

## **Youth On Their Own Child/Youth Safety Policy**

Youth On Their Own (YOTO) is committed to Child/Youth safety, promoting a culture that centers Child/Youth wellbeing, respect, dignity, fairness, and is free from abuse, violence, harassment, and discrimination. YOTO acknowledges the significant role YOTO plays in Children/Youth's lives and takes that responsibility seriously. YOTO abides by best practices for youth development and maintaining ethical and professional boundaries with Children/Youth.

YOTO has a zero-tolerance policy for Child abuse and Youth mistreatment of any kind. Allegations or suspicions of Child abuse are taken seriously by YOTO and will be reported to the law for investigation. YOTO will fully cooperate with any related investigations and will pursue the prosecution of Child abusers to the full extent of the law.

The policies outlined in this document apply to YOTO Youth and Children, Youth, and Teens associated with YOTO in any way. Except for mandated reporting requirements which only apply to minor Children, this policy also includes Youth ages 18-24.

### **I. Expectations of Staff and Stakeholders**

Staff and other YOTO stakeholders (volunteers, board members, etc.) must practice caring, healthy, and professional boundaries with Children/Youth. YOTO leaders must be highly accountable to modeling youth safety behaviors and holding stakeholders accountable for demonstrating youth safety behaviors. To achieve this, YOTO will do the following:

- a) Staff and stakeholders must complete regular training on appropriate interactions with Children/Youth. Required training for staff and stakeholders is outlined in YOTO's *Youth Safety Guide*.
- b) Staff and stakeholders are prohibited from having intimate/romantic/sexual relationships with current YOTO program participants and for five years after they have ended program services.
- c) Staff and stakeholders should never share their personal phone numbers, personal email addresses, and personal social media profiles with YOTO program participants and any former YOTO participants who are minors.
- d) Staff and stakeholders are prohibited from giving personal money to YOTO program participants or inviting YOTO Youth or Children/Youth seeking support to their homes.
- e) Staff and stakeholders are strictly prohibited from transporting YOTO program participants in personal vehicles unless specifically approved by the CEO and only for the purposes described by organizational policy.

- f) Staff are required to have a valid fingerprint clearance card. Staff who do not have a valid fingerprint clearance card can only perform administrative duties or must always be in the presence of a staff member with a valid fingerprint clearance card when conducting YOTO business with Children/Youth. Employment is contingent on maintaining a valid fingerprint clearance card. Employment will be terminated if a staff member cannot obtain a fingerprint clearance card or reinstate/renew their clearance within an acceptable period.
- g) Stakeholders are prohibited from being alone with program participants without a valid fingerprint clearance card. Any person interacting with program participants who does not have a fingerprint clearance card must always be in line of sight of a YOTO staff person with an active fingerprint clearance card.
- h) YOTO must conduct quarterly fingerprint clearance card checks for all employees.
- i) YOTO must conduct annual background checks for board members and volunteers.

Additional guidelines on appropriate and inappropriate behaviors, common Youth interactions for nuanced situations (such as hugs, gift giving, and more) are outlined in YOTO's *Youth Safety Guide*.

## **II. Safety Procedures**

YOTO Management must maintain updated, written safety procedures that include both on-site (at YOTO) and off-site (in community) interactions with YOTO Youth.

## **III. Monitoring**

YOTO embraces a culture of monitoring and reporting as a mechanism for creating a safe place where all Children and Youth can ask for help and receive support. The goal of monitoring is to prevent, recognize, and respond to inappropriate and harmful behaviors and to reinforce appropriate behaviors. Observers scanning for, and reporting, behaviors that don't align with this commitment increases consistent and healthy adult behaviors that create a safe environment.

Monitoring involves observing interactions and reacting appropriately. This includes both Adult-to-Youth and Youth-to-Youth interactions. YOTO Management must maintain updated, written monitoring procedures for Youth interactions.

## **IV. Internal Reporting**

YOTO is committed to creating a culture of safety. This includes an open-door policy for staff, volunteers, school liaisons, and others, to report unsafe or concerning behaviors to YOTO. Everyone is responsible for monitoring adult behaviors to ensure Child/Youth safety and reporting any concerns.

YOTO Management must maintain updated, written reporting procedures for YOTO Youth, staff, school liaisons, and volunteers.

## **V. Investigating Internal Reports**

When Child/Youth safety reports are made, YOTO will conduct an investigation. YOTO Management must maintain updated, written investigation procedures for Child/Youth safety reports.

## **VI. Confidentiality**

YOTO seeks to protect the confidentiality of individuals involved in safety incidents to the greatest extent possible. We commit to the following:

- a) Reports will remain highly confidential and only be shared with people who need to know. That may include the staff member's supervisor, department director, Director of HR, and the CEO, assuming those individuals are not involved in the incident.
- b) The person identified in the report must be informed a report has been made and any status or next steps. In some cases, the person may not be notified immediately of the report to protect the safety of the Child/Youth or reporter.
- c) Staff under investigation are prohibited from contacting the Child/Youth or school liaisons during the investigation period. Staff are also prohibited from discussing any details of the investigation with other staff.
- d) Any observed or reported incidents of retaliation, coercion, or similar behaviors, by the staff member under investigation towards other staff member(s), Child/Youth, school liaison, or reporter may result in disciplinary action and may result in termination of the person's employment.
- e) YOTO will always share information required by law as mandated reporters.
- f) There may be cases where those involved request confidentiality or request no actions to be taken after reporting a safety concern. However, obligations under the law to report and act on safety concerns and to ensure a safe environment for all may require YOTO to act, whether or not the persons involved want action, and to disclose details even if confidentiality is requested.
- g) All questions, inquiries, and statement requests from the media related to Child Abuse must be directed to the CEO or their official designee. Only the CEO or official designee can respond to the media.

## **VII. Auditing**

YOTO's Child/Youth safety procedures must include ongoing auditing to monitor organizational compliance and identify opportunities for improvement. Led by the Director of HR, YOTO Management must maintain updated, written auditing procedures for policy compliance and improvement.

## **VIII. Policy Compliance and Review**

YOTO's Board of Directors must receive an annual report from the CEO on organizational Child/Youth Safety Policy compliance and any identified Child/Youth safety concerns or incidents.

The CEO will notify the Board of Directors of any significant procedure changes that affect the integrity of the Child/Youth Safety Policy or that increase organizational risk. Staff-developed processes must affirm YOTO's Child safety priorities and include meaningful accountability.

This policy and related procedures must be reviewed by YOTO's Board of Directors at least every 12 months.

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## **References**

YOTO's Child/Youth Safety Guidance and Procedures are established and maintained to provide additional details and guidance for the execution of this policy. Relevant Guidance and Procedures include:

- [Terminology & Definitions](#)
- [Mandated Reporting Requirements](#)
- [On-Site and Off-Site Safety Procedures](#)
- [Monitoring Procedures](#)
- [Reporting Procedures](#)
- [Investigation Procedures](#)
- [Auditing Procedures](#)

## GUIDANCE & PROCEDURES DOCUMENT 1:

### Terminology & Definitions

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*This list is illustrative not exhaustive. Other unlisted terms may apply.*

**Child:** Anyone between the ages of zero and 17 years.

**Youth:** Anyone between the ages of 13 and 24 years.

**Teen:** Anyone between the ages of 13 and 19 years.

**YOTO Youth:** Anyone who has been a program participant within the previous 5 years.

**Child Abuse and Neglect:** When a parent, guardian, custodian, or other adult inflicts or allows the infliction of physical, sexual, or emotional abuse, neglect, exploitation or abandonment.

- **Physical Abuse:** Non-accidental physical injuries such as bruises, broken bones, burns, cuts or other injuries.
- **Child Sexual Abuse:** Any sexual activity with a Child. This includes sexual contact that is accomplished by force or threat of force, regardless of the age of the participants, and all sexual contact between an adult and a Child, regardless of whether there is deception or the Child understands the sexual nature of the activity. Sexual contact between an older and a younger Child also can be abusive if there is a significant disparity in age, development, or size, rendering the younger Child incapable of giving informed consent. Sexually abusive acts may include sexual penetration, sexual touching, sex trafficking, and other types of sexual activity or non-contact sexual acts such as exposure, pornography, or voyeurism.
- **Emotional abuse:** Severe anxiety, depression, withdrawal or improper aggressive behavior as diagnosed by a medical doctor or psychologist that is caused by the acts or omissions of the parent, a caretaker, or other adult.
- **Neglect:** When Children are not given necessary care for illness or injury, when young Children are left unsupervised or alone, locked in or out of the house, or without adequate clothing, food, or shelter, or Children living in environmental neglect (hazardous or chronic filth).
- **Exploitation:** Use of a Child by a parent, guardian, custodian, or other adult for material gain.
- **Abandonment:** The failure of the parent to provide reasonable support and to maintain regular contact with the Child, including providing normal supervision, when such failure is intentional and continues for an indefinite period.

## GUIDANCE & PROCEDURES DOCUMENT 2:

### Mandated Reporting Requirements

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**Any person conducting business on behalf of YOTO is considered a mandated reporter** in the course of their YOTO duties and, as such, is required to report Child abuse as mandated by law. This includes YOTO employees and stakeholders (volunteers, interns, AmeriCorps members, and Board members).

- a) All persons conducting business on behalf of YOTO are required to complete DCS Mandated Reporter training annually. It is the responsibility of the mandated reporter to ensure they understand their obligations under the law and to complete mandated reporter training. The mandated reporter is responsible for seeking support from YOTO leadership if unsure about any requirement, policy, or process.
- b) Mandated reporters must make reports immediately whenever possible and no later than 24 hours. Mandated reporters cannot delegate this responsibility to others and do not need manager/supervisor approval to make a report. Mandated reporters are not absolved of responsibility if others have also made a mandated report for the same incident or minor.
- c) Mandated reporters who are uncertain whether a report meets reasonable belief requirements may call the ChildHelp Hotline (1-800-4-A-Child or 1-800-422-4453) to receive advice from a trained professional. This does not satisfy mandated reporting requirements.
- d) Mandated reports must be made to the Arizona mandated reporting line (1-888-767-2445/1-888-SOS-CHILD) and to law enforcement. If the report concerns a person who does not have care, custody or control of the minor, the report shall be made to law enforcement only. If the report concerns a person who has care, custody, or control of the minor, report to both the police and DCS.
- e) For Youth residing on reservations make a mandated report to the [Pascua Yaqui Tribal Children's Social Services](#) or the [Tohono O'odham Child Welfare Division](#). If unknown whether the Child is a member of these tribes, mandated reporters can use the DCS Hotline to report abuse as they will coordinate with reservation agencies.
- f) Mandated reporters must report any abuse such as a physical injury, a reportable offense or Neglect that appears to have been inflicted on the minor by other than accidental means or that is not explained by the available medical history as being accidental in nature, or who reasonably believes that there has been a denial or deprivation of necessary medical treatment or surgical care or nourishment with the intent to cause or allow the death of an infant who is protected under [A.R.S. § 36-2281](#).
- g) A report of suspected abuse, Neglect, Exploitation or Abandonment is only a request for an investigation. Mandated reporters should not conduct investigations. DCS staff cannot ask or demand investigation from a mandated reporter. The person making the report does not need

to prove the abuse. Investigation and validation of Child abuse reports are the responsibilities of Child protective service workers.

- h) Mandated reporters must include all information, to the extent information is known, to DCS. Including, (1) names & address of the minor and the parents or custodians or the minor or other adult involved with the incident; (2) the minor's age and the nature and extent of the abuse, physical injury or Neglect (including evidence of prior abuse, physical injury or Neglect); (3) any other information the person reporting believes might be helpful in establishing the cause of the abuse, physical injury or Neglect.
- i) If a mandated reporter is conducting business on behalf of YOTO, they are obligated to share all information the reporter has access to, including YOTO Portal information, reporter observations, and information received through communications (verbal or written).
- j) If a DCS investigator or DCS staff member contacts YOTO regarding an open case or about a Child/Youth under DCS care, YOTO is obligated to share all information available. If DCS is investigating a claim, YOTO is not obligated to share information. However, best practice is to share available information because there is a safety concern for the minor.
- k) If DCS staff or law enforcement contact YOTO seeking Child/Youth information, the person conducting YOTO business must always verify the person's credentials (e.g. ask for badge numbers, supervisor contact information, request for email communications, etc.). Mandated reporters should ask for and record the police report number and/or the DCS intake number for documentation and report this information to their supervisor.
- l) Whenever possible, mandated reporters should notify the Child/Youth they have made a report and what kind of information was shared. They may also ask the Youth if they want to listen to the call when the mandated report is being made or if they would like to make the report together. However, mandated reporters cannot delay the mandated report if the Youth does not want to report or wishes to wait beyond 24 hours to make the report. Reporters should never delay making a report to law enforcement when the minor is in danger.
- m) If additional incidents of abuse occur after an initial report has been made or the mandated reporter is aware of new information regarding a past report, reporters are required to make another report.
- n) The YOTO program serves unaccompanied minors because of familial disruption and poverty. This may mean Children/Youth are potentially experiencing or have experienced Neglect. YOTO does not make mandated reports for the majority of YOTO Youth because at the time of their application there typically is not enough information to have reasonable belief they are presently unsafe. However:

- YOTO stakeholders should **always** report if a minor discloses that there are other Children in their former home who are experiencing Neglect, including not having food, water, clothing, etc.
  - YOTO stakeholders should **always** report if a minor discloses experiencing physical or Sexual abuse, even if it occurred in the past.
  - YOTO stakeholders should **always** report if a minor discloses their current living situation is a location not meant for long-term human habitation (i.e. sleeping outside, in a car, etc.).
- o) A mandated report is not required for sexual conduct if both parties are 14, 15, 16, or 17 years old and there is nothing to indicate conduct is anything other than consensual.
- p) Individuals are not required to report when information is protected by attorney/client privilege, disclosed during sex offender treatment, or a playground injury has occurred.
- q) Individuals are not required to report incidents they become aware of outside the course of their YOTO duties and which do not involve YOTO Youth, but are strongly encouraged to do so.
- r) Mandated reporters may elect to remain anonymous in the mandated report.



GUIDANCE & PROCEDURES DOCUMENT 3:  
**SAFETY PROCEDURES**

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**I. On-Site Safety Procedures**

- a) Any spaces where a Child/Youth may interact with adults should be observable by others, even if those interacting with them have a valid fingerprint clearance card. Staff should never meet with Children/Youth behind closed doors in which there is no way to view interactions. All YOTO offices and meeting rooms must have doors with glass inserts to maintain Child/Youth safety.
- b) There must be two YOTO staff members in the Youth Center at all times. This ensures Child/Youth and staff safety by having support if a crisis should occur and that a witness is present in case a Child/Youth reports staff or YOTO stakeholder misconduct.
- c) Children/Youth should never be left unattended in a YOTO initiated activity (workshop, meeting, event, etc.) without two adults present, one of which must be a staff member, regardless of group size.
- d) There must be a manager on-site at all times whenever Children/Youth are on the premises. A designated manager can be on call for events/activities outside of operating hours.

**II. Off-Site Safety Procedures**

- a) Any time YOTO stakeholders engage with Children/Youth at YOTO events, schools, or other YOTO approved sites, they should ensure interactions are observable by others (open doors, open meeting spaces, in line of sight of others, etc.).
- b) When YOTO Youth attend YOTO events, YOTO staff must ensure they remain in line of sight as much as possible to ensure community members and Youth are maintaining appropriate behavior. Staff should periodically check closed doors, bathrooms, and other locations that present risk.
- c) YOTO staff members should never meet Children/Youth at a location other than their school/campus, YOTO event location, partner organization location, or YOTO offices, unless approved by a supervisor. Locations requiring supervisor approval include, but are not limited to, meeting Youth at stores, libraries, coffee shops, their workplaces, etc.

## GUIDANCE & PROCEDURES DOCUMENT 4:

### Monitoring Procedures

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#### I. Peer Monitoring

- a) All YOTO stakeholders are responsible for monitoring Adult-to-Youth and Youth-to-Youth interactions to maintain a safe YOTO environment.
- b) Any YOTO stakeholder has the right, and is encouraged, to enter spaces that present risk (not observable, no glass inserts, low foot traffic, etc.) to check for Child/Youth safety.
- c) Stakeholders should contact the Director of Operations for any concerns related to restrooms. Stakeholders should only enter a locked restroom in emergency situations and must have either the explicit consent from the person inside or approval from the Director of Operations.
- d) A YOTO stakeholder may feel uncertain about whether they should report behaviors they've witnessed. In these cases, stakeholders should err on the side of reporting observations.
- e) Whenever possible, stakeholders should immediately report safety issues. A report must be made within 24 hours of the incident through preferred reporting channels.
- f) Stakeholders must attend training on monitoring and reporting policies at least annually.
- g) For more information on reportable behaviors and Child/Youth interactions, see YOTO's *Youth Safety Guide*.

#### II. Organizational Monitoring

- a) Supervisors should periodically monitor Child/Youth interactions for non-Youth-facing staff roles and may request to observe Child/Youth interactions, as needed or appropriate. This may occur at any time without notice.
- b) All supervisors are responsible for monitoring all YOTO stakeholder adherence to Child/Youth safety policies.
- c) For Youth-facing positions, supervisors are required to observe staff at least twice a year. Supervisors may observe interactions at any time and without notice. Observations must be included in performance reviews and discussed during performance feedback sessions. Supervisors must explicitly communicate Child/Youth safety related performance expectations aligned with Child/Youth safety policies.

- d) Senior Leadership is responsible for ensuring manager fidelity to and monitoring of Child/Youth safety policies. The CEO is responsible for ensuring Senior Leadership fidelity to and monitoring of Child/Youth safety policies.

### **III. Non-Observable Interactions**

- a) All YOTO-provided cell phones used to contact Children/Youth must be monitored at least once per quarter for Child/Youth safety policy adherence. This includes devices issued to non-program staff and non-employees. Messaging services used by YOTO (Crisp Chat, Text Magic, etc.) must be observable by multiple staff members, including management, and therefore continuously monitored.
- b) Cell phone text messages must be scanned for predatory behaviors and other Child/Youth safety concerns by the program management team. Monitoring should include key word searches, phrase searches, and representative random sampling for all text messages. Any text written in Spanish must be reviewed by a program manager who is English/Spanish bilingual.
- c) Staff, interns, and board members are the only stakeholders who should have a reason to email YOTO Youth. These individuals are required to copy at least one staff member on any email messages to Children/Youth, making the interactions observable and therefore continuously monitored.
- d) Because of the nature of YOTO's work, understanding message context may be needed before determining if the message violates policy. Any areas of concern should be flagged for a second review by a Program Director. Any flags or areas of concern reviewed by the director may initiate additional next steps, such as staff re-training, additional information gathering, corrective action, etc., aligned with YOTO's *Youth Safety Guide*. If any inappropriate behavior is identified, the information shall be immediately documented, including screenshots.
- e) After the monitoring is complete, the program management team must submit a report that outlines the result of findings to a Program Director. Findings and the report should remain confidential in accordance with YOTO policies.
- f) After review, the Program Director will report any concerning behavior, and any actions taken, to the Director of HR. Findings and the report should remain confidential in accordance with YOTO policies.
- g) At the end of each fiscal year, the Program Director must provide an annual Child/Youth safety report to the CEO and Director of HR. The report should include frequency of issues, types of issues, any actions taken, any trainings provided to support Child/Youth safety policies, etc.

- h) Any staff member whose behavior is found to be in violation of YOTO's policies, or any staff member found to be mishandling YOTO property in violation of YOTO's technology contract, will be held accountable according to YOTO's disciplinary guidelines.

## GUIDANCE & PROCEDURES DOCUMENT 5:

### Reporting Procedures

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To best respond to reports, YOTO will need to know: (1) Who was involved; (2) When and where the issue happened; (3) An explanation focused on observed facts of what occurred, with as much detail as possible; and (4) Whether a mandated report has been made.

#### I. Adults Making Reports

- a) YOTO staff, volunteers, interns, school liaisons, and board members must make reports immediately whenever possible and no later than 24 hours of an incident. Adults should err on the side of reporting behavior when uncertain if observations constitute Child/Youth safety violations.
- b) YOTO staff, volunteers, interns, school liaisons, and board members should also report general safety concerns, practices that blur professional boundaries, and anything else that may put Children/Youth safety at risk. For example:
  - Any inappropriate Child/Youth behaviors directed at a YOTO adult (such as sexually provocative statements, invasion of privacy and space, etc.), whether or not the YOTO adult involved reported the incident themselves
  - Common situations/interactions that present risk
  - Physical spaces that carry risk
  - Gaps or weak policies or practices that are often violated or not possible to comply with because of the environment or context
- c) Reports may be made via these channels:
  - Report directly to their YOTO supervisor or point of contact
  - Report to the Director of HR or the CEO
  - YOTO's online safety report form ([yoto.org/safety](https://yoto.org/safety))
  - Use the [CEO's anonymous link](#) included in every weekly roundup *\*for staff only*
  - [Program department anonymous link](#) linked in the program team chat *\*for staff only*

Reports may or may not be anonymous depending on the reporting channel.

- d) YOTO employees are protected from retaliation or harm for reporting Child/Youth safety issues according to the organization's Whistleblower Protection Policy. If any staff member is experiencing harassment because they reported Child/Youth safety issues, they should immediately report it to their supervisor, the Director of HR, or the CEO.

- e) Staff reporting Youth/Child safety concerns must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a safety concern. Any allegations that prove not to be substantiated and which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offense.
- f) Supervisors and managers are required to report complaints or concerns about Child/Youth safety by writing to the Director of HR or CEO within 24 hours of receiving the report. The Director of HR has the responsibility of investigating all reported complaints.

## **II. Children/Youth Making Reports**

- a) Children/Youth may report unsafe behavior and other violations of this policy through multiple channels, including but not limited to:
  - Contacting their Program Coordinator directly
  - Contacting their school liaison
  - Contacting program leadership
  - Submitting a report at [yoto.org/safety](http://yoto.org/safety)
  - Submitting a report via their YOTO Portal account or YOTO Portal login page ([yotoaz.org](http://yotoaz.org))
  - Submitting a report via the open chat service on the YOTO Portal (Crisp Chat)
  - Contacting other YOTO leadership (CEO, Director of HR, etc.)
  - Submitting information in the biannual program surveys

Reports may or may not be anonymous depending on the reporting channel.

- b) When a report is made to staff, the employee must act immediately and no later than within 24 hours. Actions depend on what was reported, however, in general, staff should inform their supervisor and Director of HR about the report. Staff must abide by mandated reporting requirements.
- c) YOTO Youth must have an opportunity to share safety concerns, issues, or violations biannually through program surveys. Surveys should include at least one question that assesses potential risk areas.

GUIDANCE & PROCEDURES DOCUMENT 6:  
**Investigation Procedures**

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**I. Investigation Procedures**

- a) The Director of HR is YOTO's designated incident investigator. When Youth are involved, it's important to coordinate with program staff to ensure Youth are receiving the support they need and to ensure trauma-informed care, where appropriate.
- b) Reporters must receive acknowledgement of their report and any next steps within one to two business days. YOTO's internal investigation process may include, but is not limited to, the following. Steps may or may not occur sequentially.
  - i. Treat allegations seriously and immediately conduct a safety assessment to ensure the Youth is safe. This may necessitate precautionary measures to support the Youth, to de-escalate or address workplace tensions (including separating employees), restricting contact with Youth, placing employees on administrative leave, contacting school leadership to restrict school staff involvement with YOTO, etc. YOTO must abide by mandated reporting requirements and immediately report to the Department of Child Safety (for minors) and police department when they have reasonable belief that Child abuse has occurred.
  - ii. Interview the complainant, if possible. Ideally, the HR department receives written and signed statements and all supporting documentation the complainant can provide. The Director of HR may need to seek this documentation if not provided.
  - iii. Take steps to preserve relevant evidence, including coordinating with YOTO Operations & IT vendors to confiscate devices and secure information to prevent deletion.
  - iv. Identify investigation goals and strategy to provide a clear direction for the investigation and how those involved will be contacted/communicated with. This may also include a timeline and identifying the appropriate person to conduct the investigation, particularly to ensure trauma-informed approach if interviewing Children/Youth. This may require external contractors to conduct the investigation, such as an outside consultant, or may require DCS and police to complete their investigations before conducting an internal investigation.
  - v. Identify witnesses to be interviewed to corroborate or refute the allegations. This includes respondent suggested witnesses, if applicable. Investigations should ensure only factual information is provided by witnesses or included in the investigation. Character witnesses are unnecessary/irrelevant to this type of investigation.

- vi. Identify and obtain relevant evidence, including but not limited to, security footage, emails and other correspondence, personnel records, etc. This should include dates and times, direct quotes, and observed behaviors.
- c) Conduct interviews and document them. Witness interviews should always take place individually and in a safe/confidential location. The respondent must have an opportunity to respond to the allegation. The interviewer must ensure:
  - Interviews are conducted using a trauma-informed approach.
  - Questions are factual inquiries within the scope of the investigation.
  - Witnesses are aware they can stop the interview at any time or refuse to participate.
  - They never promise confidentiality and inform witnesses how the information will be used and to whom it will be reported.
- d) Interviews should be completed in a consistent method for all witnesses whenever possible (e.g. if conducted virtually, all should be virtual, etc.).
- e) Investigators may alter the plan and strategy based on evidence and interview findings to collect additional information.
- f) Provide consistent communication by maintaining a structured, two-way communication plan for updates while managing expectations that reporters may not learn final outcomes.
- g) Conduct a root-cause analysis to determine organizational deficiencies contributing to the safety incident.
- h) Complete a detailed report that includes evidence and findings. These must be shared with those that need to know (such as law enforcement, YOTO's CEO, etc.) but otherwise remain confidential.
- i) Take actions if safety concerns are validated, up to and including termination.
- j) The amount of time it takes to investigate a report may range from a few days to a few weeks, as each case is unique and investigations can take time. YOTO should respond as quickly as possible to each report.
- k) Once the investigation period has ended, reporters will be informed of any actions or status of the report as able, while abiding by confidentiality policies. If a reporter does not agree with the conclusion of the report, they may submit a formal complaint with the Director of HR.



## II. Possible Investigation Activities

a) If YOTO is investigating a Child/Youth safety allegation involving a **YOTO employee**:

| ACTION                                       | DETAILS                                                                                                                                                                                                                                                                                                               |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Investigate</b>                           | YOTO may conduct an internal investigation of the issue by engaging individuals involved and collecting additional information; staff will also check related laws, policies, etc., to know what options for response are viable. Staff may be placed on administrative leave while the matter is being investigated. |
| <b>Limit interactions</b>                    | Depending on the situation, YOTO may restrict certain individuals from being on-site or prohibit Child/Youth engagement.                                                                                                                                                                                              |
| <b>Retrain &amp; Performance Improvement</b> | Staff may be required to attend additional trainings, may have the incident documented in their YOTO file, may be put on a performance improvement plan, etc.                                                                                                                                                         |
| <b>Contact Authorities</b>                   | Any suspicion of Child Abuse must be reported to law enforcement and the Department of Child Safety.                                                                                                                                                                                                                  |
| <b>Immediate Termination</b>                 | An employee may be immediately terminated for verified reports of Child/Youth safety violations without notice.                                                                                                                                                                                                       |
| <b>Nothing</b>                               | After investigating the incident, YOTO might not take an action because the incident was not found to violate any Child/Youth safety policies or laws, behaviors were not considered violations or substantiated, or because the reporter or others involved in the incident have chosen to report anonymously.       |

b) If YOTO is investigating a Child/Youth safety allegation involving a **YOTO volunteer, school liaison, or YOTO Governing Board Member**:

| ACTION                                          | DETAILS                                                                                                                                                                                                                                                                                                                                                   |
|-------------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Investigate</b>                              | YOTO may conduct an internal investigation of the issue by engaging individuals involved and collecting additional information; YOTO will also check related laws, policies, etc., to know what options for response are viable. Persons or partners may be placed on suspension from YOTO related duties or work while the matter is being investigated. |
| <b>Limit interactions</b>                       | Depending on the situation, YOTO may restrict certain individuals from being on-site or prohibit Child/Youth engagement.                                                                                                                                                                                                                                  |
| <b>Retraining &amp; Performance Improvement</b> | YOTO may require the person to attend additional trainings before reengaging in YOTO work.                                                                                                                                                                                                                                                                |
| <b>Contact Authorities</b>                      | Any suspicion of Child Abuse must be reported to law enforcement and the Department of Child Safety.                                                                                                                                                                                                                                                      |
| <b>Immediate Termination</b>                    | YOTO may immediately terminate their position in YOTO for verified reports of Child/Youth safety violations without notice.                                                                                                                                                                                                                               |
| <b>Report to Workplaces</b>                     | YOTO will report any Child/Youth safety violations to the person's workplace as appropriate.                                                                                                                                                                                                                                                              |

|                |                                                                                                                                                                                                                                                                                                                 |
|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Nothing</b> | After investigating the incident, YOTO might not take an action because the incident was not found to violate any Child/Youth safety policies or laws, behaviors were not considered violations or substantiated, or because the reporter or others involved in the incident have chosen to report anonymously. |
|----------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|

- c) If YOTO is investigating a Child/Youth safety allegation involving a **Child/Youth**, including both Youth inappropriate behavior directed at staff and/or directed at other Youth:

| ACTION                     | DETAILS                                                                                                                                                                                                                                                                                                                                                                                                                        |
|----------------------------|--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Investigate</b>         | YOTO may conduct an internal investigation of the issue by engaging individuals involved and collecting additional information; YOTO will also check related laws, policies, etc., to know what options for response are viable. Typically these investigations are conducted by Program Directors or Managers.                                                                                                                |
| <b>Limit interactions</b>  | Depending on the situation, YOTO may restrict certain individuals from being on-site and prohibit from participating in in-person events (see relevant policy in YOTO's <i>Program Manual</i> ). YOTO may require two staff members to be present at all times during interactions with a Youth. Youth may be reassigned to another staff member and prohibited from contacting or interacting with the staff member involved. |
| <b>Redirect Behavior</b>   | Reestablishing boundaries and clarifying appropriate behavior. Communicate consequences for violating agreement.                                                                                                                                                                                                                                                                                                               |
| <b>Contact Authorities</b> | Any suspicion of Child Abuse must be reported to law enforcement and the Department of Child Safety. Any violations of court orders (restraining orders, etc.) and other law enforcement matters (e.g. Youth are not minors, but an assault has occurred between two adult Youth), must be reported to law enforcement.                                                                                                        |
| <b>Inactive in YOTO</b>    | Youth may be prohibited from participating in YOTO services and events immediately and indefinitely.                                                                                                                                                                                                                                                                                                                           |
| <b>Report to School</b>    | YOTO will report any Child safety violations to schools and partners, as appropriate.                                                                                                                                                                                                                                                                                                                                          |
| <b>Nothing</b>             | After investigating the incident, YOTO might not take an action because the incident was not found to violate any Child/Youth safety policies or laws, behaviors were not considered violations or substantiated, or because the reporter or others involved in the incident have chosen to report anonymously.                                                                                                                |

- d) If YOTO is investigating a Child/Youth safety allegation involving a **community partner** or **member of the public**:

| ACTION                                       | DETAILS                                                                                                                                                                                                                                                                                                         |
|----------------------------------------------|-----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|
| <b>Investigate</b>                           | YOTO may conduct an internal investigation of the issue by engaging individuals involved and collecting additional information; YOTO will also check related laws, policies, etc., to know what options for response are viable.                                                                                |
| <b>Limit interactions</b>                    | Depending on the situation, YOTO may restrict certain individuals from being on-site and prohibit from participating in YOTO events. YOTO may require staff to be present at all times during interactions with a Youth.                                                                                        |
| <b>Retrain &amp; Performance Improvement</b> | YOTO may require the person to attend additional trainings before reengaging in YOTO work.                                                                                                                                                                                                                      |
| <b>Termination of Partnership</b>            | YOTO may dissolve the partnership between YOTO and organization or individual. YOTO may discontinue donations from the individual or organization.                                                                                                                                                              |
| <b>Contact Authorities</b>                   | Any suspicion of Child Abuse must be reported to law enforcement and the Department of Child Safety.                                                                                                                                                                                                            |
| <b>Nothing</b>                               | After investigating the incident, YOTO might not take an action because the incident was not found to violate any Child/Youth safety policies or laws, behaviors were not considered violations or substantiated, or because the reporter or others involved in the incident have chosen to report anonymously. |

### III. Possible Investigation Outcomes

What happens at the end of an investigation depends on what evidence is discovered. However, the severity of the safety violation will typically indicate the severity of the consequence:

| <u>Level of Offense</u> | <u>Example Behavior</u>           | <u>Required Action</u>                        |
|-------------------------|-----------------------------------|-----------------------------------------------|
| 1                       | Boundary blur (non-malicious)     | Coaching, retraining                          |
| 2                       | Policy violation (moderate)       | Formal warning, possible activity restriction |
| 3                       | Abuse, major/repeat safety breach | Immediate removal, report to authorities      |

## GUIDANCE & PROCEDURES DOCUMENT 7:

### Auditing Procedures

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#### **I. External Auditing**

YOTO must conduct an external audit of its Child/Youth Safety Policy, procedures, and physical space to identify risk areas and gaps, at least every three years or after a serious safety incident, whichever comes first. This must also include an assessment of policies through the lens of all key roles (staff, board, volunteers, program participants, YOTO school liaisons, etc.).

External audit findings must be reviewed by the Senior Leadership team. The team is responsible for creating an action plan to address necessary key findings. External audit findings must also be made available to all YOTO stakeholders.

#### **II. Internal Auditing**

YOTO must conduct ongoing internal auditing of its Child/Youth Safety Policy, procedures, and physical space to identify risk areas and gaps. This includes:

- a) YOTO's Safety Committee must conduct physical space audits for Child/Youth safety and report any gaps or weaknesses to the Senior Leadership team at least annually or after a serious safety incident, whichever comes first. At direction of the Senior Leadership team, YOTO's safety Committee must create a timely action plan to address physical space safety concerns.
- b) The Director of HR must conduct a fidelity (compliance) check for YOTO's Child/Youth Safety Policy and procedures at least annually or after a serious safety incident, whichever comes first, including an assessment of policies through the lens of all of the key roles (staff, board, volunteers, program participants, school liaisons, etc.). This may be achieved by:
  - Including safety-related questions on the annual staff survey and/or other method.
  - Ongoing internal auditing of safety policy compliance conducted by Senior Leadership, including documenting any trends and outcomes, such as:
    - Medium-term and long-term reduction in incidents of Child/Youth safety violations
    - Medium-term and long-term reduction in breaches of the Code of Conduct
    - Compliance or non-compliance of Child/Youth safety related procedures
    - Staff survey findings about feelings of safety, appropriateness of response to incidents, quality of training, etc.
    - Supervisor reported boundaries weaknesses or safety concerns
    - The Safety Committee's physical space audit findings
    - Policy weaknesses/gaps identified by staff or other stakeholders and plans to address them

- c) The Youth Action Board should review and recommend changes to the Child/Youth Safety Policy and YOTO's safety procedures at least every three years or after a significant policy change, whichever comes first.
- d) The Director of HR is responsible for ensuring plans for addressing Child/Youth safety weaknesses or issues are completed.
- e) Any Child/Youth safety findings and action plans must be available to YOTO stakeholders assuming report adherence to YOTO confidentiality policies.