

HARRISBURG AREA YMCA YOUTH PROTECTION POLICY

The YMCA is a youth-serving organization, and all staff and volunteers share the responsibility of keeping children safe. All staff and volunteers must read and sign this policy statement at hire and abide by it. You will be asked to review and sign this document annually.

In addition, both staff and volunteers are required, both by the Child Protective Service Laws and by the policies the Harrisburg Area YMCA has in place, to take and retake a Mandated Reporter training, prior to or within the first 45 days of employment or volunteering and at the interval defined by the Child Protective Service Laws and by the Harrisburg Area YMCA policies, whichever is sooner, to remain current with Child Abuse recognition and reporting laws and guidelines. Leadership will provide annual training opportunities for all staff about child abuse prevention. Failure to complete this training will result in suspension until the requirement has been met.

Why all staff and volunteers? Child protection is a critical part of our YMCA culture, and we expect that all staff and volunteers be educated on how to best protect the youth and teens who take part in our programs. No matter what you do for the YMCA, child protection is your responsibility.

1. Child Abuse Policy

Any action which falls within the definition of Child Abuse under the Commonwealth of Pennsylvania's Child Protective Service Law is a violation of YMCA policy and will not be tolerated. The Harrisburg Area YMCA will cooperate in the identification and reporting of cases of suspected child abuse and, likewise, requires the cooperation of all staff and volunteers in this endeavor.

A child is anyone under 18 years of age.

The Commonwealth of Pennsylvania's Child Protective Service Law (CPSL) defines Child Abuse as:

"intentionally, knowingly, or recklessly doing any of the following:

- 1. Causing bodily injury to a child through any recent act or failure to act.
- 2. Fabricating, feigning or intentionally exaggerating or inducing a medical symptom or disease which results in a potentially harmful medical evaluation or treatment to the child through any recent act.



- 3. Causing or substantially contributing to serious mental injury to a child through any act or failure to act or a series of such acts or failures to act.
- 4. Causing sexual abuse or exploitation of a child through any act or failure to act.
- 5. Creating a reasonable likelihood of bodily injury to a child through any recent act or failure to act.
- 6. Creating a likelihood of sexual abuse or exploitation of a child through any recent act or failure to act.
- 7. Causing serious physical neglect of a child.
 - a. Engaging in any of the following recent acts:
 - b. Kicking, biting, throwing, burning, stabbing, or cutting a child in a manner that endangers the child.
 - c. Unreasonably restraining or confining a child, based on consideration of the method, location or the duration of the restraint or confinement.
 - d. Forcefully shaking a child under one year of age.
 - e. Forcefully slapping or otherwise striking a child under one year of age.
 - f. Interfering with the breathing of a child.
 - g. causing a child to be present at a location while a violation of 18 Pa.C.S. § 7508.2 (relating to operation of methamphetamine laboratory) is occurring, provided that the violation is being investigated by law enforcement.
 - h. Leaving a child unsupervised with an individual, other than the child's parent, who the actor knows or reasonably should have known:
 - i. Is required to register as a Tier II or Tier III sexual offender under 42 Pa.C.S. Ch. 97 Subch. H (relating to registration of sexual offenders), where the victim of the sexual offense was under 18 years of age when the crime was committed.
 - ii. Has been determined to be a sexually violent predator under 42 Pa.C.S. §9799.24 (relating to assessments) or any of its predecessors.
 - iii. Has been determined to be a sexually violent delinquent child as defined in 42 Pa.C.S. § 9799.12 (relating to definitions).
- 8. Causing the death of the child through any act or failure to act."

Under the CPSL, any employee or volunteer who works directly with children is a Mandated Reporter. A Mandated Reporter is obligated, by law, to report suspicion of child abuse when there is reasonable cause to suspect it. The following procedure is hereby required of all Harrisburg Area YMCA personnel and volunteers when they have reasonable cause to suspect child abuse:

- 1. The witness immediately contacts Childline orally or electronically. The witness then follows all instructions given by Childline personnel when the report is made to: 1-800-932-0313 or bn. LL www.compass.state.pa.us/cwis/public/home.
- The YMCA 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 youth participants.
- 3. Once the proper authorities have been notified, the Harrisburg Area YMCA employee or volunteer witness must then contact the designated person at their branch who receives all reports of suspected child abuse. The designated person will notify the Executive Director of the branch that a report was made by the employee or volunteer.
- 4. In the event the suspected individual who is suspected of committing child abuse is an employee or volunteer of the Harrisburg Area YMCA, that employee or volunteer will be immediately suspended from their duties within the Harrisburg Area YMCA.
- 5. In cases where the individual who is suspected of committing child abuse is an employee or volunteer of the Harrisburg Area YMCA, and the investigation by Children and Youth Services has found reasonable cause to suspect child abuse occurred, the Harrisburg Area YMCA employee or volunteer will be immediately terminated from their role and duties in all Harrisburg Area YMCA programs.
- 6. Reinstatement will be considered of any employee or volunteer of the Harrisburg Area YMCA who is suspected of child abuse but proved by Children and Youth Services to be unsubstantiated to the satisfaction of the Branch Director, the President of the Harrisburg Area YMCA, and the Area Board of Directors Chair.
- 7. All Harrisburg Area YMCA personnel and volunteers must remain sensitive to the need for confidentiality and should only discuss information relating to suspicion of child abuse to Childline, local authorities, and those Harrisburg Area YMCA persons mentioned above.
- 8. Appropriate records of all child abuse reports shall be kept in the General Office of the Harrisburg Area YMCA.
- 9. All personnel and volunteers must read and sign this policy upon hire and annually.
- 10. The YMCA 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 person given investigative authority by the organization. Cooperation with investigations includes by is not limited to promptly acknowledging and responding to requests for information, making oneself available to 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.
- 11. All staff and high-access volunteers are required to obtain and maintain clearances appropriate to their YMCA duties and in accordance with current Harrisburg Area YMCA policy.
- 12. ANY EMPLOYEE OR VOLUNTEER'S FAILURE TO COOPERATE WITH AN INVESTIGATION WILL RESULT IN DISCIPLINARY ACTION UP TO AND INCLUDING TERMINATION OF EMPLOYMENT OR DISMISSAL FROM THE ORGANIZATION.



2. YMCA Child Protection Code of Conduct

At the Y, we are for youth development, and all our actions should be in line with the goal of safe, positive interactions with youth. You are personally responsible for understanding acceptable conduct as it relates to child protection.

- 1. To protect YMCA staff, volunteers, and program members, at no time during a YMCA program may a staff person be alone with a single youth program participant or youth staff member where they cannot be observed by others. As staff supervise children, they should space themselves in such a way that other staff can see them.
- 2. Staff shall never leave a child program participant unsupervised.
- 3. Restroom supervision: Staff will make sure the restroom is not occupied by suspicious or unknown individuals before allowing a child program participant to use the facilities. Staff will stand in the doorway of the rest room while child program participants are using the rest room. This policy allows privacy for the program participants and protection for the staff (not being alone with a child program participant), If staff are assisting younger children, doors to the facility must remain open. No child program participant, regardless of age, should ever enter a bathroom alone on a field trip or at other off-site location. Always send child program participants in threes (known as the rule of three), and whenever possible, with staff.
- 4. Staff should conduct or supervise private activities in pairs-diapering, putting on bathing suits, taking showers, and so on. When this is not feasible, staff should be positioned so that they are visible to others.
- 5. Staff shall not abuse children in any way, including;
 - a. physical abuse-striking, spanking, shaking, slapping, and so on.
 - b. verbal abuse-humiliating, degrading, threatening, and so on.
 - c. sexual abuse-touching or speaking inappropriately.
 - d. mental abuse-shaming, withholding kindness, being cruel, and so on.
 - e. neglect-withholding food, water, or basic care.

No type of abuse will be tolerated and may be cause for immediate dismissal.

- 6. Staff must use positive techniques of guidance, including redirection, positive reinforcement, and encouragement rather than competition, comparison, and criticism. Staff will have age-appropriate expectations and set up guidelines and environments that minimize the need for discipline. Physical restraint is used only in predetermined situations (when necessary to protect the child or other children from harm), administered only in a prescribed manner, and must be documented in writing.
- 7. Staff will conduct a health check of each child program participant upon their arrival each time the program meets, noting any fever, bumps, bruises, burns, and so on, Questions or comments will be addressed to the parent or child program participant in a nonthreatening way. Staff will document any questionable marks or responses.
- 8. Staff will respond to youth with respect and consideration and treat all youth equally, regardless of sex, race, religion, culture, economic level of the family, or disability.



- 9. Staff will respect children's rights not to be touched or looked at in ways that make them feel uncomfortable, and their right to say no. Other than diapering, children are not to be touched on areas of their bodies that would be covered by a bathing suit.
- 10. Staff will refrain from intimate displays of affection toward others in the presence of children, parents, and staff.
- 11. Staff are not to transport children in their own vehicles. Youth participants or minor staff old enough to drive may not transport other staff or children in the program.
- 12. Staff are not permitted to babysit for families that currently have or previously had children enrolled in any YMCA childcare programs.
- 13. Staff and volunteers of the YMCA may not give or receive excessive gifts to youth program participants. Excessive could be high frequency, extreme monetary value, and awarded to individual program participants.
- 14. Staff must appear clean, neat, and appropriately attired.

Anonymous Reporting 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:

- 1. Staff and volunteers may place a written list of concerns in the mailbox of the leadership staff at each branch, or call them directly.
- 2. Praesidium's Helpline: 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.



Acknowledgement – Youth Protection Policy

Because the Harrisburg Area YMCA is a youth serving organization, any incident of suspected child abuse will be job related, whether it occurs on or off the YMCA premises.

I have read the above "Harrisburg Area YMCA Youth Protection Policy and Youth Code of Conduct" and understand their intent, content, the actions I must take, including the actions required as a Mandated Reporter if I have reasonable cause to suspect child abuse is occurring, and the actions to be taken by the Harrisburg Area YMCA in cases of suspected child abuse of any child involved in a Harrisburg Area YMCA program.

I understand that I will review and sign this policy annually.

Staff Name (Print)	Staff Signature	Date	
Branch	Department		
Supervisor Name (Print)	 Supervisor Signature	 	

Supervisors: Please scan a copy to the HR department upon completion, and during annual reviews.



Appendices: About Praesidium and Additional Resources

Why Praesidium: An organization's consumers and communities deserve the highest level of safety and abuse protection, and its team is a valuable resource that demands leadership and support to navigate daily challenges. Pursuing Praesidium Accreditation creates a pathway to align the organization's mission and values with best practices in abuse prevention. Sexual abuse is a preventable risk and together we can make a difference.

The following appendices are included to help you understand the finer points of preventing child abuse at the YMCA.

Please note: "Consumer" is a Praesidium term for anyone under the age of 18. When referencing interactions with "consumers," the materials are limited to engagement with minor children.

Defining High Access and Low Access Volunteers

There are two categories of volunteers: High-Access and Low-Access. The category of volunteer determines the level of screening, training, and supervision the volunteer requires.

High-Access Volunteers typically interact often or over an extended period with consumers. Such volunteers may be readily known to consumers under their supervision and to other volunteers and employees in the program. They may also supervise consumers with or without an employee present. High-Access Volunteers may carry a substantial amount of responsibility in a program serving consumers and such volunteers may have opportunities to develop relationships with consumers over time.

Examples of High-Access Volunteers include a volunteer program instructor, a regularly scheduled volunteer coach, or a mentor for a consumer.

Low Access Volunteers typically interact with consumers only in line-of-sight of an employee and only infrequently. Such volunteer might be a parent/guardian who is helping at a one-time event, or someone who only works with adults, not consumers. Low Access Volunteers may not be known by the consumers in the program or to other volunteers and employees. Low Access/Occasional Volunteers have limited access to consumers and have few opportunities to develop relationships with consumers over time.

Examples of Low Access Volunteers include a one-time event volunteer (such as for a fun run), parents/guardians who assist at a program where their child is a participant, a volunteer who works strictly with adults outside of the organization's property, a volunteer who helps with business activities and does not interact with consumers, or a board member.



WORKING TOGETHER FOR SAFETY

Talk to your child about his or her experiences in YMCA programs, school, sports, and other activities.

Drop in on your child's programs.

Trust your instincts. Don't wait to tell someone if something seems "strange." Speak up!

Watch for warning signs of abuse:

- Unexplainable bruising or other physical markings
- · Disturbed sleeping or eating patterns
- Abrupt changes in behavior/anxiety, clinging, aggressiveness, withdrawal, depression
- · Fear of a certain person or place
- · Discomfort with physical contact
- · A child who abuses other children

Listen and watch for signs of your child receiving special attention that other children or teens are not receiving, including favors, treats, gifts, rides, increasing affection or time alone, particularly outside the activities of school, child care, or other activities.

Every once in a while, ask your child these questions:

- Is anyone scaring or threatening you?
- · Is anyone asking you to keep secrets?
- Has anyone said anything to you that made you feel bad?
- Is anyone touching you in a way that you don't like?

Encourage your child to tell you or another trusted adult if anything happens to him or her.

Read our Code of Conduct. If someone breaks it, let us know immediately.

COMMUNITY RESOURCES

Reporting Suspected Cases of Child Abuse
PA ChildLine
1-800-932-0313

Child Abuse Helplines
PA Coalition Against Rape
1-888-772-7227
Cumberland/Perry Crisis Helpline

1-866-350-4357

Dauphin County Helpline (717) 652–4400

Pinnacle Health Children's Resource Center (717) 782-6802

Praesidium Helpline 855-347-0751

Support Groups and Healing

Pinnacle Health Children & Teen Center (717) 782-4650

Holy Spirit Women's Resource Center (717) 763–2228

Join the Movement – Empower People to Prevent Child Abuse

www.darkness2light.org











FOR YOUTH DEVELOPMENT®
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY

WORKING TOGETHER FOR SAFETY

Creating A Child Safe Environment



YMCA AND YOUTH

The Harrisburg Area YMCA has Youth Programs at all of its branches.

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.

Staff and volunteers may place a written list of concerns in the mailbox of the leadership staff at each branch or by phone, or by contacting one of our Harrisburg Area YMCA Association Certified Praesidium Guardians:

CAMP CURTIN YMCA

Tish Burns - (717) 346-1322

EAST SHORE YMCA

Chelstan Anderson II - (717) 232-9627

FRIENDSHIP YMCA

Chad Krebs - (717) 234-9622

NORTHERN DAUPHIN COUNTY YMCA

Sidney Gray - (717) 362-8549

WEST SHORE YMCA

Jason Snyder - (717) 346-1631

YMCA CENTER FOR HEALTHY LIVING

Amy Jacobs - (717) 232-2068

CERTIFIED PRAESIDIUM GUARDIANS

Kelly Campbell - (717) 219-3974 Bradley Mattern - (717) 346-1304 Jessica Mattern - (717) 346-1324

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.





YMCA CHILD SAFE POLICY

OUR STAFF

The Harrisburg Area YMCA has more than 1,300 staff members and volunteers working with youth in the many programs we offer.

OUR SCREENING

To keep children in our programs safe, we take the following steps in our intensive screening of employees and volunteers:

- Detailed application forms
- Comprehensive interview process
- Reference checks
- · Criminal background checks and fingerprinting

OUR TRAINING

Employees and volunteers complete an extensive child abuse prevention training program to further promote a child-safe environment. All staff members are mandated to report suspected child abuse. Staff and volunteers are required to be trained in the Darkness 2 Light – Stewards of Children Child Sexual Abuse Prevention and Mandated Reporter training at time of hire.

OUR POLICIES

Staff is prohibited from working one-on-one with youth outside of the YMCA (i.e. babysitting). Policies exist to ensure staff and volunteers are not alone with a child.

INFORMATION ABOUT ABUSE



The YMCA wants all children to be safe. Unfortunately, child abuse does exist, taking many forms.

EMOTIONAL ABUSE

Threatening a child or using words that can hurt a child's feelings or self-esteem; withholding love and support from a child

PHYSICAL ABUSE

Causing injuries to a child on purpose, such as bruises, burns, scars, or broken bones

SEXUAL ABUSE

Having sexual contact in any form with a child, including exposing, fondling, intercourse, pornography, or internet solicitation

NEGLECT

Not providing children with enough food, clothing, shelter, medical care, hygiene, or supervision

IF YOU SUSPECT ABUSE, CALL PA CHILDLINE 1-800-932-0313

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Defining Appropriate and Inappropriate Physical Contact

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

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

Appropriate Physical Interactions	Inappropriate Physical Interactions		
Contact initiated by the consumer such as: Side hugs Shoulder-to-shoulder or "temple" hugs 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)	 Full-frontal hugs Kisses Showing affection in isolated areas or while one-on-one Lap sitting Wrestling Piggyback rides Tickling Allowing a consumer 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 is outside authorized and documented personal care assistance 		

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's policies for appropriate and inappropriate verbal interactions include but are not limited to:

Appropriate Verbal Interactions			Inappropriate Verbal Interactions
•	Positive reinforcement	•	Name-calling
•	Appropriate jokes Encouragement	W	Discussing sexual encounters or in any way involving consumers in the
•	Praise		personal problems or issues of employees and volunteers
•	Strength-based conversations	•	Secrets
• Self-disclosure as a supervised therapeutic tool by licensed clinicians, medical professionals, and pastoral	•	Cursing	
	•	Off-color or sexual jokes	
	counseling	•	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

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

One-on-one interactions may occur as part of the YMCA's programming under authorized circumstances. The purpose of this policy is to ensure the YMCA 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 unavoidable, ensure physical
 and verbal interactions align with this organizations established policies and are limited
 to the task at hand.
- If meeting in a room or office, leave the door open, move to an area that can be easily observed by others passing by, or is in view of a security camera.
- Inform other employees and volunteers that you are alone with a consumer and encourage them to randomly drop in or pass by the interaction.
- Document and immediately report any unusual incidents, including disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted.

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 at increased risk. The following examples of contact outside of regularly scheduled program activities are **not permitted**:

- Babysitting consumers
- One-on-One Tutoring
- Private lessons/coaching
- Offsite mentorship outside of program hours
- Social interactions between employee's or volunteer's children and children served by the organization:
 - Playdates and birthday parties
 - If the event is held in honor of a staff person or volunteer's child, they
 must require that all parents/guardians remain on site during the
 event.
 - o Sleepovers
 - Overnight trips and vacations
 - o Rides to/from organization or extracurricular activities and events
- Attending public events alone with a staff person or volunteer in a shared community (like graduation, sports events, religious ceremonies)
 - Staff and volunteers are permitted to attend public events, but are not permitted to provide transportation, seek out one on one conversations, or give excessive gifts.
- Continued private contact with consumer after a consumer's participation in a program has ended

Please forward any questions or concerns about this directive to your supervisor or the leadership staff at your branch, or to one of our Harrisburg Area YMCA Certified Praesidium Guardians.

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

The YMCA 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 YMCA's reporting procedures.

Remember, at the YMCA, the policies apply to everyone.

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

- Any violation of the YMCA's Youth Protection Policy
- Seeking unauthorized private time or one-on-one time with consumers
- Seeing or visiting with a consumer outside of scheduled programing
- Buying excessive gifts for individual consumers
- Sending unauthorized electronic communications through text messaging, social media, online gaming, etc. in violation of the YMCA'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 ensure that the rights of all those involved are protected.

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 is about a supervisor or administrator, contact the next level of management.
- Complete an internal report but do not investigate.
- Keep reporting until the appropriate action is taken.

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 YMCA 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 if 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 consumer 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 PA ChildLine (1-800-932-0313) according to mandatory reporting requirements. After you have called ChildLine, notify the appropriate leader at the YMCA.
- 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 YMCA authority.

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.
- Immediately report the allegation or incident to PA ChildLine (1-800-932-0313) according to mandatory reporting requirements. After you have called ChildLine, notify the appropriate leader at the YMCA.
 - i. Do not attempt to determine whether the consumer's behavior was "sexual curiosity". There is not a standard definition of what normal sexual curiosity looks like. An external body, such as law enforcement, utilizes criterion 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)

Guidelines for Supervising and Monitoring Bathroom, Locker Room, and Shower Procedures

Bathrooms and locker rooms are high risk locations for sexual activity between consumers, and adult offenders can use the privacy afforded in bathrooms and during shower time to abuse a consumer. Consequently, bathrooms, locker rooms and shower time require close monitoring, and these practices must be carefully managed. Shower time and changing in the locker room also present increased risk, because consumer may be nude or partially nude and consumers may engage in horseplay.

When directly supervising bathroom and locker room use, adult employees and volunteers should first quickly scan the bathroom or locker room before allowing consumers to enter to ensure the bathroom is vacant.

For directly supervised group bathroom breaks:

- Require employee and volunteers to take groups of two or more consumers to the bathroom following the "rule of three" or more.
- If the bathroom only has one stall, only one consumer should enter the bathroom while the others wait outside with the employee or volunteer.
- If there are multiple stalls, only send in as many consumers as there are stalls available for use.
- Minimize consumers of different ages using the bathroom at the same time.
- Require employee to stand outside the bathroom door but remain within earshot.

For directly supervised single use restrooms:

- Require consumers to ask permission to use the bathroom.
- Require all employees to frequently check bathrooms.
- Require all managers and/or on-duty supervisors to frequently check bathrooms and ensure employees are monitoring bathrooms correctly and at established intervals.

For directly supervised shower time:

- Only one consumer can be in a shower stall at any given time.
- If there are multiple stalls, only send in as many consumers as there are stalls.
- Ensure shower doors/curtains do not extend all the way to the ground so employee and volunteers can easily glance into the bathroom to see how many feet are in each shower stall.

- Require employee and volunteers to stand outside the shower area but remain within earshot.
- Prohibit employees and volunteers from using the bathroom at the same time as consumers.
- When necessary to assist young consumers in the stalls, employees and/or volunteers should keep the door to the stall open.
- Consumers who require assistance with personal care activities should have this noted within their file and include the level of assistance necessary.
- Employees and volunteers who are authorized to provide assistance with personal care activities need specific training on appropriate diapering and toileting procedures.

For directly supervised locker room and changing areas:

- Require employees and volunteers to stand within earshot of locker room when in use by consumers.
- Require employees to check inside the locker room so users know the locker room is monitored intermittently and briefly.
- Encourage employees to provide consumers with a strict time limit of how long they
 can be in the locker room to limit opportunity for inappropriate interactions and
 activities.
- Discourage the use of locker rooms by consumers of different ages at the same time.
- Prohibit the use of locker room horseplay such as towel snapping.
- When possible, arrange lockers to minimize unnecessary privacy.
- Require all employees (including maintenance) and volunteers to also watch for suspicious or inappropriate locker room conduct.

For all employees:

- All employees are required to frequently walk through locker rooms and bathrooms during their shift.
- All managers and/or on-duty supervisors are required to frequently check locker rooms and bathrooms to ensure employees are monitoring private spaces correctly and at established intervals.
- Awareness is key. If an employee notices any kind of red flag behavior related to bathrooms or locker rooms during their shift, they are required to follow the reporting procedures outlined in the Youth Protection Policy.
- While not all employees will directly supervise shower, locker room, or bathroom time for consumers, all employees should be familiar with appropriate use, and make sure they report any deviations from standard protocols.