



Safety Policies Manual

Revised January 2026

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Denotes Required BGCA Membership Policy



BOYS & GIRLS CLUB
OF LENAWEE

Child & Club Safety Policy Statement

Safety Management System: Our Layers of Safety Protection

At Boys & Girls Club of Lenawee safety is foundational to everything we do. We strive to create safe places where youth and staff thrive and we are committed to maintaining a safe and healthy environment at all times.

To ensure the safety of our operations and services, we are committed to a safety management system to identify, assess and mitigate risks and to continuously improve our safety performance. This requires our unyielding commitment to the following principles:

- Promoting the concept that safety is a core value and precondition to operation.
- Enabling proactive identification, assessment, and mitigation of risks associated with our activities, programs, and services.
- Fostering a positive safety culture through behavioral norms, expectations and "unwritten rules."
- Prioritizing the safety and health of all individuals involved in our operations and affected stakeholders.
- Conducting risk assessments on a regular basis to proactively address risks and minimize the likelihood and severity of incidents.
- Complying with all applicable laws, regulations, and standards, including the Movement's membership requirements.
- Actively encouraging the reporting of incidents, near misses and other safety concerns without fear of reprisal.
- Promoting safety awareness through open, regular communication and engagement initiatives.
- Providing comprehensive training to employees, volunteers, and other stakeholders to ensure they are equipped with the knowledge and skills necessary to perform their tasks safely.
- Allocating sufficient resources (people, processes, tools and training) to supporting this safety policy.
- Integrating safety into all aspects of our business planning and decision-making processes.
- Ensuring all employees understand that we all have a daily obligation to pursue safety, quality and compliance as described in this safety policy.

Review and Revision:

This Child & Club Safety policy will be reviewed annually to ensure its continued effectiveness and relevance. It may be revised as necessary to reflect changes in regulations, industry standards, and organizational requirements.

Laura Bell
Board Chair

8/12/25

Date:

Child Abuse Prevention Policy

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

DEFINITIONS

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

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

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

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

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

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

MANDATED REPORTING

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

REQUIRED TRAINING

BGCL conducts and reports through a BGCA-approved process the following training for all staff members and volunteers with direct repetitive contact with young people (at the intervals noted for each).

Before providing services to young people, and annually thereafter:

1. BGCA-approved child abuse prevention
2. BGCA-approved mandated reporting
3. BGCA-approved grooming prevention

Annually:

- All the policies, including all safety policies, for BGCL.

PHYSICAL INTERACTIONS

Every staff member and volunteer of BGCL is required to maintain appropriate physical contact with minors. Appropriate and inappropriate interactions include but are not limited to the following:

Appropriate	Inappropriate
• Side hugs • Handshakes • High-fives and hand slapping • Holding hands (with young children in escorting situations)	• Full-frontal hugs or kisses • Showing affection in isolated area • Lap sitting • Wrestling or piggyback/shoulder rides • Tickling • Allowing youth to cling to an adult's leg

VERBAL INTERACTIONS

Every staff member and volunteer of BGCL is required to maintain appropriate verbal interactions with minors. Appropriate and inappropriate interactions include but are not limited to the following:

Appropriate	Inappropriate
• Positive reinforcement • Child-appropriate jokes (no adult content) • Encouragement • Praise	• Name calling • Inappropriate jokes (adult-only content) • Discussing sexual encounters or personal issues • Secrets • Profanity or derogatory remarks • Harsh language that may frighten, threaten, or humiliate youth

ABUSE AND SAFETY RESOURCES

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

Behavior Support Policy

Behavior support is a process of understanding what youth are communicating with their actions and using that information to adjust their environment, and teach skills that promote positive behavior.

5 Guiding Principles of Behavior Support

- All behavior is communication.
- All youth are in the process are learning about their own behavior. As youth learn to meet expectations, they will often act in ways that are challenging or concerning.
- People interpret behavior based on culture, upbringing, and experience.
- Behavior is an opportunity to learn how youth respond to their environments, and the skills they are working on in those spaces.
- Behavior support is a team approach that should include the youth, caregivers, mentors, or other supportive adult in a youth's life.

Boys & Girls Club of Lenawee Positive Behavior Support:

- Understands that youth do well if they can, not if they want to
- Considers equity and cultural differences
- Understands individual youth needs (i.e. responds to individual differences among youth with insight and sensitivity), providing reasonable accommodations when able
- Is explicit, reasonable and timely
- Is logical, consistent, developmentally appropriate, and considerate of the circumstances
- Relies primarily on supportive environments, staff relationships, and positive youth development as prevention. Ensures parent and youth voice are appropriately integrated in the development and implementation of support plans
- Increases the youth's awareness of the impact of their behavior and provides an opportunity to take full responsibility for it
- Builds a sense of community and its capacity for resolving conflict and maintaining a positive culture
- Provides opportunity to teach youth responsibility, regulation, and agency to solve their own problems
- Makes appropriate efforts to identify the root of the need behind the behavior, and respond accordingly
- Utilizes Trauma Informed Care (TI) practices by prioritizing: Physical and emotional safety, stability and predictability, equity, empowerment and choice, and connecting with the positive adult mentor
- Recognizes that staff and Clubs need to examine, with a TI lens, our environments, expectations, and communication to ensure we are truly setting our youth up for success

Club behavior support and response procedures taken into consideration:	
• Duration • Frequency • Age and developmental level of youth • Individual circumstances • Documented disabilities that may impact behaviors or responses • The Club's ability to provide reasonable accommodations • The strengths and experiences of the individual youth (including ACE's)	• Impact on the youth expressing behavior (loss of dignity, extreme emotional duress, threat of harm to self) • Impact on others (physical harm, emotional harm, loss of property) • Impact on the program (loss of ability to run programs, maintain safe and positive culture) • The experience of the larger Club community

Behavior responses or practices that are never acceptable at the Club:
- Restraint or seclusion - Withholding of basic needs (food, water, bathroom use) - Any form of physical punishment (including pushups, wall sits, or running laps) - Verbal Abuse (berating, taunting, name-calling) - Emotional Abuse (belittling, threatening, shaming)

Negative behavior or group management looks like:
- Punishing a whole group for the actions of a few - Yelling - Excluding a youth from a program in "time out" (other than to take a break to calm down, regulate, or take a break for safety) - Having a group "owe staff time" and sit in silence - Calling a youth out in front of a group, or making a negative example of them - Sending a youth to a Calm down corner, Cool down room, or Front Desk as a form of punishment

Supervision and Facilities Policy

SUPERVISION

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

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

RESTROOM USAGE

BGCL is committed to providing a safe, clean environment and enforces the following restroom policy for members, staff, volunteers, and other adults.

- There will be either a designated adult restroom or procedures to ensure adults and minors never utilize a restroom at the same time.
- Club will either have single-user restrooms or multi-user restrooms with single stalls that can be secured from the inside.
- When using restrooms at public facilities during field trips, a minimum of three youth will be escorted by one staff member, who will wait outside the main entrance of the restroom.

RESTROOM MONITORING

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

- Implementing procedures to limit the number of children using restrooms at the same time.
- Prohibiting younger children and teens from sharing a restroom.
- Positioning staff near restroom entries to maintain auditory supervision of space.
- Designing or renovating multi-user restrooms to eliminate outer doors, while maintaining privacy with individual stalls.

Staff observing unacceptable restroom conditions or incidents shall:

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

ENTRANCE AND EXIT CONTROL

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

All emergency exit doors shall have an audible alarm to discourage unauthorized use to exit or enter the facility.

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

FACILITY CONDITION

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

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

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

FOOD AND DRINK

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

Transportation Policy

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

DRIVERS:

- Must have a valid Driver's license and an acceptable driving record. A copy of staff Driver's License will be kept in the administrative Office.
- Must allow for DMV background check and be cleared to transport youth per the barrier crime policy of the organization.
- Must keep an updated list of all youth who are transported to and from the Clubhouse and Club- related activities.
- Must confirm that no children are left on a vehicle after every trip (based on a seat-by-seat scan of each vehicle); log must be signed daily to ensure compliance.
- Must perform regular checks to ensure that all members are picked up and dropped off at the appropriate times and locations.
- Must submit written reports detailing issues or incidents involving transportation of members to and from the Clubhouse or to and from Club-related activities.
- May only transport Club members in personal vehicles with prior authorization and appropriate documentation.
- 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.

VEHICLE

- Each agency vehicle should meet all local, state, and federal inspection and licensing requirements.
- Each vehicle should be inspected as outlined by DMV by staff before every trip for which youth are being transported; any problems with the vehicle must be addressed promptly.
- Regular maintenance should be performed on vehicles and documents/records reflecting that maintenance should be maintained.
- Each vehicle must provide a seat belt for every passenger and fully comply with state and federal seat belt regulations.
- Each vehicle must have a complete first-aid kit that satisfies state licensing requirements.
- Each vehicle must have a working and current fire extinguisher that satisfies state licensing requirements.
- Each vehicle must have reflective traffic warning signs (e.g., triangles or flares) that are stored securely during transport.
- The vehicle must be clean and well maintained and exterior physical damage must be repaired promptly.

SHARED-USE RESTROOMS

- On a field trip or when using a public restroom, youth shall never enter the restroom alone unless it is a single-stall restroom that is empty.
- Youth shall follow the “rule of three” in using public restrooms, with at least two youth and an adult walking to the restrooms and three youth entering a multi-stall facility together. The adult will remain outside the restroom door to provide auditory surveillance.
- Whenever possible, staff/volunteers will monitor and clear public restrooms before use by members to ensure that the facility is free of adults – and clear of youth not involved in the Club program – before allowing youth to use the facilities. Alternatively, staff members will stand in the restroom doorway and/or hold the door at least partially open when supervising member use of public restrooms. Staff may position themselves inside the restroom near the sinks if positioning at the door is not feasible or is deemed ineffective.
- In a shared-use facility, Boys & Girls Clubs will utilize the best practice of shutting the exterior door to the restroom and using an “Occupied” sign outside of the door to alert others that they must wait until Club members have exited the restroom before they can enter.

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

Screening and Onboarding Policy

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

BACKGROUND CHECKS

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

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

- Verify the person's identity and legal aliases through verification of a social security number.
- Provide a national Sex Offender Registry search.
- Provide a comprehensive criminal search that includes a national search.
- Provide a comprehensive local criminal search that includes either a statewide or county level criminal search, depending on jurisdiction (*a current list of jurisdictions can be found at www.bgca.net/childsafety*).
- 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 BGCL will not employ potential staff or engage potential volunteers if such individual:

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

INTERVIEWING

BGCL will conduct in-person, or utilize a virtual meeting platform to conduct behavioral-based interviews with every candidate for employment or program volunteer service. BGCA will provide behavioral-based interview questions for local use.

REFERENCE CHECKS

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

STAFF AND VOLUNTEER ONBOARDING

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

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

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

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

Emergency Operations Plan Policy

EMERGENCY OPERATIONS PLAN (EOP)

Boys & Girl Club of Lenawee 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, fire department & law enforcement agencies.

EOP ANNUAL REVIEW

BGCL 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 EOP annually.

EMERGENCY WEATHER CONDITION POLICIES

When emergency weather conditions during BGCL operating hours, BGCL Leadership will make appropriate decisions to close or otherwise alter the operations of BGCL. Communications will be made to inform staff, families, and the community of these changes as appropriate.

FIRST AID AND CPR TRAINING

BGCL always maintains a minimum of one CPR- or first-aid-trained staff on site during all operating hours when members are being served.

KEY DEFINITIONS

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

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

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

Incident Management Policy

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

INTERNAL INCIDENT REPORTING

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

The following information shall be included on an Incident Report:

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

EXTERNAL INCIDENT REPORTING

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

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

GENERAL INCIDENT DESCRIPTION

Safety incidents can include but are not limited to:

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

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

INCIDENT INVESTIGATION

Boys & Girls Club of Lenawee takes all incidents seriously and will promptly initiate a thorough fact finding and information gathering query. If it is determined that Law Enforcement intervention is necessary, this will be done promptly as well. All employees, board members, volunteers and Club members will cooperate fully with any investigation conducted by law enforcement or any other regulatory agency, including a third party investigation team.

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

It is our objective to conduct a thorough and impartial investigation and expect confidentiality to be maintained until the investigation is complete. The accused may be placed on leave of absence or job reassignment during the investigation period. We 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. In the event that an incident involves an allegation against a staff member, volunteer or Club member, the Club may suspend that individual immediately (employees with pay) and maintain the suspension throughout the course of the investigation.

EMPLOYEE PROTECTION POLICY

If any employee reasonably believes that some policy, practice, or activity of the Boys & Girls Club of Lenawee is in violation of law, a written complaint must be filed by that employee with the CEO or the Board President. It is the intent of BGCL to adhere to all laws and regulations that apply to the organization and the underlying purpose of this policy is to support the organization's goal of legal compliance. The support of all employees is necessary to achieving compliance with various laws and regulations. An employee is protected from retaliation only if the employee brings the alleged unlawful activity, policy, or practice to the attention of BGCL and provides BGCL with a reasonable opportunity to investigate and correct the alleged unlawful activity.

The protection described below is only available to employees that comply with this requirement. BGCL will not retaliate against an employee who in good faith, has made a protest or raised a complaint against some practice of BGCL, or of another individual or entity with whom the BGCL has a business relationship, on the basis of a reasonable belief that the practice is in violation of law, or a clear mandate of public policy.

BGCL will not retaliate against employees who disclose or threaten to disclose to a supervisor or a public body, any activity, policy, or practice of BGCL that the employee reasonably believes is in violation of a law, or a rule, or regulation mandated pursuant to law or is in violation of a clear mandate or public policy concerning the health, safety, welfare, or protection of the environment.

BGCL prohibits retaliation made against any employee, volunteer, board member, or Club member who reports a good faith complaint of sexual abuse or who participates in any related investigation. Making false accusations of sexual abuse in bad faith can have serious consequences for those who are wrongly accused. We prohibit making false and/or malicious sexual abuse allegations, as well as deliberately providing false information during an investigation.

BGCA CRITICAL INCIDENT REPORTING

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

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

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

BGCL 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.

Weapons Prohibition Policy

BGCL strictly prohibits the possession, transportation, storage, presence or use of firearms (including but not limited to handguns) or other weapons on all campus property, in BGCL vehicles, or while engaged in BGCL business, including during travel and BGCL-sponsored social events or volunteer opportunities. Under no circumstances is a staff member authorized to store a firearm or other dangerous weapon on BGCL premises or in a BGCL vehicle. This policy applies to all staff members, including those who have a valid permit to carry a firearm.

Prohibited weapons include but are not limited to: firearms, knives, explosives or objects which can be used as weapons and are not necessary equipment assigned for use in ones job. If a staff member is unsure whether an item is covered by this policy, they should contact the CEO or COO. Staff members are responsible for making sure that any item they possess is not prohibited by this policy. Police officers, security guards, and other individuals who have been given consent by the organization to carry a weapon on the property will be allowed to do so.

REPORTING

Safety Anyone observing conduct that may be a violation of this policy in the workplace should report such behavior to management as soon as possible. Staff members are responsible for making this report regardless of the relationship between the individual who initiated the threatening behavior and the person or persons being threatened. Staff members who make a good faith report pursuant to this policy will not be subject to retaliation. Local law enforcement may be contacted and any staff members with knowledge of the report shall cooperate with BGCL and law enforcement authorities during any investigation.

INVESTIGATION

BGCL will respond promptly whenever violent/abusive or threatening behavior is reported and conduct an investigation regarding reported behavior. Nothing in this policy shall be construed as creating any duty or obligation on the part of the organization to take any actions beyond those required of an employer by existing law. However, an investigation will generally include the following components:

1. Review any completed documentation forms and file CPS reports when applicable.
2. Interview the person(s) reporting the incident.
3. Interview any witnesses to the incident. Witness reports will be obtained in writing and witnesses will be required to sign and date such reports.
4. Interview the staff member, youth, or visitor who suffered abuse or violence.
5. Interview staff members who have had contact with the alleged victim during the time of the incident.

BGCL understands the sensitivity of any information shared in these circumstances. Every effort will be made to exercise confidentiality, recognize and respect the privacy of the reporting parties, and maintain respect and dignity for all concerned.

Should the investigation reveal that a false report was made, the investigation will cease. All involved parties will be notified. If a staff member is found to have made an intentionally false report, the staff member will be subject to disciplinary action up to and including termination.

SEARCHES

BGCL reserves the right at any time and at its discretion to search and inspect property and

persons while on BGCL premises or while engaged in BGCL business off premises. Any staff member failing or refusing to promptly permit a search under this policy will be subject to disciplinary action, up to and including termination.

DISCIPLINARY ACTION

Anyone believed to be violating this policy will be removed from the premises as quickly and safely as possible and shall remain off premises pending the outcome of an investigation. Violations of this policy will lead to disciplinary action, up to and including termination of employment and/or referral to counseling professionals or to appropriate law enforcement agencies, at the discretion of BGCL.

Drug- and Alcohol-Free Workplace Policy

DRUG AND ALCOHOL POLICY

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

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

BGCL further reserves the right to take any and all appropriate and lawful actions necessary to enforce this drug- and alcohol-free workplace policy, including but not limited to the inspection of organization-issued lockers, desks, or other suspected areas of concealment, as well as an employee's personal property when the organization has reasonable suspicion to believe that the employee has violated this policy.

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

SMOKING POLICY

BGCL will comply with all applicable federal, state, and local regulations regarding non-smoking in the workplace in order to provide a work environment that promotes productivity and the well-being of its employees. Smoking in the workplace can adversely affect members, employees,

and volunteers. Accordingly, smoking is restricted at all its facilities.

Smoking is defined to include the use of any tobacco-containing products, including cigarettes, cigars, and pipes, as well as the use of electronic cigarettes (e-cigarettes) and vaporizers.

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

REASONABLE SUSPICION

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

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

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

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

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

INSPECTION AND TESTING

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

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

insurance companies and/or the employee's doctor.

PRESCRIPTION MEDICATION

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

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

Technology Acceptable Use Policy

CLUB MEMBER USAGE

Before a member will be allowed to use Club technology equipment or their personal device, both the member and their caregiver will need to read and sign the Technology Acceptable Use policy during membership enrollment. Under the Technology Acceptable Use policy, the following relevant principles shall apply:

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

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.

Loss and damage: Members are responsible for their devices 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.

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: BGCL 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.

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.

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. BGCL 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.

Parental notification and responsibility: While the BGCL 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 BGCL 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 BGCL Code of Conduct. The same rules and guidelines members are expected to follow offline (i.e., in the real world) shall also be followed when online. Should a member behave online in a manner that violates the BGCL 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.

STAFF AND VOLUNTEER USAGE

Before a staff member can use Club technology equipment or a personal device, they shall read and sign the Technology Acceptable Use policy and return it to the Club during onboard training.

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: E-mail messages and other use of the Club's computers are *not confidential*. Even though individuals may be issued a private password or other private access code to log in to the computer, you should have ***no expectation of privacy*** with regard to your use of the system. If necessary to enforce these policies, computer, Internet and e-mail usage may be monitored by the CEO and COO, including retrieving and reading e-mail messages and other computer files, and monitoring of Internet traffic.

BGCL 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 device.

Furthermore, the Club is not liable for the loss, damage, misuse, or theft of any personally owned device brought to the Club.

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

Inappropriate communication includes but is not limited to:

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

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

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

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

subject to disciplinary action.

Examples of cyberbullying include but are not limited to:

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

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

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

Internet access: Personally owned devices used at the Club must access the internet via the Club's content-filtered wireless network and are not permitted to directly connect to the internet through a phone network or other content service provider. Boys & Girls Clubs (local name) 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 devices with 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.

Personal Devices: Cell phone usage during Club operations is to be limited to business needs with only occasional brief personal use, within reasonable limits, so long as it does not interfere with fulfilling a staff or volunteers duties and responsibilities. Utilizing a cell phone, or other personal device, distracts from the members being supervised appropriately and limits engagement with BGCL programs/activities. Conducting any personal business while an employee is on duty for BGCL distracts from the mission and may be dangerous. Cell phones or electronic devices should not be used for personal reasons while supervising youth. Unauthorized personal use of cell phones could result in disciplinary actions, including termination. Employees are asked to utilize voicemail, or a similar service, to handle incoming messages or calls while on duty.

Password and access: To prevent unauthorized access, is expected that BGCL employees and volunteers adequately protect access to their accounts and/or devices by utilizing built in password protection, dual-factor authentication, and/or other protection methods as necessary.

SOCIAL MEDIA AND OTHER PUBLIC COMMUNICATIONS

This policy also governs the publication of and commentary on social media by employees or volunteers of Boys & Girls Club of Lenawee and its related companies. For the purposes of this policy, social media means any facility for online publication and commentary, including without limitation: blogs, social networking sites such as Facebook, LinkedIn, Instagram, Snapchat, Twitter, TikTok and YouTube. This policy is in addition to and complements any existing or future policies regarding the use of technology, computers, e-mail and the internet.

BGCL employees and volunteers who are not specifically authorized by the CEO are not allowed to publish or comment via social media in any way that suggests they are doing so as a representative of the Boys & Girls Club of Lenawee.

BGCL employees or volunteers who are specifically authorized by the CEO are free to publish or comment via social media in accordance with this policy. Such employees are subject to this policy to the extent they identify themselves as a BGCL employee or volunteer (other than as an incidental mention of place of employment in a personal social media on topics unrelated to BGCL).

Publication and commentary on social media carries similar obligations to any other kind of publication or commentary. All uses of social media must follow the same ethical standards that BGCL employees must otherwise follow. Personal use of social media including, but not limited to, Facebook, Twitter, Instagram, Snapchat, and TikTok should not happen while on duty. Individuals are responsible for what is posted on social media. Please keep in mind that what is done or said online has the potential to impact BGCL and for this reason personal activity must comply with guidelines set forth in the Club's Policies. If an employee or volunteer is contacted by a member of the media or by an elected official about social media postings relating to BGCL, they must NOT respond, but instead contact CEO for guidance on how to move forward. Failure to adhere to these guidelines could lead to disciplinary action up to and including termination.