

VOLUNTEER HANDBOOK



FOR YOUTH DEVELOPMENT®
FOR HEALTHY LIVING
FOR SOCIAL RESPONSIBILITY

OLD COLONY YMCA

Updated – July 2026



Old Colony YMCA

Volunteer Handbook

Table of Contents

Introduction.....	4
• Welcome • Purpose of the Volunteer Handbook • Written Communication of Policy Changes and Training • The History of the YMCA Movement • Mission • Core Values • Charitable Status	
Becoming an Old Colony YMCA Volunteer.....	5
• Definition of Volunteer • Volunteer Opportunities	
Recruitment and Selection.....	6
• Volunteer Registration • Background Checks • Required Forms	
Training.....	7
• Praesidium	
General Volunteer Guidelines.....	7
• Staff Liaison • Dress Code • Identification / Name tags • Attendance and Punctuality • Minor Volunteers • Volunteer Records • Tracking Volunteer Hours of Service • Termination of Volunteer Services • Standards of Professional Conduct	

- Legal Matters
- Photographs
- Use of Supplies and Equipment
- Virtual Programming

Child & Youth Care Policy.....9

- Staff and Volunteer Training
- Code of Conduct
- Staff and Volunteer Responsibilities
- Gift-Giving and Gift Acceptance Policy
- Transportation Activities
- Electronic Communication with Youth
- Cell Phone Use During Program Hours
- Appropriate and Inappropriate Physical and Verbal Interactions
- Reporting Abuse and Neglect

Sexual and Other Unlawful Harassment Policy..... 18

- Policy
- Reporting

Safety and Security.....22

- Emergency Procedures
- Safety
- Reporting Volunteer-Related Accidents and Illnesses
- Incident Reporting
- Security Policy
- Preventing Violence at the Y
- Substance-Free Policy

General Policies.....25

- Contact with the Media
- Social Media Policy
- Information Security Policy
- AI Usage Policy
- Reporting and Anti-Retaliation Policy
- Whistleblower Policy

Conclusion.....44

INTRODUCTION

Welcome

Thank you very much for volunteering at the Old Colony YMCA. As a volunteer-founded organization, volunteer development remains a priority of the YMCA today. We value your role and want your time spent with us to be rewarding. If you have any questions or concerns, please let us know.

Purpose of the Volunteer Handbook

The Volunteer Handbook is a general guide to YMCA policies. When applying policies and procedures, the YMCA will make decisions based on its needs and the specific facts and circumstances of each situation. We expect that our policies and guidelines will change and develop over time. The YMCA retains the right to amend or modify its policies at any time, whether such change is reflected in the Handbook. The Handbook is therefore not a contract.

Written Communication of Policy Changes and Training

The OCY will communicate changes to organizational policy manuals and/or procedures in writing within seven (7) days of the change. The OCY will announce and communicate all policy changes to employees, volunteers, consumers, and parent/guardians through written or electronic methods, [and organizational methods such as employee meetings, trainings, and supervision discussions]. Any training necessary to effectuate policy or procedure changes will be assigned to relevant employees and volunteers and is expected to be completed as soon as possible.

The History of the YMCA Movement

In 1844, industrialized London was a place of great turmoil and despair. Twenty-two-year-old George Williams, a farmer-turned department store worker, was troubled by what he saw. He joined 11 friends to organize the first Young Men's Christian Association (YMCA), a refuge of Bible study and prayer for young men seeking escape from the hazards of life on the streets.

Although an association of young men meeting around a common purpose was nothing new, the Y offered something unique for its time. The organization's drive to meet social need in the community was compelling, and its openness to members crossed the rigid lines separating English social classes.

Years later, retired Boston Sea captain Thomas Valentine Sullivan, working as a marine missionary, noticed a similar need to create a safe "home away from home" for sailors and merchants. Inspired by the stories of the Y in England, he led the formation of the first YMCA in the United States at the Old South Church in Boston on December 29, 1851.

Mission

The Old Colony YMCA is a charitable, non-profit Association committed to the development of strong spirit, mind, and body, guided by Judeo-Christian principles, to enrich the quality of life for everyone in our communities.

Core Values

Character development is integral to all YMCA programs. We are guided by four core values:

- Caring
- Honesty
- Respect
- Responsibility

It is our goal as an organization to make these core values the foundation of all we do – programs we offer, the relationships we build, the children we teach.

Charitable Status

The YMCA is a charity dedicated to strengthening the foundations of communities. We do this by nurturing the potential of children, teens, and young adults; promoting healthy living; and fostering social responsibility. Through YMCA financial assistance programs, the YMCA is accessible to all.

Becoming an Old Colony YMCA Volunteer

A volunteer is an individual who is willing to give their time to the organization in a variety of ways without monetary or other compensation. Employees can volunteer in different departments or special events if that department or event is not part of their job description or duties they are monetarily compensated for. All volunteers must create a profile in our VolunteerMatters system and officially sign up for a volunteer opportunity through there.

1. **High-access volunteers:** If a volunteer has unsupervised access to consumers or responsibility for directly supervising consumers, they are considered high-access.

2. **Low-access / partially screened volunteers:** A volunteer who has some access to consumers but is always supervised by an employee does not have to complete the full employee/high-access screening process. A low access volunteer may have access to consumers only while supervised by employees and cannot independently supervise consumers.

Volunteer Opportunities

Volunteers at the Old Colony YMCA can give back to the organization in a variety of ways, including but not limited to.

- Committee, Policy and Board Volunteers
- Special Events
- Fundraising
- Program and Initiative
- Corporate Opportunities
- Interns and Co-ops
- Mentoring

Recruitment and Selection

The YMCA engages in a thorough recruitment, selection, and placement process for all volunteers. Screening is carried out to ensure the safest and most productive experience for volunteers, staff, and members.

High-access volunteers must be screened to the same level as employees:

- Application
- Interview with behaviorally based questions
- Three reference checks (2 personal, 1 Professional)
- Background check and NSOR

Low-access / partially screened volunteers: must complete a CORI/ SORI check

Volunteer Registration

To become a volunteer, you must complete registration through VolunteerMatters. The YMCA relies upon the accuracy of information contained in the volunteer application and all other information presented throughout the onboarding process.

Background Checks

OCY will conduct and review a criminal background check and National Sex Offender Registry Check on all new employees and high-access volunteers prior to the individual having access to consumers. The criminal background check will include, at a minimum:

- A multi-state criminal records search with a social-security-number trace, and an individual county level search in every county the applicant has lived in over the last seven years.

OCY will conduct a criminal background check and National Sex Offender Registry Search on all continuously employed employees and high-access volunteers at least once every two years. For employees or high-access volunteers who are returning, rehired, or seasonal workers, OCY will conduct a criminal background check and National Sex Offender Registry Search when the employee returns from an absence longer than six months, and at least once every two years.

OCY will keep documentation that the checks have been completed and reviewed in the employee or volunteer's personnel file.

Required Forms

To become a YMCA volunteer, you will need to review, complete, and sign the following paperwork:

- Volunteer Registration / Profile through VolunteerMatters.
- Consent Form / Authorization for Background Check
- Acknowledge your understanding of:
 - Volunteer Handbook
 - Child and Youth Care Policy

Training

The Old Colony YMCA requires all volunteers to complete the 45-minute Praesidium online training course Foundations: Preventing Abuse in Youth-Serving Organizations. This course is available through VolunteerMatters. Other training may be deemed necessary by the volunteer's position and responsibilities.

General Volunteer Guidelines / Volunteer Relations

Staff Liaison

Your staff liaison is responsible for day-to-day management and guidance of your service, and will be available for consultation, assistance, and ongoing feedback.

Dress Code

As a representative of the YMCA, dress must be professional and safe/appropriate for the activities associated with your role. Dress code for volunteers varies for each YMCA program and from department to department. Your staff liaison will provide you with the information you need.

Identification / Name Badges

Name badges are required to be worn while volunteering at all times and should be easily visible.

Attendance & Punctuality

Attendance and punctuality are important factors for your success. If you are going to be late or absent from your volunteer position, you must notify your staff liaison, ideally at least two hours before the start of the volunteer service hours. If you are unable to make it to a volunteer commitment, please let your staff liaison know as soon as possible.

Minor Volunteers

The standard expectation is that minor employees/volunteers are treated with the same boundaries as the minor consumers we serve.

Minor volunteers (under 18) must be actively supervised by adult employees.

- Minor volunteers who assist with supervising youth are always supervised by an adult employee
- Any youth supervised by a minor employee or volunteer are at least two years younger than the youngest minor employee or volunteer responsible for their supervision
- Minor volunteers are never placed in sole charge of a group, activity, or program area
- If a minor employee/volunteer is working alongside an adult employee, or an adult employee is physically present/supervising, the minor employee can count towards the ratio.
- If you are left alone for any reason, contact a supervisor or administrative employee for immediate support or relocation of the group to designated program areas where additional adult employees can provide "zone" supervision.
- Minor employees/volunteers wear green lanyards, with the message communicated to all employees: "If they're wearing green, they're under

18". This provides a clear visual cue that the individual is a minor, reinforcing the need for additional supervision of appropriate boundaries.

Volunteer Records

To keep your volunteer records current, notify the YMCA of any changes to your name, address, phone number, email address, or emergency contact information.

Tracking Volunteer Hours of Service

To have an accurate record of your volunteer time or service, we ask that you track your hours and assignments within VolunteerMatters.

Termination of Volunteer Services

All volunteer services are appreciated. The YMCA strives to retain and attract quality volunteers. However, circumstances change, and volunteers may no longer be able or willing to continue. Any volunteer wishing to voluntarily resign is asked to notify their staff liaison, in writing, at least two weeks in advance.

Standards of Professional Conduct

The YMCA expects that employees and volunteers will conduct themselves in accordance with the highest standards of behavior and will treat each other and our members with dignity and respect.

Employees and volunteers are expected to conduct their personal affairs in a manner that does not adversely affect the Association's integrity, reputation, or credibility. Illegal or otherwise problematic off-duty conduct that unfavorably affects the Association's interests or the individual's ability to perform his or her service will not be tolerated.

Legal Matters

Any volunteer who is arrested or convicted of a misdemeanor or felony must notify Human Resources of such an arrest no later than three calendar days after the arrest.

Photographs

During your volunteer work with the YMCA, any photos taken of you may be used in promotional materials.

Use of Supplies and Equipment

The YMCA supplies and equipment, including copy machines, computers, and postage meters, are for YMCA business use only. Equipment and supplies belonging to the YMCA are not for individual personal use.

Policy for Managing One-on-One Interactions Between Employees, Volunteers, and Consumers in Virtual Programming

One-on-one interactions with consumers in virtual programming must only occur during programming under authorized circumstances. The purpose of this policy is to ensure the OCY clearly communicates expectations for employees and volunteers engaging in one-on-one interactions that occur in virtual programming and give examples of appropriate behavior when authorized one-on-one interactions do

occur. In those situations where one-on-one interactions are authorized, employees and volunteers should observe the following guidelines to limit the risk of abuse or false allegations of abuse:

- Ensure one-on-one interactions in virtual programming are scheduled in advance and communicated with a supervisor. Links and passwords to virtual sessions should be shared with a supervisor.
- Ensure one-on-one interactions in virtual programming are documented. Keep documentation of these meetings (such as in shared calendar, case notes, etc.) and share with your supervisor.
- Document and immediately report any unusual incidents, including disclosures of abuse or maltreatment, observations of abusive or neglectful conditions, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted or that made you uncomfortable.
- Invite a parent or supervisor to join the meeting. Supervisory staff are required to frequently monitor all virtual activities to ensure organizational policies are observed by all employees, volunteers, and consumers. Supervisors who oversee staff who interact virtually with consumers must conduct routine, unannounced supervisory visits determined by program. Supervisors must document their visits and observations in program specific software.

Child and Youth Care Policy

Old Colony YMCA is dedicated to the belief that supporting positive youth development and strengthening families will in turn strengthen our community. We strive to create environments where young people can learn and grow, and in actuality enhance the learning day through positive relationships with Y staff and structured enriching curriculum that supports social and emotional development. We want youth to thrive - to be innovative, creative, to try new things, to laugh, play and make new friends, and to build lasting relationships with caring adult role models at the Y.

At Old Colony Y, we do not simply deliver services. We work alongside children, families, and communities to fuse key elements of youth development with fun, engaging, educational programs.

For the protection of its children, families, members, employees, and volunteers, Old Colony YMCA has established the following guidelines to aid in the prevention and reporting of child abuse. Staff members and volunteers are trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse.

Staff and volunteers will:

- be familiar with the symptoms of child abuse and neglect, including physical, sexual, verbal, and emotional abuse;
- know and follow organization policies and procedures that protect youth against abuse;

- report suspected child abuse or neglect to the appropriate authorities as required by state mandated reporter laws

Old Colony Y cooperates fully with the authorities to investigate all cases of alleged abuse. Any staff or volunteer shall cooperate to the fullest extent possible in any external investigation by outside parties or internal investigation conducted by the organization or persons given investigative authority by the organization. Failure to cooperate fully may be grounds for termination.

STAFF and VOLUNTEER TRAINING

All staff and volunteers will be given the YMCA policies, procedures and regulations regarding child protection and abuse prevention as well as abuse reporting. They will be made aware of their legal requirements of being a mandated reporter. Acknowledgment of the handbook is receipt of this policy.

Each OCY program will provide initial orientation training, both HR and Division, during an employee's first 90 days of employment. As a part of this, ALL OCY staff members and volunteers must complete the **45-minute Praesidium online training course Foundations: Preventing Abuse in Youth-Serving Organizations within the first week of volunteering and prior to interacting with OCY consumers.**

CODE OF CONDUCT

The following policies are intended to assist volunteers in making decisions about interactions with youth. For clarification of any guideline, or to inquire about behaviors not addressed here, contact your supervisor.

The code of conduct with youth outlines specific expectations of volunteers as we strive to accomplish our mission together. No form of abuse will be tolerated, and confirmed abuse will result in immediate dismissal from our organization. All reports of suspicious or inappropriate behavior with youth or allegations of abuse will be taken seriously.

- Youth will be treated with respect and treated fairly at all times regardless of race, sex, age, social status, disability, or religion.
- Volunteers will avoid affection with youth
- Volunteers will adhere to uniform standards of appropriate and inappropriate verbal interactions as outlined by our organization
- Volunteers will not stare at or comment on youth bodies.
- Volunteers will not date or become romantically involved with youth.
- Volunteers will not use or be under the influence of alcohol or illegal drugs while on Y property.
- Volunteers will not have sexually oriented materials, including printed or online pornography, while on Y property.
- Volunteers will not have secrets with youth and will only give gifts with prior permission.
- Volunteers will comply with our organization's policies regarding interactions with youth outside of our programs.
- Volunteers will not engage in inappropriate electronic communication with youth.
- Volunteers are prohibited from working one-on-one with youth in a

private setting.

- Volunteers will use common areas when working with individual youth.
- Volunteers will not abuse youth in any way, including (but not limited to) the following:
 - Physical abuse: hitting, spanking, shaking, slapping, unnecessary restraints
 - Verbal abuse: degrading, threatening, cursing
 - Sexual abuse: inappropriate touching, exposing oneself, sexually oriented conversations
 - Mental abuse: shaming, humiliation, cruelty
 - Neglect: withholding food, water, shelter
- Volunteers must follow state-specific mandatory reporting requirements. Volunteers should be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. Volunteers will:
 - Be familiar with the symptoms of child abuse and neglect, including physical, sexual, verbal, and emotional abuse.
 - Know and follow organization policies and procedures that protect youth against abuse.
 - Report suspected child abuse or neglect to the appropriate authorities as required by state mandated reporter laws.
 - Follow up to ensure that appropriate action has been taken.
- Old Colony Y will not tolerate the mistreatment or abuse of one youth by another youth. In addition, our organization will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, we will take steps needed to eliminate such behavior.

Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength. Anyone who sees an act of bullying and who then encourages it is engaging in bullying. This policy applies to all youth, staff, and volunteers. Bullying can take on various forms, including:

- Physical bullying – when one person engages in physical force against another person, such as by hitting, punching, pushing, kicking, pinching, or restraining another.
- Verbal bullying – when someone uses their words to hurt another, such as by belittling or calling another hurtful names.
- Nonverbal or relational bullying – when one person manipulates a relationship or desired relationship to harm another person. This includes social exclusion, friendship manipulation, or gossip. This type of bullying also includes intimidating another person by using gestures.
- Cyberbullying – the intentional and overt act of aggression toward another person by way of any technological tool, such as email, instant messages, text messages, digital pictures or images, or website postings (including blogs). Cyberbullying can involve:
 - Sending mean, vulgar, or threatening messages or images.
 - Posting sensitive, private information about another person.
 - Pretending to be someone else to make that person look bad.
 - Intentionally excluding someone from an online group.

- Hazing – an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers that person regardless of that person’s willingness to participate.
- Sexualized bullying – when bullying involves behaviors that are sexual in nature (sexting, bullying that involves exposures of private body parts, and verbal bullying involving sexualized language or innuendo).
- Volunteers will report concerns or complaints about other volunteers, staff, adults, or youth to an Old Colony Y manager or supervisor.
- Our organization cooperates fully with the authorities to investigate all cases of alleged abuse. Volunteers shall cooperate to the fullest extent possible in any external investigation by outside authorities or internal investigation conducted by the organization or persons given investigative authority by the organization. Failure to cooperate fully may be grounds for termination.

VOLUNTEER RESPONSIBILITIES

In order to protect YMCA staff, volunteers and program participants, at no time during a YMCA program may a staff person or volunteer be alone with a single youth where others cannot observe him/her. Volunteers should space themselves in such a way that other staff can see them. However, in those situations where one-on-one interactions are approved, volunteers should observe the following additional guidelines to manage the risk of abuse or false allegations of abuse:

- When meeting one-on-one with a youth, always do so in a public place where you are in full view of others.
- Avoid physical affection that can be misinterpreted. Limit affection to pats on the shoulder, high-fives, and handshakes.
- If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by.
- Inform other staff and volunteers that you are alone with a youth and ask them to randomly drop in.
- Document and immediately report any unusual incidents, including disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted.

YMCA employees and volunteers are required to know the whereabouts of youth under twelve or at mixed age activities at all times and know that they have safe supervision. Head counts, attendance lists, and the “rule of three” (does not include minor employees out of sight of an adult employee) are to be utilized by staff on an ongoing basis and used on field trips, van trips, in pool areas, locker rooms, playgrounds, and in classrooms, both on-site and off-site. The “rule of three” specifies that there should always be at least three people present, i.e. one employee/volunteer (cannot be a minor) and two youth or two employees/volunteers and one youth.

- Staff and volunteers shall never leave youth unsupervised.
- Restroom supervision: Staff and volunteers will make sure the restroom is not occupied by suspicious or unknown individuals

before allowing youth to use the facilities. Staff and volunteers will stand in the doorway of the restroom while youth are using the restroom. This policy allows privacy for the youth and protection for the staff/ volunteer (not being alone with a child). If staff members or volunteers are assisting younger children, doors to the facility must remain open. No child, regardless of age, should ever enter a bathroom alone on a field trip.

- Staff and volunteers should conduct or supervise private activities in pairs when diapering, putting on bathing suits, taking showers, monitoring and supervising nap time etc. When this is not feasible, staff and volunteers should be positioned so that they are visible to others.
- YMCA staff and volunteers who provide direct care for youth will be identified by nametag and/or staff T-shirt.
- YMCA staff will call a parent or guardian when a youth is unexpectedly absent to ensure that they know the whereabouts of the youth.
- Staff and volunteers must use positive techniques of guidance, including redirection, positive reinforcement, and encouragement rather than competition, comparison, and criticism. Staff and volunteers will have age-appropriate expectations and establish guidelines and environments that minimize the need for discipline. Physical restraint is used only in predetermined situations necessary to protect the youth or other youth from harm, is only administered in a prescribed manner, and must be documented in writing and filed accordingly.
- Friends, relatives, former employees, or significant others of the YMCA staff and volunteers will not be allowed to spend time with or distract staff or volunteers during working hours.
- YMCA staff and volunteers should be alert to the physical and emotional state of all youth each time they report for a program. All behavior changes, bruises, and/or suspected abuse or neglect must be documented and reported to the supervisor in a timely manner.
- Staff and volunteers must appear clean, neat, appropriately attired, and ready for work. Please refer to the dress code policy at your site.
- Smoking or using tobacco on any Y property is prohibited.
- Using profanity, sharing inappropriate jokes, and/or intimate details of one's personal life in the presence of children, parents, or co-workers while at work is prohibited.
- Staff and volunteers will maintain an attitude of respect, responsibility, honesty, caring, patience, tact, and maturity.
- Many cases of organizational abuse occur off-site and outside of regularly scheduled activities. This contact outside of regularly scheduled activities may put staff, volunteers, and Old Colony Y at increased risk. Staff and volunteers may not relate to youth who participate in Y programs outside of approved Y activities. Although we strongly discourage contact outside of program hours or outside of regular job duties, if the specific situation warrants such contact and is allowable within our guidelines, the employee or volunteer and the child's parent/guardian will be asked to complete a Pre-Existing Relationship Notification and a Hold Harmless Agreement.

- Staff or volunteers will not transport youth in their own vehicles without the supervisor's and parent's approval and the proper documentation on file. See Transportation Activities Section below.
- Under no circumstances will staff release youth to anyone other than the authorized parent, guardian, or other adult (18 or older and photo ID required) authorized by the parent or guardian. The YMCA requires written parent authorization to be on file.
- Staff and volunteers are required to read and sign all policies related to identifying, documenting, and reporting child abuse and attend classes and training on the subject as instructed by their supervisor.
- YMCA staff and volunteers must act professionally with parents and children involved in YMCA programs.
- Commonwealth and federal laws governing confidentiality of information protect the minor's right to privacy. Information contained in a child's record will be privileged and confidential. No staff member, with the exception of directors or their designee, will distribute or release information in a child's record to unauthorized individuals or agencies. The director of the program will designate individuals and agencies authorized to receive information. Written consent from the child's parent or legal guardian will be required before any information is released.

Gift-Giving and Gift Acceptance Policy

Offenders routinely groom youth by giving gifts, thereby endearing themselves to the youth. They might instruct the youth to keep the gifts a secret, which then encourages keeping other bigger or more harmful secrets from trusted adults.

Gifts to Youth

The YMCA strongly discourages employees and volunteers from exchanging gifts with youth. However, gifts to youth may be given under the following circumstances:

- Gift requests must be submitted to a supervisor and/or a designated administrator prior to being purchased;
- The supervisor and/or designated administrator will determine a cost limit regarding how much can be spent on the gift; and,
- Parents/guardians of the youth must be notified about the gift item and why the youth are receiving the gift.
- Employees and volunteers are prohibited from giving gifts to individual youth. Gifts must be authorized by a supervisor or designated administrator and given to all youth (i.e., celebration of special events/holidays or group recognition).
- Employees and volunteers must communicate that the gift is given on behalf of the YMCA, not the individual employee or volunteer.

Gifts from Youth

Sometimes it may be difficult to refuse gifts from youth or their families. In many cultures, people give gifts to reflect their appreciation for people or services. To be respectful of youth and their families, the Old Colony YMCA makes reasonable

allowances for acts of gratitude involving small gifts of appreciation from youth and/or their families that have a monetary value not exceeding \$25. Employees and volunteers must disclose all such gifts to their immediate supervisor and/or a designated administrator. Under no circumstances can money be accepted from youth or their families as a gift.

This gift acceptance policy is included within materials given to parents/guardians and youth; however, if a parent or youth approaches an employee or volunteer with a gift that exceeds \$25 the employee or volunteer should politely decline the gift and refer to this policy. The employee or volunteer can also encourage the parent or youth to speak with an immediate supervisor and/or a designated administrator if they have any questions.

Artwork and letters of appreciation written by youth for employees or volunteers may only be accepted if these items will be displayed in a public area at the YMCA. Employees and volunteers may not take youth artwork or letters away from the YMCA whether to their personal homes or any other location.

TRANSPORTATION ACTIVITIES

Transporting youth may increase the risk of abuse or false allegations of abuse because staff and volunteers may be alone with a youth or may make unauthorized stops with youth. In addition, transportation activities may provide a time for unsupervised youth to engage in youth-to-youth sexual activity.

Transportation guidelines:

- Require written parent permission from all youth on the trip. Staff take these permission forms and medical releases with them on the trip.
- Require staff to have a list of the youth on the trip. The staff take roll call when boarding the bus, when leaving the bus, periodically throughout the trip, and then again when boarding the bus on the return trip.
- Specify staff-to-youth ratios.
- Require staff to sit in seats that permit maximum supervision.
- Discourage mixed age groups from sitting together. When possible, high-risk youth are seated by themselves or with a staff member.
- Prohibit drivers from making unauthorized stops.
- Where applicable (such as in mentoring programs), require staff to document the beginning and ending time of the trip and the mileage, names of the youth being transported, and the destination.
- Require documentation of any unusual occurrences.

When public transportation is used:

- In addition to the transportation procedures listed above, youth should remain in one area of the bus, if possible.
- Staff and volunteers who are assigned to a group should remain with that group on the bus.

- Take a head count immediately after entering and leaving the bus.

In situations where staff transport youth in non-organization vehicles:

- Administrators must be notified of all transportation activities.
- Use the “rule of three” when transporting youth: At least two adults must transport a single youth, or at least two youth must be present if transported by a single adult.
- Youth must never be transported without written permission from a parent.
- Youth must be transported directly to their destination. No unauthorized stops may be made.
- A staff member must document beginning and ending times and mileage, the names of youth and other staff and volunteers who are involved in transportation, purpose of transportation, and destination.
- Staff must avoid unnecessary physical contact with youth while in vehicles.
- Staff should avoid engaging in sensitive conversations with youth.

ELECTRONIC COMMUNICATION WITH YOUTH

Any private electronic communication between staff members and volunteers with youth, including the use of social networking websites like Facebook, Instagram, Snapchat, Twitter, instant messaging, texting, etc. is prohibited.

All communication between staff and volunteers with youth must be transparent. The following are examples of appropriate electronic communication:

- Sending and replying to emails and text messages from youth ONLY when copying in a supervisor or the youth’s parent
- Communicating through “organization group pages” on Facebook or other approved public forums
- “Private” profiles for staff and volunteers which youth cannot access

The following are examples of inappropriate electronic communication:

- Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating comments
- Sexually oriented conversations
- Private messages between staff or volunteers and youth
- Posting pictures of organization participants on social media sites
- Posting inappropriate comments on pictures
- “Friending” participants on social networking sites

POLICY ADDRESSING CELL PHONE USE DURING PROGRAM HOURS

While assigned to work with youth, staff and volunteers are not permitted to use electronic communication devices except during approved breaks and emergency situations. Internet use, text messaging, and/or emailing pictures while assigned to work with youth is strictly prohibited regardless of the type of device used and whether for business or personal reasons. Employees and volunteers need to ensure that friends and family members are aware of this policy.

Use of personal electronic communication devices to contact (via voice, text, or pictures/video) organization members and/or program participants for personal and/or inappropriate reasons shall be subject to termination.

Acceptable Use of Cell Phones during Program Hours:

There are occasions in which staff will need to use official, personal or organization-issued electronic communication devices. In these cases, staff will have explicit directions from supervisors governing use. Situations which may require use of personal or organization- issued electronic communication devices include: field trips, off-site programs, and emergencies.

POLICY DEFINING APPROPRIATE AND INAPPROPRIATE PHYSICAL AND VERBAL INTERACTIONS

Old Colony Y's physical and verbal contact policy promotes a positive, nurturing environment while protecting youth, staff, and volunteers. Our organization encourages appropriate contact with youth and prohibits inappropriate displays of physical and verbal contact. Any inappropriate contact by staff, volunteers, or peer-to-peer toward youth in the organization's programs will result in disciplinary action, up to and including termination or in the case of peer-to-peer abuse, removal from the program.

Examples of APPROPRIATE physical and verbal interactions are:

- Side hugs, pats on the shoulder or back, handshakes, high-fives and hand slapping, verbal praise, pats on the head when culturally appropriate, touching hands, shoulders, and arms, arms around shoulders, holding hands with young children (in escorting situations), positive reinforcement, appropriate jokes, encouragement, and praise.

Examples of INAPPROPRIATE physical and verbal interactions are:

- Full-frontal hugs, kisses, showing affection in an isolated area, lap sitting, wrestling, piggy back rides, tickling, allowing a child to cling to an employee's or volunteer's leg, any type of massage given by or to a youth, any form of affection that is unwanted by the youth or the staff or volunteer, compliments relating to physique or body development, touching bottom, chest, or genital areas, name-calling, discussing sexual encounters or in any way involving youth in the personal problems or issues of staff and volunteers, secrets, cursing, off-color or sexual jokes, shaming, belittling, derogatory remarks, harsh language that may frighten, threaten or humiliate youth, or derogatory remarks about the youth or his/her family.

Also, please speak with your program director to be aware of additional information or requirements that may pertain to this policy provided by Old Colony Y's licensors.

POLICY FOR REPORTING ABUSE OR NEGLECT

When an inappropriate behavior is identified:

- YMCA staff and volunteers are to immediately inform their supervisor, who will confirm the facts reported and the condition

of the child.

- The supervisor will request the staff and volunteer involved to complete an incident report with the date, time, and specific details observed, including the type and location of physical marks. This report must be submitted to the proper authorities (DCF, EEC) as soon as possible by the staff person involved with the incident.
- Program staff and volunteers will be made aware of the suspected abuse/neglect on a need-to-know basis only, to allow further documentation.

In the event the reported incident or suspicion involves a staff person or volunteer, the steps below will occur within 24 hours (see Internal Review of Red Flag or Inappropriate Behaviors for procedure to follow):

- The employee or volunteer will immediately inform their site supervisor or other senior staff member.
- The senior manager will inform the SVP, Child Protection and the SVP, Human Resources.
- The site supervisor will contact the staff member or volunteer concerning suspicions and will either move the employee or volunteer to an environment with no direct care of youth or suspend that employee/ volunteer from all duties (if the work environment cannot be modified) until the allegations have been cleared or substantiated.
- In the case that allegations have been cleared, the employee or volunteer may return. In the case that allegations are substantiated, the employee or volunteer will be terminated. The Employee Handbook provides further details regarding the suspension policy.
- Staff or volunteers who have been accused of child abuse or neglect may not contact co-workers, or children or parents involved in an alleged child abuse/neglect incident.

In the event that, outside of the Y, an employee or volunteer is accused of abuse/neglect, you must notify Human Resources within 24 hours, and the above steps will apply.

The child at risk hotline to report a child abuse case is 1-800-792-5200.

Sexual and Other Unlawful Harassment

Old Colony Y is committed to providing a work environment that is free of harassment based on any legally protected characteristics. As a result, OCY maintains a strict policy prohibiting sexual harassment and harassment against any applicant, employee, or volunteer based on any legally recognized status, including, but not limited to: veteran status, uniformed service member status, race, color, religion, sex, sexual orientation, gender identity, age (40 and over), pregnancy (including childbirth, lactation and related medical conditions), national origin or

ancestry, physical or mental disability, genetic information (including testing and characteristics), citizenship or immigration status or any other status protected by federal, state or local law (collectively, "protected characteristics").

The harassment prohibited by this policy applies to conduct by any person involved in our operations, including employees, supervisors, managers, volunteers temporary or seasonal workers, agents, clients, vendors, customers, or any other third party involved in OCY's operations, and this policy specifically prohibits conduct that creates or contributes to a hostile or offensive working environment for any Company employee or applicant based on protected characteristics. If such harassment occurs that an employee believes to be a violation of this policy, the procedures set forth in the Complaint Procedures in this policy should be followed.

OCY prohibits unlawful harassment and sexual harassment and prohibits harassing conduct (as defined in this policy) that does not rise to the level of being unlawful. This policy is not designed or intended to limit OCY's authority to discipline or take remedial action for conduct that violates this policy that OCY deems unacceptable, regardless of whether that conduct satisfies the definition of unlawful harassment or sexual harassment.

Sexual Harassment Defined

Sexual harassment includes unwanted sexual advances, requests for sexual favors, or visual, verbal, or physical conduct of a sexual nature when:

- Submission to such conduct is made a term or condition of employment; or
- Submission to, or rejection of, such conduct is used as a basis for employment decisions affecting the individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an employee's work performance or creating an intimidating, hostile or offensive working environment, even if the individual making the report is not the intended target of such conduct.

Sexual harassment also includes various forms of offensive behavior based on sex. The following is a non-exhaustive list of the types of conduct prohibited by this policy:

- Unwanted sexual advances or propositions (including repeated and unwelcome requests for dates).
- Offers of employment benefits in exchange for sexual favors.
- Making or threatening reprisals after a negative response to sexual advances.
- Visual conduct: leering, making sexual gestures, displaying of sexually suggestive objects or pictures, cartoons, posters, websites, emails, or text messages.
- Verbal conduct: making or using sexually derogatory comments, innuendos, epithets, slurs, sexually explicit jokes or comments about an individual's body or dress, whistling or making suggestive or insulting sounds.
- Verbal and/or written abuse of a sexual nature, graphic verbal and/or written sexually degrading commentary about an individual's body or dress or sexual experiences, sexually suggestive or obscene letters, notes, invitations, emails, text messages, tweets or other social media postings.

- Physical conduct: unwelcome or inappropriate touching, physical violence, intimidation, assault or impeding or blocking normal movements.
- Hostile actions taken against an individual because of that individual's sex, sexual orientation, gender identity or the status of being transgender, such as:
 - Interfering with, destroying or damaging a person's workstation, tools or equipment, or otherwise interfering with the individual's ability to perform the job;
 - Repeated and intentional use of a name or pronoun inconsistent with an individual's known gender identity;
 - Asking intrusive questions about a person's sexual orientation, gender identity, gender transition, or intimate body parts;
 - Sabotaging an individual's work; and
 - Bullying, yelling, or name-calling
- Retaliation for making reports or threatening to report sexual harassment.

Sexual harassment can occur regardless of the gender of the person committing it or the person who is exposed to it. Harassment based on sexual orientation, self-identified gender, perceived gender, or transgender status are all forms of prohibited sexual harassment.

Other Types of Prohibited Harassment

Harassment based on any protected characteristic is prohibited, including harassment based on veteran status, uniformed service member status, race, color, religion, sex, age (40 and over, if there are 20 or more employees), pregnancy (including childbirth, lactation and related medical conditions), national origin or ancestry, physical or mental disability, genetic information (including testing and characteristics), citizenship or immigration status or any other consideration protected by federal, state or local law. Prohibited harassment may also include, but is not limited to:

- Verbal conduct: including taunting, jokes, threats, epithets, derogatory comments or slurs based on an individual's protected characteristics;
- Visual and/or written conduct: including derogatory posters, photographs, calendars, cartoons, drawings, websites, emails, text messages or gestures based on an individual's protected characteristics;
- Sharing pornography or sexually demeaning depictions of people: including AI-generated and deepfake images and videos;
- Mimicking or mocking a person's disability, accent or religious garments, jewelry, or displays; and
- Physical conduct: including assault, unwanted touching or blocking normal movement because of an individual's protected characteristics.

Protection Against Retaliation

Retaliation is prohibited against any person by another employee or by Old Colony Y for using the Complaint Procedures provided below; reporting prohibited discrimination, harassment, sexual harassment or retaliation; objecting to such conduct; or filing, testifying, assisting or participating in any manner in any investigation, proceeding or hearing conducted by a governmental enforcement agency. Prohibited retaliation includes, but is not limited to, termination, demotion,

suspension, failure to hire or consider for hire, failure to give equal consideration in making employment decisions, failure to make employment recommendations impartially, adversely affecting working conditions or otherwise denying any employment benefit.

Individuals who believe they have been subjected to retaliation or believe that another individual has been subjected to retaliation should report this concern pursuant to the Complaint Procedures in this policy. Any report of retaliatory conduct will be investigated in a thorough and objective manner. If a report of retaliation prohibited by this policy is substantiated, appropriate action, up to termination, will be taken.

Complaint Procedures

Any individual who believes that they or another individual has been subjected to discrimination, sexual harassment, or any other form of prohibited harassment or retaliation should, as soon as possible, report it to your Association Supervisor, your Department Head and/or the SVP, Human Resources at 320 Main Street, Brockton, MA 02301, (508) 583-2155. Complaints can be made orally or in writing. Employees may also file a formal complaint with either or both government agencies listed below:

- The Massachusetts Commission Against Discrimination (MCAD) is the state agency responsible for handling complaints of harassment, including sexual harassment. The MCAD can be reached at the following locations:
 - Boston Office: One Ashburton Place, Sixth Floor, Room 601, Boston, MA 02108; telephone number (617) 994-6000.
 - Springfield Office: 436 Dwight Street, Second Floor, Suite 220, Springfield, MA 01103; telephone number (413) 739-2145.
 - Worcester Office: 18 Chestnut Street, Room 520, Worcester, MA 01608; telephone number (508) 453-9630.
- The Equal Employment Opportunity Commission (EEOC) is the federal agency that investigates harassment claims, including claims of sexual harassment. The EEOC can be reached at:
 - John F. Kennedy Federal Building, 15 New Sudbury Street, Room 475, Boston, MA 02203, telephone number (800) 669-4000.

Complaints filed with the MCAD and the EEOC must be filed within 300 days of the incident giving rise to the claim.

Employees or Volunteers are not required to report any prohibited conduct to a supervisor or manager who may be hostile, who has engaged in such conduct, who is a close associate of the person who has engaged in such conduct, or with whom the employee or volunteer is uncomfortable discussing such matters. If any supervisor or another manager is the alleged harasser or otherwise believed to be violating this policy, the employee must report the alleged conduct to Human Resources – reporting directly to the offending supervisor is not sufficient.

Any supervisor or manager who receives a complaint of harassment, sexual harassment, or retaliation or receives information about such conduct must also immediately report it to Human Resources.

Employees and volunteers are encouraged, but not required, to communicate to the offending person that their conduct is offensive and unwelcome. Individuals who observe any behavior directed at others that may violate this policy are encouraged to take reasonable action to defuse such behavior, if possible, such as intervening directly, alerting a supervisor or Human Resources to assist, or making a report under this policy. Physical confrontation, violence, or assault is not an appropriate method of intervention. The intervening person must act in accordance with OCY's policies.

Investigation

After a report is received, OCY otherwise has reason to believe discrimination, prohibited harassment, or retaliation is occurring, a timely, thorough, and objective investigation by OCY will be conducted. OCY will maintain confidentiality surrounding the investigation to the fullest extent possible, consistent with a thorough and objective investigation, and to the extent permitted or required under applicable law, and related information will only be shared with others on a need-to-know basis.

Once the investigation is completed and a determination is made, the complaining party will be advised that the investigation has been completed and may be informed of the resolution. OCY complies with the law in conducting investigations and expects that employees will cooperate with an investigation, except when voluntary compliance with an investigation is being requested. Employees are expected to provide truthful information when participating in an investigation.

Discipline

If OCY determines that this policy has been violated, including if a supervisor or manager knowingly allows the policy to be violated without reporting it, prompt remedial action will be taken, up to and including termination.

Good Faith Reporting

The initiation of a good faith complaint of discrimination, prohibited harassment, sexual harassment, or retaliation will not be grounds for disciplinary or other retaliatory action, even if the allegations cannot be substantiated or the employee or volunteer was mistaken about aspects of the complaint. Any individual who makes a complaint that is demonstrated to be intentionally false may be subject to discipline, up to and including termination.

Safety and Security

Emergency Procedures

The YMCA has procedures to follow in the event of fire, disasters, and other emergencies. These procedures are available in each facility (in the red Emergency Response book).

Safety

The YMCA strives to provide safe volunteering conditions and comply with all OSHA standards. Safety is the responsibility of everyone. Any injury or hazardous

condition must be reported to the appropriate staff liaison and the Association office within 24 hours.

Reporting Work-related Accidents and Illnesses

Volunteers must notify their staff liaison immediately when an accident occurs. The staff liaison will immediately report the accident to the branch executive and complete an Accident Report form. These forms must be filed within 24 hours of the occurrence.

Incident Reporting

Volunteers who witness an incident must report it immediately to a staff liaison, branch executive, and the CHRO. A reportable incident would include, but is not limited to, the following:

- Illness/injury of any member or visitor during business hours or while on YMCA property
- Incidents of verbal, sexual, or physical abuse
- Fires, bomb threats, floods, or other threats of damage to Association property or personnel
- Incidents which could harm the YMCA's reputation
- Theft or vandalism

Security Policy

In an effort to provide a safe and secure facility for employees, volunteers, and members, we require compliance with the following:

- Contraband, drugs, weapons, and other unauthorized or illegal substances or materials cannot enter the YMCA or any locations where we operate.
- Cameras, cell phones, or any other device capable of capturing images cannot be used to take pictures of members, staff, children, or other visitors without their specific consent.
- Tools, files, equipment, products, materials, and other property of the YMCA cannot be removed from its premises without proper authorization.

Violation of the policies listed above may result in immediate termination, depending upon the specific circumstances.

The Old Colony YMCA employs security cameras to enhance the safety and security of members, employees, volunteers, visitors, and the property within our facilities. The use of surveillance technology allows the Old Colony YMCA to assess trends and foresee problems to increase our response time, cover a larger portion of the facilities, and utilize better resources. Integral to our commitment to safety is the use of video equipment to deter crime, assist in response to security and safety issues, and provide information for criminal investigations. Video monitoring will be conducted in a professional, ethical, and legal manner and will not violate anyone's reasonable expectation of privacy. Likewise, cameras are not installed in areas where members and staff could reasonably expect privacy, such as restrooms and locker rooms. Viewing surveillance camera footage will be conducted solely by Management in a legal, responsible, and ethical manner. This policy does not in any way imply or guarantee that video surveillance devices will be indefinitely operational or actively monitored at any time.

Preventing Violence in our Y

It is the objective of the YMCA to promote a safe, secure volunteering environment that is free from any type of violence. The YMCA prohibits threatening behavior, physical violence, or any other conduct that is perceived as harmful to the well-being of others (employees, members, participants, and volunteers).

Volunteers who violate this policy will be subject to termination and criminal penalties.

The Association prohibits all people who enter a YMCA program or property from carrying dangerous weapons, including handguns, firearms, knives, etc., regardless of whether the person is licensed to carry the weapon or not.

If an individual feels that his/her domestic problems may lead to violence in the workplace, the person is asked to immediately relay these concerns to the Senior Vice President of Human Resources.

Substance-Free Policy

All tobacco-related products are strictly prohibited in YMCA programs or facilities.

Substance abuse has the potential to endanger the OCY-by increasing the risk of accidents, impairing the health and well-being of the user, and diminishing productivity. Accordingly, it is the policy of the YMCA to maintain a substance-free environment.

For purposes of this policy, a controlled substance is any illegal or prescription drug that, if abused, may lead to physical or psychological dependence. Volunteering while under the influence of a controlled substance is prohibited, unless use of the controlled substance is consistent with a physician's prescription and neither substantially impairs the volunteer's ability to volunteer satisfactorily, nor poses a risk to safety.

Volunteers are required to abide by the following conditions:

- The use, sale, or possession of alcohol, marijuana, narcotics, drugs, or controlled substances while on the job, whether on Association property or not, is prohibited. The YMCA will turn any illegal substances over to the appropriate law enforcement agency and will cooperate with any criminal prosecution.
- Volunteers may not be on YMCA property while under the influence of controlled substances, marijuana, or alcohol, except as prescribed by a physician. If the YMCA learns or suspects that an individual has violated this policy, the Association may, at its discretion (and in accordance with applicable law), require the submission of a drug or blood alcohol test. The volunteers may be subject to termination.
- Volunteers arrested or convicted for off-duty conduct related to drug and alcohol use must advise the Senior Vice President of Human Resources within three days. Within thirty days after receiving notice, the Association may impose remedial measures on the individual up to termination.

General Policies

Contact With the Media

To ensure that OCY communicates with the media in a consistent, timely, and professional manner about matters related to OCY, volunteers should notify their staff liaison (who will then notify Michael Ricci, Vice President of Public Affairs), if they are contacted by the media and asked to speak on behalf of OCY so that OCY knows that a media inquiry has been made.

Do not respond to media inquiries on OCY's behalf without authorization. This rule does not prevent volunteers from speaking with the media, but they should not attempt to speak on behalf of OCY unless they have specifically been authorized to do so by an officer of OCY.

Social Media

Old Colony Y respects its volunteers and understands that volunteers' time outside of volunteering is their own. However, volunteers should be mindful that their social media activity, even if done off premises and while off-duty, could affect OCY's legitimate business interests. For example, the information posted could be OCY's confidential business information. In addition, some readers may mistakenly view a volunteer as a spokesperson for OCY. Consequently, social media activity is a legitimate and proper focus of Company policy.

For purposes of this policy, "social media activity" includes all types of posts and other communications on the internet, including, but not limited to, posts on social networking sites, such as Facebook, LinkedIn, Instagram, Pinterest and X (formerly known as Twitter); blogs and other online journals and diaries; bulletin boards, chat rooms and forums; microblogging, such as X, Instagram, Slack or Trello; and postings of video or audio on media-sharing sites, such as YouTube, Instagram, TikTok, Snapchat or Flickr.

Social media activity also includes permitting, or failing to remove, posts by others whenever the volunteer can control the content of posts, such as on a personal page or blog.

Scope of This Policy

This Social Media policy applies:

- To all volunteers;
- To social media activity for business or personal purposes;
- To social media activity while on or off duty, when on or off OCY's premises, and while using OCY's or personal electronic resources;

- To social media activity that relates in any way to, or may reflect on or impact, OCY's business, employees, customers, business partners, vendors, suppliers or competitors; and
- Regardless of whether a volunteer identifies their affiliation with OCY in their social media activity or in their account profile or posts anonymously or using a pseudonym.

Volunteers should adhere to the following social media guidelines:

- **Limit personal use:** Volunteers are not to engage in personal social media posting while on-site and "on the clock."
- **Know and follow the rules:** All pertinent Old Colony Y policies, such as the anti-harassment and antidiscrimination provisions, apply to personal social media use.
- **Express only your personal opinions:** Volunteers should not represent in any social media that they are speaking on Old Colony Y behalf unless they are specifically authorized to do so.
- **Social media networks, blogs and other types** of online content sometimes generate press and media attention or legal questions. Volunteers should refer these inquiries to the President/Chief Executive Officer as the only authorized Old Colony YMCA spokesperson.
- **Identify yourself in endorsements:** Volunteers must disclose their affiliation with Old Colony Y if they endorse Old Colony Y products or services in social media.
- **Use privacy settings:** Old Colony Y volunteers must use privacy settings to restrict access by others to overlay personal content posted in social media.
- **Be respectful:** Old Colony Y volunteers should not post content that (a) would be threatening, abusive, knowingly false, or similarly offensive; (b) disparages the OCY's products or services; or (c) depicts the volunteer engaging in conduct that violates an Old Colony Y policy or that is unlawful.
- **Volunteers who supervise minors** should keep all Old Colony YMCA communications with minors public and include another adult supervisor in all communications.
- **Use of Old Colony Y logo:** Old Colony Y volunteers are prohibited from using the corporate logo in a manner that would create commercial confusion.
- **Safeguard sensitive personal information.** Old Colony Y volunteers must not post their own or others' personal information that could be used to commit identity theft, such as credit card numbers, driver's license numbers, and Social Security numbers.
- **Internal contact.** Volunteers concerned about social media content posted by others related to Old Colony Y should direct concerns to their staff liaison.
- **Restrictions on Use of Corporate Email Address.** Old Colony Y prohibits volunteers from using their corporate email address to register for personal social media accounts.
- **Addressing Concerns.** Old Colony Y volunteers should not address OCY-related concerns with their supervisor through social media.
- **Enforcement.** Old Colony Y will fully monitor social media permitted by applicable law and will take disciplinary action against those who violate

the policy.

Information Security Policy

It is the policy of the Old Colony Y (the "OCY" or the "Association") to create and maintain strict controls to protect the personal information of its clients and staff in compliance with Executive Order 504 and G.L. c. 93H and 93I. To meet this goal, the OCY has developed an Information Security Program ("ISP") to institute measures to ensure the integrity, confidentiality, and security of the personal information the agency collects, uses, stores, and disposes. The OCY trains every staff member to be aware of and utilize these safeguards. The OCY relies on its managers to exercise due diligence to achieve compliance with the ISP in each OCY location.

Definitions:

For the purposes of interpreting this policy, the terms below shall have the following meanings.

- Executive Order 504: a measure signed by the Governor which requires all agencies within the Executive Branch of the Commonwealth, and their providers, to enhance measures to safeguard personal information.
- G.L. c. 93H: known as the "Identity Theft" law, this statute protects Massachusetts citizens in the event their personal information is acquired by an unauthorized person, used for an unauthorized purpose, or information assets are compromised, leading to a substantial risk of unauthorized access or use.
- G.L. c. 93I: known as the "Trash Disposal" law, this statute protects Massachusetts citizens by setting minimum standards for safe and secure disposal of personal information in both paper and electronic form.
- Information Assets: any IT resources, including but not limited to, desktop computers, laptop computers, telephones, fax machines, mobile devices (such as PDA's, flash/thumb drives, Blackberries, cell phones), servers, cables or connecting wires, antennae, video conferencing equipment, video surveillance equipment, tapes, VPN certificates, and the OCY website.
- Information Security: measures which protect personal information that the OCY collects, uses, stores and disposes.
- Information Security Program ("ISP"): measures the OCY has taken or will take in compliance with various laws and other authorities that govern and protect how the Association collects, uses, stores and disposes of personal information.

- Institutional Security Officer ("ISO"): the President and CEO's designee for all issues related to information security; at the OCY, the SVP, Human Resources is the ISO.
- Personal Information: a Massachusetts resident's first name and last name or first initial and last name in combination with any one or more of the following data elements that relate to such a resident: (a) Social Security number; (b) driver's license number or state-issued identification card number; or (c) financial account number, or credit or debit card number, with or without any required security code, access code, personal ID number or password, that would permit access to a resident's financial account; provided, however, that "Personal Information" shall not include information that is lawfully obtained from publicly available information, or from federal, state or local government records lawfully made available to the general public.
- Reasonable Assurance: achieving the lowest practical level of acceptable risk.
- Risks: potential threats to information security or information assets, internal or external, deliberate or accidental, including interruptions to the availability of data, loss of data, breaches of security, unauthorized access to or unauthorized use of personal information.
- Security Breach: a break in information security which exposes the OCY to any of the risks listed above.
- Unauthorized Person, Access or Use: an intentional or accidental security breach which results in a person having personal information without authorization, or when a person authorized to access personal information uses it for a purpose outside of the scope of his or her duties.

General Principles

All Massachusetts citizens, including OCY clients, members, volunteers, and employees, should be able to expect that the Association will take reasonable precautions to reduce the risk of identity theft and invasion of privacy through the improper collection, usage, storage, and disposal of personal information.

To accomplish this goal at the OCY, the Association and each of its employees shall undertake measures to protect personal information.

The OCY's Information Security Program ("ISP")

The OCY has created an Information Security Program to protect personal information and information assets from risks. The OCY has taken or will take protective measures, including but not limited to the following:

- Appoint an ISO;

- Conduct an assessment of risks to its personal information and assets;
- Develop internal controls to address identified risks to a level of reasonable assurance;
- Train employees on the agency's ISP;
- Perform an annual self-audit to monitor compliance with the ISP;
- Develop a program to manage and maintain the OCY's information assets (such as passwords, logins, encryption, access reviews, antivirus software, firewalls, data back-ups, systems synchronization, data continuity, and disaster recovery);
- Study ways to ensure that only the minimum quantity of reasonably necessary clients, employee, volunteer, member, and donor information is collected, stored, and used to conduct the Association's business;
- Design a reporting system for security breaches;
- Institute measures to permanently dispose of personal information; and Institute any other information protection measures deemed to be reasonably necessary to protect personal information.

Responsibilities of All OCY Volunteers

- All OCY volunteers shall safeguard the integrity, confidentiality and security of personal information and information assets.
- OCY volunteers shall use personal information only for authorized purposes.
- OCY volunteers shall not leave personal information unattended or unsecured (paper or electronic) or use it in conversation where unauthorized persons may overhear the content of the conversation.
- OCY volunteers shall not share their passwords to any information asset, email or voicemail account with anyone other than their supervisor on a need-to-know basis only and shall not leave a computer without logging off.
- OCY volunteers sending personal information to printers, fax machines, copy machines, via email, overnight or regular mail shall make sure to send the information to the right location/recipient.
- OCY volunteers disseminating personal information shall disclose only the minimum quantity reasonably necessary to conduct the Association's business.
- OCY volunteers shall not save voicemail with personal information unless it is necessary and then only for as long as necessary. When forwarding voicemails, volunteers shall make sure to send voicemails to the right recipient.
- OCY volunteers shall not remove personal information from any work location without the authorization of a supervisor and shall not store personal information in any non-work location.

- OCY volunteers shall use a cross-cut shredder or outside shredding service to dispose of paper records containing personal information. Similar appropriate electronic methods will be used to dispose of electronic media such as floppy disks, compact disks, or USB drives.
- OCY volunteers shall not copy or share building keys, access codes, or access cards, or leave windows or doors unsecured in areas where information assets or personal information are located.

Security Breaches

In the event of a breach or suspected security breach, the volunteer shall immediately report relevant information to the Program Director. The Program Director shall complete an OCY Information Security Incident Report available on the OCY shared files and submit it electronically, as soon as practical after discovery of the breach, to the Human Resources Office. After reviewing the Report, the OCY will make any required notifications, and may deny access to or intentionally disable any of its information assets.

Policy Violations

Any OCY volunteer who intentionally violates this or any other OCY information security policy or procedure may be subject to termination.

Use of Company Equipment and Resources

When using Company equipment, vehicles or other property, volunteers are expected to exercise care; maintain the property in safe working order; and follow all operating instructions, safety standards and guidelines.

Volunteers should notify their supervisors if any equipment, machines, tools or vehicles appear to be damaged, defective or in need of repair. Prompt reporting of damages, defects and the need for repairs could prevent deterioration of equipment and possible injury to volunteers or others. Volunteers who have questions about their responsibility for maintenance and care of equipment or vehicles used on the job should consult their supervisor.

All volunteers are expected to comply with all local, state and federal laws while operating Company vehicles and other equipment. Old Colony Y may terminate volunteers who engage in unlawful conduct.

Technology Use and Property Policy

The following describes Old Colony Y's (OCY's) policy on the use and monitoring of electronic communication systems including computers, telephones, Y-issued cell phones, fax machines, Email, and the Internet.

To ensure that the use of electronic communication systems and business equipment is consistent with the OCY's business interests, authorized

representatives of the OCY may monitor the use of its systems at its sole discretion, at any time, with or without notice or permission, and notwithstanding any passwords. Email is monitored, traced, and stored for at least 3 years, and can be used in a court of law. OCY business should only be conducted using an OCY e-mail address and vice versa.

All volunteers must use Old Colony Y electronic communications systems in a responsible, professional, and ethical manner. Email and Internet usage and communication must reflect well on the organization. Telephones, computers, fax machines, and desks are the property of the Old Colony Y and are intended for business use.

Use of such systems for purposes inconsistent with Old Colony Y's policies or in violation of Massachusetts or federal law is not permitted and can be subject to termination.

Prohibited activities

Include, but are not limited to, copyright infringement, messages to staff members that serve as advertising or solicitation unless approved in advance by the CEO, intentional misuse of data, equipment, or infrastructure, invasion of privacy, or the display or transmission of obscene, threatening, racist, sexist, discriminatory, or harassing messages or materials. In addition, the following is prohibited: access, display, production, possession and distribution of pornography. If you receive a communication containing material you deem offensive, please report it immediately to your supervisor, but do not delete or forward it.

Dual Use of Device: Personal use of equipment

- Volunteers may make or receive limited personal telephone or cellular calls. Under no circumstances are personal long-distance calls to be made at the expense of the OCY.
- Under NO circumstances are volunteers allowed to bring personal equipment inclusive of computers, routers, cables, access points and the like into an OCY building and use within the OCY infrastructure.

Software Installation/Downloading

Software, Programs, Printers, Toolbars, Screensavers, Cursors, Weather Indicators, Instant Messaging, etc. are NOT to be downloaded or installed by anyone except the IT department.

Laptop Usage

Laptops are the property of Old Colony Y and intended for Old Colony Y employee usage only. This usage should not be extended to family members or friends.

Passwords are confidential

Do not provide passwords to anyone except on a "need to know" basis by your supervisor or the IT department for official OCY business purposes. Examples of a

need to know basis are a supervisor needing access to a file in the absence of the staff member, or the Information Technology Department for updating or troubleshooting.

Software Licensing

All installed software MUST be licensed and installed by IT. Do not download programs onto your computer or install illegal copies of software. Do not copy or make illegal copies of software. Software purchases grant the employee a usage license only. Software is owned by Old Colony Y and not the employee.

Hardware/Software Purchases

All hardware and software purchases must be made by the Information Technology Department.

Backups

It is your responsibility to maintain backups of your individual data.

Virus Protection

Virus protection is automatic on all OCY computers connected to the Internet. If you work remotely with a laptop, you must ensure you connect to the Internet and VPN (SonicWALL Banyan) and allow virus updates to occur regularly (weekly at a minimum).

Confidentiality and Ownership:

OCY computers and all the software and data on them are the property of Old Colony Y. You are responsible for maintaining the confidentiality of data on the system. You may not remove from the premises any hardware, software, files or data without written permission from your supervisor. You may not use a code, access a file, or retrieve any stored information from another employee's computer unless authorized to do so by your supervisor.

Accessibility

The Old Colony Y reserves the right to retrieve and review information stored in or on telephones, computers, and desks. No information should be considered personal and private.

AI Usage Policy

Purpose

This policy governs the responsible use of AI tools within Old Colony YMCA to ensure data security, regulatory compliance, and ethical AI usage.

Approved AI Tools

When Inputting Organizational Data volunteers should use the following OCY sponsored applications:

- Microsoft Copilot (via OCY Teams)
- ChatGPT (licensed and assigned paid version through OCY)

When No Organizational or Personal Data is Input use the following applications:

- Microsoft Copilot (Free version)
- ChatGPT (Free version)

Note: No other AI tools may be used unless explicitly approved through the internal leadership review process.

Data Governance & Security

To protect sensitive information, volunteers must adhere to the following:

Restricted Data

Do not input the following into AI tools:

- Personally Identifiable Information (PII)
- Health information (HIPAA)
- Financial records containing PII
- Donor information

Role-Based Access

Access to AI tools and capabilities is determined by employee roles to ensure compliance with data security policies

Compliance Standards

All AI usage must comply with applicable regulations, including:

- **HIPAA** – Health Information Privacy
- **PII** – Personally Identifiable Information protections

Ethical Use of AI

- AI-generated outputs **must be verified** for accuracy and appropriateness prior to use in decision-making.
- AI tools **must be used with caution** when making decisions that may negatively impact individuals, such as:
 - Hiring or HR-related decisions

- Financial assistance eligibility
 - Donor engagement prioritization
- AI usage must align with organizational values and ethical guidelines.

AI Tool Usage Guidelines

- Review all AI-generated content for **bias, misinformation, or inaccuracy**.
- Volunteers must **not use AI** to generate **misleading or deceptive information**.

Oversight & Compliance

- The **IT Department**, in collaboration with **HR**, will oversee AI usage and ensure compliance.
- Failure to follow AI-related policies may result in termination.

This policy is subject to periodic review and updates to reflect changes in AI technology and regulatory requirements.

Glossary of AI Terms

- **AI (Artificial Intelligence):** Technology that simulates human intelligence to perform tasks such as learning, problem-solving, and decision-making.
- **PII (Personally Identifiable Information):** Data that can identify an individual (e.g., name, SSN, DOB, address, email, phone number).
- **HIPAA:** U.S. law protecting individuals' medical and health information.
- **Machine Learning (ML):** A subset of AI enabling systems to improve performance based on data.
- **Generative AI:** AI that creates new content (e.g., text, images, code) based on training data.
- **Bias in AI:** Unfair discrimination in AI outputs, often due to biased data.
- **Automation:** Use of AI to perform tasks without human intervention.
- **Ethical AI:** AI developed and used in alignment with ethical and societal values.
- **Compliance Framework:** Guidelines ensuring AI usage meets regulatory and ethical standards.
- **RBAC (Role-Based Access Control):** Security model that limits AI tool access based on user roles.

Information Sensitivity Policy

Background

The Old Colony YMCA's information systems capture, process, and store information in many forms and using a wide variety of media. Old Colony YMCA information must be protected throughout its life cycle, from its creation to its destruction, regardless of where it resides, the form it takes, the technology used to handle it, or the purpose it serves. This policy is based on the need-to-know principle: access to certain information is determined by whether access to the information being necessary for the conduct of a person's role.

Definition of Policy

Information Sensitivity is the control of access to any information where the loss, misuse, or unauthorized access to or modification of which could adversely affect the Old Colony YMCA's interests or the conduct of Old Colony YMCA programs, or the privacy to which individuals are entitled.

Purpose

The purpose of this policy is to ensure that Old Colony YMCA information is protected in a manner commensurate with the sensitivity level of the information. This policy provides a framework for securing information from risks associated with unauthorized destruction, modification, disclosure, access, use, and removal.

Scope

- This policy applies to Old Colony YMCA data and to all user-developed data sets and systems that may access these data, regardless of the environment where the data reside or the media on which information resides.
- This policy applies to employees, volunteers, contractors, consultants, temporaries, and other workers at the Old Colony YMCA, including all personnel affiliated with third parties.

Authority and Enforcement

- The Old Colony YMCA's Information Security Officer (ISO) is responsible for the development and oversight of these policies and standards.
- The ISO works in conjunction with the H/R department, Enterprise Risk Manager, Senior Management, and others for developing, monitoring, and enforcing these policies and standards.

Information Sensitivity Levels

All Old Colony YMCA information should be rated based on the information's category and level of confidentiality.

Information Categories

- Public Information – Information that is already a matter of public record or knowledge, including business information that is not subject to special protection and may be routinely shared with anyone inside or outside of the Old Colony YMCA.
- Business Use Information – This information is for use by employees, contractors, and authorized partners during the normal course of conducting Old Colony YMCA business.
- Confidential Information – Information whose disclosure may harm the Old Colony YMCA. The confidentiality level of the information is classified as follows:
 - Low: The Unauthorized Disclosure of information could be expected to have a limited adverse effect on organizational operations,

- organizational assets, or individuals.
- Moderate: The Unauthorized Disclosure of information could be expected to have a serious adverse effect on organizational operations, organizational assets, or individuals.
- High: The Unauthorized Disclosure of information could be expected to have a severe or catastrophic adverse effect on organizational operations, organizational assets, or individuals. This information includes, but is not limited to, information restricted by MA 201 CMR or HIPAA.

Policy General Controls

- Old Colony YMCA departments are responsible for identifying and classifying Old Colony YMCA information used and stored in their respective areas.
- All Old Colony YMCA employees, volunteers, contractors, consultants, temporaries, and other workers at the Old Colony YMCA, including all personnel affiliated with third parties, have a responsibility to protect the confidentiality, integrity, and availability of the Old Colony YMCA's information.
- The ISO, working in conjunction with Senior Management, is responsible for implementing appropriate administrative, physical, and technical controls for access to, use of, transmission of, and disposal of Old Colony YMCA information in compliance with this policy.
- Nothing in this policy is intended to restrict the right of departments to require policies and/or procedures in addition to the ones identified in this document.

Controls for Public Information

- Public Information has no existing local, national, or international legal restrictions on access or usage.
- By way of illustration only, some examples of public Information include:
 - *Publicly posted press releases.*
 - *Information published on the Old Colony YMCA website.*
- Public Information, while subject to Old Colony YMCA disclosure rules, is available to all employees, volunteers, contractors, consultants, temporaries, and other workers at the Old Colony YMCA, including all personnel affiliated with third parties and to all individuals and entities external to the Old Colony YMCA.

Controls for Business Use Information

- Business Use Information must be guarded due to proprietary, ethical, or privacy considerations, and must be protected from unauthorized access, modification, transmission, storage, or other use.
- By way of illustration only, some examples of Business Use Information include:
 - *Old Colony YMCA organization charts.*
 - *Information published on the Old Colony YMCA internal servers.*
 - *Class and program rosters, assuming no Personally Identifiable Information is shown.*

- Business Use Information is restricted to members of the Old Colony YMCA community who have a legitimate purpose for accessing such information.
- Business Use Information must be protected to prevent loss, theft, unauthorized access, and/or Unauthorized Disclosure.
- Business Use Information must not be posted on any public website or used in any AI tool.
- A "best effort" must be made to dispose of Business Use Information in a way that will render it unusable by a third party when it is no longer needed.

Controls for Confidential Information

- Confidential Information may be disclosed to individuals on a need-to-know basis only. By way of illustration only, some examples of Confidential Information include:
 - *Personally Identifiable Information.*
 - *Trade secrets*
 - *Old Colony YMCA financial records.*
- When stored in an electronic format, Personally Identifiable Information must be protected with strong passwords and stored on servers that have protection and encryption measures to protect against loss, theft, unauthorized access, and Unauthorized Disclosure.
- Confidential Information must not be disclosed to parties without explicit management authorization.
- Confidential Information must be stored only in a locked drawer or room or an area where access is controlled by a guard, cipher lock, and/or card reader, or that otherwise has sufficient physical access control measures to afford adequate protection and prevent unauthorized access by members of the public, visitors, or other persons without a need-to-know.
- When sent via fax, Confidential Information must be sent only to a previously established and used address or one that has been verified as using a secure location.
- Confidential Information must not be posted on any public website or used in any AI tool.
- Confidential Information must be destroyed when no longer needed, subject to the Old Colony YMCA's Media Sanitization Policy. Destruction may be accomplished by:
 - "Hard Copy" materials must be destroyed by shredding or another process that destroys the information beyond either recognition or reconstruction. After destruction, materials may be disposed of with normal waste.
 - Electronic storage media shall be sanitized appropriately by overwriting or degaussing before disposal in accordance with the Old Colony YMCA's Media Sanitization Policy.
 - Disposal of electronic equipment must be performed in accordance with the Old Colony YMCA's Media Sanitization Policy.
- The ISO must be notified immediately if information classified as confidential Information is lost, disclosed to unauthorized parties, or

suspected of being lost or disclosed to unauthorized parties, or if any unauthorized use of the Old Colony YMCA's information systems has taken place or is suspected of taking place.

Compliance

- Audits will be performed on a regular basis by authorized organizations within the Old Colony YMCA.
- The internal audit group or the ISO, in accordance with the Audit Policy, will manage audits.
- The ISO will filter findings not related to a specific operational group and then present the findings to the appropriate support staff for remediation or justification.

Enforcement

- Any volunteer found to have violated this policy may be subject to termination.
- Any volunteer aware of any violation of this policy is required to report it to their supervisor or other authorized representative.

Definition of Terms

Personally Identifiable Information (PII)

The first initial/first name and last name of an individual plus one or more of the following:

- Social Security number
- driver's license number
- state identification number
- checking/savings account number
- date of birth
- mother's maiden name
- credit/debit card number
- passport number
- insurance policy number
- medical information
- health insurance information
- birthplace
- address
- phone Number
- email address

Sensitive Information or Sensitive Personal Data

Business Use Information and Confidential Information, as those terms are defined in this policy.

Unauthorized Disclosure

The reasonable belief that an unauthorized person acquired or has had access to Sensitive Information compromises the security, confidentiality, or integrity of the information.

No Solicitation/Distribution of Literature

Old Colony Y has established the following rules applicable to all employees and nonemployees that govern solicitation, distribution of written material, and access to company property:

- Nonemployees are not permitted to solicit or to distribute written material for any purpose on company property.
- Off-duty volunteers are not permitted in volunteer areas.

Strict compliance with these rules is required.

Limited Exception for YMCA Support:

The above restrictions apply to solicitations on behalf of organizations with the limited exception of charitable campaigns in support of the YMCA or the United Way. Any other exceptions must be with the approval of the Chief Operating Officer.

Reporting and Anti-Retaliation Policy

We Encourage a Speak Up Culture

Choosing to speak up about work-related concerns helps build a healthy, ethical, and compliant company and is part of our culture. To promote that culture, OCY encourages volunteers to speak up and raise questions and concerns promptly about any situation that may violate our policies or procedures; the laws, rules and regulations that govern our business operations; and best practices in accounting, auditing, and financial reporting matters (collectively, these are referred to in this policy as our “Code”).

For purposes of this policy, and because our “Code” captures standards of ethics and compliance at a broad level, references to our “Code” should also be read to encompass all of our obligations to perform our jobs in a manner that is consistent with OCY’s policies and procedures, as well as applicable laws. Our people are our most valuable asset. It benefits all of us if we raise our concerns so OCY may consider them carefully and address them properly.

Old Colony Y is deeply committed to promoting a culture of ethical business conduct and compliance with:

- Our policies and procedures;
- The laws, rules, and regulations that govern our business operations; and
- Best practices in accounting, auditing, and financial reporting matters.

We expect all our employees, volunteers, officers, directors, and agents to follow this commitment in all aspects of their work.

Raise Good-Faith Questions and Concerns About Conduct That May Violate Our Code

Consistent with our commitment to ethics, compliance, and the law, we welcome your good-faith questions and concerns about any conduct you believe may violate our Code.

We promote an environment that fosters good-faith communications when performing job duties and responsibilities for OCY. This includes conduct by employees, managers, supervisors, and third parties involved in OCY's business operations, including, for example, volunteers, contractors, suppliers, consultants, or clients.

OCY Does Not Tolerate Retaliation

Coming forward with questions or concerns may sometimes feel like a difficult decision, but we are committed to fostering an environment that does not deter individuals from speaking up when they observe conduct that may violate our Code. For that reason, OCY will not tolerate retaliation of any kind because a volunteer in good faith raises a question or concern about a violation or suspected violation of our Code, or because the volunteer participates in or cooperates with an investigation of such concerns.

Retaliation is any conduct that would reasonably dissuade a volunteer from raising, reporting or communicating about good faith concerns through our internal reporting channels or with any governmental authority, or from participating in or cooperating with an investigation or legal proceeding raising such concerns.

Retaliation may occur through conduct or written communication and may take many forms, including actual or implied threats, verbal or nonverbal behaviors, changes to the terms or conditions of volunteering, coercion, bullying, intimidation, or deliberate exclusionary behaviors.

How to Raise Questions and Concerns

Employees or volunteers can submit their good-faith questions or concerns about conduct they believe may violate our Code to:

- Their supervisor or manager;
- Human Resources;
- Our anonymous and confidential Ethics Hotline;
<https://www.oldcolonyymca.org/ethics-point> or 1-888-559-8613

When a volunteer raises a concern, OCY will fully maintain confidentiality to the fullest extent, consistent with applicable legal requirements and the need to conduct an adequate investigation or review.

When raising concerns, we ask that volunteers provide as much detailed information as possible, including the background and history of the concern,

names, dates, places, and the reasons why the situation is cause for concern. This is especially important for concerns raised anonymously, so that OCY may conduct an appropriate review and, if necessary, begin an investigation.

What We Will Do

Old Colony Y is committed to reviewing all reported concerns; conducting proper, fair, and thorough investigations tailored to the circumstances; and taking appropriate remedial and concluding steps as warranted. All action taken by OCY in response to a concern will necessarily depend on the nature and severity of the concern. This may include initial inquiries and fact-gathering to decide whether an investigation is appropriate and, if so, the form and scope of the investigation. Note that an investigation into concerns raised is not an indication that they have either been confirmed or rejected. OCY complies with the law in conducting investigations. OCY also expects volunteers to provide truthful information when participating in an investigation and, during the investigation, to keep matters related to the investigation confidential.

Remember, all good-faith concerns and reports raised under this policy will be taken seriously.

Adherence to This Policy

Volunteers who believe that they have been subjected to any conduct that violates this policy may register a complaint using the procedures outlined above. Any employee who unlawfully discriminates or retaliates against a volunteer as a result of their protected actions as described in this policy may be subject to termination.

Please note as well that OCY does not prohibit anyone from electing to report concerns to make lawful disclosures to provide documents or other information to, or communicate with the EEOC, the National Labor Relations Board (NLRB or Board), the SEC, or any other federal, state or local agency about conduct believed to violate laws or regulations. OCY also does not prohibit volunteers from participating in investigations or proceedings conducted by one of these authorities.

Whistleblowers Policy

All Old Colony Y volunteers are encouraged to report either orally or in writing to their immediate supervisor, or an alternate line of authority, all evidence of activity by an Old Colony Y employee that may constitute:

- Corporate Fraud
- A violation of State or Federal law
- Unethical Business Conduct or Policy Violation, or
- Substantial and specific danger to an employee's or public's health and safety
- Reporting suspicions of child abuse or neglect (51A) on a child and or staff member

Any Old Colony Y volunteer who in good faith reports such incidents as described above will be protected from threats of retaliation, discharge, or other types of discrimination that are directly related to the disclosure of such reports. In addition, no volunteer may be adversely affected because the volunteer refused to carry out a directive which, in fact, constitutes corporate fraud or is a violation of State or Federal Law.

Any volunteer who wants to report evidence of alleged improper activity as described should contact their staff liaison, or that supervisor's manager. In situations where the volunteer is not satisfied with the supervisor or manager's response or is uncomfortable for any reason addressing such concerns to their supervisor or the manager of such supervisor, the volunteer may contact the following designated Corporate Staff.

If the volunteer is uncomfortable for any reason contacting those individuals, the volunteer may go to the EthicsPoint section of the Old Colony Y website at www.oldcolonymca.org to report the situation. For matters involving financial fraud in particular, if the volunteer is uncomfortable contacting Corporate Staff, they may contact either the Chair of the Audit Committee of the Board of Directors (see below) or go to the EthicsPoint section of the OCY website. Volunteers are encouraged to provide as much specific information as possible, including names, dates, places, and events that took place, and the volunteer's perception of why the incident(s) may be a violation. Anonymous written or telephone communications will be accepted. Volunteers who choose to identify themselves will typically receive a reply to their report within five business days or as soon as practicable thereafter.

OLD COLONY Y CORPORATE STAFF

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Conclusion

We are delighted that you have chosen to volunteer your time with us. We understand that your time is precious and we are honored that you are willing to spend some of it with us. We ask that you read this Handbook carefully and refer to it whenever questions arise. However, please don't hesitate to ask your staff liaison and other staff members questions. We believe you will enjoy your volunteer work and find the YMCA a great place to volunteer.

*****Nothing in this handbook creates a contractual relationship between you and the YMCA, nor does it change your "At-Will" status as a YMCA volunteer.***