



BOYS & GIRLS CLUBS
OF GREATER OXNARD AND
PORT HUENEME

Organization
Safety Policies



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Table of Contents

Emergency Operations Plan Policy.....	2
Incident Management Policy.....	3-4
Screening Policy.....	5-6
Child Abuse Prevention Policy.....	7-8
Drug- and Alcohol-Free Workplace Policy.....	9-10
Data Breach Management & Response Plan.....	11-15
Restroom Policy.....	16
Supervision Policy.....	17
Transportation Policy.....	18
Video Surveillance Policy.....	19-20
Acceptable Use Policy for Members.....	21-22

EMERGENCY OPERATIONS PLAN POLICY

EMERGENCY OPERATIONS PLAN (EOP)

Boys & Girls Clubs of Greater Oxnard and Port Hueneme 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 (earthquake, 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 Oxnard and Port Hueneme 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.

FIRST AID AND CPR TRAINING

Boys & Girls Clubs of Greater Oxnard and Port Hueneme 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.

GENERAL INCIDENT DESCRIPTION

Safety incidents can include but are not limited to:

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

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

INTERNAL INCIDENT REPORTING

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

The following information shall be included on an Incident Report:

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

EXTERNAL INCIDENT REPORTING

Boys & Girls Clubs of Greater Oxnard and Port Hueneme 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.=

INCIDENT INVESTIGATION

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

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

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

BGCA CRITICAL INCIDENT REPORTING

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

- b. 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.
- c. 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.
- d. Any child who might have been abducted or reported missing from a Club site or Club-sponsored activity.
- e. 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.
- f. 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.
- g. Any failure to comply with requirements set forth by childcare licensing agencies or organizations.
- h. Any known or suspected felony-level criminal act committed at a Club site or during a Club-sponsored activity.
- i. Any misappropriation of organizational funds in the amount of \$10,000 or greater, or any amount of federal funds.
- j. 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.
- k. Negative media attention that could compromise the reputation of the Member Organization or the Boys & Girls Clubs of America brand.
- l. 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 Clubs of Greater Oxnard and Port Hueneme 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.

SCREENING POLICY

The Boys & Girls Clubs of Greater Oxnard and Port Hueneme is committed to selecting and retaining the best staff and volunteers to serve our youth. As part of the initial selection process and on an on-going basis, Boys & Girls Clubs of Greater Oxnard and Port Hueneme will conduct background checks in accordance with the following policy.

BACKGROUND CHECKS

Boys & Girls Clubs of Greater Oxnard and Port Hueneme will conduct criminal background checks of all employees, including minors, board, volunteers, and others who serve on a standing committee, and conduct background checks on all volunteers, including partners and minors, who have direct, repetitive contact with children.

Name-based or fingerprint-based record searches may be used in any combination but will, at a minimum,

- (a) verify the person's identity and legal aliases through verification of a social security number,
 - (b) provide a national Sex Offender Registry search,
 - (c) provide a comprehensive criminal search which includes a national search, and
 - (d) provide a comprehensive local criminal search which includes either a statewide criminal search or county level criminal search, depending on your jurisdiction (a current list of jurisdictions can be found at www.bgca.net/childsafety),
- Such checks will be conducted prior to employment and at regular intervals not to exceed twelve (12) months.

All background check findings will be considered when making employment or volunteer decisions. It is the policy of Boys & Girls Clubs of that an employee or volunteer will be automatically ineligible for employment or volunteer service, 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

The Boys & Girls Clubs of Greater Oxnard and Port Hueneme will conduct in-person behavioral-based interviews with every candidate for employment or program volunteer service.

REFERENCE CHECKS

The Boys & Girls Clubs of Greater Oxnard and Port Hueneme 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 the candidate worked at prior to extending an offer for employment or volunteer service. Additionally, Boys & Girls Clubs of Greater Oxnard and Port Hueneme 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.

CHILD ABUSE PREVENTION POLICY

The priority of Boys & Girls Clubs of Greater Oxnard and Port Hueneme is the physical and emotional safety of its members, staff, and volunteers. Boys & Girls Clubs of Greater Oxnard and Port Hueneme maintains a zero-tolerance policy for child abuse. Boys & Girls Clubs of Greater Oxnard and Port Hueneme 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: Boys & Girls Clubs of Greater Oxnard and Port Hueneme 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 Boys & Girls Clubs of Greater Oxnard and Port Hueneme who

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

REQUIRED TRAINING

Boys & Girls Clubs of Greater Oxnard and Port Hueneme 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 Boys & Girls Clubs of Greater Oxnard and Port Hueneme Every staff member and volunteer of Boys & Girls Clubs of Greater Oxnard and Port Hueneme 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 Boys & Girls Clubs of Greater Oxnard and Port Hueneme 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 Clubs of Greater Oxnard and Port Hueneme prominently displays BGCA-approved collateral that shares ethics hotline, crisis text line and safety helpline information with members, staff, volunteers, and families. Safety policies are available on our website for parents/guardians.

DRUG- AND ALCOHOL-FREE WORKPLACE POLICY

DRUG AND ALCOHOL POLICY

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

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

Boys & Girls Clubs of Greater Oxnard and Port Hueneme 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.

SMOKING POLICY

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

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

PRESCRIPTION MEDICATION AND LEGAL DRUGS

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

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

DATA BREACH MANAGEMENT & RESPONSE PLAN

PURPOSE

This plan outlines the steps to follow in the event of an imminent or actual breach of personally identifiable information (PII) and identifies and describes the roles and responsibilities of the **clubs** Data Breach Response Team (DBRT or “Team”).

DEFINITIONS

For the purposes of this plan, a **breach** refers to the loss of control, compromise, unauthorized disclosure, unauthorized acquisition, or any similar occurrence where (1) a person other than an authorized user accesses or potentially accesses personally identifiable information or (2) an *authorized* user accesses or potentially accesses personally identifiable information for a purpose that is not authorized. A breach can lead to an adverse impact on information assets such as an information system and/or network and mobile devices.

The following pages describe breach severity levels, responsibilities of the Boys & Girls Clubs of Greater Oxnard and Port Hueneme Data Breach Response Team, and a communication plan. *All staff, board members, other volunteer staff (including mentors), and other representatives that create, collect, use, process, store, maintain, disseminate, disclose, or dispose of PII must be aware of this policy.*

In the event of a breach, **one of the first steps** the designated DBRT lead should take is to:

1. Report an actual or detection of an imminent breach of PII to Boys & Girls Clubs of America (BGCA) via the BGCA CIMS (Club Incident Management System) **no later than 12 hours after an occurrence of an actual breach or detection of an imminent breach.**
2. Agree to free exchange of information with representatives of the U.S. Department of Justice, Office of Justice Programs, as needed.

Outages caused by scheduled maintenance, or authorized, planned activities that cause expected outages as part of those activities are not included in this definition and for the purpose of this plan. Examples of information security incidents may include (but are not limited to):

- Unauthorized access or use of a system
- Unauthorized use of the system as a gateway to other systems
- Unauthorized use of any account
- Compromise of “restricted”, “confidential”, non-public information
- Execution of malicious code that destroys data
- Computer security intrusion (physical)
- Unauthorized change to computer or software
- Loss or theft of equipment used to store private or potentially sensitive information
- Denial of service attack
- Interference with the intended use of an information technology resource
- Insider Sabotage
- Mishandling of Information / Data Assets

SEVERITY LEVELS

All actual breach events detected will be categorized according to one of the following four (4) severity levels:

1. Critical
2. High
3. Medium
4. Low

The severity levels have been set based on the impact of the incident to the Boys & Girls Clubs of Greater Oxnard and Port Hueneme.

Severity Level	Exposur	Description
<p>Level 1 - Critical</p>	<p>Public Facing Incident</p> <p><i>(A breach that is visible to the general public and/or has implications for the Club's brand, whereby the breach could erode customer confidence.)</i></p>	<p>A direct and significant threat to the brand of [Club]. Some financial loss is likely in such incidents and customer impact may be widespread.</p> <p>Such incidents could involve loss of sensitive data, total loss of a crucial service or business function; severe degradation of critical system performance. Generally involves escalation to senior management at Boys & Girls Clubs of Greater Oxnard and Port Hueneme</p> <p>Examples include: Large scale disclosure of the personally identifiable information of members or staff of Boys & Girls Clubs of Greater Oxnard and Port Hueneme</p> <ul style="list-style-type: none"> • Large scale attack on the Club's systems, or on third-party hosted information assets causing a virtual lockdown of all online services. <p>Malware or Ransomware attack affecting virtually all of the information assets of Boys & Girls Clubs of Greater Oxnard and Port Hueneme</p>

Severity Level	Exposur	Description
Level 2 – High	<p>Internal - Club Facing Incident</p> <p><i>(An incident that does not involve external parties, and is not publicly known, but is propagated throughout Boys & Girls Clubs of Greater Oxnard and Port Hueneme</i></p>	<p>May involve limited disruption to the Club and impact with potentially repeated errors or possibility of reoccurring attacks against information assets.</p> <p>These incidents may involve non mission-critical business applications and systems</p> <p>Examples include:</p> <ul style="list-style-type: none"> • Unauthorized access to a non-privileged account on a non-mission critical system or application. • A limited number of end user workstations affected by known malware. • Multiple customer / cardholder data compromised
Level 3 – Medium	<p>Internal to Boys & Girls Clubs of Greater Oxnard and Port Hueneme</p>	<p>May involve a potential (but unrealized) threat to the Club’s information assets. In some cases irregular but unconfirmed security breaches may be classified under this level. The impacted system(s) usually are not expected to have a significant business impact.</p> <p>Examples include:</p> <ul style="list-style-type: none"> • Multiple internal systems affected by a virus. • An internal file server is compromised by a disgruntled employee. • Inappropriate material is distributed
Level 4 – Low	<p>Internal to Boys & Girls Clubs of Greater Oxnard and Port Hueneme</p>	<p>A system is compromised without access to sensitive data.</p> <p>Examples include:</p> <ul style="list-style-type: none"> • A single workstation infected with a known form of malware (a virus with a confirmed signature). • Unsuccessful attempt to port scan a target system from an unknown

Other adverse events include floods, fires, electrical outages and excessive heat that cause system crashes. Adverse events such as natural disasters and power-related disruptions are not generally within the scope of this Data Breach Management & Response Plan

DATA BREACH RESPONSE TEAM (DBRT)

A DBRT is established to provide a quick, effective and orderly response to a breach of PII and other related incidents such as virus infections, hacking attempts and break-ins, improper disclosure of confidential information to others, system service interruptions, and other events with serious information security implications.

The DBRT's mission is to prevent any loss of PII, other sensitive or confidential information, or public confidence by providing an immediate, effective and skillful response to any unexpected breach involving computer information systems, networks or databases.

DBRT MEMBERS

Each of the following members will have a primary role in incident response:

- VP of Operations
- NPCE

Each of the following members may provide supporting roles during incident response. Additional personnel may be identified to participate as appropriate:

- VP of Operations
- NPCE
- CEO

DBRT ROLES AND RESPONSIBILITIES

DBRT Team Lead - Breach Oversight and Communication Protocol

- Report actual or imminent breach of PII to Boys & Girls Clubs of America (BGCA) via the BGCA CIMS (Club Incident Management System) **no later than 12 hours** after an occurrence of an actual breach or the detection of an imminent breach. BGCA is required to notify the U.S. Department of Justice within 24 hours of breach detection.
- Declares an Information Security incident exists.
- Determines the nature and scope of the incident.
- Contacts qualified information security specialists as needed.
- Acts as central point of contact for an incident.
- Contacts members of the DBRT.
- Communicates with executive leadership as appropriate.
- Determines which DBRT members play an active role in the investigation.
- Provides proper training on incident handling.
- Escalates to executive management as appropriate.
- Monitors progress of the investigation.
- Ensures evidence gathering, chain of custody and preservation is appropriate.
- Prepares a written summary of the incident and corrective action taken for distribution to executive leadership.
- Assesses the execution of the Data Breach Management & Response Plan.

IT Manager or Managed Service Provider - Information Technology Systems Oversight and Monitoring

- Oversees all IT related activities.
- Assesses and advises on issues related to IT and to communications and network systems such as telephones, servers, computers, etc.
- Coordinates all emergency telephone service as needed.
- Monitors critical applications and processes.
- Coordinates and ensures critical processes and application are operating as needed.
- Analyzes network traffic for signs of denial of service, distributed denial of service, or any other attacks.
- Coordinates the execution of any tracing tools such as sniffers, Transmission Control Protocol (TCP) port monitors and event loggers.
- Looks for signs of a firewall breach.
- Contacts external internet service provider for assistance in handling the incident.
- Takes action necessary to block traffic from suspected intruder.
- Ensures all service packs and patches are current on mission-critical computers and critical file shares.
- Ensures backups are in place for all critical systems and critical file shares.
- Monitors business applications and services for signs of attack.
- Reviews audit logs of mission-critical servers for signs of suspicious activity.
- Ensures database backups are in place for all critical systems.
- Examines database system logs of critical systems for unusual activity.
- Monitors the physical security of and access to equipment.
- Provide support to all Club personnel during the incident.
- Central point of contact for all technology support issues and questions.

CEO - External Communication

- Coordinates public information and media relations pertinent to the incident or emergency situation.
- Communicates factual information to the news media, public, and employees.
- Receives and processes all inquiries from external sources.
- Corrects misinformation or rumors and disseminates factual information to media sources.

VP of Operations - Legal and Human Resources

- Determines and coordinates any legal impact and correspondence.
- Provides input to the DBRT on legal matters.
- Determines and coordinates disciplinary effort if an employee is suspected of causing an incident.
- Assesses the impact of the situation on employees.
- Provides support for human resource elements of recovery and employee notification.
- Coordinates operations and personnel needs.

COMMUNICATION PLAN

Upon activation of the DBRT, it is the responsibility of the CEO to facilitate communication and to closely manage and control the notification process.

The Club CEO is responsible for establishing guidelines and procedures for external communications related to a breach. No Club staff member, except the designated spokesperson has authority to discuss any breach with any person outside **Boys & Girls Clubs of Greater Oxnard and Port Hueneme of**.

Unauthorized disclosure of a breach could lead to greater disruption and financial loss than the incident itself.

RESTROOM POLICY

Boys & Girls Clubs of Greater Oxnard and Port Hueneme is committed to safeguarding the health, safety and dignity of all persons who use its restrooms. Restrooms shall be regularly cleaned and sanitized, fixtures shall be functional and maintained in good repair, and restroom rules of conduct shall be strictly enforced. Where BGC operates in facilities owned and managed by others, the organization will coordinate with the property owner to ensure that the restrooms meet the organization's standard of care.

Sanitary should mean that all restroom fixtures, hardware, accessories and surfaces within reach must be regularly cleaned. Functional shall mean that all restroom physical features are fully functional. Safe means that rules for conduct are established and enforced. Attractive shall mean that finish surfaces are maintained in good repair and all graffiti is promptly removed.

Each individual Site operated by BGC_ shall develop and document practical strategies for ensuring the safety of restrooms.

- Adults, teens and kids so not use the restroom at the same time and this policy is enforced.
- The number of kids in the restroom must be limited to the number of stalls available.

Below are the best practices in order to adhere to the policy above.

- Adults, teens and kids have separate restroom facilities which are clearly stated and the policy is enforced.

Staff observing unacceptable restroom conditions shall complete a *Repair Request Form* and submit it to the Unit Director, who will review the form with his/her supervisor. Staff observing inappropriate conduct by members or adults shall intervene to stop the behavior and report it to the Unit Director, as soon as possible.

Unit Directors shall document, in writing, restroom conduct incidences and report them to the Chief Professional Officer (CPO), as soon as possible. The CPO shall determine what actions will be taken. Depending on the incident, actions may include one or more of the following:

- communication with the parents of Club members
- disciplinary actions against persons involved or alleged to be involved in an incident
- reporting to child protective services or law enforcement
- notifying the organization's Chief Volunteer Officer
- notifying Boys & Girls Clubs of America
- notifying the organization's insurance carrier.

The BGC_ Safety Committee shall review each incident and develop a plan of action to reduce the likelihood of a recurrence.

SUPERVISION POLICY

Club activities should be under continuous supervision by an appropriate adult and should maintain reasonable ratios when supervising youth. The ratio should be based on an organization's experience, common practices in the community, and/or standards set by Club leadership. Recommended Ratios*

Type Adults Youth Drop-in 1 20
Instructional 1 20
Group Clubs 1 15
Kinder 1 12
Teams 1 15
Day Camp 1 15
Day Trips 1 8 Overnight 1 (with minimum of 2 adults present)

Boys & Girls Club of Greater Oxnard and Port Hueneme is committed to providing a safe environment. As such, all Club activities shall be under continuous supervision by an appropriate adult at all times. Staff shall not:

- Use electronic devices such as cell phones, PDAs, or other communication devices while supervising members unless it is part of approved programming.

Staff shall:

- Abide by the Organization's one-on-one contact policy.
- Abide by the Organization's disciplinary policies and procedures.
- Ensure at least three individuals are present when supervising members.
- Maintain proper ratios at all times.
- Be trained on appropriate supervision tactics and behavior patterns.
- Ensure all youth volunteers are supervised by an adult staff member.

TRANSPORTATION POLICY

The Boys & Girls Club of Greater Oxnard and Port Hueneme is committed to providing a safe environment and enforces the following transportation policy for members, staff, volunteers, board members and other adults.

The Club 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.

Staff shall not:

- Transport Club members in personal vehicles.
- Transport one member at a time.
- Use electronic devices such as cell phones, PDAs, or other communication devices while transporting members to and from the Clubhouse or Club related activities.

Staff shall:

- Only transport members in official Club vehicles
- Ensure at least three individuals are present when transporting members
- Abide by the one-on-one policy when transporting members.
- Keep an updated list of all youth who are transported to and from the Clubhouse and Club related activities

Drivers shall:

- Keep a log of all youth who are picked-up and dropped off.
- Perform regular checks to ensure all members are picked-up and dropped-off at the appropriate times and locations.
- Immediately notify Club leadership if there is a delay or issue with transporting members to and from the Clubhouse or Club related activities.
- Submit written reports detailing issues or incidents involving transporting members to and from the Clubhouse or Club related activities.
- Complete the Daily Vehicle Inspection Form before driving any Club vehicle. Prior to operation, the driver shall inspect each vehicle daily to ascertain that it is in safe condition, it is equipped as required and all equipment is in good working order. Please inform Director of Operation or Director of Programs right away if the vehicle needs repairs prior to driving.

VIDEO SURVEILLANCE POLICY

USE OF VIDEO SURVEILLANCE

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

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

PLACEMENT AND NOTIFICATION

Video surveillance equipment may be installed in and around Club facilities, property, and vehicles. The system provides constant monitoring 24/7 (is activated and records when motion is detected). Video surveillance equipment will not be used or installed in areas where Club Members, staff, and parents/guardians have a reasonable expectation of privacy, such as locker rooms and restrooms. Video surveillance equipment may always be in operation, whether the Club is operational and whether the facilities or buildings are in use at all. The Club will determine the operation schedule of any video surveillance equipment in its discretion. Video monitors shall not be in an area that enables public viewing. The Club shall notify Club members, parents/guardians, staff, and the public that video surveillance systems are present by signs prominently displayed in appropriate locations throughout the facilities and grounds and provide any other notification or consent as required by applicable law.

ACCESS TO VIDEO IMAGES

The use of video surveillance equipment on Club grounds shall be supervised and controlled by the CEO, Director of Operations and Director of Program Services. The actual recording equipment will be maintained in an area or room that is locked and secure to only be accessed by authorized personnel. Live video monitoring may randomly occur as needed. Video data is recorded and stored digitally. Video recording data is considered confidential and secure. Access to live and video recorded data is strictly limited to the following authorized full-time Boys & Girls Club personnel: CEO, Director of Operations, Director of Program Services and Unit Directors when permitted. These authorized personnel are trained on the video surveillance policy and how video data should be used during any official investigation. Video recording data may be used as evidence that a Club member, parent/guardian, staff member, volunteer, or other person has engaged in behavior that violates state or local law, policies, and/or Club rules. Video footage is subject to production by a valid subpoena or other court order.

UNAUTHORIZED ACCESS AND/OR DISCLOSURE

Confidentiality and privacy concerns limit the general public, including parents and relatives of Club members, from viewing video recording footage and/or data involving Club members, staff, and volunteers. Only the authorized personnel provided above can view and/or export video recording data. No unauthorized recordings are permitted of video recording data through cell phones, portable devices, or any other means. Any Club personnel who becomes aware of unauthorized disclosure of video recording data from the Club and/or a potential privacy breach must immediately inform the CEO. Club personnel and volunteers are prohibited from unauthorized use of, tampering with or otherwise interfering with video surveillance equipment. Violations will be subject to disciplinary action that may include, but are not limited to, written reprimand, suspension, demotion, or termination of employment. Video recording data will remain the property of the Boys & Girls Clubs of Greater Oxnard and Port Hueneme and may be reproduced only in accordance with applicable law and board policy.

RETENTION OF DIGITAL IMAGES

Video recording data shall be kept for approximately 30 days except for appropriate still shots or selected portions of the recorded data relating to any incidents under investigation by authorities. The latter shall be retained for one year after the incident or until such time as any legal matters pertaining to the recordings have been resolved. The stored media shall be kept on a secured computer. In situations involving banned parents/guardians, former employers or volunteers, or visitors, stored still images may be shared with Club personnel and appropriate officials.

CLUB MEMBER PRIVACY

Video recording data will not to be used directly or indirectly to identify the activities of individual Club members except as viewed in relation to a specific event or suspected criminal activity; suspected violation of Club policy or rules; incidents where there is reasonable basis to believe a claim may be made against the Club for civil liability; or if otherwise compelled by law. Authorized Club personnel may use a still shot or selected portions of recorded data to request law enforcement review for assessing the security risk of a specific individual or for investigating a potential crime on Club property.

DISCLAIMER OF LIABILITY

A copy of this policy will be shared with any Club member, parent/guardian, or staff member upon request.

ACCEPTABLE USE POLICY FOR MEMBERS

An Acceptable Use Policy defines appropriate use of computer equipment and the Internet for both staff and members. As approved by the Board of Directors and signed by each staff member and placed in their membership file.

Responsible Computer Use Guidelines for Members

Boys and Girls Clubs ("Club" or "Clubs") computer, network and Internet access are available to members. To enhance their educational experience and help them become literate in an increasingly technological world.

The purpose of this Acceptable Use Policy is to foster the appropriate use of that network, e-mail and the internet. The following guideline applied to all users whether they access any of the Club's network connections.

Educational Purpose

The Club's network has been established for educational purposes, limited to classroom activities, school-to-career development and scholastic research on appropriate subjects. The Clubs' network has not been established as a public access service or public forum. The Club has a right to place reasonable restrictions on material members access or post through the system. Members are expected to follow this Acceptable Use Policy (as well as other club rules and policies applicable to members) when in the Technology Center or accessing the network.

The Clubs' network is considered a limited forum, similar to school and, therefore, the Club reserves the right to regulate that form for valid educational reasons. The Club will not restrict Speech. On the basis of a disagreement with opinion you, the member, are expressing.

You should expect only limited privacy with the content of your personal files on the Clubs' network. This situation is similar to the rights you have in the privacy of your locker at school. The Club reserves the right to search your files if there is a reasonable suspicion you violated the Acceptable Use Policy, Club rules and policies, or the law.

Unacceptable Uses and Personal Safety

You must not post personal contact information about yourself, staff or other people. Personal contact information includes (but is not limited to) home, school or work addresses; telephone number; and e-mail addresses.

You must never agree to meet with someone you have met online without parent's approval. A parent or guardian should always accompany you to such meetings.

You must promptly disclose to club staff members Any message you received that is inappropriate or makes you feel uncomfortable.

Illegal Activities

You must not attempt to gain unauthorized access to the club's network or to any other computer system through Clubs Network. This includes attempting to log in through another person's account or accessing another's personal files. These actions are illegal, even if only for the purpose of "browsing".

You must not make deliberate attempts to disrupt the computer system or destroy data by spreading computer viruses.

You must not use the Clubs' network to engage in any illegal act, including but not limited to arranging to the purchase or sale of alcohol, tobacco or other drugs; engaging in criminal activity; or threatening the safety of another person.

System Security

You are responsible for your individual user account and should take all. Reasonable precautions to prevent others from being able to use your account. Under no circumstance should you provide your password to another person.

You must immediately notify a Club staff member if you have identified or witnessed a possible security problem.

Do not look for security problems, because this may be constructed as an illegal attempt to gain access.

Inappropriate Use

Restrictions against inappropriate use apply to public message, private message and material posted on the web page. Within reason. Freedom of speech and access to information will be honored.

The following are not permitted:

- Sending or displaying unkind or offensive messages or pictures pornography or hate literature
- Using unkind or offensive language.
- Harassing, insulting, or attacking others.
- Intentionally damaging computers, computer systems or computer networks
- Violating company laws
- Using another person's password.
- Trespassing into another person's folder, work or files
- Intentionally wasting limited resources (i.e, distributing mass e-mail messages, participating in chain letters, Creating or participating in all unauthorized newsgroups and storing files and file servers without proper authorization)
- Employing the network for commercial purposes, political activity or lobbying
- Installing additional software without prior approval
- Using portal or proxy websites

Violations may result in the loss of access as well as other disciplinary or legal action.

Respect for Privacy

You must not re-post messages that was sent to you privately, without the permission of the other person who sent the message.

You must not post private information about another person.

Plagiarism and Copyright Infringement

You must not plagiarize work you find on the Internet. Plagiarism is taking ideas, written or pictures of others and presenting them as your own. It is dishonorable, and it is a prohibited use of this facility.

You must respect the rights of copyright owners. Copyright infringement occurs when you reproduce a work that is protected by a copyright without authorization. If a work contains language that specifies appropriate use of that work, you should follow the expressed requirements. Copyright law can be confusing; therefore, if you have any questions, please ask a teacher or Club staff member.

Disciplinary Actions

Members who violate the Acceptable Use Policy may be denied future internet and or network privileges for the defined period of time, and may be subject to other disciplinary measures as set forth by the Club policies.