INCIDENT MANAGEMENT
POLICY & PROCEDURES

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POLICY

Boys & Girls Club of Chaves & Lincoln Counties (BGCCLC) is committed to providing a safe environment for members, staff, volunteers, and visitors. Clear reporting policies and procedures are essential to identifying, responding to, documenting, and investigating incidents that may affect the health, safety, or well-being of any individual involved in Club operations.

All employees, volunteers, and contractors are required to immediately report and document any safety incident, allegation, concern, or situation that may impact the safety, security, or welfare of members, staff, volunteers, or visitors. Failure to report a known incident may result in disciplinary action, up to and including termination of employment or volunteer service.

GENERAL INCIDENT DESCRIPTION

Safety incidents can include but are not limited to:

- Inappropriate activity between adults (18 and over) and youth;
- Inappropriate activity between multiple youth;
- Allegations or suspicions of abuse;
- Bullying; harassment, hazing, or intimidation.
- Inappropriate electronic communications between adults (18 or over) and youth;
- Threats communicated in person, electronically, or through social media;
- Minor and major medical emergencies;
- Mental health crises;
- Accidents, including slips and falls;
- Threats made by or against staff, volunteers and/or members;
- Physical assaults and injuries, including fights;
- Missing children;
- Criminal activity, including theft, ~~and~~ robbery~~; and~~ vandalism, or possession of illegal substances;
- Vehicle accidents involving Club-owned, leased, rented, or personal vehicles used for Club business;
- Incidents occurring during transportation to or from Club activities;
- Facility damage, security breaches, or emergency evacuations; and
- Other incidents as deemed appropriate by Club leadership.

Safety incidents include those that occur during Club programs, on Club property, during transportation, at school-based sites, during virtual programming, and during any Club-sponsored activity or event.

INTERNAL INCIDENT REPORTING

Any employee, volunteer, contractor, or program participant who becomes aware of an incident, allegation, safety concern, or policy violation covered by this policy shall immediately notify Club leadership.

Employees and volunteers are required to verbally report all incidents to their Program Director as soon as possible. If the Program Director is unavailable, the incident shall be reported to the CEO or the CEO's designee.

An Incident/Accident Report must be completed by the employee or volunteer who witnessed, responded to, or was first made aware of the incident. Reports should be completed before the end of the employee's scheduled shift whenever possible and no later than 24 hours after the incident occurred or was discovered.

Upon receiving notification of an incident, Club leadership shall review the report, ensure all necessary information has been documented, conduct any required follow-up, and complete the Follow-Up Incident/Accident Report.

Any incident involving allegations of abuse, neglect, criminal activity, missing children, major medical emergencies, threats of violence, law enforcement involvement, licensing concerns, or any situation that presents an immediate risk to the health or safety of members, staff, volunteers, or visitors must be reported to the CEO immediately by phone or in person, regardless of the time of day.

All incident reports and related documentation shall be treated as confidential and shared only with individuals who have a legitimate business, legal, licensing, or safety-related need to know.

Failure to report a known incident or intentionally providing false or misleading information during the reporting process may result in disciplinary action, up to and including termination of employment or volunteer service.

EXTERNAL INCIDENT REPORTING

Boys & Girls Club of Chaves & Lincoln Counties (BGCCLC) shall comply with all applicable federal, state, and local laws regarding incident reporting, mandated reporting, licensing requirements, and youth protection.

Any employee, volunteer, or contractor who becomes aware of a situation that may require external reporting shall immediately notify Club leadership. The CEO, or the CEO's designee, shall be responsible for ensuring all required notifications and reports are completed in a timely manner.

BGCCLC follows all applicable mandated reporter statutes and regulations for the protection and safety of youth. Employees, volunteers, and contractors who are mandated reporters under state law shall fulfill their legal reporting obligations immediately and shall not delay reporting while awaiting internal review or approval.

Incidents that may require external reporting include, but are not limited to:

- Allegations or suspicions of child abuse or neglect;

- Inappropriate activity between adults and youth;
- Inappropriate activity between multiple youth;
- Sexual misconduct, exploitation, or harassment;
- Any form of child pornography or child sexual abuse material;
- Missing children;
- Criminal activity, including assault, theft, robbery, or other illegal acts;
- Major medical emergencies resulting in hospitalization, permanent injury, or death;
- Threats of violence or credible safety threats;
- Licensing violations or incidents required to be reported to childcare licensing agencies; and
- Any other incident required by law, regulation, licensing requirements, or BGCA standards.

When required, reports shall be made to the appropriate agencies, including but not limited to:

- Law enforcement;
- Child Protective Services (CPS);
- New Mexico Early Childhood Education and Care Department (ECECD);
- Licensing agencies;
- Insurance carriers;
- Boys & Girls Clubs of America (BGCA); and
- Any other agency or authority having jurisdiction over the incident.

Internal investigations or reviews shall never replace, delay, or interfere with required external reporting obligations.

INCIDENT INVESTIGATION

Boys & Girls Club of Chaves & Lincoln Counties takes all incidents, allegations, and safety concerns seriously and is committed to ensuring that all reports are reviewed promptly, thoroughly, and objectively.

When an incident is reported, Club leadership shall assess the situation and determine the appropriate course of action, including any required external reporting, protective measures, or internal review.

BGCCLC will fully cooperate with law enforcement, Child Protective Services, licensing agencies, Boys & Girls Clubs of America, and any other agency conducting an authorized investigation. Internal investigations shall never replace, delay, or interfere with legally required external investigations.

Federal, state, and local laws regarding mandated reporting, child protection, criminal activity, and licensing compliance shall be followed before any internal investigation is initiated.

When appropriate, Club leadership may conduct an internal investigation to gather facts, document findings, identify policy violations, determine corrective actions, and implement measures necessary to protect members, staff, volunteers, and visitors.

During the investigation process, BGCCLC may implement temporary protective measures, including but not limited to:

- Administrative leave;
- Suspension from Club activities;
- Reassignment of duties;
- Increased supervision;
- Restriction of access to members, staff, volunteers, facilities, or programs; or
- Other actions deemed necessary to ensure the safety and well-being of all individuals

involved.

Individuals involved in an investigation are expected to cooperate fully and provide truthful and complete information. Knowingly providing false information, withholding relevant information, or interfering with an investigation may result in disciplinary action.

All investigation records, reports, statements, and related documentation shall be maintained in a confidential manner and shared only with individuals who have a legitimate business, legal, licensing, or safety-related need to know.

Upon completion of the investigation, Club leadership shall determine any necessary corrective actions, disciplinary measures, policy revisions, training requirements, or other actions needed to address the incident and reduce the likelihood of future occurrences.

EVIDENCE PRESERVATION

Boys & Girls Club of Chaves & Lincoln Counties shall take reasonable steps to preserve evidence related to any reported incident, allegation, investigation, or safety concern. Upon becoming aware of an incident that may result in an internal investigation, external investigation, legal action, licensing review, insurance claim, or BGCA report, Club leadership shall ensure that relevant evidence is preserved and protected from alteration, destruction, or unauthorized access.

Evidence may include, but is not limited to:

- Incident and accident reports;
- Witness statements;
- Photographs;
- Video surveillance footage;
- Electronic communications, including emails, text messages, and social media communications;
- Medical documentation;
- Attendance records and sign-in/sign-out sheets;
- Transportation logs;
- Personnel records;
- Licensing records; and
- Any other documents or materials related to the incident.

Employees, volunteers, contractors, and members shall not alter, destroy, conceal, or remove any evidence related to an incident or investigation. Any attempt to intentionally alter, destroy, or withhold evidence may result in disciplinary action, up to and including termination of employment or volunteer service, and may be reported to the appropriate authorities when required.

When applicable, video footage and electronic records shall be secured as soon as possible to prevent accidental deletion or loss. Club leadership shall maintain all evidence and investigation records in a confidential manner and shall only share such information with individuals who have a legitimate business, legal, licensing, insurance, or safety-related need to know.

All evidence and documentation related to an incident shall be retained in accordance with BGCA requirements, applicable laws, licensing regulations, insurance requirements, and the Club's document retention policies.

BGCA CRITICAL INCIDENT REPORTING

In addition to any reporting required by federal, state, local, licensing, or law enforcement authorities, Boys & Girls Club of Chaves & Lincoln Counties shall comply with all Boys & Girls Clubs of America (BGCA) critical incident reporting requirements.
The CEO, or the CEO's designee, shall be responsible for ensuring all required critical incidents are reported to BGCA within the required reporting timeframe. Unless otherwise required by BGCA, critical incidents shall be reported within 24 hours of the organization becoming aware of the incident.
Failure to report required critical incidents may result in funding holds, provisional status, loss of good standing, or other corrective actions by BGCA.

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

In addition to reporting the incident to BGCA, the Club shall maintain documentation of:

- The date and time the incident occurred;
- The date and time the incident was reported to BGCA;
- The individual responsible for submitting the report;
- Any external agencies notified;
- Corrective actions taken; and

- Any follow-up actions required by BGCA.

Documentation shall be maintained with the incident file in accordance with the Club's document retention policies.

PARENT/GUARDIAN NOTIFICATION

Boys & Girls Club of Chaves & Lincoln Counties recognizes the importance of timely communication with parents and guardians regarding incidents involving their children. Parents or guardians shall be notified as soon as reasonably possible following an incident affecting the health, safety, well-being, or participation of their child, but in no case later than 24 hours after the incident is discovered or reported, unless otherwise directed by law enforcement, Child Protective Services, licensing authorities, or other governmental agencies. Parent or guardian notification may be made by the Program Director, CEO, or their designee and shall be documented as part of the incident record.

Parents or guardians shall be notified immediately, or as soon as reasonably possible, in situations including but not limited to:

- Any injury requiring medical attention beyond basic first aid;
- Any major medical emergency or illness;
- Behavioral incidents resulting in suspension or removal from programming;
- Physical altercations involving their child;
- Allegations involving abuse, neglect, harassment, bullying, or threats against their child;
- Missing child incidents;
- Law enforcement involvement related to their child;
- Transportation accidents involving their child;
- Mental health crises or situations involving self-harm concerns; or
- Any other incident deemed significant by Club leadership.

For minor injuries, behavioral concerns, or incidents that do not require immediate parent contact, notification may occur at member pick-up, by telephone, email, written communication, or another method approved by Club leadership, provided notification occurs within 24 hours of the incident being discovered or reported.

When an incident involves allegations of abuse, neglect, criminal activity, or an active investigation by law enforcement, Child Protective Services, licensing authorities, or another governmental agency, parent or guardian notification may be delayed or modified when directed by the investigating agency or when otherwise required by law.

All parent or guardian notifications shall be documented, including:

- The date and time of notification;
- The method of notification;
- The individual contacted;
- The employee making the notification; and
- A summary of the information provided.

The safety and well-being of members shall remain the primary consideration when determining the timing and manner of parent or guardian notification.

CORRECTIVE ACTION AND INCIDENT REVIEW

Following the completion of an incident investigation, Boys & Girls Club of Chaves & Lincoln Counties shall review the incident to determine whether corrective action, additional training,

policy revisions, environmental changes, or other preventive measures are necessary.
Corrective actions may include, but are not limited to:

- Additional staff training;
- Member behavior interventions;
- Parent or guardian conferences;
- Policy or procedure revisions;
- Increased supervision;
- Facility or equipment modifications;
- Staff coaching, disciplinary action, or performance improvement plans; and
- Other actions deemed appropriate by Club leadership.

When appropriate, Club leadership shall review incident trends to identify recurring concerns, potential risks, and opportunities to improve member safety and program quality.
The purpose of incident review is not only to address individual incidents but also to reduce the likelihood of future occurrences and strengthen the overall safety culture of the organization.

RECORD RETENTION

Incident reports, investigation records, witness statements, parent notifications, BGCA reports, and all related documentation shall be maintained in accordance with applicable federal and state laws, licensing requirements, BGCA standards, insurance requirements, and the Club's document retention policies.
All records shall be stored in a secure manner that protects confidentiality and limits access to authorized individuals with a legitimate business, legal, licensing, or safety-related need to know.