappropriate consumer-to-consumer interactions.
- The process for consumers to report concerns, complaints, or grievances back to the organization.

Procedures for Providing Parents/Guardians with Organizational Policies on Abuse Prevention

The YMCA of Austin Minnesota will provide parents/guardians with a written document explaining our organization's policies and procedures related to child abuse prevention. This document should, at a minimum, include the following:

- Code of conduct for employees/volunteers.
- Policies regarding appropriate and inappropriate displays of physical affection.
- Policies regarding appropriate and inappropriate verbal communication.
- Policies regarding one-on-one interactions and outside contact between employees/volunteers and consumers.
- Policies regarding one-on-one interactions and outside contact between employees/volunteers and consumers.
- Policies regarding electronic communication between employees/volunteers and consumers.
- Policies regarding gift giving and receiving with consumers and employees/volunteers.
- Policies regarding appropriate and inappropriate interactions between consumers.
- The process for parents/guardians to report concerns, complaints, or grievances back to the organization.

Internal Feedback Systems

Employee Grievance Policy

The YMCA of Austin Minnesota believes employees have valuable thoughts and insights to share regarding the workplace and our operations. Accordingly, this organization encourages employees to share opinions, suggestions, concerns, questions and/or grievances about our policies, personnel issues, and/or other workplace matters and the organization.

In general, the best person initially to bring opinions, suggestions, concerns, and/or questions to is the employee's direct supervisor. However, to the extent the concerns relate to his/her direct supervisor, or to the extent an employee believes his/her direct supervisor did not fully address a matter, employees may direct their opinions, suggestions, concerns, and/or questions to the next level of management or directly to the CEO of the YMCA of Austin Minnesota.

To remedy concerns that appear to have been ignored or unresolved after initial reporting, utilize this formal grievance procedure. This procedure provides for a timely, thorough, and objective investigation of the following concerns:

1. Wages, hours, and/or conditions of employment;
2. Harassment or discrimination;
3. Other violations of law or policy;
4. Retaliation; and/or
5. Whistleblower complaints.

Written Complaint Required

Verbal complaints are encouraged, particularly for issues that may be easily and expeditiously resolved, but a written complaint is required to initiate this grievance process.

To ensure a timely and effective response, complaints should include the following information to the extent possible:

- 1) The name(s) of employee(s) involved;
- 2) The date(s) the behavior occurred;
- 3) The name(s) of any known witness(es);
- 4) A summary of the conduct meriting the grievance including:
 - a. The behavior complained of and/or the alleged policy or legal violation(s);
 - b. Direct quotes when relevant and available; and
 - c. Any relevant documentation.
- 5) The remedy sought by the employee making the complaint.

[Form containing spaces for all of the above provided at the end of this policy.]

Timeline

Employees who themselves have a complaint against another employee who is aware of employee behavior meriting a complaint, must provide the above-described written complaint via email to their direct supervisor or the CEO within 5 business days. The direct

supervisor or CEO will meet with the employee to hear their concern and attempt to resolve the complaint within 15 business days.

Following that meeting, the direct supervisor or director of operations will provide a written response to the employee who brought the complaint no later than 15 business days that includes brief written findings on the issues raised and the relief sought.

If the employee is not satisfied with the written response, the employee who brought the complaint may submit an appeal to the CEO no later than 10 business days. The CEO will meet with the employee to hear their concern and attempt to resolve the complaint within 15 business days.

Following that meeting, the CEO will provide a written response to the employee who brought the complaint no later than 15 business days that includes brief written findings on the issues raised and relief sought.

The CEO is the final arbiter of grievance matters at this organization.

Investigation

The direct supervisor, Director of Operations and/or the CEO will thoroughly investigate the issues raised in the grievance and will protect the privacy and confidentiality of all parties involved to the extent possible by law. All employees must cooperate with the investigation.

If the organization determines a violation of policy or law has occurred, the organization will take appropriate disciplinary action, up to and including termination.

Retaliation

This organization strictly prohibits retaliation against employees for reporting, filing, testifying, assisting, or participating in any manner in any investigation, proceeding, or hearing conducted by the organization or a federal or state law enforcement agency or court. Employees should report any suspected retaliation to their direct supervisor or another supervisory-level employee immediately after becoming aware of it. Any report of retaliatory conduct will be objective, timely, and thoroughly investigated. If a report of retaliation is found to be valid, the organization will take appropriate remedial action, up to and including discharging the employee(s) responsible. This organization will not retaliate against any employee for raising a complaint and will not knowingly permit retaliation by management or other employees.

Publication and Communication with Employees

This Grievance Policy must be shared with employees annually and must be included in any organization handbook or employee manual. Any changes to this policy will be communicated in writing to employees via organization email.

Grievance Policy for Volunteers

This organization believes volunteers have valuable thoughts and insights to share regarding our operations. Accordingly, this organization encourages volunteers to share opinions, suggestions, concerns, questions and/or grievances about our policies, personnel, and/or other matters impacting the organization.

In general, the best person initially to bring opinions, suggestions, concerns, and/or questions to is the Director of Operations. However, to the extent the concerns relate to Director of Operations to the extent a volunteer believes the Director of Operations did not fully address a matter, volunteers may direct their opinions, suggestions, concerns, and/or questions to the next level of management or directly to the CEO

To remedy concerns that appear to have been ignored or unresolved after initial reporting, utilize this formal grievance procedure. This procedure provides for a timely, thorough, and objective investigation of the following concerns:

- Inappropriate Behavior by Employees/Volunteers;
- Inappropriate Behavior by Consumers;
- Retaliation; and/or;
- Whistleblower complaints.

Written Complaint Required for Formal Process

Verbal complaints are encouraged, particularly for issues that may be easily and expeditiously resolved, but a written complaint is required to initiate this grievance process.

To ensure a timely and effective response, complaints should include the following information to the extent possible:

1. The name(s) of individuals(s) involved;
2. The date(s) the behavior occurred;
3. The name(s) of any known witness(es);
4. A summary of the conduct meriting the grievance including:
 - a. The behavior complained of and/or the alleged policy or legal violation(s);
 - b. Direct quotes when relevant and available; and
 - c. Any relevant documentation.
5. The remedy sought by the employee making the complaint.

[Form containing spaces for all of the above provided at the end of this policy.]

Timeline

Volunteers who themselves have a complaint or who are aware of behavior meriting a complaint, must provide the above-described written complaint via email to their Direct Supervisor or Director of Operations within 10 business days. The Direct Supervisor or Director of Operations will meet with the volunteer to hear their concern and attempt to resolve the complaint within 15 business days.

Following that meeting, the Direct Supervisor or Director of Operations will provide a brief written response to the volunteer who brought the complaint no later than 15 business days that includes brief written findings on the issues raised and the relief sought.

If the volunteer is not satisfied with the written response, the employee who brought the complaint may submit an appeal to the CEO no later than 15 business days. The CEO, will meet with the volunteer to hear their concern and attempt to resolve the complaint within 15 business days.

Following that meeting, the CEO will provide a written response to the volunteer who brought the complaint no later than 15 business days that includes brief written findings on the issues raised and the relief sought.

The CEO is the final arbiter of grievance matters at this organization.

Investigation

The Direct Supervisor, Director of Operations, and/or the CEO will thoroughly investigate the issues raised in the grievance and will protect the privacy and confidentiality of all parties involved to the extent possible by law. All parties must cooperate with the investigation.

If the organization determines a violation of policy or law has occurred, the organization will take appropriate action, up to and including termination and notification of external authorities.

Retaliation

This organization strictly prohibits retaliation against volunteers for reporting, filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by the organization or a federal or state law enforcement agency or court. Volunteers should report any suspected retaliation to their Direct Supervisor, Director of Operations and/or CEO immediately after becoming aware of it. Any report of retaliatory conduct will be objective, timely, and thoroughly investigated. If a report of retaliation is found to be valid, the organization will take appropriate remedial action, up to and including discharging the employee(s) responsible. This organization will not retaliate against any volunteer for raising a complaint and will not knowingly permit retaliation by management or other employees.

Publication and Communication to Volunteers

This Grievance Policy must be shared with all volunteers annually and must be included in any organization handbook or manual. Any changes to this policy will be communicated in writing to volunteers via email on file.

Grievance Policy for Parents/Guardians and Consumers

The YMCA of Austin Minnesota believes consumers and parents/guardians have valuable thoughts and insights to share regarding our operations. Accordingly, this organization encourages consumers and parents/guardians to share opinions, suggestions, concerns, questions, and/or grievances about our policies, personnel, and/or other matters impacting the organization.

In general, the best person initially to bring opinions, suggestions, concerns, and/or questions to is the Director of Operations. However, to the extent, the concerns relate to Director of Operations, or to the extent a consumer or parent/guardian believes Director of Operations did not fully address a matter, consumers and parents/guardians may direct their opinions, suggestions, concerns, and/or questions to the next level of management or directly to the CEO.

To remedy concerns that appear to have been ignored or unresolved after initial reporting, utilize this formal grievance procedure. This procedure provides for a timely, thorough, and objective investigation of the following concerns:

Inappropriate Behavior by Employees/Volunteers;

Inappropriate Behavior by Consumers;

Retaliation; and/or;

Whistleblower complaints.

Written Complaint Required for Formal Process

Verbal complaints are encouraged, particularly for issues that may be easily and expeditiously resolved, but a written complaint is required to initiate this grievance process.

To ensure a timely and effective response, complaints should include the following information to the extent possible:

- 1) The name(s) of individuals(s) involved;
- 2) The date(s) the behavior occurred;
- 3) The name(s) of any known witness(es);
- 4) A summary of the conduct meriting the grievance including:
 - a. The behavior complained of and/or the alleged policy or legal violation(s);
 - b. Direct quotes when relevant and available; and
 - c. Any relevant documentation.
- 5) The remedy sought by the employee making the complaint.

[Form containing spaces for all of the above provided at the end of this policy.]

Timeline

Consumers or parents/guardians who themselves have a complaint or who are aware of behavior meriting a complaint must provide the above-described written complaint via email to the Director of Operations within 5 business days. The Director of Operations will meet with the consumer or parent/guardian to hear their concern and attempt to resolve the complaint within 15 business days.

Following that meeting, the Director of Operations will provide a brief written response to the consumer or parent/guardian who brought the complaint no later than 15 business days that includes brief written findings on the issues raised and the relief sought.

If the consumer or parent/guardian is not satisfied with the written response, the individual who brought the complaint may submit an appeal to the CEO no later than 10 business days. The CEO will meet with the consumer or parent/guardian to hear their concern and attempt to resolve the complaint within 15 business days.

Following that meeting, the CEO will provide a written response to the consumer or parent/guardian who brought the complaint no later than 15 business days that includes brief written findings on the issues raised and the relief sought.

The CEO is the final arbiter of grievance matters at this organization.

Investigation

The Director of Operations and/or the CEO will thoroughly investigate the issues raised in the grievance and will protect the privacy and confidentiality of all parties involved to the extent possible by law. All parties must cooperate with the investigation.

If the organization determines a violation of policy or law has occurred, the organization will take appropriate action, up to and including termination and notification of external authorities.

Retaliation

This organization strictly prohibits retaliation against consumers and/or parents/guardians for reporting, filing, testifying, assisting, or participating in any manner in any investigation, proceeding, or hearing conducted by the organization or a federal or state law enforcement agency or court. Consumers and/or parents/guardians should report any suspected retaliation to the Director of Operations and/or the CEO immediately after becoming aware of it. Any report of retaliatory conduct will be objective, timely, and thoroughly investigated. If a report of retaliation is found to be valid, the organization will take appropriate remedial action, up to and including discharging the individual(s) responsible. This organization will not retaliate against any consumer or parent/guardian for raising a complaint and will not knowingly permit retaliation by management or other employees.

Publication and Communication to Consumers and Parents/Guardians

This Grievance Policy must be shared with all consumers and parents/guardians annually and must be included in any organization handbook or manual. Any changes to this policy will be communicated in writing to consumers and parents/guardians via email on file.

Policy Requiring Confidentiality of Reports

The YMCA of Austin Minnesota will protect the confidentiality of anyone who reports allegations or disclosures of abuse, or other violations of law or policy to the extent possible under law. Legal and civil authorities (police, child or adult protective services) may require confidential information in order to investigate any report of illegal conduct but this does not eliminate the requirement to maintain confidentiality within the organization and its employees, volunteers, and consumers.

The YMCA of Austin Minnesota will provide written communication of any changes to this policy to all employees, volunteers, consumers, and parents/guardians.

Policy for Follow-Up with Individuals Who Report Concerns or Complaints

The YMCA of Austin Minnesota is committed to creating a safe environment for our employees, volunteers, and especially our consumers and their parents/guardians. For that reason, we will treat every concern or complaint with the utmost seriousness and provide a timely, thorough, and objective response in every instance. When an individual shares a concern or complaint:

1. They will be given the time and attention necessary to allow them to share their thoughts in person.
2. They will be thanked for sharing their concerns with the organization and for contributing to maintaining a healthy and safe environment for everyone.
3. They will be advised that their concern is being taken seriously and that action will be taken.
4. They will be reassured that they have done the right thing by reporting and that their communication is valued.
5. They will be informed, in general statements, of the steps that the organization will take in addressing the matter.
6. They will be given contact information for someone in the organization with whom they can contact should they become aware of additional information.
7. They will be provided with regular updates on how the process is advancing.
8. The organization will protect them from any form of retaliation.

Anonymous Reporting Mechanism for Employees and Volunteers

While we hope that our employees and volunteers feel that they can openly communicate any concerns, complaints, or grievances directly to someone in the organization, we understand that doing so can often be difficult. Because it is important to us that everyone be able to share their concerns, we provide the following mechanisms through which you can make an anonymous report:

The following is a list of anonymous reporting methods:

1. An anonymous online form that you can find and submit here
 - a. Link: <https://fs22.formsite.com/kEyPb3/njz1ycq6tc/index>
 - b. Password: YmcA@9622!YmcA
2. Praesidium's Helpline you can reach at 1-855-347-0751

Please keep in mind that our ability to respond quickly and adequately may be affected if the information provided is limited. However, we are committed to responding to all anonymous concerns to the extent possible.

Appendix I: Praesidium Helpline

Call: 1-855-347-0751

This organization is committed to creating an environment where everyone is encouraged to share their concerns and those concerns are taken seriously. To this end, we have partnered with Praesidium to establish a helpline that is available to everyone (employees, volunteers, parents/guardians, consumers, community members, etc.) 24 hours a day, seven days a week, 365 days a year.

What is the Praesidium Helpline?

The Praesidium Helpline is a consultation line anyone in the organization can call to discuss observations of inappropriate behaviors, suspicious behaviors, policy violations, instances of consumer-to-consumer sexual activity, and any other abuse prevention questions and issues.

What can you expect when you call?

One of Praesidium's experts will be ready to answer your call and gather any information relevant to your concern or question. If the matter the caller shares is one deemed to be suspected or known sexual abuse, the caller will be instructed by Praesidium to immediately call the civil authorities.

What happens once you get off the call?

Praesidium's team of risk management experts comprised of social workers, attorneys, and other professionals will staff the concern or situation and develop recommended responses and next steps. Praesidium will then share the concern and recommendations with stakeholders at the organization.

Methods for Publicizing Ways to Report Concerns, Complaints, or Grievances

Methods for publicizing the YMCA of Austin, Minnesota's mechanisms for reporting concerns, complaints, or grievances may include but are not limited to:

- Providing information in Employee Handbooks and other documentation provided to employees at hire or throughout their employment;
- Posting signage in "employee only" areas;
- Making announcements at training and employee meetings;
- Updating employee newsletters;
- Displaying magnets and posters; or
- Sending emails and posting on the organization's website.

Guidance for Collecting Data Relevant to Abuse Prevention

Strong internal feedback systems leverage various types of data to identify high-risk activities, individuals, or programs and the overall organizational climate for reporting. Data (including incident reports, survey results, turnover or discharges, consumer and parent/guardian complaints, and employee or volunteer grievances) can provide valuable information for a wide variety of considerations, such as identification of programs that may require additional monitoring or resources, or about individuals who may require increased supervision or training. It may also alert decision-makers about changes that need to be made to reduce potential exposures. Finally, data from like programs and trends over time may show where additional abuse risk management efforts are necessary.

Every organization has data collection systems that can help identify risk. The key is to identify available data collection opportunities and look for red flags of concern or abuse risk.

Data relevant to the prevention and detection of abuse can be collected from the following items:

- Incident reports
- Injury reports
- Physical restraint/de-escalation reports (if applicable)
- Satisfaction and/or feedback surveys from employees, volunteers, parents/guardians, and consumers
- Turnover or retention of employees, volunteers, and consumers
- Employee or volunteer exit interviews
- Complaints from consumers, parents/guardians, and other stakeholders
- Grievances from employees, volunteers, consumers, and parents/guardians
- Licensing violations
- Internal quality improvement audits and/or case reviews
- Monitoring visits or calls to programs and/or specific activities

With regards to the prevention and detection of abuse, incident reports should include the following documentation of data:

- Date and time of the incident
- Location of incident
- Type of incident (must select type—bullying and hazing, consumer-to-consumer sexual activity, adult-to-consumer abuse, adult-to-consumer boundary violation, general injury, property destruction, verbal assault, physical assault, etc.)
- Names of consumers and other individuals involved in the incident
- Names and positions of employees present during the incident (or disclosure of incident)
- Names of witnesses present during the incident.
- Immediate actions taken by an employee.
- How the incident was resolved
- Next steps taken by supervisor or administrators
- Who was notified internally and when and how they were notified
- Who was notified externally (i.e., police, abuse hotline, parents/guardians, etc.) and when and how they were notified (i.e., phone call, email, online form)
- Reference numbers (if applicable) for calls to hotlines or law enforcement

- Identification of necessary corrective action to prevent a recurrence
- Require signature of key administrators who have reviewed the report
- Ongoing documentation of additionally learned information of investigation results