Risk Management and Youth Safety Components for Mentoring and Youth-Serving Programs

2022

This document will outline several components to program risk management. This information is to provide samples, training resources, and other examples that are intended to serve as a resource and not intended to be comprehensive. **This project was supported by Award No. 2019-JU-FX-K001 awarded by the Office of Juvenile Justice, Office of Justice Programs.** *The intended audience is OJJDP grantees, but other mentoring and youth serving programs may find this outline informative and helpful in reviewing and assessing program and organizational risk when it comes to child and youth safety components.*

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INTRO TO RISK MANAGEMENT

Risk management is a crucial part of the work of all organizations and teams, especially for mentoring and youth-serving programs.

When an organization has a plan and systems in place to manage the unexpected, this is the start of a risk management plan. These plans are primarily in place to keep program participants, especially youth, safe from harm during their time in the program.

There is a Risk Management Overview online module available on the MENTOR Talent LMS: https://mentor.talentlms.com/shared/start/ key: BGQFPJUV. This is an introductory course that explores the topic of risk management and was designed for technical assistance providers. Every form of service delivery, including mentoring, involves some risk. In the course you will learn how to gently guide mentoring program leaders through risk management frameworks and approaches.

The content includes the following topics with some highlights of the information that is covered in a few of the sections:

What Is Risk?

- Risk is a future event with the potential to significantly impact — positively or negatively — a mentoring program's ability to achieve its mission and goals.

What Is Risk Management?

- Risk management is a discipline that helps individuals and teams anticipate future events and circumstances. Risk management goals, policies, and practices support the delivery of programs and services by inspiring action in the face of risk.

Risk Management Is Not...

- making an exhaustive, written list of what-ifs,
- predicting the likelihood or potential severity of future risks, or
- assigning the role of risk management to "someone"

Who Is Responsible for Risk Management?

What Are the Risks Associated with Mentoring?

- There are upsides and downsides to risks when it comes to mentoring.
- Some upsides include:
  - The presence of supportive relationships in youth's lives, which is a transformative experience.
  - Perceived benefits that eclipse expectations.
- Some downsides include:
  - Dissatisfaction about the match, the mentor, program coordination, or supervision.
  - Inability to find and assign mentors to enrolled participants.
  - Program suffers reputation harm in the wake of allegations of physical, mental, or sexual harm or misconduct to a program participant.

Mentoring Risks

Mentor Screening Risks

- Evaluate screening questions against these criteria to determine if you're asking the right types of questions:
  - What is the risk of being a mentor?
  - Are we examining the motivations of someone interested in volunteering?
  - Do our screening questions help us use our volunteer resources effectively?

Core Competencies in Risk Management

Risk Assessment

Staffing Risks

- Developing and following protocols for attracting, vetting/screening, onboarding, supervising, and offboarding staff and volunteers to increase their chances for success.

Staff and Volunteers – Risk Management Roles

Contingency and Continuity Planning

- Contingency and continuity plans typically look at four main areas:

  - Facilities and service sites. If your primary location is unavailable, where will staff and clients go to participate in programs?
  - Program design and delivery. If facilities can't be used, how must program design and delivery change? Are programs affected if there is a disruption to the supply chain?
  - Technology. What happens if there is a breach or a system failure? What temporary solutions can be put into place if essential systems go offline? How long can your programs operate under contingency solutions?
  - Staffing. What will you do if key players are unavailable — for hours, days, weeks, or longer? Do all clients have a secondary point of contact? Are team members cross-trained and prepped to assume additional responsibilities and roles when a colleague is unavailable?

Why Should Organizations Have Contingency Plans?

Event-based Contingency Planning

Impact-based Contingency Planning

Reflect on Disruptive Events

What Is a Crisis?

- All crises have an element of surprise. Often, disruptions come as a result of a crisis, but not always! It's important to develop crisis management and crisis communication plans in addition to your continuity plans. Doing so ensures your organization can take swift action when time is of the essence.

Crisis Management and Crisis Communication

Overall, the responsibility of risk management does not stop with one person or role at an organization. There may be someone assigned to oversee and lead risk management assessments, activities, and review but all are responsible, and every team member plays a risk role. For example:

- the volunteer who lets staff know their concern about the need for new safety practices,
- the visitor who observes and shares that a door that should be locked was left propped open, and
- the staff member who gently reminds a colleague that photographing clients is not permitted.

When risk management is accepted as a shared activity, the burden of identifying, monitoring, and acting on risk is distributed among many parties. This practice is not only more comprehensive, ensuring that risks from all areas of the organization are considered, but it also keeps the discipline alive and healthy by preventing burnout from a single risk owner.

The key points explored in this course are:

1. Risks can be harmful but they can also be wonderful! Taking risks are necessary for success and survival.

2. Risk management is the discipline that helps individuals and teams anticipate future events and circumstances and understand how to meet challenges and opportunities with mission-focused action.

3. Organizations should strive to share risk management activities widely among many parties to keep the practice alive and healthy.

4. Hold staff and volunteers accountable for risk management.

5. Maximize volunteer participation utilizing screening questions to find "best fit" positions with potential volunteers.

All mentoring and youth development agencies or programs interested in building competency for risk management should focus on key areas such as:

• Risk Assessment: identifying and understanding risks.

• Staffing and Volunteer Risks: developing and following protocols, and posting transparently for attracting, vetting/screening, onboarding, supervising, and off-boarding staff and volunteers to increase their chances for success and program advancement and help with accountability, consistency, and awareness in the process.

• Contingency and Continuity Planning: ensuring the agency has backup plans and practices in the event the customary method — or assigned person — isn't practical or available due to a change in circumstance.

• Crisis Management and Crisis Communications: identifying key roles and responsibilities and developing talking points, messages, and templates before a crisis envelops your mission.

The Nonprofit Risk Management Center has a collection of worksheets and tools to help TA providers analyze risk and build their continuity planning muscles. Check out the following resources:

• Risk Bowtie Worksheet: https://www.dropbox.com/s/8agg56w913juo2b/Risk%20Bow%20Tie%20 Exercise%20with%20Blank%20Worksheet%20-%20NMRC%20TA%20Provider%20Institute.docx?dl=0

• Business Impact Analysis Worksheet: https://www.dropbox.com/s/tq4dyxiomxqmg4i/BIA%20 Worksheet%20-%20Fillable%20PDF%20-%20MASTER.pdf?dl=0

• Learning from COVID-19 Worksheet: https://www.dropbox.com/s/18499q2vo5pgp0e/Learning%20 from%20COVID-19%20-%20Fillable%20PDF%20-%20MASTER.pdf?dl=0

• Learning from Wins, Near Misses, and Failures Worksheet: https://www.dropbox.com/s/ tpaldft1g3f8f5y/Learning%20from%20Success%2C%20Failure%20and%20Near%20Misses_ Fillable%20PDF%20-%20MASTER.pdf?dl=0

• Nonprofit Risk Management Center https://nonprofitrisk.org/

• Risk Management for Mentoring Programs http://www.emt.org/userfiles/RiskManagement.pdf

PARTICIPANT SCREENING AND BACKGROUND CHECKS

Every mentor (volunteer) and mentee who participates in a program will need to be screened based on established criteria. Setting up your screening process will take time, but keeping participants safe is worth it.

Screening mentors for safety is an obvious step, but screening them for commitment and to ensure a good fit for your program is just as important. This process is known as "screening for suitability."

There are many resources around screenings available. The best place to start is the *Elements of Effective Practice for Mentoring* (fourth edition). This information is available at https://www.mentoring.org/resource/elements-of-effective-practice-for-mentoring/. Under Standard 2, Screening (https://www.mentoring.org/resource/screening/), you will find information regarding how to screen prospective mentors to determine whether they have the time, commitment, and personal qualities to be a safe and effective mentor, as well as how to screen prospective mentees, and their parents or guardians, about whether they have the time, commitment, and desire to be effectively mentored.

Within each Standard of the *Elements of Effective Practice for Mentoring* there are benchmarks and enhancements. **Benchmarks** are practices that mentoring programs must follow in order to meet the Standard. Two criteria were used to determine whether a practice should be considered a Benchmark: 1) evidence suggesting the practice is associated with effective mentoring relationships, and 2) whether the practice is designed to protect the safety of mentees across programs.

Enhancements are practices that are not required for programs to implement for the program to be in compliance with a Standard. The Enhancements are practices that do not meet the criteria described above for Benchmarks, but which were determined to be promising, innovative, and useful for mentoring programs. Recommendations from practitioners and researchers, as well as research from fields related to mentoring such as social work, clinical psychology, volunteerism, and positive youth development, were the primary sources of Enhancements.

Here are some highlights of the Benchmarks and Enhancements of the Screening Standard that relate to risk management.

Benchmarks:
- **B.2.1:** Program has established criteria for accepting mentors into the program as well as criteria for disqualifying mentor applicants.

- **B.2.2:** Prospective mentors complete a written application that includes questions designed to help assess their safety and suitability for mentoring a youth.

- **B.2.3:** Program conducts at least one face-to-face interview with each prospective mentor that includes questions designed to help the program assess his or her suitability for mentoring a youth.

- **B.2.4:** Program conducts a comprehensive criminal background check on prospective adult mentors, including searching a national criminal records database, along with sex offender and child abuse registries and, when relevant, driving records.

- **B.2.5:** Program conducts reference check interviews with multiple adults who know an applicant (ideally, both personal and professional references) that include questions to help assess their suitability for mentoring a youth.

- **B.2.8:*** Program has established criteria for accepting youth into the program as well as criteria that would disqualify a potential youth participant.
- **B.2.10:** Parent(s)/guardian(s) provide informed permission for their youth to participate.

*Benchmark and Enhancement practices that are marked with an asterisk represent those that are either new or were substantially changed from the Third Edition. Mentoring programs are encouraged to give equal consideration to the implementation of all of the Benchmark practices that are listed under this Standard.

Benchmark Examples:
- **B.2.1:** A list of potential Permanent Disqualifiers that would be listed in a program's criteria for disqualifying mentor applicants:
  - History of abuse of youth, sexual or otherwise
  - Conviction of any other crime in which youth were involved
  - History of extreme violence or sexually exploitative behavior
  - Termination from a paid or volunteer position caused by misconduct with a youth

- **B.2.2:** [Sample Mentor Application](#)
  - An application packet could include the following sections, forms, or information:
    - An overview of the program
    - A mentor position description
    - A formal application
    - A records check permission form
    - Disclosure and other data collection forms
- **B.2.4:** Considerations to think about when it comes to a program's criminal background check process:
  - Articulate your policies and procedures
  - Obtain written permission
  - Budget funds
  - Build in time
  - Keep copies of documents and case notes for each applicant

Enhancements:
- **E.2.1:** Program utilizes national, fingerprint-based FBI criminal background checks.
- **E.2.2:** Program conducts at least one home visit of each prospective mentor, especially when the match may be meeting in the mentor's home.
- **E.2.3:** Program conducts comprehensive criminal background checks on all adults living in the home of prospective mentors, including searches of a national criminal records database along with sex offender and child abuse registries, when the match may meet in mentors' homes.

Conducting a comprehensive criminal background check on volunteers is required because each type of check has limitations. A thorough background check reflects a quality program's risk management and due diligence to ensure the safety of its mentees and mentors.

A COMPREHENSIVE BACKGROUND CHECK INCLUDES:

- State criminal records
+ National criminal records
* Fingerprint-based FBI background check
+ Sex offender registries
+ Child abuse registries
+ Driving records (when relevant)

KEY:
- LESS RIGOROUS, NOT RECOMMENDED
+ REQUIRED BENCHMARK
* HIGHLY RECOMMENDED

Other resources around screening include:

• MENTOR Background Checks

• National Sex Offender Registry

• SAFE (Screening Applicants for Effectiveness) (by Friends for Youth: Cooper, Arévalo, and Smith)

• Child Protection Improvements Act, CPIA, Disqualifying Offenses
    - This is the Child Care and Development Block Grant, CCDBG, disqualifying offenses document but shared as a recommendation in this subject area.

• US Equal Employment Opportunity Commission
    - Page on what employers need to know about collecting background information, how to store, how to dispose of it.

• What You Need to Know about Background Screening: A reference guide for youth-serving organizations and their communities (OJJDP Reference Guide)

• Screening Online Course

ORGANIZATIONAL RISK ASSESSMENT

A risk assessment for an organization can take different shapes. Below is a list of potential areas to help a program or organization assess if they have risk management policies and procedures in place or not. If someone answers no to these questions, it doesn't mean the action or activity is not taking place, there just is not something written down for all to know and understand the expectation.

Please read through these statements and answer yes or no. If you answer no, please determine if this is applicable to your program and/or organization. If so, then you are encouraged to write a policy statement and add it to your official documentation and then include in training and communication as applicable.

1. Do you have written policies for your program?

2. Do you conduct background checks on all involved in your organization (staff, volunteers, other — answer for all levels as needed)?

3. Is your background check process written out?

4. Is the background check policy informed by any state or federal laws or statutes?

5. Is there a relevant history that informs this background check policy which should be included in your documentation?

6. Are all of the terms used in the policies clearly defined so that the policy is understood?

7. Are all audiences defined to whom the policy applies?

8. Is any group included or excluded from the policies? If so, is this information incorporated i n the policy statements?

9. When do the policies come into effect?

10. Do the policies cover a specified period of time?

11. Is there a process outlined for renewal of policy terms?

12. Are specific individuals and/or departments responsible for implementing the terms of the policies? If so, are these outlined in the policy statements?

13. Is there a process for oversight and governance?

14. Are there consequences of policy violations outlined?

In conclusion:

• Develop your program's risk management policies

 - Review the program policy statements
 - Add policies that might be incomplete or missing
 - Develop new topics and policies as needed throughout
 - Review policies with your leadership, board, and insurance on a regular basis

• Train staff on a regular basis and ensure that when any updates are made, they are communicated to staff, leadership, board, stakeholders, and other partners.

• Ensure you review the Elements of Effective Practice for Mentoring regularly.

Resources:

• Nonprofit Risk Management Center: Risk Assessment Page

STAFF STRUCTURE

Organizational structure is the framework that holds an organization together and defines the lines of authority within a company, nonprofit organization, or governmental agency. A well-defined organizational structure provides a clear path for risk assessment procedures. Before risk assessment teams or staff roles can begin to work, each member of the team must have a good working understanding of how the company is organized.

The organizational structure will show team members who is responsible for each area or operation. These areas could handle responsibilities around recruitment, outreach, messaging, screening, training, match support, and other elements of mentoring and youth service programming. Some of these roles and responsibilities may be held within a certain leadership team, or department, or depending on the size of the organization it could be within a couple people's job responsibilities. To allow for more awareness, clarity, and support it would be recommended that no one person is fully responsible for all things related to risk management elements (screening, assessments of mentors/mentees/youth/volunteers, training, etc.) but rather share these responsibilities. This will help diminish burnout of staff and/or volunteers, create more continuity of practices, and allow for greater visibility in the organization's processes.

Here are questions you can ask about your staffing structure to help assess this element.

- Does your program have a staffing structure that is appropriate for your mentoring program scale and model?
  - Is the program operating at a reasonable capacity for the amount and type of staffing in place? What is the rationale for the current level of staffing and/or allocation of staff duties? Are there plans for additional staffing or unfilled positions in the program?
  - What is the ratio of matches/staff? For working with newer matches vs. more established matches? Does it seem manageable for those who monitor matches?
  - How are staff roles divvied up? Are there bottlenecks in service delivery or unequal divisions of labor? Do staff members have dedicated functions in the program, such as recruitment or match support, or do all staff share similar responsibilities?
  - Does the staffing fit the model and allow for coverage of all the tasks necessary to implement the program effectively? Or are some tasks getting disregarded? Does the work flow appropriately, or are there bottlenecks? Ask staff members for their opinions on advantages and disadvantages to the way the work flow is set up. Be aware that this can be a sensitive issue to discuss in a group, as it may be seen as critiquing others' performance — keep the focus on staff capacity.
  - In general, is the staff just trying to keep its head above water? How would those present in the review meeting characterize the current capacity of the program staff?
  - How will staffing change if the goals of the program's strategic plan are met?

- Does your program recruit and hire program staff, paid or unpaid, who have appropriate skills and experience for their role?
  - Does the program rely on external consultants or subject matter experts? What tasks are covered by these external consultants (for example, this could refer to AmeriCorps members, interns, bookkeepers, IT consultants, grant writers, etc.)?
  - Do the consultants bring needed expertise? How is this ensured? Are they knowledgeable about mentoring? Do they have formal contracts or agreements that ensure the program can access their expertise and time? Is the reliance on external consultants preventing program staff from developing additional competencies?
- Does your program have systems to support, recognize, and retain mentoring program staff?
  - What types of staff support (training, compensation, recognition, access to resources, etc.) does the program provide? Does it seem adequate for what staff members are asked to contribute? Is there a budget for (or are resources allocated for) this support?
  - How does the staff feel about the level of support it receives? Assess whether you will get straight answers to this question if you are asking in a mixed (supervisory and line staff) group.
  - Has the program had a lot of staff turnover in recent years? If so, why? Is this unusual or has it been typical for the program in the past? What do the remaining staff members see as the cause for this turnover?

The program should have enough full-time equivalent staff to implement the program model as intended for the desired number of youth participants. Despite the significant concern around staff-mentee ratios by the field, there is no known "perfect" number of staff needed to implement a program. There simply needs to be sufficient staffing to follow all procedures as intended, especially the critical ones that impact youth safety and the quality of the mentoring experience.

In addition to the amount of staffing, programs must demonstrate that they have the right blend of staff skills and competencies to fulfill the mission. Key staff should have experience or formal education in youth development programming, child psychology, education, social work, or other relevant fields. They should reflect the diversity and lived experience of the population served and reflect the values of the program. And ideally, staff should be able to fill fundraising, advocacy, partnership development, and other program leadership roles as needed.

☂ INSURANCE COVERAGE

**It is encouraged that all mentoring and youth-serving programs
1) scrutinize their current screening and youth safety practices and make necessary changes, and
2) be transparent with insurers about the many ways the program screens, trains, and monitors matches and activity between mentors and mentees — befitting the program's context.**

Here are some examples of communications that you could have or may need to have with insurers who have questions about your programming, the potential risk it has to your organization, or what might "have to" be included in coverage. These examples and scenarios can help you, as an organization, discuss what the right coverage might look like. There is no one right answer here; this is a developing area and topic the mentoring and youth serving field is working on and talking with leaders about to figure out how to best support it.

Examples/Scenarios:

QUESTION: A program leader reached out after having her liability insurance dropped and learning the insurer was uncomfortable with their program allowing one-to-one mentoring to occur unsupervised in volunteer mentors' homes.

ANSWER: Some insurers view one-to-one mentoring relationships as inherently risky, which results in changed or dropped covered. The program may need to help educate the insurer on their overall screening practices and risk management plan, as applicable. This also includes sharing the full array of background check practices and other youth safety measures set in place. Consider adding any recommended missing practices to strengthen the screening and youth safety practices. Ongoing trainings and mentor program check-ins help program staff keep an eye out for any concerning or prohibited activities or behaviors. The program may decide to limit private meeting options and opt to have matches meet in more public community settings, except in specific, preapproved circumstances that are monitored and followed up on. The program may also need to consider additional forms of coverage such as abuse or molestation coverage.

QUESTION: A program reaches out because of a new law or state requirement that creates challenges for one-to-one mentoring relationships to meet and attend activities unsupervised by program staff.

- For example: New Child Safety and Abuse Prevention Law in California – 2022. In September 2021, Governor Gavin Newsom signed into law AB 506 authored by Assemblywoman Lorena Gonzalez (D-San Diego). The bill requires all youth-serving organizations in California to utilize background checks and issue child abuse prevention training for all staff and volunteers. This law went into effect on January 1, 2022. Assembly Bill 506 focuses on two key areas — screening and abuse prevention — and makes additional changes affecting practices within and liability insurance of youth-serving organizations. These requirements apply to any youth mentoring program working with young people under the age of 18 in the state of California.

- Youth-serving organizations (YSOs) are required to provide training for all staff and volunteers on child abuse and neglect identification and how to properly report suspected abuse. This requirement can be completed online utilizing the free Office of Child Abuse Prevention training course here.

- YSOs are required to perform background checks on all staff and volunteers working with young people. The bill specifically states YSOs should "exclude" anyone who has a criminal record with a history of child abuse.

- YSOs will develop and implement child abuse prevention procedures that must include:

  - Policies and practices to require the reporting of suspected incidents of abuse to the proper external authorities (as outlined in the Office of Child Abuse Prevention training).
  - Policies requiring, "to the greatest extent possible, the presence of at least two mandated reporters whenever administrators, employees, or volunteers are in contact with or supervising children." See more about this provision below.

- Liability insurance providers have permission to require YSOs demonstrate compliance with this law (i.e., proof of policies, practices, and trainings for all staff and volunteers) before they draft insurance coverage.

ANSWER: All of these requirements match best practice and follow the body of evidence around ways to keep young people safe in YSOs' care. However, the program understands the challenge the program may face in complying with the provision requiring two mandated reporters being present when in contact with young people. The law specifically states this provision should be followed "to the greatest extent possible," offering flexibility in how a program implements youth safety practices for one-to-one mentoring relationships. The youth mentoring program is encouraged to review and update their youth safety policies and practices, to review and update background screening measures for all staff and volunteers, and share those practices transparently (online, made available upon request, etc.). No one measure is enough. So the mentoring program must implement comprehensive screening practices, ongoing trainings, check-ins, and interviews with staff and volunteers working with youth throughout their time in the program.

💡 TRAINING RESOURCES

There are many purposes to conduct program orientation trainings, skill-specific trainings, and offer ongoing support and development to achieve mentor and youth service goals, objectives, and success in the program.

There are other important functions of training for mentors and volunteers. When it comes to risk management elements, mentoring and youth-serving programs should develop techniques for early troubleshooting of problems. For example, a single behavior is not necessarily indicative of a problem; however, programs should carefully observe patterns of behaviors that together may indicate a budding problem.

The *Elements of Effective Practice for Mentoring*, Standard B.3.3 (Training), includes a list of pre-match mentor training topics:

a. Appropriate physical contact
b. Contact with mentoring program (e.g., who to contact, when to contact)
c. Relationship monitoring requirements (e.g., response time, frequency, schedule)
d. Approved activities
e. Mandatory reporting requirements associated with suspected child abuse or neglect, and suicidality and homicidality
f. Confidentiality and anonymity
g. Digital and social media use
h. Overnight visits and out of town travel
i. Money spent on mentee and mentoring activities
j. Transportation
k. Emergency and crisis situation procedures
l. Health and medical care
m. Discipline
n. Substance use
o. Firearms and weapons
p. Inclusion of others in match meetings (e.g., siblings, mentee's friends)
q. Photo and image use
r. Evaluation and use of data
s. Grievance procedures
t. Other program relevant topics

There are also Enhancements for mentee (E.3.5) and parent/guardian (E.3.7) to provide pre-match training on the same list of training topics. The purpose would be to clear expectations and understanding on the risk management policies that are matched to the program model, setting, and population served.

Some suggestions of possible behaviors that might serve as red flags to staff that a mentor might engage in unsafe practices as shared in the Elements of Effective Practice for Mentoring, Standard 3: Training, include:

- mentors who focus primarily on their own personal needs,
- mentors who are over-involved with youth (especially combined with under-involvement or superficial connections with adults),
- mentors with unhealthy beliefs or attitudes such as treating youth as peers,
- mentors who engage in developmentally inappropriate behaviors,
- mentors who display excessive physical contact with others including mentees,
- mentors who are secretive about the activities they do with their mentees or have several cursory conversations with program staff without sharing much information about their mentoring relationship,
- mentors who are unable or unwilling to set limits or boundaries with their mentees or other youth,
- mentors whose references do not know them well, and
- mentors who have problematic background characteristics such as a history of victimization or rejection from volunteering at other youth development programs.

Resources:

- National Mentoring Resource Center
- Child Safety Handbook: Example of training and information to share with mentees around risk management elements and expectations.
- Darkness to Light training
- Praesidium: An organization focused on the prevention of sexual abuse of youth and vulnerable adults
- Safe to Compete: An introduction to sound practices for keeping young people safer in youth-serving organizations.

RISK MANAGEMENT PLAN

Having good policies and procedures can help an organization better plan and prepare for unexpected situations. It is best to establish procedures for the implementation and maintenance of an organization's risk management plan throughout the entire operations.

The policy of the organization is committed to protecting its human, physical, financial, and goodwill assets and resources through the practice of effective risk management. This should be supported and lead by leadership, board members, and staff to help safeguard the safety and dignity of its staff, volunteers/interns, clients/participants, and anyone who has contact with the organization.

When reviewing and writing up policies and procedures as part of a risk management plan, there are many areas to consider including:

- Orientation and Training Topics for Mentors, Mentees, Volunteers, and Staff
- Mandatory Reporters: How to report and document incidents
- Information Technologies
- Volunteers
- Special Events
- Public Relations
- Human Resources
- Finance
- Development/Fundraising
- Buildings and Grounds
- Data Assurance/Quality Improvement
- Governance and Administration
- Other Services and Program Areas
- Vehicles

Risk Management Plan Policy and Procedure Examples:
Human Resources

- Personnel policies address classification of employees, nondiscrimination, recruitment and selection, payroll information, fringe benefits and deductions, employee expenses, travel and transportation, motor vehicle record checks, training and career development, probationary period, performance evaluation, employee conduct, code of ethics, sexual harassment, reporting of child abuse, confidentiality and maintenance of records, reduction in workforce, forced vacation leave, disciplinary action, separation of employment, complaint resolution procedures, and drug-free workplace. All new employees are given a copy of the Personnel Policy.

- The organization follows all applicable laws in the hiring and treatment of employees regarding discrimination, ADA, civil rights, Fair Labor Standards Act, OSHA, unemployment, and worker's compensation.

- All employees are screened for records of child abuse and criminal convictions.

- All employees have three documented references from unrelated persons.

- Staff job descriptions address uniform format for all organization job descriptions, general statement of role, required knowledge, skills and abilities, required education and experience, job essential functions, and responsibilities.

- The organization's "Staff Performance Evaluations" addresses uniform format for all performance evaluations and specifies when evaluations will be conducted.

- If applicable, all staff, such as direct service staff and food care workers, are required to have a communicable disease checkup and TB screen at

initial employment and every three years thereafter.

- "Beginning Employment-New Employees" addresses procedures to follow when a new employee is hired, along with the required paperwork.

- The organization's "Personnel Policy, Chapter XI-Training and Career Development" addresses the training all employees will receive during their employment with the organization. Human resources staff will complete motor vehicle reports on applicable staff and provide a summary to the QI Team for review and follow-up.

- The Personnel Practices Committee, a committee of the organization's Board of Directors, will hear periodic reports from the human resource manager relating to human resource risk management issues. The Personnel Practices Committee may make recommendations to staff.

Programs and Client/Participant Services

- "Eligibility, Intake, and Service Procedures" ensures that all clients/participants will have equal access to services.

- "Statement of Client/Participant Rights and Responsibilities" ensures that all clients/ participants are provided with consumer information, which informs them of their rights and responsibilities, grievance procedures, and other program specific information.

- "Confidentiality" ensures the confidentiality of all clients/participants.

- Policies and procedures are in place to ensure the safety of the organization's high-risk clients/participants. (i.e., Suicide Assessment and Protocol).

- Client case files are reviewed and audited by external reviewers regularly.

- "Screening, Assessment, Treatment Planning, and Delivery" ensures that client case files are reviewed quarterly by an internal review team to guarantee that all necessary documentation is present and that the content of the file is appropriate.

- "Screening, Assessment, Treatment Planning, and Delivery" ensures that case supervisions are conducted routinely by the staff and their immediate supervisor, who provides an in-depth review of the clinical or direct service work performed by the staff with respect to their caseload.

- Staff is trained in the use of any client/ participant assessment tools.

- Ensures that staff monitors units of service to establish that all clients/participants are receiving the services the organization has agreed to provide.

- Program manuals are available to all staff to help guide and direct them in providing the highest quality services. The manual helps ensure that best practice standards are maintained.

- "Reporting of Incidents and Accidents" for the organization ensures that all staff are trained in incident and accident reporting procedures. The organization's Staff Risk Management Committee monitors any incidents involving physical intervention and cases in which a person served is a danger to self, others, and/ or organization personnel at quarterly team meetings, ensuring that appropriate corrective action and follow-up are completed.

The risk management plan should be reviewed on a scheduled basis by staff and leadership, and recommendations should be made for updates and changes as needed. It is also important to review on a scheduled basis (annually) as an organization if the policies and procedures were followed, and if not, what action was taken to minimize the risks in the future, address appropriate training needed, and plan corrective action.

A risk management plan also outlines the procedure to be taken if a concern or accusation of inappropriate contact occurs. There are many different elements a risk management plan could include. Here is a list to consider:

Orientation and Training

- For Mentees and Parents/Guardians:
  - Age-appropriate definition of appropriate/ inappropriate contact
  - Instructions on how to report inappropriate contact
  - THINK ABOUT: Documenting the conversation/receipt of information
    - On forms like intake, interview, home visit (as applicable).
- Some considerations for younger youth** might include:
  - A person's private parts are the parts of their body covered by a swimsuit and underwear.
  - No one is allowed to touch your private parts, no matter what. It's not okay.
  - No one is allowed to show you their own or anyone else's private parts, or touch you with their own private parts, no matter what. It's not okay.
  - What would you do if anyone tries to touch your private body parts, or show you their own or anyone else's private parts? Who would you tell?

For Mentors:

- Definition of appropriate/inappropriate contact
- Instructions on what to do if inappropriate contact occurs
- Information regarding approved meeting places including best practices and restrictions
- THINK ABOUT, if applicable to your program:
  - Rules about transportation
  - Rules about contact/correspondence outside of the program
  - Rules about meeting alone, or in a private or isolated area
  - Rules regarding other residents in mentor's home
  - Rules about parental consent
  - Documenting the conversation/receipt of above information
    - Signature on volunteer agreement, code of conduct, and/or acknowledgment of information form
    - Orientation/training sign in/out sheet with attached agenda

CONSIDER: What program practices already exist where this information would best be included, such as mentee interview, mentor orientation, addition to the manual, etc. "Training" does not exclusively mean its own separate event. Training is an opportunity to share information and to review for understanding.

** Programs should tailor their material to the youth's age and ability to understand.

Examples and Resources:

• <u>Risk Management Plan example:</u> Risk Management Sample Plan example from a mentoring program

• <u>General Nonprofit Risk Management Plan outline</u>

• <u>Risky Business: Risk Management Policies and Key Questions to Ask</u>

• <u>Risky Business: Risk Management Mentor and Mentee Interactions Policies Components Checklist</u>

THANK YOU TO OUR PARTNERS: