



**BOYS & GIRLS CLUB**  
OF GREATER BILLERICA

# **Safety Policy Packet**

**May 2022**  
**Updated April 2026**

**The mission of the Boys & Girls Club of Greater Billerica is to enable all young people, especially those who need us most, to reach their full potential as productive, caring, responsible citizens. We strive to provide a positive, safe, and fun environment while creating strong, healthy relationships, building youth ownership and offering unlimited opportunities for our youth and teens to learn and reach their full potential.**

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# Child Abuse Prevention & Response Policy

The priority of Boys & Girls Club of Greater Billerica is the physical and emotional safety of its members, staff and volunteers. The Boys & Girls Club of Billerica maintains a zero-tolerance policy for child abuse. The Boys & Girls Club of Greater Billerica implements policies and procedures for members, employees, volunteers, visitors or any victims of sexual abuse or misconduct to report any suspicion or allegation of abuse.

## DEFINITIONS

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

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

**Child abuse** is when an adult or another child, whether through action or by failing to act, causes serious emotional or physical harm to a child. Sexual abuse or misconduct may include but is not limited to:

- Any sexual activity, involvement or attempt of sexual contact with a person who is a minor (under 18 years old).
- Sexual activity with another who is legally incompetent.
- Physical assault or sexual violence, such as rape, statutory rape, abuse, molestation or any attempt to commit such acts.
- Unwanted and intentional physical conduct that is sexual in nature, such as touching, pinching, patting, brushing, massaging someone's neck or shoulders and/or pulling against another's body or clothes.
- Inappropriate activities, advances, comments, bullying, gestures, electronic communications or messages (e.g., by email, text, or social media).

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

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

## MANDATED REPORTING

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

## REQUIRED TRAINING

Boys & Girls Club of Greater Billerica conducts and reports through a BGCA-approved process the following training for all staff members and volunteers with direct repetitive contact with young people (at the intervals noted for each).

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

- BGCA Foundations: Preventing Abuse in Youth Servicing Organizations

### Annually:

- All the policies, including all safety policies, for Boys & Girls Club of Greater Billerica
- Concussion Training

## PHYSICAL INTERACTIONS

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

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

## VERBAL INTERACTIONS

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

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

## ABUSE AND SAFETY RESOURCES

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

# Prohibition of Private One-on-One Interaction Policy

Boys & Girls Club of Greater Billerica provides a safe environment for members, staff and volunteers. To further ensure their safety, the organization prohibits all one-on-one interactions between Club members and staff and volunteers (including board members). All staff and volunteers must abide by the following:

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

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

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

## ONE-ON-ONE INTERACTION POLICY GUIDANCE

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

### Definition of One-on-One Interaction

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

- **Private** contact/communication is any communication, in person or virtual, that is between one youth member and one adult (18 or over) that takes place in a secluded area, is not in plain sight and/or is done without the knowledge of others. Private places can include but are not limited to vehicles, rooms without visibility to others, private homes and hotel rooms. Examples of private contact include but are not limited to:
  - Meeting behind closed doors (in rooms without windows or visible sightlines) or any spaces that are not visible to others.
  - One staff member transporting one member in a vehicle.
  - Electronic communications (text, video, social media, etc.) between one member and one staff member or volunteer.

- **Public contact/communication** is any communication or meeting, in person or virtual, that is between at least three individuals, including two staff and one member, one staff and two members or variations of these combinations. Examples of public contact include but are not limited to:
  - Meeting in plain sight of others (e.g., in a quiet corner of an active games room).
  - Transporting members via public transportation (bus, taxis, train, air, etc.) or transporting multiple members.
  - Electronic communications (text, video, social media, etc.) between multiple members and adults (e.g., group chats).
  - Public places can include but are not limited to buses, airports, shopping malls, restaurants and schools.

### **Impact on Mentoring Programs**

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

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

### **Impact on Partnerships with Local Mentoring Organizations**

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

### **Impact on Travelling to Off-site Events and Activities**

- When travelling to external events such as Keystone, Youth of the Year or other off-site events, the one-on-one policy shall continue to be followed.
- Should the Club take responsibility for transporting members to and/or from an event, one staff member should not transport one single child at any time in a vehicle. Accommodations shall be made to ensure at least three people (two staff and one member or one staff and two members) are together when traveling. As an alternative, public transportation may be used (e.g., taxi, Uber, public transport).
- If this arrangement presents staffing or budget challenges, consider the following:
  - Inviting parents or guardians to attend and/or chaperone their child.
  - Including additional youth (e.g., Junior Youth of the Year) and/or staff in travel plans.

- Coordinating with other Clubhouses or nearby organizations to travel together.
- Travelling with additional staff or members.
- Parents and guardians should also provide written consent in each instance in which a member travels to any off-site event. NOTE: Parents or guardians are never allowed to provide consent for one-on-one interaction.
- Similar practices should be in place when coordinating field trips.

**Impact on Transportation to and from the Club**

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

**Exceptions to Policy**

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

- When delivering medical or counseling services by a licensed, trained therapist or similar professional (e.g., counselors, social workers).
- When the emotional or physical safety of a member is at risk and a private, one-on-one communication is deemed necessary by Club leadership.
- In emergency situations that could create a safety risk, exceptions can be made.

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

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

# Supervision and Facilities Policy

## Main Clubhouse

### **SUPERVISION**

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

- Must abide by the prohibition of private one-on-one interaction policy.
- Must abide by all the organization's disciplinary policies and procedures.
- Must ensure that at least one adult staff (18 and over) is present when supervising members.
- Must always maintain proper supervision ratios. The maximum ratio in the Clubhouse is 1:20.
- Must be trained on appropriate supervision tactics and behavior patterns.
- Must ensure that all youth staff and volunteers are supervised by an adult (18 and over) staff member.
- Must immediately notify Club leadership and/or submit written reports detailing supervision issues, accidents, or critical incidents.
- Must never use electronic devices such as cell phones, PDAs, or other communication devices while supervising members unless for Club purposes, as defined in the Acceptable Technology Use Policy.

### **RESTROOM USAGE**

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

- The Clubhouse program has one single-use restroom that is designated for adult use. This restroom is locked at all times. Adults and minors never utilize a restroom at the same time.
- The Clubhouse maintains four single-use restrooms and two multi-user locker rooms with single stalls that can be secured from the inside. Locker rooms are only to be used by members participating in aquatics activities and are locked at all other times.

### **RESTROOM MONITORING**

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

- The prohibition of 1:1 contact must be enforced at all times, including in the restrooms.
- 1 child may use the bathroom at a time, OR 3 children may enter the bathroom at a time. More than 3 children should never enter the bathroom at one time.
- 1 child in each stall at a time.
- A staff auditorily supervises the restroom by standing outside the doorway and listens for any behavioral issues.
- The other students wait their turn in the hallway outside the restrooms.
- Staff inspect restrooms during the program to ensure cleanliness and safety.
- Members participating in the drop-in program must use the single-use bathrooms in the gamesroom. Members participating in aquatics programming must use the locker rooms and/or single-use bathroom on the pool deck.

- Clubhouse Unit Director and/or manager on the floor will regularly check each bathroom during building walk-throughs to ensure proper usage. Building walk-throughs will happen at a minimum of once per hour.
- Caregivers are responsible for the supervision and ensuring the safety of their children in the locker rooms during aquatics programming, such as swim lesson & family swim. Auditory and visual supervision of the locker rooms are provided by aquatics staff from outside the locker rooms.
- Auditory and visual supervision of the single-use restrooms are provided by the program staff in space in the gamesroom and Makerspace.

Staff observing unacceptable restroom conditions or incidents shall:

- Immediately notify Club leadership of the incident.
- Document, in writing, restroom conduct incidents and report them to Club leadership as soon as possible in compliance with the Club's Incident Reporting Policy.

### **ENTRANCE AND EXIT CONTROL**

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

All members, staff, volunteers, and visitors use only one entrance & exit location, located in the main lobby. The lobby is the location of the front desk, where an adult staff member always monitors while the program is open to members. The facility is locked and those wishing to enter the building are buzzed into the building by front desk staff.

This designated staff member ensures that all members sign into and out of the program using their membership cards. They also ensure that only screened and trained adults are allowed into the Clubhouse, and that allowed visitors are logged and identified properly.

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

### **FACILITY CONDITION**

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

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

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

### **FOOD AND DRINK**

Any distribution, preparation, or consumption of food and/or drink at any facility shall comply with all applicable food services sanitation and public health codes. Required city or county health department

inspection certificates shall be posted if food is prepared and served on-site. Any dangerous kitchen utensils, including knives, shall be properly and securely stored.

### **OFF-SITE SUPERVISION POLICY**

Throughout the program year, off-site opportunities are provided to members including, but not limited, to field trips, volunteer opportunities, and athletic games. Members will always be accompanied by Club staff following all required ratios and supervision expectations outlined above.

A roster of off-site members, including staff, will be left with the front desk. This will include a copy of signed permission slips. Rosters, permission slips, and relevant member information will also be taken on the trip with Club staff.

Prohibition of 1:1 contact must be enforced at all times. And special attention will be paid to shared-use restroom while off site, including the following:

- On a field trip or when using a public restroom, youth shall never enter the restroom alone unless it is a single-stall restroom that has been confirmed empty.
- Staff will follow the “3 plus me” rule in using public restrooms, with at least 3 youth entering a multi-stall facility together with a staff member.
- Staff members will position themselves inside the restroom near the sinks whenever possible with a group of 3 or more members.
- Alternatively, staff members will stand in the restroom doorway and/or hold the door at least partially open when supervising member use of public restrooms to provide auditory surveillance.

# Supervision and Facilities Policy

## School Sites

### **SUPERVISION**

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

- Must abide by the prohibition of private one-on-one interaction policy.
- Must abide by all the organization's disciplinary policies and procedures.
- Must ensure that at least one adult staff (18 and over) is present when supervising members.
- Must always maintain required supervision ratios at all time, not exceeding the EEC maximum ratio of 1:13.
- Must be trained on appropriate supervision tactics and behavior patterns, including all members are under the supervision of a qualified Group Leader, as per EEC guidelines.
- Must ensure that all youth staff and volunteers are supervised by an adult (18 and over) staff member.
- Must immediately notify Club leadership and/or submit written reports detailing supervision issues, accidents, or critical incidents.
- Must never use electronic devices such as cell phones, PDAs, or other communication devices while supervising members unless for Club purposes, as defined in the Acceptable Technology Use Policy.

### **RESTROOM USAGE**

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

- School sites use designated bathroom assigned by the schools during after school hours.
- Staff have their own designated bathrooms, separate from the facilities marked for youth members.
- Adults and minors never utilize the same restroom.

### **RESTROOM MONITORING**

Restrooms shall be regularly monitored by designated staff according to a schedule set by Club leadership. All school sites are licensed through EEC and restrooms are considered public spaces under EEC guidelines. Monitoring includes walk-throughs, inspections, and/or any (but not necessarily all) of the best practices outlined below:

- Staff must perform a visual inspection to confirm the restroom is empty.
- A full sweep is required at the Hajjar, Kennedy, Dutile, and Diston.
- At the Parker the restroom is locked and staff must unlock before use and lock upon exiting.
- Members will only use restrooms designated for their program area. Group Leaders bring members in groups of 3 or more to the restroom for use.
- The prohibition of 1:1 contact must be enforced at all times, including in the restrooms.
- Only 1 child may use the restroom at a time. Up to three children may enter simultaneously for handwashing only.
- A staff member must remain outside the restroom to provide auditory supervision and monitor for inappropriate behavior.
- All remaining members must wait outside the restroom in the hallway until their turn.
- Staff must inspect restrooms prior to each use by individuals to ensure safety and cleanliness.

Staff observing unacceptable restroom conditions or incidents shall:

- Immediately notify Club leadership of the incident.
- Document, in writing, restroom conduct incidents and report them to Club leadership and/or EEC as soon as possible in compliance with the Club's Incident Reporting Policy.

### **ENTRANCE AND EXIT CONTROL**

All facility entries and exits shall be controlled and monitored by paid adult staff (18 or over) during all hours of operation.

Members are brought to the program space at the end of the school day by school staff. Club staff track attendance and absences and input them into our member tracking system. The facility is locked and those wishing to enter the building ring the Club doorbell for pickups.

The designated staff member welcomes caregivers, checks identification as needed, and works with other Club staff to dismiss members. Caregivers wait at the entry to collect their members or are escorted to the program space by Club staff.

### **FACILITY CONDITION**

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

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

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

### **FOOD AND DRINK**

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

# Screening and Onboarding Policy

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

## BACKGROUND CHECKS

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

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

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

Include any additional background check criteria required by organizational policies, funding or licensing agencies or required in the applicable jurisdiction, such as motor vehicle records, child abuse registry or credit checks.

Such checks will be conducted prior to employment and at regular intervals not to exceed twelve months.

## Written Crime Barrier Policy

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

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

## **INTERVIEWING**

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

## **REFERENCE CHECKS**

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

## **STAFF AND VOLUNTEER ONBOARDING**

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

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

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

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

# Drug and Alcohol-Free Workplace Policy

## **DRUG AND ALCOHOL POLICY**

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

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

Boys & Girls Club of Greater Billerica further reserves the right to take any and all appropriate and lawful actions necessary to enforce this drug- and alcohol-free workplace policy, including but not limited to the inspection of organization-issued lockers, desks or other suspected areas of concealment, as well as an employee's personal property when the organization has reasonable suspicion to believe that the employee has violated this policy. Staff may refuse to allow such inspections. If so, the staff member may be subject to disciplinary action up to and including termination.

## **SMOKING POLICY**

Boys & Girls Club of Greater Billerica will comply with all applicable federal, state and local regulations regarding non-smoking in the workplace in order to provide a work environment that promotes productivity and the well-being of its employees. Smoking in the workplace can adversely affect members, employees and volunteers. Accordingly, smoking and nicotine use are restricted at all its facilities. Smoking is defined to include the use of any nicotine-containing products, including cigarettes, cigars and pipes, as well as the use of electronic cigarettes (e-cigarettes) and vaporizers.

Smoking is prohibited at all Boys & Girls Clubs properties. The smoking policy applies to employees, volunteers and members while on Club premises or during Club activities (on or off site).

## **REASONABLE SUSPICION**

Staff and or volunteers shall immediately notify Club leadership of any action by an employee or volunteer who demonstrates an unusual pattern of behavior suggesting that they are under the influence of drugs or alcohol. Club leadership will determine whether the employee should be examined by a physician or clinic and/or tested for drugs or alcohol in accordance with the Club's drug-testing policies. Employees and volunteers believed to be under the influence of drugs or alcohol will be required to leave the premises. Any illegal drugs or drug paraphernalia will be turned over to the appropriate law enforcement agency and may result in criminal prosecution.

Examples of behavior suggesting that employees or volunteers are under the influence of drugs or alcohol include but are not limited to:

- Odors (smell of alcohol, body odor or urine);
- Movements (unsteady, fidgety, dizzy);
- Eyes (dilated, constricted or watery eyes or involuntary eye movements);
- Face (flushed, sweating, confused or blank look);
- Speech (slurred, slow, distracted mid-thought, inability to verbalize thoughts);
- Emotions (argumentative, agitated, irritable, drowsy);
- Actions (yawning, twitching); or
- Inactions (sleeping, unconscious, no reaction to questions).

Unusual patterns of behavior that may suggest drug or alcohol misuse include but are not limited to:

- Repeatedly calling in sick;
- Being absent directly before or after holidays and weekends;
- Repeatedly damaging inventory or failing to meet reasonable work schedules; and
- Being involved in frequent accidents that can be related to the use of drugs or other substances.

## **INSPECTION AND TESTING**

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

Screening, testing and security measures may be used as methods of enforcement, as permitted by applicable state law. It is a violation of this policy to refuse to submit to testing. Tests that are paid for by the organization are the property of the organization, and the examination records will be treated as confidential and held in separate medical files. However, records of specific examinations will be made available, if required by law or regulation, to the employee, persons designated and authorized by the employee, public agencies, relevant insurance companies and/or the employee's doctor.

## **PRESCRIPTION MEDICATION AND LEGAL DRUGS**

Employees and volunteers are prohibited from reporting to work or working when using any legal drugs, except when the use is pursuant to a doctor's orders and the doctor has advised the employee or volunteer

that the substance does not adversely affect the employee's or volunteer's ability to safely perform his or her duties.

Employees and volunteers taking a legal drug, such as prescription medication or medical marijuana, that potentially affects job safety or performance are responsible for notifying their supervisor and/or Club leadership so that a determination of job performance or reasonable accommodation can be made. An employee/volunteer may not be permitted to perform his or her job duties unless such a determination or reasonable accommodation is made

# Incident Reporting & Investigation Policy

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

## GENERAL INCIDENT DESCRIPTION

Safety incidents can include but are not limited to:

- Inappropriate activity between adults (18 and over) and youth;
- Inappropriate activity between multiple youth;
- Allegations of abuse;
- Bullying behavior;
- Inappropriate electronic communications between adults (18 or over) and youth;
- Minor and major medical emergencies;
- Accidents, including slips and falls;
- Threats made by or against staff, volunteers and/or members;
- Physical assaults and injuries, including fights;
- Missing children;
- Criminal activity, including theft and robbery; and
- Other incidents as deemed appropriate by Club leadership.

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

## INTERNAL INCIDENT REPORTING

Any employee or volunteer who becomes aware of an incident, as defined in this policy, shall immediately complete an incident report and submit the incident to Club leadership.

The following information shall be included on an Incident Report:

- Date and location
- Incident details (if applicable)
- Witnesses and contact information
- Names of all involved (youth and staff if applicable)
- All notifications made (first responders, parents, leadership, etc.)

## EXTERNAL INCIDENT REPORTING

Boys & Girls Club of Greater Billerica follows all applicable mandated reporting statutes and regulations and all applicable federal, state and local laws (including those around licensing, for licensed sites) for the protection and safety of youth. Types of incidents reported include but are not limited to:

- Inappropriate activity between adults (18 or over) and youth;
- Inappropriate activity between multiple youth;
- Allegations of child abuse;
- Any form of child pornography;
- Criminal activity, including assault, theft and robbery; or
- Children missing from the premises.

## **INCIDENT INVESTIGATION**

Boys & Girls Club of Greater Billerica takes all incidents seriously and is committed to supporting external investigations of all reported incidents and allegations or internal investigations by the Safety Committee when not an externally reportable incident.

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

In the event that an incident involves an allegation against a staff member, volunteer or Club member, the Club shall suspend that individual immediately (employees with pay) and maintain the suspension throughout the course of the investigation.

## **BGCA CRITICAL INCIDENT REPORTING**

Each Member Organization shall immediately report any allegation of abuse or potential criminal matter to law enforcement. In addition, each Member Organization shall report the following critical incidents to BGCA within 24 hours:

- a. Any instance or allegation of child abuse, including physical, emotional or sexual abuse; sexual misconduct or exploitation (Club-related or not) against any child by a current employee or volunteer; or any Club-related instance by a former employee or volunteer.
- b. Any instance or allegation of child abuse, including physical, emotional or sexual abuse; or sexual misconduct or exploitation by a youth towards another youth at a Club site or during a Club-sponsored activity.
- c. Any child who might have been abducted or reported missing from a Club site or Club-sponsored activity.
- d. Any major medical emergency involving a child, staff member or volunteer at a Club site or during a Club-sponsored activity leading to extended hospitalization, permanent injury or death; or a mental health crisis with a child requiring outside care.
- e. Any instance or allegation of abuse, including physical, emotional or sexual abuse, sexual misconduct, harassment or exploitation (Club-related or not) involving any staff member; or any Club-related instance or allegation of abuse, including physical, emotional or sexual abuse, sexual misconduct harassment or exploitation against a volunteer or visitor.
- f. Any failure to comply with requirements set forth by childcare licensing agencies or organizations.
- g. Any known or suspected felony-level criminal act committed at a Club site or during a Club-sponsored activity.
- h. Any misappropriation of organizational funds in the amount of \$10,000 or greater, or any amount of federal funds.
- i. Any criminal or civil legal action involving the organization, its employees or volunteers, as well as any changes in the status of an open organization-related legal action.
- j. Negative media attention that could compromise the reputation of the Member Organization or the Boys & Girls Clubs of America brand.
- k. Any other incident deemed critical by the Member Organization.

Failure to report safety incidents to Boys & Girls Clubs of America could result in a funding hold or the organization being placed on provisional status.

# Technology Acceptable Use Policy

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

## CLUB MEMBER USAGE

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

- **Club devices** shall include any and all Club-owned existing and/or emerging technologies and devices that can take photographs, play and record audio or video, input text, upload and download content and/or media and transmit or receive messages or images.
- **Personally, owned devices** shall include any and all member-owned existing and/or emerging technologies and devices that can take photographs, play and record audio or video, input text, upload and download content and/or media and transmit or receive messages or images.
- **Club purposes** shall include program activities, career development, communication with experts and/or Club peer members, homework and Club activities. Members are expected to act responsibly and thoughtfully when using technology resources. Members bear the burden of responsibility to inquire with staff when they are unsure of the permissibility of a particular use of technology prior to engaging in its use.
- **Authorized use:** Club devices and personally owned devices are permitted for use during approved Club times for Club purposes and in approved locations only. The Club expressly prohibits the use of Club devices or personally owned devices in locker rooms, restrooms and other areas where there is an expectation of privacy.
- **Appropriate use:** Members may not use any technology to harass, threaten, demean, humiliate, intimidate, embarrass or annoy their peers or others in their community. Any inappropriate use of a Club or personally owned device, as determined by Club staff, can lead to disciplinary action including but not limited to confiscation of the device, immediate suspension from the Club, termination of membership or other disciplinary actions determined to be appropriate to the Club's existing disciplinary policies including, if applicable, referral to local law enforcement.
- **Monitoring and inspection:** Boys & Girls Club of Greater Billerica reserves the right to monitor, inspect, copy and review any personally owned device that is brought to the Club. Parents/guardians will be notified before such an inspection takes place and may be present, at their choice, during the inspection. Parents/guardians may refuse to allow such inspections. If so, the member may be barred from bringing personally owned devices to the Club in the future.
- **Loss and damage:** Members are responsible for keeping devices with them at all times. Staff are not responsible for the security and condition of the member's personal device. Furthermore, the Club is not liable for the loss, damage, misuse or theft of any personally owned device brought to the Club.

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

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

- Obscene, profane, lewd, vulgar, rude, inflammatory, threatening or disrespectful language or images typed, posted or spoken by members;
- Information that could cause damage to an individual or the Club community or create the danger of disruption of the Club environment;
- Personal attacks, including prejudicial or discriminatory attacks;
- Harassment (persistently acting in a manner that distresses or annoys another person) or stalking of others;
- Knowingly or recklessly posting false or defamatory information about a person or organization; or
- Communication that promotes the destruction of property, including the acquisition or creation of weapons or other destructive devices.

If a member is told to stop sending communications, that member must cease the activity immediately.

### **Cyberbullying**

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

Examples of cyberbullying include, but are not limited to:

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

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

### **Monitoring and Inspection**

Boys & Girls Club of Greater Billerica reserves the right to monitor, inspect, copy and review files stored on Club-owned devices or networks. In addition, Boys & Girls Club of Greater Billerica reserves the right to inspect and/or review personally owned devices that are brought to the Club.

Parents/guardians will be notified before such an inspection takes place and may be present, at their choice, during the inspection. Parents/guardians may refuse to allow such inspections but the member may be barred from bringing personally owned devices to the Club in the future.

### **Internet Access**

Personally owned devices used at the Club must access the internet via the Club's content-filtered wireless network and are not permitted to directly connect to the internet through a phone network or other content

service provider. Boys & Girls Club of Greater Billerica reserves the right to monitor communication and internet traffic, and to manage, open or close access to specific online websites, portals, networks or other services. Members must follow Club procedures to access the Club's internet service.

### **Loss and Damage**

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

### **Parental Notification and Responsibility**

While the Boys & Girls Club of Greater Billerica's Technology Acceptable Use Policy restricts the access of inappropriate material, supervision of internet usage might not always be possible. Due to the wide range of material available on the internet, some material might not fit the particular values of members and/or their families. Because of this, it is not considered practical the Boys & Girls Club of Greater Billerica to monitor and enforce a wide range of social values in student use of the internet. If parents/guardians do not want members to access information beyond the scope of the Technology Acceptable Use Policy, they should instruct members not to access such materials.

### **Digital Citizenship**

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

### **Club-Owned-and-Operated Technology**

Members are expected to follow the same rules and guidelines when using Club-owned technology. Club technology and systems are the property of the Club, are intended to be used for Club purposes and are to be used during approved times with appropriate supervision. Club members shall never access or use Club technology or systems without prior approval and are required to successfully complete BGCA provided digital citizenship and technology safety training.

### **Technology Safety Training**

All members who wish to use a Boys & Girls Clubs device or equipment will be required to successfully complete technology safety training annually. This training is required for all members who utilize Boys & Girls Club of Greater Billerica's devices and equipment.

### **STAFF AND VOLUNTEER USAGE**

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

- **Club devices** shall include any and all Club-owned existing and/or emerging technologies and devices that can take photographs, play and record audio or video, input text, upload and download content and/or media and transmit or receive messages or images.
- **Personally, owned devices** shall include any and all staff-owned existing and/or emerging technologies and devices that can take photographs, play and record audio or video, input text, upload and download content and/or media and transmit or receive messages or images.

- **Club Purposes** include but are not limited to the delivery of program activities, accessing sanctioned training or career development opportunities, communication with experts and/or authorized Club staff and for Club purposes or management of other Club activities, such as member check-in or incident reporting. Staff are expected to act responsibly and thoughtfully when using technology resources. Staff bear the burden of responsibility to ask their supervisor when they aren't sure of the permissibility of a particular use of technology prior to engaging in that use.
- **Authorized use:** Personally, owned devices are permitted for use during approved Club times for Club purposes and in approved locations only. The Club expressly prohibits the use of personally owned devices in locker rooms, restrooms and other areas where there is an expectation of privacy.
- **Appropriate use:** Staff may not use any technology to harass, threaten, demean, humiliate, intimidate, embarrass or annoy their peers or others in their community. Any inappropriate use of a personally owned device, as determined by a supervisor, can lead to disciplinary action including but not limited to confiscation of the device, immediate suspension from the Club, termination of employment or volunteer assignment or other disciplinary actions determined to be appropriate to the Club's existing disciplinary policies including, if applicable, referral to local law enforcement.
- **Loss and damage:** Staff are responsible for keeping devices with them at all times. Supervisors and the Club at large are not responsible for the security and condition of the staff member's personal device. Furthermore, the Club is not liable for the loss, damage, misuse or theft of any personally owned device brought to the Club.

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

Inappropriate communication includes but is not limited to:

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

If a staff member is told to stop sending communications, he/she must cease the activity immediately.

Staff must be aware of the appropriateness of communications when using Club or personally owned devices. Inappropriate communication is prohibited in any public or private messages, as well as material posted online.

Staff may not use any technology to harass, threaten, demean, humiliate, intimidate, embarrass or annoy others. This behavior is cyberbullying, which is defined as bullying that takes place using existing or emerging

technologies and devices. Any cyberbullying that is determined to disrupt the safety and/or well-being of the Club, Club staff, Club members or community is subject to disciplinary action.

Examples of cyberbullying include but are not limited to:

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

### **Communication with Club Members**

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

**Monitoring and Inspection:** Boys & Girls Club of Greater Billerica reserves the right to monitor, inspect, copy and review a personally owned device that is brought to the Club. Staff may refuse to allow such inspections. If so, the staff member may be subject to disciplinary action up to and including termination.

### **Password and Access**

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

# Transportation Policy

Boys & Girls Club of Greater Billerica is committed to providing a safe environment and enforces the following transportation policy for members, staff, volunteers and other adults. Boys & Girls Club of Greater Billerica only provides transportation to and from the Clubhouse and various approved off-site locations. The Club only transports youth in Club vehicles or other vehicles approved by Club leadership.

## **DRIVER & VEHICLE USE POLICY**

Authorized drivers of a Boys & Girls Club of Greater Billerica vehicle have been given certain privileges. They assume the duty of obeying all motor vehicle laws, maintaining the vehicle properly at all times, and otherwise following the policies and procedures outlined in this policy. Any violation that results in loss of driver's license must be immediately reported in writing to the Club's CEO.

All Boys & Girls Club applicants/employees must complete a driver's license form in order to be considered as an approved driver of any Club vehicle. The form and a photocopy of both sides of applicants/employees' driver's license must be submitted to the Club's CFO. They will notify director supervisors when employees are approved. Employees should not operate agency vehicles until approved under the following terms.

Club vehicles are provided to support Club activities and are to be used only by qualified and authorized persons. In all cases, these vehicles are to be operated in strict compliance with motor vehicle laws of the jurisdiction in which they are driven and with the utmost regard for their care and cost-efficient use. Any person authorized to drive Club vehicles will be examined at the start of employment and annually thereafter. Authorized drivers must complete the Van Drivers Safety Training at the time of becoming an authorized driver and at least every two years or directed by their supervisor or other Club leadership.

## **DRIVERS**

- Must allow for DMV background check and be cleared to transport youth per the barrier crime policy of the organization.
- Must keep an updated list of all youth who are transported to and from the Clubhouse and Club-related activities.
- Must confirm that no children are left on a vehicle after every trip (based on a seat-by-seat scan of each vehicle).
- Must submit written reports detailing issues or incidents involving transportation of members to and from the Clubhouse or to and from Club-related activities.
- Must only transport members in official Club vehicles.
- Must ensure that at least three individuals are present when transporting members. If one child remains to be dropped off, two adults (18 or over) must be present in vehicle.
- Must never transport Club members in personal vehicles.
- Must never use cell phones or other communication devices while transporting members to and from the Clubhouse or Club-related activities.

## **VEHICLE**

- Each agency vehicle should meet all local, state and federal inspection and licensing requirements.
- Each vehicle should be inspected as outlined by DMV by staff before every trip for which youth are being transported; any problems with the vehicle must be addressed promptly.

- Regular maintenance should be performed on vehicles and documents/records reflecting that maintenance should be maintained.
- Each vehicle must provide a seat belt for every passenger and fully comply with state and federal seat belt regulations.
- Each vehicle must have a complete first-aid kit that satisfies state licensing requirements.
- Each vehicle must have a working and current fire extinguisher that satisfies state licensing requirements.
- Each vehicle must have reflective traffic warning signs (e.g., triangles or flares) that are stored securely during transport.
- The vehicle must be clean and well maintained and exterior physical damage must be repaired promptly.

#### **ACCIDENT OR EMERGENCY PROTOCOL**

- Driver should immediately notify Club leadership if there is a delay or issue (e.g., breakdown, accident, emergency) with transporting members to and from the Clubhouse or Club-related activities.
- Staff shall immediately inform Club leadership if a staff member, volunteer or board member violates this policy. In such case, the organization will take appropriate disciplinary action.

#### **OFF-SITE SUPERVISION POLICY**

Throughout the program year, off-site opportunities are provided to members including, but not limited, to field trips, volunteer opportunities, and athletic games. Members will always be accompanied by Club staff following all required ratios and supervision expectations outlined in the Club's Supervision & Facilities Policies.

A roster of off-site members, including staff, will be left with the front desk. This will include a copy of signed permission slips. Rosters, permission slips, and relevant member information will also be taken on the trip with Club staff.

Prohibition of 1:1 contact must be enforced at all times. And special attention will be paid to shared-use restroom while off site, including the following:

- On a field trip or when using a public restroom, youth shall never enter the restroom alone unless it is a single-stall restroom that has been confirmed empty.
- Staff will follow the "3 plus me" rule in using public restrooms, with at least 3 youth entering a multi-stall facility together with a staff member.
- Staff members will position themselves inside the restroom near the sinks whenever possible with a group of 3 or more members.
- Alternatively, staff members will stand in the restroom doorway and/or hold the door at least partially open when supervising member use of public restrooms to provide auditory surveillance.

# Video Surveillance Policy

## **USE OF VIDEO SURVEILLANCE**

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

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

## **PLACEMENT & NOTIFICATION**

Video surveillance equipment may be installed in and around Club facilities, property, and vehicles. The system provides constant monitoring 24/7 (is activated and records when motion is detected). Video surveillance equipment will not be used or installed in areas where Club Members, staff, and parents/guardians have a reasonable expectation of privacy, such as locker rooms and restrooms.

Video surveillance equipment may always be in operation, whether the Club is operational and whether the facilities or buildings are in use at all. The Club will determine the operation schedule of any video surveillance equipment in its discretion.

Video monitors shall not be in an area that enables public viewing.

The Club shall notify Club members, parents/guardians, staff, and the public that video surveillance systems are present by signs prominently displayed in appropriate locations throughout the facilities and grounds and provide any other notification or consent as required by applicable law.

## **ACCESS TO VIDEO IMAGES**

The use of video surveillance equipment on Club grounds shall be supervised and controlled by the CEO, CFO, Unit Director and Department Heads. The actual recording equipment will be maintained in an area or room that is locked and secure to only be accessed by authorized personnel. Live video monitoring may randomly occur as needed.

Video data is recorded and stored digitally. Video recording data is considered confidential and secure. Access to live and video recorded data is strictly limited to the following authorized full-time Boys & Girls Club personnel: CEO, CFO, Unit Director and Department Heads. These authorized personnel are trained on the video surveillance policy and how video data should be used during any official investigation.

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

## **UNAUTHORIZED ACCESS AND/OR DISCLOSURE**

Confidentiality and privacy concerns limit the general public, including parents and relatives of Club members, from viewing video recording footage and/or data involving Club members, staff, and volunteers. Only the

authorized personnel provided above can view and/or export video recording data. No unauthorized recordings are permitted of video recording data through cell phones, portable devices, or any other means. Any Club personnel who becomes aware of unauthorized disclosure of video recording data from the Club and/or potential privacy break must immediately inform the CEO.

Club personnel and volunteers are prohibited from unauthorized use of, tampering with or otherwise interfering with video surveillance equipment. Violations will be subject to disciplinary action that may include, but are not limited to, written reprimand, suspension, demotion, or termination of employment.

Video recording data will remain property of the Boys & Girls Club of Greater Billerica and may be reproduced only in accordance with applicable law and board policy.

#### **RETENTION OF DIGITAL IMAGES**

Video recording data shall be kept for approximately 30 days except for appropriate still shots or selected portions of the recorded data relating to any incidents under investigation by authorities. The latter shall be retained for one year after the incident or until such time as any legal matters pertaining to the recordings have been resolved. The stored media shall be kept on a secured computer.

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

#### **CLUB MEMBER PRIVACY**

Video recording data will not to be used directly or indirectly to identify the activities of individual Club members except as viewed in relation to a specific event or suspected criminal activity; suspected violation of Club policy or rules; incidents where there is reasonable basis to believe a claim may be made against the Club for civil liability; or if otherwise compelled by law.

Authorized Club personnel may use a still shot or selected portions of recorded data to request law enforcement review for assessing the security risk of a specific individual or for investigating a potential crime on Club property.

# Emergency Operations Plan Policy

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

## **EMERGENCY OPERATIONS PLAN (EOP)**

Boys & Girls Club of Greater Billerica shall create and maintain an Emergency Operations Plan (EOP). At minimum, the plan shall encompass the following elements:

- Mitigation, preparedness, response and recovery for the following types of emergencies:
  - Fire
  - Weather (tornado, flooding, hurricane, etc.)
  - Lockdown (for interior or exterior threat)
  - Bomb threat
  - Suspicious package
- Training/drill schedule and reporting procedures for staff, volunteers and members.
- Developed and shared with local first responders, such as fire department and law enforcement agencies.

## **EOP ANNUAL REVIEW**

Boys & Girls Club of Greater Billerica's leadership will maintain a board-led safety committee that regularly focuses on safety and will have oversight and responsibility for the emergency operations plan. The board-led safety committee will be responsible for reviewing and updating the emergency operations plan annually. Emergency Evacuations locations will be reconfirmed annually.

## **FRIST AID & CPR TRAINING**

Boys & Girls Club of Greater Billerica always maintains a minimum of one CPR- or first-aid trained staff on site during all operating hours when members are being served.