



## **Organizational Safety Policies**

### **Safe Environment Policy**

Our vision is a community that is inclusive and where equal opportunities and equitable outcomes exist for all youth, no matter where their journeys begin. We are committed to developing and maintaining a diverse, equitable, and inclusive Club, where the voices of our members are amplified and where every member feels physically and emotionally safe. We do Whatever It Takes to ensure that our Club premises are safe, and that our staff have the training necessary to safely execute programs.

### **Responsibility of Employees to Report (Child) Abuse or Neglect Policy**

Under New Hampshire law, any person who has reason to suspect that a child has been sexually, physically or psychologically abused or neglected is required to report to the State the suspected abuse or neglect. The report is to be made immediately upon forming the suspicion of abuse or neglect, and is to be followed by a written report within 48 hours.

Similarly, any person who has reason to believe that an incapacitated adult has been subjected to physical abuse, neglect or exploitation, or is living in hazardous conditions must orally report the suspected abuse, neglect or hazard to the State immediately. The oral report must be followed immediately by a written report. If the appropriate State office is not open, because it is a weekend or after hours, the report should be made to local law enforcement. Failure to comply with the above reporting requirements is a misdemeanor under New Hampshire law.

While this legal obligation falls on each employee individually, the Boys & Girls Club of Greater Nashua (BGCN) needs to know whenever your employment brings you into contact with any situation in which you suspect abuse or neglect of a child or incapacitated adult. In such circumstances, report your suspicions immediately to the Club's Primary Safety Lead. If the Club's Primary Safety Lead cannot be reached, report the matter immediately to the Club's Secondary Safety Lead. The Primary and/or Secondary Safety Lead will help the employee navigate the State reporting process and will also follow all Boys & Girls Clubs of America (BGCA) reporting guidelines. The Primary and/or Secondary Safety Lead will also inform the Executive Director.

Sometimes circumstances arise in which an employee suspects abuse or neglect, but he/she/they do not want to report for fear that filing the report may destroy his/her/their rapport with the family or individuals to which the employee is providing services. Failure to file a report of suspected abuse or neglect is a crime, and places both the employee and the Boys & Girls Club of Greater Nashua at risk. If you are struggling with a concern about possible abuse or neglect, you must discuss the matter at once with the Club's Safety Lead(s).

## **Preventing Child Sexual Abuse, Sexual Misconduct and Sexual Exploitation Policy**

It is the priority of the Boys & Girls Club of Greater Nashua to do Whatever It Takes to prevent child sexual abuse, sexual misconduct, and sexual exploitation.

The Boys & Girls Club of Greater Nashua prohibits and does not tolerate sexual abuse or misconduct in the workplace or during any organization-related activity. Those reasonably suspected or believed to have committed sexual abuse or misconduct will be appropriately disciplined, up to and including termination of employment or membership, as well as criminally prosecuted. No employee, volunteer, board member or other person, regardless of his or her title or position has the authority to commit or allow sexual abuse or misconduct.

### *Definitions and Examples*

The following definitions or examples of sexual abuse, misconduct, or harassment may apply to any and/or all of the following persons – employees, volunteers or other third parties. Sexual abuse or misconduct may include, but is not limited to:

- Child sexual abuse – any sexual activity, involvement, or attempt of sexual contact with a person who is a minor (under 18 years old) where consent is not or cannot be given.
- Sexual activity with another who is legally incompetent or otherwise unable to give consent.
- Physical assaults or violence, such as rape, sexual battery, 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.
- Material such as pornographic or sexually explicit images, posters, calendars, or objects.
- Unwelcome and inappropriate sexual activities, advances, comments, innuendoes, bullying, jokes, gestures, electronic communications, or messages (e.g., email, text, social media, voicemail), exploitation, exposure, leering, stalking or invasion of sexual privacy.
- A sexually hostile environment characterized as comments or conduct that unreasonably interferes with one’s work performance or ability to do the job or creates an intimidating, hostile, or offensive environment.
- Direct or implied threats that submission to sexual advances will be a condition of employment or affiliation with the organization.

### *Reporting Procedure*

Staff and volunteers are required to immediately report suspected sexual abuse or misconduct to their manager and/or Club Safety Lead(s). Managers must report all incidents they are made aware of to the Club Safety Lead(s). Club Safety Leads are to report any critical incidents to BGCA within 24 hours. It is not required to directly confront the person who is the source of the report, question, or complaint before notifying the individuals listed. BGCN will take every reasonable measure to ensure that those named in the complaint of misconduct, or individuals who are too closely associated with those involved in the complaint, are not part of the investigative team.

### *Boys & Girls Clubs of America 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:

- 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.
- 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.
- Any child who might have been abducted or reported missing from a Club site or Club sponsored activity.
- Any major medical emergency involving a child, staff member or volunteer at a Club site or during a Club-sponsored activity leading to extended hospitalization, permanent injury, or death; or a mental health crisis with a child requiring outside care.
- Any instance 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.
- Any failure to comply with requirements set forth by childcare licensing agencies or organizations.
- Any known or suspected felony-level criminal act committed at a Club site or during a Club sponsored activity.
- Any misappropriation of organizational funds in the amount of \$10,000 or greater, or any amount of federal funds.
- Any criminal or civil legal action involving the organization, its employees, or volunteers, as well as any changes in the status of an open organization-related legal action.
- Negative media attention that could compromise the reputation of the Member Organization or the Boys & Girls Clubs of America brand.
- 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. Boys & Girls Club of Greater Nashua 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.

### *Anti-retaliation and False Allegations*

BGCN prohibits retaliation made against any employee, volunteer, board member, or other person who lodges a good faith complaint of sexual abuse or misconduct or who participates in any related investigation. Making knowingly false or malicious accusations of sexual abuse or misconduct can have serious consequences for those who are wrongly accused. BGCN prohibits making false or malicious sexual misconduct allegations, as well as deliberately providing false information during an investigation. Anyone who violates this rule is subject to disciplinary

action, up to and including termination of employment or membership and criminal prosecution.

#### *Investigation and Follow-up*

BGCN will take all allegations of sexual abuse or misconduct seriously and will promptly, thoroughly, and equitably investigate whether misconduct has taken place. The organization may utilize an outside third party to conduct an investigation of misconduct. BGCN will cooperate fully with any investigation conducted by law enforcement or other regulatory/protective service agencies. BGCN will make every reasonable effort to keep the matters involved in the allegation as confidential as possible while still allowing for a prompt and thorough investigation.

#### *Reporting to Law Enforcement or Appropriate Child or Adult Protective Services:*

BGCN is committed to following the state and federal legal requirements for reporting allegations or incidents of sexual abuse or misconduct to appropriate law enforcement and child or adult protective services organizations. It is the policy of BGCN not to attempt to investigate or assess the validity or credibility of an allegation of sexual or physical abuse as a condition before reporting the allegation to proper law enforcement authorities or protective services organizations.

#### *Employee and Worker Screening and Selection*

As part of its sexual abuse and misconduct prevention program, BGCN is committed to maintaining a diligent screening program for prospective and existing employees, volunteers and others that may have interaction with those employed by, associating with or serviced by BGCN. The organization may utilize a variety of methods of screening and selection, including but not limited to applications, personal interviews, criminal background checks and personal and professional references.

BGCN requires reference checks on any candidate for employment or volunteer with direct, repetitive interaction with young people prior to extending an offer for employment or volunteer service. A reference must be obtained from all Boys & Girls Clubs the potential staff/volunteer has worked or volunteered at previously. If the potential staff/volunteer does not meet any of the conditions outlined in Boys & Girls Clubs of America's (BGCA) membership requirements, they cannot be extended an offer of employment or be contracted for any volunteer services.

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

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

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

Such checks will be conducted prior to employment and at regular intervals not to exceed twelve months. All background check findings shall be considered when making employment or volunteer decisions, and BGCN will not employ potential staff or engage potential volunteers if such individual:

- Refuses to consent to a criminal background check.
- Makes a false statement in connection with such criminal background check.
- Is registered, or is required to be registered, on a state or national sex offender registry.
- Has been convicted of a 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
- Has been convicted of any misdemeanor or felony against children, including child pornography.

**Personal Conduct Expectation Policy**

In addition to expecting employees and volunteers to perform their jobs competently and reliably, the Boys & Girls Club of Greater Nashua expects employees and volunteers to conduct themselves in a professional, ethical, and responsible manner that reflects well upon the Boys & Girls Club of Greater Nashua. All employee actions and behaviors towards fellow employees, Club members, parents, community partners, and/or other key stakeholders should promote a spirit of cooperation, inclusivity, and respect. Failure to do so may lead to corrective action, including dismissal.

All staff and volunteer applicants are subject to an initial background check; all Club employees and volunteers are subject to an annual background check thereafter. Fingerprinting of all employees and volunteers who have direct, repetitive interaction with children as part of their roles will occur every five years. Background investigations may include, but are not limited to, verification of name/social security number, National Sex Offender search, state and federal criminal records and checks of any employee’s driver’s license; any offenses or convictions may prevent on-going employment or Club participation.

It is also expected that all members, staff, and volunteers engage in appropriate methods of conflict resolution, and respect the boundaries set by other members, staff, and/or volunteers.

No employee, volunteer, member, or any person on the Boys & Girls Club of Greater Nashua premises shall engage in any type of harassment towards any other person. Harassment occurs in a variety of situations, which share the common element of unwelcome comments or

behavior that affects the workplace. Some examples of harassing behavior include but are not limited to:

- *Verbal* – innuendoes, comments or jokes emphasizing the personal identity of an individual, graphic comments, slurs, and unwanted flirtations or propositions.
- *Visual* – derogatory, demeaning, or suggestive postures regarding a person’s identity, cards, cartoons, graffiti, drawings, gestures, objects.
- *Physical* – unwanted touching, impeding or blocking movement, physical interference with normal work, or assault.

Harassment does not include, for example, a compliment that does not make another employee feel uncomfortable or mutually acceptable conduct (i.e., two employees dating).

### *Sexual Harassment Defined*

Sexual harassment is a form of discriminatory harassment and will be treated in accordance with the discriminatory harassment policy outlined above. Sexual harassment is defined as unwelcome conduct of a sexual nature when:

- Submission to such conduct is made, either explicitly or implicitly, a term of the individual’s employment;
- Submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual; or
- The conduct has the purpose or effect of unreasonably interfering with the individual’s job performance or creating an intimidating, uncomfortable, hostile, or offensive working environment.

Examples of some of the kinds of conduct that violate our Sexual Harassment policy include:

- Sexual assaults, including rape and molestation, and attempts or threats to commit these assaults;
- Unwanted, intentional contact of a sexual nature, such as touching, pinching, patting, grabbing, kissing, brushing against or poking a person’s body;
- Unwanted sexual advances, propositions or comments, including sexually oriented gestures, jokes or comments about a person’s sexuality or sexual experience;
- Preferential treatment or the promise of preferential treatment to an employee for engaging in sexual conduct;
- Displaying or publicizing pictures, posters, reading materials, calendars, objects, etc. that are sexually suggestive, sexually demeaning or pornographic;
- Disciplining or retaliating against an employee in any way because he/she/they has resisted, reported, or complained about sexual harassment.

If you feel that you have been sexually harassed during the course of your employment, or if you believe you have witnessed another employee being sexually harassed, report your concerns immediately to your manager or the Executive Director.

### *Responsibility*

Employees are encouraged to help eliminate harassing, and discriminatory behavior directed toward themselves and others by confronting the offenders directly and/or bringing it to their

manager or the Executive Director's attention. Employees are responsible for respecting the right of their co-workers and discouraging all forms of unprofessional conduct. Each member of management is responsible for creating an atmosphere free from harassment and discrimination by setting a positive example and by remaining aware of what behaviors are occurring within his/her/their department.

### *Consequences*

Any employee, volunteer, member, or any person on the Boys & Girls Club of Greater Nashua premises who is found to have engaged in discrimination, harassment or unprofessional conduct against another individual will be subject to appropriate corrective action, up to and including expulsion from the Club or termination of employment.

### **Member Supervision Policy**

#### *Staff shall NOT*

- Initiate one-on-one contact with a member
- Have a private meeting or communication with a member. This includes in-person meetings and virtual communications such as texting, video chat, and contact through social media.
- Transport one member at a time in a form of transportation unless accompanied by another adult (18-years or older) staff member.
- Transport members in personal vehicles
- Conduct unauthorized visits to a member's home or allow a member to visit the staff or volunteer's home

#### *Staff shall*

- Not exceed a 1:20 youth-to-adult staff ratio for all license-exempt (Clubhouse and Teen Center) programming.
- Adhere to New Hampshire Department of Health and Human Services (DHHS) youth-to-adult staff ratio requirements for all licensed child care programming. Early Learning Center staff are never to exceed a maximum of 1:20 youth-to-adult staff ratio, even if DHHS standards allow it.
- Communicate to another staff if an emergency situation arises.
- Ensure meetings and communications (in-person and virtual) between members and staff/volunteers include at least three individuals; or
- Ensure in-person meetings with members take place in areas where other staff and/or members have direct line-of-sight.

Exceptions may only be made when delivering medical or counseling services by a licensed, trained therapist, or similar professional, or when a meeting is requested by staff of Child Protective Services. All exceptions shall be documented and provided to the Club Safety Lead(s).

Staff shall immediately inform the Club Safety Lead(s) if a staff member, volunteer, or board member violates this one-on-one member contact policy. Should any adult staff, volunteer, or board member violate this policy, the Organization will take appropriate disciplinary action, up to and including termination.

### *Entrance and Exit Control*

Main front entrance shall be controlled and monitored by a staff member during all hours of operation, along with a system to monitor and track everyone who is in the facility. Secondary entries (Stahl Teen Center & Early Learning Center) shall be controlled and monitored by a staff member during peak program hours.

All exit doors not actively monitored by a staff member shall have an audible alarm to discourage unauthorized use to exit or enter the facility. Only staff and authorized volunteers shall be authorized to possess keys and/or fobs to the facility. If an employee is supervising a scheduled activity during non-program hours (ex. one time weekend activity), they shall be responsible for the security of their program space.

### **Anti-Bullying Policy**

The Boys & Girls Club of Greater Nashua operates all activities, programs, and services with a zero-tolerance approach to bullying and other forms of victimizing. It is the Club's expectation that all members adhere to a policy of respectful behavior. The Club will do everything in its power to reduce the incidence of bullying and bully-type behaviors, and to proactively create an atmosphere of respect, tolerance, and dignity for every person in our community.

For purposes of the Club's environment and its expectations of its members, staff, and volunteers, Boys & Girls Clubs of America defines bullying as:

- An attack of intimidation toward another with the intention to cause fear, distress, or harm, that is either:
  - o Physical (e.g., hitting, punching, tripping, pushing)
  - o Verbal (e.g., name calling, teasing, hand signals or inappropriate gestures, yelling, using inappropriate language)
  - o Psychological/Relational (e.g. rumors, social exclusion, mind games, etc.)
  - o Digital (e.g. inappropriate comments on social media websites, posting photos without permission, etc.) "Cyber bullying" and other forms of electronic aggression are defined as bullying.
- A real or perceived imbalance of power between the "bully" and the victim.
- Repeated attacks or intimidation, no matter the severity, between the same youth over time.

### *Rectifying the Situation:*

In cases where acts of bullying are witnessed or reported, either from the victim or a third-party, staff will immediately cease the situation, should the act be occurring.

In cases where alleged harassment behaviors are prolonged, continual, and/or combined with oral epithets, racial slurs, or other prohibited behaviors, staff will consider the situation to be a bullying offense. The Club staff will intervene in all bullying behavior that is brought to its attention or witnessed; counseling will be provided to all participants.

When bullying is witnessed or reported to any Boys & Girls Club employee or volunteer, and the alleged incident is found to be an actual case of bullying, the following will occur:

- All care will be taken to immediately interrupt any active incident of bullying

- Employee will make an oral report to the appropriate program area manager, within 24-hours of the alleged incident. Fact-finding will occur. Then the following steps will take place:
  - o Employee will submit a written report to his/her/their manager within 48-hours of the alleged incident; The manager will review the written report and pass it on to the Club Safety Lead(s)
  - o Promptly after receiving the report, the Club Safety Lead will work with the program area manager to complete an investigation
  - o Within 72-hours of the incident, staff will notify parents of the Club's actions, including its response and consequences.
  - o In rare situations where local authorities, school officials, or law officials must be brought into the situation, the Club will proactively involve the appropriate authorities.

Appropriate measures will be taken on a case-by-case basis to ensure that bullying behavior stops, and that all members feel emotionally and physically safe at the Boys & Girls Club of Greater Nashua.

**Responsible Use of Technology Policy**

*Club Member Usage:*

Before a member is 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 Nashua 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 Nashua reserves the right to monitor, inspect, copy, and review files stored on Club-owned devices or networks. In addition, Boys & Girls Club of Greater Nashua 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 Nashua 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 their personal device(s) 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 Nashua 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 for Boys & Girls Club of Greater Nashua 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 Nashua Code of Conduct. The same rules and guidelines members are expected to follow offline, shall also be followed when online. Should a member behave online in a manner that violates the Boys & Girls Club of Greater Nashua Code of Conduct, that member shall face the same discipline policy and actions they would if their behavior had happened within the physical Club environment.

*Club-owned-and-operated technology:* Members are expected to follow the same rules and

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

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

*Staff and Volunteer Usage:*

Before a staff member can use Club technology equipment or a personal device, he/she/they shall 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 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:* Shall 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 are not 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.

*Monitoring and inspection:* Boys & Girls Club of Greater Nashua 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 disciplinary action up to and including termination.

*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 devices. 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 of weapons or other destructive devices.

If a staff member is told to stop sending communications, he/she/they 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, or communication must take place via a Club-approved platform that is monitored by Club leadership (e.g., Brightwheel and SportsYou).

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

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

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

*Password and access:* To prevent unauthorized access, devices must lock themselves and require authentication using the strongest features available on the device. A minimum standard would require a typed password of at least six characters or numbers, though some devices utilize fingerprint or other biometric technologies. Staff computers/laptops must be manually locked when not in use (e.g., staff must lock their work computers before walking away), and all staff computers/laptops in program area spaces should be secured in a locked staff office when not in use.

### **Restroom Usage Policy**

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

Restrooms located at the Boys & Girls Club of Greater Nashua have been designated for members of all ages. Adults and staff over the age of 18 are to use the staff restrooms located in the administrative hallway and/or any other single-use only restroom. Public bathrooms are not available at our Club. When using restrooms at public facilities during field trips, a minimum of three youth will be escorted by a minimum of one staff member, who will wait outside the main entrance of the restroom.

Restrooms shall be regularly monitored by designated staff at a schedule set by Club leadership. Monitoring includes walk-throughs, inspections, and/or positioning staff near restroom entries.

Staff shall:

- Only use designated adult restrooms and/or authorized single-use only restrooms. Should separate restrooms be unavailable, staff shall use restrooms at designated intervals to ensure they are not using restrooms at the same time as youth members
- Abide by all staff codes of conduct
- Intervene and notify Club leadership should inappropriate conduct be observed

- Ensure restrooms are regularly cleaned and sanitized. Staff observing unacceptable restroom conditions shall:
  - o Immediately notify Club leadership and/or the Club Facility Lead(s)
  - o Document, in writing, restroom conduct incidents and report it to their manager and the Club Safety Lead(s) as soon as possible.

**Prescription Medication Policy**

All efforts should be made by families to schedule prescription medication administration at times when their child is not at the Boys & Girls Club of Greater Nashua.

If prescription medication must be administered while a child is at the Club, it must be brought to the Boys & Girls Club of Greater Nashua in its original container and must include the child's name, the name of the medication, the dosage, the number of times per day, and the number of days the medication is to be administered. This prescription label will be accepted as the written authorization of the physician. The Boys & Girls Club of Greater Nashua will not administer any medication contrary to the directions on the label unless so authorized by written order of the child's physician.

The parent must fill out a Medication Authorization Form before the medication can be administered.

The following criteria/procedures will be met any time the Boys & Girls Club of Greater Nashua administers prescription medication:

- At least the first dosage must be administered by the parent at home in case of an allergic reaction
- Only Club staff members trained in the handling and administration of medications may handle medications, all medication must be handed to these staff members by the parent themselves (children may not hand staff their medications on behalf of parents)
- All medications will be stored in designated medication areas, out of the reach of children.
- Only staff trained and authorized to administer medications may administer necessary prescription medication
- BGCN will maintain a written record of the administration of any medication (excluding topical ointments and sprays applied to normal skin) which will include the child's name, the time and date of each administration, the dosage, and the name of the staff person administering the medication. This completed record will become part of the child's file
- All unused medication will be returned to the parent.

**Non-discrimination Policy**

The Boys and Girls Club of Greater Nashua strives to provide an environment free from all forms of improper discrimination and harassment, including sexual harassment. Discrimination and harassment is unlawful and will not be tolerated.

It is the fundamental policy of the Boys & Girls Club of Greater Nashua to provide a community space that is respectful and that is free from all forms of harassment. The Boys & Girls Club of Greater Nashua prohibits discrimination on the basis of an individual's age, color, disability, marital status, national origin, race, religion, sex, sexual orientation, veteran status, or ancestry.

Harassment is defined as offensive conduct relating to an individual's personal identity, which has the purpose or effect of:

- Creating an intimidating, hostile, or offensive environment
- Interfering with an individual's work performance
- Adversely affecting an individual's employment or a career related action

The Boys & Girls of Greater Nashua's Non-discrimination policy applies to all aspects of employment and participation, including recruiting, hiring, training, transfers, promotions, compensation, benefits, layoffs, disciplinary action, termination and social or recreational programs. The Boys & Girls Club of Greater Nashua may also apply its policy to address situations which, while not unlawful, involve unprofessional, unacceptable or disrespectful statements, actions or behaviors.

While it is consistent with federal requirements, the Boys & Girls Club of Greater Nashua's policy on Non-Discrimination and Equal Employment Opportunity is also based on our moral commitment. The Boys & Girls Club of Greater Nashua is dedicated to ensuring fulfillment of these policies with regard to all terms and conditions of employment.

It is the responsibility of all staff, volunteers and members to ensure compliance with these guidelines and to create an atmosphere free of discrimination.

#### *Reasonable Accommodations*

As part of the Boys & Girls Club of Greater Nashua's commitment to provide an equitable place for all, we will reasonably accommodate an individual's religion and/or disability. This means we will make requested necessary accommodations that do not present an undue hardship to the Club.

The Boys & Girls Club of Nashua will reasonably accommodate employees and members who have disabilities that prevent or limit them from performing their jobs or participating in programs, unless the accommodation poses an undue hardship.

Disabilities include physical or mental impairments that substantially limit one or more of a person's major life activities. Major life activities include functions such as walking, seeing, hearing, speaking, breathing, thinking and working.

Reasonable accommodations include things the Club may do that are both reasonable and enable a disabled employee or member to satisfactorily perform essential job functions or participate in programming that he/she/they otherwise could not perform because of a disability.

Undue hardship refers to an undue hardship to the Boys & Girls Club of Greater Nashua. This policy applies to all employees.

## Procedure to Secure a Reasonable Accommodation

1. An employee or member who believes that, because of a disability, they require an accommodation in order to perform their job or participate in programming should discuss the matter with their supervisor, the Safety Lead(s), or the Executive Director. The employee or member may bring the matter up in whatever manner he/she/they feel is most comfortable - either orally or in writing.
2. The employee or member should be prepared to discuss the nature and extent of any limitations on his/her/their ability to perform the job or participate in programming.
3. Whenever possible and if known, the employee or member should be prepared to discuss reasonable ways to accommodate those limitations in a manner that will enable him/her/them to perform the essential job functions or participate in programming.

The Club may require the employee to provide medical documentation in connection with a request for accommodation. Medical documentation requests may cover any of the following:

- The existence of a disability
- Determination of which of the employee's major life activities are substantially limited and the extent of the limitation
- Determination of which job duties may be limited or restricted and to what extent
- Determination of workplace impediments that pose problems for the employee
- Identification of potential accommodations that could enable the employee to satisfactorily perform the job duties and an indication as to which accommodations are medically necessary

The Club will consider reasonable accommodations to the employee/member's disability that do not present an undue hardship. The Boys & Girls Club of Greater Nashua desires to treat each situation on an individual basis, taking into consideration the specific job and program requirements and the employee/member's particular limitations. Suggested accommodations may come from the employee/member, from the employee/member's treating physician or other sources. The Boys & Girls Club of Greater Nashua may also utilize external resources to identify potential reasonable accommodations. The Boys & Girls Club of Greater Nashua supports a constructive and collaborative dialogue to find an appropriate solution in each case.

The Boys & Girls Club of Greater Nashua will implement those accommodations that are best suited to the situation and that do not create an undue hardship for the Boys & Girls Club of Greater Nashua.

Once accommodations are implemented, the employee/member will be held to the same performance and personal conduct standards as are applied to other employees/members.

Accommodations should be evaluated periodically by the Boys & Girls Club of Greater Nashua and by the employee/member to ensure that they continue to be necessary and effective, and that they do not pose an undue hardship to the employee or the Club.

Employees will not be evaluated or in any way treated less favorably or penalized by the Club for having requested or utilized an accommodation. An employee whose disability is accommodated through a leave of absence or who does not work a full work schedule may have his/her/their compensation, prorated to reflect the period of active employment. Benefits

may also be affected, consistent with the Club's benefits plan or program provisions, if the employee's status changes (e.g., going from full-time to part-time, or regular to leave of absence).

### **First Aid and CPR Training**

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

### **Transportation Policy**

Boys & Girls Club of Greater Nashua 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 Nashua only provides transportation to and from the Club and various approved off-site locations. The Club only transports youth in Club vehicles or other vehicles approved by 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 Club 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 Club 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, PDAs or other communication devices while transporting members to and from the Clubhouse or Club-related activities.
- Must ensure all members have their seat belts buckled in for the entirety of the ride. (Note: Seat belts are not mandatory on the busses but still encouraged)

#### *Vehicles:*

- Each Club vehicle should meet all local, state, and federal inspection and licensing requirements.
- 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, up to and including termination.

Through the appropriate use of Club and community resources, the Boys & Girls Club of Greater Nashua strives 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 recover from, an emergency.

**Field Trip / Overnight Policy**

Program services may include field trips that require transportation in Boys & Girls Club of Greater Nashua vehicles. If there is an upcoming event/field trip, families will receive an announcement the week leading up to the event and information about the trip will be sent home with the Club member for the parents/guardians.

Parents and/or legal guardians must provide permission in writing before Club members can participate in field trips.

All member supervision policies shall be in effect during field trips or overnight programs. No staff/volunteer shall be in a one-on-one situation with a member and no staff/volunteer shall transport one member at a time unless accompanied by another staff member. Members shall never be transported in the personal vehicle of any Club staff or volunteer.

**Drug-Free Workplace Policy**

The Boys & Girls Club of Greater Nashua is committed to the well-being of our employees, to the safety of the workplace, and to providing high-quality services to our members and community partners. For all of these reasons, we cannot tolerate the unlawful possession, use, manufacture, distribution, or dispensation of controlled substances in the workplace or during work time. Moreover, employees must come to work free from the influence of alcohol, illegal drugs, inhalants, and unlawful use of prescription medications. Any employee who violates this Drug-Free Workplace Policy will be subject to disciplinary action, up to and including dismissal. Legal consequences may follow, as well.

It is the policy of the Boys & Girls Club of Greater Nashua to create and maintain an alcohol and drug-free workplace. The workplace use of alcohol and/or controlled substances:

- Is inconsistent with the behavior expected of employees.
- Undermines our ability to operate effectively and efficiently.
- Subjects all employees and visitors to our facility to unacceptable safety risks.

The manufacturing, distribution, dispensation, possession, sale or use of a controlled substance, inhalant, drug paraphernalia, or alcohol in the work place or while engaged in Boys & Girls Club of Greater Nashua's work activities, is strictly prohibited.

Violation of this policy will result in corrective action, up to and including termination of employment. Employees have a responsibility to:

- Know the potential side effects of any prescription drugs they may be taking, inform their manager of their use of prescription drugs which might potentially impair their job performance, and use prescription drugs in an appropriate manner.
- Report any violation of these guidelines, including violations of other employees, to their manager or Club leadership. Employees who fail to report such violations may be subject to corrective action, up to and including termination of employment.
- Inform Boys & Girls Club of Greater Nashua within 5 days if they are convicted for criminal offenses involving controlled substances and/or abuse of illegal drugs or alcohol. Employees must inform the Boys & Girls Club of Greater Nashua of:
  - Conviction
  - Nature of the conviction
  - Ultimate disposition of the conviction

Conviction and/or failure to notify the Boys & Girls Club of Greater Nashua of conviction may result in corrective action, up to and including termination of employment.

The Boys & Girls Club of Greater Nashua reserves the right to perform searches of employees and their property, where reasonable suspicion exists, including vehicles parked on company premises. An employee who refuses to submit to such a search will be subject to corrective action, up to and including termination of employment. Any suspected illegal substances may be confiscated and the appropriate law enforcement agency may be notified.

If you are involved in an on-the-job accident, or your observed behavior raises a reasonable suspicion of drug or alcohol use, you may be required to submit to blood, urine, or other diagnostic tests to detect alcohol and/or controlled substances (or drug metabolites) in your system. If an initial screening test indicates positive findings, a confirmatory test may be conducted. Employees under the influence of drugs or alcohol will be subject to corrective action up to and including termination of employment.

#### *Smoke-Free Workplace*

The Boys & Girls Club of Greater Nashua provides a smoke-free work place and is a "Tobacco Free Zone". It is unlawful to use tobacco products on Club grounds pursuant to NH RSA 126-K.

#### **Emergency Operations Plan Policy**

Boys & Girls Clubs 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 Nashua 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.

**I have read and understand the Boys & Girls Club of Greater Nashua’s Safety Policies:**

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Print name

Signature

Date