



## Camp Fire River Bend Youth Protection Policies

### Appropriate and Inappropriate Physical Contact

Camp Fire’s physical contact policy promotes a positive, nurturing environment while protecting youth participants, employees, and volunteers. Any inappropriate physical contact with youth participants by employees or volunteers will result in disciplinary action, up to and including termination of employment or dismissal from participation in Camp Fire activities. Appropriate and inappropriate physical interactions include, but are not limited to, the following:

Appropriate Physical Interactions	Inappropriate Physical Interactions
<ul style="list-style-type: none"> <li>• Side Hugs</li> <li>• Shoulder-to-shoulder hugs</li> <li>• Pats on the back or shoulder</li> <li>• Handshakes</li> <li>• High fives</li> <li>• Pats on the head (when culturally acceptable)</li> <li>• Touching hands, arms, shoulders</li> <li>• Arms around shoulders</li> <li>• Holding hands (with young children in escorting situations)</li> </ul>	<ul style="list-style-type: none"> <li>• Full frontal hugs</li> <li>• Kisses</li> <li>• Showing affection in isolated areas or when one-on-one</li> <li>• Allowing youth to sit on a staff member’s lap</li> <li>• Wrestling</li> <li>• Piggyback rides</li> <li>• Tickling</li> <li>• Allowing youth to cling to a staff member’s leg</li> <li>• Any type of massage or back rub</li> <li>• Any form of affection that is unwanted by the youth or another staff member</li> <li>• Touching the bottom, chest, or genital areas of any youth or adult, outside of authorized and documented personal care assistance or medical treatment provided by the Camp Health Officer</li> </ul>

- Never touch a youth participant without their consent, except in the case of extreme physical danger.
- Set limits with children who “cling” or hang on you.
- Do not share a bed or sleeping bag with a youth participant OR other staff members.

- Youth participants must sleep in their own beds and not with other youth participants.
- Staff should use discretion when changing their own clothes in front of youth, and should respect the privacy of the youth when they are changing their clothes.
- Younger participants should be encouraged to change on their own as much as possible.
- Staff members and campers may not visit cabins or living areas for the opposite gender at any time, unless specifically authorized to do so by the Directors or Head Counselors.

### **Appropriate and Inappropriate Verbal Interactions**

Employees and volunteers are prohibited from speaking to youth in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Employees and volunteers must never initiate sexually-oriented conversations with youth. Employees and volunteers are prohibited from discussing their own sexual activities with youth participants in Camp Fire programs.

If at any time a conversation comes up between a staff member and a youth participant that makes the staff member uncomfortable or puts them in a compromising position, the staff member has the option of moving the conversation to a safe location that is out of earshot of others, but still public, or discontinuing the conversation if it is not appropriate for discussion at camp and the child’s welfare is not at risk. Share any concerns with the Directors.

Appropriate and inappropriate verbal interactions include, but are not limited to, the following:

<b>Appropriate Verbal Interactions</b>	<b>Inappropriate Verbal Interactions</b>
<ul style="list-style-type: none"> <li>• Friendly conversation - like you might have with the younger sibling of a friend</li> <li>• Discussion about campers’ likes, dislikes, and needs</li> <li>• Positive reinforcement</li> <li>• Age-appropriate jokes</li> <li>• Encouragement</li> <li>• Praise</li> <li>• Strength-based conversations</li> <li>• Thrive {ology} language (growth mindset, goal setting, reflection, sparks)</li> </ul>	<ul style="list-style-type: none"> <li>• Name-calling</li> <li>• Discussing sexual encounters, sexuality, dating, birth control, safe sex, or any other topic related to sex</li> <li>• Involving youth in the personal problems or issues of staff</li> <li>• Secret-keeping</li> <li>• Cursing</li> <li>• Off-color or sexual jokes</li> <li>• Shaming or belittling</li> <li>• Oversharing personal history</li> <li>• Derogatory remarks</li> <li>• Harsh language, such as that which would frighten, threaten, or humiliate others</li> </ul>

	<ul style="list-style-type: none"> <li>● Compliments relating to physique or body development</li> <li>● Discussing drinking, smoking, or drugs</li> <li>● Any form of bullying, harassment, or intimidation</li> <li>● Comments, teasing, tricks, or practical jokes that are embarrassing or abusive in any manner</li> </ul>
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- Maintain the confidentiality of all youth, staff, and volunteers involved in our camp program.
- Listen to your campers.
- Be respectful and make eye contact when they talk to you.
- Do not interrupt campers or brush them off when they talk to you.
- Show respect for others by using their names (or preferred nicknames) when speaking to them.
  - Make an effort to learn your campers' names on the **first day** they arrive at camp.
  - Do not refer to youth as “buddy” or “kiddo” or “hey you” – **use their names!**
  - Do not give youth your own nicknames. Use the name they prefer.
- Remember that every participant has a different background, beliefs, and abilities, and we should always be respectful of those differences.
  - Do not question or criticize other people’s beliefs, opinions, customs, or traditions, even if you do not agree with them.
  - Always be aware of the developmental abilities of the youth you are working with, and adjust your behavior and language to fit.
- Be careful to use respectful, appropriate language when speaking to AND about youth and other staff members.
  - Staff are not permitted to use obscenities, profanity, or vulgar language at camp, or when speaking to or about youth, their families, or other staff members.
  - Do not make comments that are derogatory with regard to an individual’s race, gender identity, religion, sexual orientation, disability, or any other status or characteristic.
  - Do not make sexually explicit or suggestive comments in the presence of youth OR around other staff members.
- Do not discuss topics that are socially sensitive or potentially offensive. These are conversations that they should have with their parents; not with our staff!
  - Drinking, smoking, drugs.
  - Sexuality, dating, birth control, safe sex.
  - Religion.
  - Tattoos, body piercings.
  - Your personal life or what you do on your time off.

## Appropriate Interactions Between Youth

Most serious incidents of youth-to-youth abuse are preceded by more subtle incidents such as name-calling, taunting, or roughhousing. Intervening in these in interactions early and establishing and communicating standards of conduct can keep the program environment safe. Camp Fire recognizes that the following interactions are high risk and as such are prohibited:

- Hazing
- Bullying
- Derogatory language
- Name-calling
- Games of Truth or Dare
- Singling out children for different treatment
- Ridicule or humiliation

Camp Fire has zero tolerance for abuse, mistreatment, or sexual activity among youth participants in our programs. Camp Fire is committed to providing all youth participants with a safe environment, and will not tolerate the mistreatment or abuse of one participant by another. Conduct by youth participants that rises to the level of abuse, mistreatment, or sexual activity will result in intervention and/or disciplinary action, up to and including dismissal from the program.

Camp Fire further has zero tolerance for behavior that is classified under the definition of bullying and will take the necessary steps to eliminate such behavior. Bullying is aggressive behavior that is intentional, repeated over time, and involves an imbalance of power or strength. Bullying can take various forms, including:

1. Physical bullying (hitting, punching, pushing, kicking, pinching, or restraining another individual)
2. Verbal bullying (belittling, name-calling, derogatory language)
3. Non-verbal or relational bullying (manipulation of a relationship to harm another person, such as social exclusion, friendship manipulation, gossip, intimidation through physical gestures)
4. Cyberbullying (an intentional and overt act of aggression toward another person by way of any technological tool such as email, instant messaging, text messages, digital images or videos, or website postings). Cyberbullying can include:
  - a. Sending mean, vulgar, or threatening messages or images.
  - b. Posting sensitive, private information about another person.
  - c. Pretending to be someone else in order to make that person look bad.
  - d. Intentionally excluding someone from an online group.
  - e. Hazing – any activity expected of someone in order to join or participate in a group that humiliates, degrades, abuses, or endangers that person, regardless of their willingness to participate.

- f. Sexualized bullying (sexting, exposures of private parts, sexualized language, or innuendo).

**Anyone who sees an act of bullying and encourages it or does not intervene to stop it, is also engaging in bullying.** This applies to all youth, staff, and volunteers.

## **Responding to Inappropriate Interactions Among Youth**

Youth-to-youth sexual behaviors can include inappropriate touching, exposing body parts, using sexualized language, making threats of sexual activity, engaging in sexual activity, and similar types of interactions.

If staff witness youth-to-youth sexual behaviors that are contrary to the defined behavioral expectations of Camp Fire, they should follow these guidelines:

- If you observe sexual activity between youth, you should safely separate them as soon as possible.
- Calmly explain that such interactions are not permitted at Camp Fire or Camp Fire-sponsored events.
- Notify your supervisor (either the Head Counselors, Directors, or CEO).
- A member of the leadership team will contact parents / guardians of the youth involved.
- Follow your supervisor's instructions regarding communications with parent / guardians / appropriate authorities.
- Complete an incident report form, including a statement of what you observed and how you responded.
- Do not attempt to determine if the behavior was "sexual curiosity." There is no standard definition for this term. An external agency, such as law enforcement or child protective services, will investigate and determine whether further actions need to be taken.
- Additional action may be required, up to or including the dismissal of one or both youth from the program.
- Identify how youth will be managed or supported to prevent further occurrences of sexual activity (e.g., safety or behavior plans including additional supervision requirements).

In the event that a supervisor or administrator receives a report of a youth's sexualized behavior or youth-to-youth sexual activity, they are to follow these guidelines:

- Meet with staff who reported the sexual activity to gather additional information.
- Confirm that the youth involved have been separated and/or placed under increased supervision.
- Notify the parents / guardians of all youth involved.
- Notify the proper authorities
  - Contact the camp licensing consultant for a situation which occurred at camp. The consultant's name is Jarrah Buch and she can be reached at **269-615-6200**.

- Contact Michigan Child Protective Services for a situation that did not occur at camp or during camp programming. **The hotline is 855-444-3911.**
- Alert the Camp Fire River Bend Board Chair of the situation.
- Review the incident report to confirm it is accurately and thoroughly completed.
- Meet with parents / guardians of youth involved.
- Review the immediate steps taken by the staff member who initially responded.
- Determine what additional actions should be taken to ensure there is not a recurrence.
- In some cases, youth behavior can be managed through a safety or behavior management plan.
- Develop a written corrective action or follow-up plan in response to the incident.

Based on the information gathered, the following may be required:

- Assess the suitability of the program for the youth involved.
- Review the need for additional youth or program supervision.
- Review the need for revised policies or procedures.
- Review the need for additional employee or volunteer training.
- Review the need for additional youth education.
- Alert others in the organization (e.g., file a report with Camp Fire National HQ) within 24 hours of the incident.

### **One-on-One Interactions / Rule of Threes**

Most abuse occurs when an adult is alone with a child. Camp Fire aims to reduce or eliminate these situations by following **The Rule of Threes**. To minimize the risk of inappropriate conduct or compromising situations, staff should not be alone, one-on-one, with youth participants. Staff should make sure there are at least three individuals present at all times - either two staff members with a camper, or multiple campers with a staff member.

One-on-one interactions may sometimes be unavoidable. The purpose of this policy is to ensure that staff clearly understand expectations for appropriate behavior when one-on-one interactions may occur. In those situations where one-on-one interactions are necessary, staff should observe the following guidelines to limit the risk of abuse or allegations of abuse:

- Meet youth in a public place where you are in full view of others.
- Avoid physical affection during one-on-one interactions. If unavoidable, ensure that all physical and verbal interactions align with the established policies for appropriate behavior, and are limited to the task at hand.
- If meeting in a room or an office, leave the door open or move to an area that can be easily observed by others passing by.
- Inform other staff that you are alone with a youth, and request that they drop in or pass by to observe the interaction.

- To the extent possible, ensure that one-on-one interactions occurring behind closed doors are scheduled in advance and communicated with a supervisor.
- Ensure that all one-on-one interactions are documented, especially if behind closed doors. Keep written records of these interactions (such as an incident report or case notes).
- Document and immediately report any unusual incidents, including disclosures of abuse, maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted.

### **Staff Interactions with Youth and Families Outside of Camp Fire Programs**

Research shows that many cases of abuse occur off-site and outside of regularly scheduled activities. Allowing contact with youth outside of regularly scheduled Camp Fire programs may put staff, volunteers, and our organization at increased risk. This policy is intended to minimize the risk of abuse or allegations of abuse arising from contact outside of Camp Fire’s regularly scheduled programs.

Examples of contact outside of regularly schedule program activities include:

- Babysitting arrangements
- Tutoring, private lessons, or coaching
- Mentorship
- Social interactions such as playdates, parties, trips, or vacations
- Rides to / from organized extracurricular activities
- Continued contact with a youth or their family once their participation in a Camp Fire program has concluded

Camp Fire strongly discourages staff from outside contact with youth participants and their families, except when the staff member has a relationship with the youth participant established prior to their employment at Camp Tannadoonah (e.g., a relative, neighbor, or attended camp together in the past), and has verified that relationship with a Director.

If outside interactions with youth and their families do occur, Camp Fire requires that the following guidelines be observed:

- The staff member must notify a Director in writing about any outside interactions with youth and their families.
- The youth’s parents or guardians must notify a Director to indicate that they are aware of, and approve of, the outside contact. The parent or guardian must understand that the contact is not affiliated with Camp Fire, and does not represent the staff member’s professional role within the organization.
- Only the parents or guardians may initiate sustained contact or communication with staff outside of Camp Fire programming.

## Technology, Social Media, and Electronic Communication

- Staff members are prohibited from sending text messages to youth participants and/or replying to text messages from a youth participant. If a youth attempts to communicate with a staff member via text (or any other form of private or direct messaging), they must notify a Director immediately.
- All email communications with youth participants must be directed to their parents or guardians, or their parent or guardian must be copied on all such communications.
- Staff are prohibited from all other forms of electronic communication with youth participants, such as instant messaging or direct messaging through social media or gaming platforms.
- Any harassment, illegal online activities, or other unethical use of the internet access may be grounds for disciplinary action up to and including dismissal from employment or participation in any Camp Fire programs and activities.
- All staff will use discretion when using cameras, video cameras, and other recording equipment. No youth photos or videos may be used for any purpose without permission from one of the Directors.
- Staff are **absolutely prohibited** from posting camper photos or videos on their personal social media (including on Facebook, Twitter, Instagram, Snapchat, or ANY other online sites).
- Personal computer, laptop, or tablet use is not permitted when campers are in camp. Seasonal staff will NOT have access to Camp WiFi.
- Staff members **may not be friends with campers or youth participants on any social media platforms, before, during, or after camp ends**, unless the staff member has a relationship with the camper established prior to their employment at Camp Tannadoonah (e.g., a relative, neighbor, or attended camp together in the past), and has verified that relationship with a Director.
- Staff members must not request to be friends with, or follow, any youth participants on social media, and must decline any friend or follow requests from youth participants.
- Staff members may communicate online with youth participants only on the closed (and monitored) Facebook page set up by Camp Fire.
- We encourage all staff members to set their social media profiles to “private” so that youth participants do not have access to their personal information.
- Any harassment, illegal online activities, or other unethical use of internet access can be grounds for dismissal.
- Exceptions regarding computer use may be granted for specific activities (such as Science, CSI, Lego Robotics, etc.), if approval has been obtained from one of the Directors.
- If you need to use a camp computer in the Welcome Center, **you must get approval from one of the Directors in advance**. Staff will be permitted to use the camp computers for approved reasons, such as taking a class, checking email or the status of job or school applications, or urgent communication with family.



## Gifts, Tips, and Gratuities

Sometimes it may be difficult to refuse gifts from youth participants or their families. In many cultures, people give gifts to reflect their appreciation for people or services. In order to be respectful of youth and their families, Camp Fire 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 \$10. Staff must disclose all such gifts to one of the Directors. **Under no circumstances may staff accept money from youth or families as a tip, gift, or gratuity.**

If a youth or family member approaches a staff member with a gift that exceeds \$10 in value, the staff member should politely decline the gift and refer to this policy. The staff member may also encourage the youth or family member to speak to one of the Directors if they have any questions. Artwork or letters of appreciation given by youth or their families to staff should be shared with a Director or Supervisor.

Camp Fire strongly discourages staff from giving gifts to youth participants. However, gifts may be given under the following circumstances:

1. Staff are prohibited from giving gifts to youth except when the gift has been authorized by a Director, and is given to all youth in a group or program (e.g., all campers in the cabin or cohort).
2. Requests to give gifts must be submitted to a Director and approved **prior to being purchased.**
3. No gifts given to youth participants may exceed a value of \$5.
4. Parents or guardians must be notified about the gift item, and why youth are receiving the gift.

## Child Abuse and Neglect

Camp Fire has zero tolerance for abuse and will not tolerate the mistreatment or abuse of youth in any of its programs. Any mistreatment or abuse by an employee or volunteer will result in disciplinary action, up to and including termination of employment or dismissal from participation in Camp Fire activities.

Staff should be aware of the possibility that campers may have experienced, or are currently experiencing, some form of child abuse. Abuse may be physical, sexual, emotional, or verbal, and may involve other campers, staff, or adults outside of camp.

Common warning signs of abuse include, but are not limited to, the following: unusual or excessive bruises; violent behavior toward themselves or others; eating disorders; fear of going to bed, the bathroom, and /or shower house; low self-esteem; confiding that they have been abused; overly

sexually mature behavior or knowledge; “acting out” abuse; other abnormal or overly emotional behavior (e.g., rage, depression, flinching).

## **Mandatory Reporting**

All staff must follow state mandatory reporting requirements. Individuals who are caregivers for children in the State of Michigan are mandatory reporters and must report any suspected abuse or neglect of a youth participant – whether it occurred on or off Camp Fire property, or whether perpetrated by staff, volunteers, or others – to state authorities.

In addition to reporting to state authorities, staff are required to report any suspected or known abuse of youth directly to the program leadership, so that immediate and proper steps may be taken to ensure the safety of alleged victims and others who may be at risk. If you observe any red flags, or a camper discloses information to you, you must expand the circle of confidentiality to your immediate supervisor to protect the child.

Staff must be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. Staff will:

1. Be familiar with the symptoms of abuse and neglect, including physical, sexual, verbal, and emotional abuse.
2. Know and follow policies and procedures that protect against abuse.
3. Report suspected abuse or neglect to the appropriate authorities as required by mandated reporter laws.
4. Follow up to ensure that appropriate action has been taken.

Guidelines for staff response to incidents or allegations of abuse:

- If you witness abuse, safely interrupt the behavior immediately.
- If abuse is disclosed to you, reassure the individual disclosing that they were right to tell you. Do not probe for more information or ask questions. Allow them to share with you what they want to share, but do not press them for more information or details. Do not share the information with any other staff members – report it directly to a member of the leadership team and otherwise maintain the confidentiality of the youth.
- Protect the alleged victim from intimidation, retribution, or further abuse to the extent possible.
- If the camper is injured, contact the appropriate authorities for medical treatment.
- Immediately report the allegation or incident to a member of the leadership team, who will help you make a report to the proper authorities.
- Complete an incident report, documenting the incident, disclosure, or any circumstances causing your suspicion of abuse. State only the facts.
- It is not your job to investigate the incident, but it is your job to report the incident as soon as possible.

- Check back with the camp leadership team to make sure that the appropriate steps were taken. If not, report again to leadership, or contact the designated authorities directly.

Staff will read and sign the code of conduct, documenting their understanding of the legal and ethical duty to report suspected mistreatment or abuse.

Supervisors and Administrators who have received a report of suspected abuse or neglect should follow these guidelines:

- First, determine if the youth is still in danger, and if so, take immediate steps to prevent further harm.
- If you have received a report from a staff member or volunteer, verify that the mandated reported rules have been followed, and the proper authorities have been notified. If not, help the staff member make that call. Make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency.
- Ensure that the parents/guardians of the youth(s) involved are notified (if appropriate).
- Complete an incident report.
- Make contact with appropriate individuals:
  - Child Protective Services
  - Michigan LARA (licensing) within 24 hours of the initial incident.
  - Camp Fire National HQ.
  - Camp Fire River Bend Board Chair.
- Gather as much information about the allegation as you can. For example, who made the report, who was allegedly abused, who was the alleged abuser, what was the nature of the alleged abuse, where and when did the alleged abuse occur, etc.
- Accurately record everything you learn, in as much detail as you can. Remember that your notes will be read by others. Stick to the facts.
- If the alleged abuse involves a staff member, suspend the accused staff member until the investigation has been completed.
- Deploy the communication plan for crisis situations.
- Provide resources for victims, families, and other stakeholders.

### **Reporting Procedures:**

1. The staff member who reported the suspected abuse or neglect will be asked to complete a written report within 24 hours.
2. A Director shall make a report to Camp Licensing within 24 hours if the suspected abuse or neglect occurred at camp.
3. A report shall be made to the Michigan Department of Health and Human Services (DHHS) within 24 hours. The report shall contain the name of the camper and a description of the abuse or neglect, the names and addresses of the camper's parents or guardians, and any

other information which might establish the cause of abuse or neglect and the manner in which it occurred.

4. Reporting is handled as follows:
  - Contact the camp licensing consultant for a situation which occurred at camp. The consultant's name is Jarrah Buch and she can be reached at **269-615-6200**.
  - Contact Michigan Child Protective Services for a situation that did not occur at camp. **The hotline is 855-444-3911.**
  - Notify Camp Fire National Headquarters and the Camp Fire River Bend Board Chair if the incident involves a current or past staff member or volunteer.

### **Investigations by Authorities**

Camp Fire River Bend takes every allegation of abuse or misconduct seriously, and will fully cooperate with the authorities to investigate all cases of alleged abuse or misconduct. Staff shall cooperate with any external investigation by outside authorities or internal investigation conducted by Camp Fire or persons given investigative authority by the organization.

Cooperation with investigations includes, but is not limited to:

- Promptly acknowledging and responding to requests for information.
- Making oneself available for meetings with investigating officials.
- Providing full, accurate, and truthful information.
- Keeping confidential information learned or transmitted during the investigation, unless directed otherwise by legal authorities.
- Preserving relevant information and documents.

A staff member's failure to cooperate with an investigation will result in disciplinary action, up to and including termination of employment or dismissal from participation in Camp Fire programs.

### **Reporting Red-Flag or Inappropriate Behaviors and/or Policy Violations**

Camp Fire has zero tolerance for abuse. It is imperative that every staff member actively participates in the protection of our youth participants. In the event that a member of the staff observes red-flag or inappropriate behaviors and/or policy violations by other members of the staff, it is their professional and personal responsibility to immediately report their observations to Camp Fire leadership.

The following are examples of red-flag or inappropriate behaviors that all staff members are required to report:

- Any violation of Camp Fire's abuse prevention policies.
- Seeking private or one-on-one time with youth.

- Spending time with youth outside of scheduled Camp Fire programs.
- Buying gifts for individual youth.
- Sending unauthorized electronic communications through text messaging, social media, online gaming platforms, etc. in violation of the electronic communication policy.
- Making suggestive or sexualized comments towards youth or other staff.
- Showing favoritism towards a youth participant.
- Youth disclosing that a staff member makes them feel uncomfortable.

If staff members witness suspicious or inappropriate behaviors or policy violations by another staff member, they should follow these guidelines:

- Immediately interrupt the behavior.
- Report the behavior to camp leadership (head counselor, Directors, or CEO).
- If the report is about a supervisor or member of the leadership team, contact the Camp Fire River Bend Board Chair, whose contact information will be posted in the Welcome Center and the Staff Lounge.
- Complete an incident report. It is your job to report the incident, not to conduct an investigation.
- Follow up to ensure that appropriate action has been taken. If it has not, continue to report the incident up the chain of command.

In the event that a supervisor or administrator receives a report of suspicious or inappropriate behaviors or policy violations, they should follow these guidelines:

- Report it to the next level supervisor or administrator, following the chain of command.
- Review the file of the staff member to determine if any other complaints have been reported.
- Speak with the staff member who has been reported.
- Document the report in an official incident report.
- If at any point in gathering information, a concern about potential abuse arises, contact the state authorities and file the appropriate report.
- Advise the person who reported the behavior that their report is being taken seriously.
- Determine the appropriate response based on the report. Take into consideration:
  - Context of the behavior or violation.
  - Severity of the behavior or violation.
  - History of red flag or inappropriate behaviors or policy violations.
  - Trainability of the staff member.
- If appropriate, notify parents/guardians of youth involved.
- Based on the information gathered, the following may be necessary:
  - Increased monitoring or supervision of the staff member and/or program.

- If policy violations involving youth are confirmed, the staff member will be subject to disciplinary action, up to and including termination and referral to law enforcement. Disciplinary action must follow the disciplinary process outlined in the staff handbook.
- If more information is needed, interview other staff members or youth.

After the internal review of the report, determine if system changes are necessary, such as:

- Review the need for increased supervision.
- Review the need for revised policies or procedures.
- Review the need for additional training.