

Girl Scouts of Kentuckiana: Code of Conduct

www.gskentuckiana.org

Introduction

As the premier leadership development organization for girls, it is Girl Scouts of Kentuckiana's ("GSK") objective to uphold the highest legal, ethical, and moral standards. Our donors and volunteers support Girl Scouts because they trust us to be good stewards of their resources, and to uphold rigorous standards of conduct. Our reputation for integrity and excellence requires careful observance of all applicable laws and regulations, as well as a scrupulous regard for the highest standards of conduct and personal integrity.

This Code of Conduct covers four sections:

- I. Section 1.0. GSK Code of Legal and Ethical Behavior (p. 2–3)**
- II. Section 2.0 Girl Scouts of the USA Code of Conduct for Adult Interaction with Children (p. 3–5)**
- III. Section 2.1. GSK Code of Conduct for Adult Interactions with Children (p. 6–10)**
- IV. Section 3.0 GSK Child Protection and Compliance Policy (p. 11–15)**

GSK seeks to create the most secure environment possible. All adults at GSK are expected to support each other and hold each other accountable to ensure adherence to this Code of Conduct. Keep in mind that no document, however comprehensive, can cover every potential situation that may arise. This Code of Conduct, therefore, should be interpreted in a common-sense manner consistent with the underlying purpose of providing a safe and healthy experience for the children and youth we serve.

This Code of Conduct sets forth policies, best practices, and language, such as the Girl Scout Law, which explains the "spirit" of the Code. Policies are mandatory and best practices are suggestions on the best way to handle situations that may arise. If you have any questions about what is mandatory under this Code of Conduct, please follow the spirit of the Code and please feel free to reach out to the Chief People Officer of the Girl Scouts of Kentuckiana, Anita Bullitt (abullitt@gskentuckiana.org or 502-413-2851).

The Girl Scout Law

This Code of Conduct is animated by the Girl Scout Law which provides as follows:

I will do my best to be honest and fair, friendly and helpful, considerate and caring, courageous and strong, and responsible for what I say and do, and to respect myself and others, respect authority, use resources wisely, make the world a better place, and be a sister to every Girl Scout.

I. Section 1.0. GSK Code of Legal and Ethical Behavior

Membership in Girl Scouts of Kentuckiana is a privilege that is extended to volunteers and employees by Girl Scouts of Kentuckiana. It is expected that all members exhibit behavior that is in accordance with the Girl Scout Promise and Law at all times when representing Girl Scouts of Kentuckiana. This includes all times when the member can be physically identified as a member or by way of communications that identify the member as a member.

Girl Scouts of Kentuckiana will comply with all applicable laws and regulations and expects its directors, officers, committee members, volunteers, and employees to conduct business in accordance with the letter and spirit of all relevant laws; to refrain from any illegal, dishonest, or unethical conduct; to act in a professional, businesslike manner; and to treat others with respect.

In general, the use of good judgment based on high ethical principles will guide all board members, staff, and volunteers with respect to lines of acceptable conduct. However, if a situation arises where it is difficult to determine the proper course of conduct, or where questions arise concerning the propriety of certain conduct by an individual or others, the matter should be brought to the attention of Girl Scouts of Kentuckiana.

Employees should contact their immediate supervisor and, if necessary, the Chief People Officer, Anita Bullitt (abullitt@gskentuckiana.org or 502-413-2851). Board members should raise any such concerns with the Board Chair of Girl Scouts of Kentuckiana. Area Chairs and Vice Chairs should raise any concerns with the Field Vice Board Chair of Girl Scouts of Kentuckiana. Information on how to contact the Board Chair or Field Vice Board Chair may be obtained by contacting the Chief People Officer.

Volunteers should address operational concerns at the lowest level of their volunteer structure, depending on their role, by following the Girl Scouts of Kentuckiana Volunteer Conflict Process as described at: <https://bit.ly/gskvolconflict>.

Reporting and Investigations of Violations

Any violation of this policy should be reported directly to the Chief People Officer or CEO. If the violation of this policy involves the CEO, reports should be reported directly to the Board Chair. If one is unsure whether the action is a violation of the policy, one should err on the side of reporting to ensure the situation is considered. In all questions involving ethics and conduct, the appropriate conflict resolution process will be followed. To document a violation, complete a Support Request Form, available at: <https://bit.ly/gsksupport>.

Investigations may be required concerning issues arising under the Code of Conduct. Cooperation in any such investigation is expected. Failure to cooperate in an investigation under this policy will be considered a violation of the policy.

If a member, volunteer, parent, guardian, or employee refuses to participate in the applicable steps of the conflict resolution process, this will be documented. A complainant may attempt to resolve a complaint by speaking directly with the involved member, volunteer, parent, guardian, or employee. The complainant may also request to have an advocate present.

An employee who presents a complaint that is considered a violation of their rights, will be encouraged to utilize the Staff Conflict Resolution Process as described at: <https://bit.ly/gskconflictres>.

If the complaint is not successfully resolved, the employee complainant may then submit their complaint in writing to the supervisor of the other party.

II. Section 2.0. Girl Scouts of the USA Code of Conduct for Adult Interaction with Children

Upon Girl Scout membership, registrants agree to adhere to all abuse prevention policies and procedures set forth by Girl Scouts of the USA and the local Girl Scout council. Policies and procedures may be amended occasionally, and the following are

not inclusive of all supporting processes and training available in Girl Scouts to prevent abuse. The pertinent policies and procedures to prevent abuses in Girl Scouts include:

No Tolerance for Physical or Sexual Abuse

Physical, verbal, emotional, or sexual abuse of youth is forbidden. Sexual pressure, sexual advances, improper touching, sexual communication, including text messaging, and sexual activity of any kind with Girl Scout members is not tolerated. If you witness or experience any behavior of this nature, including between youth, notify appropriate council staff immediately. Incidences of abuse of any kind will result in immediate council intervention and law enforcement notification when necessary. Volunteers are responsible for following their council's guidelines for reporting any direct information or concern around physical, verbal, emotional, or sexual abuse with respect to members.

No Tolerance for Youth Violence and Bullying

Youth violence or bullying is not tolerated in Girl Scouts. Youth violence occurs when young people intentionally use physical force or power to threaten or harm others. Bullying is a form of youth violence. Volunteers should become familiar with the signs, risk factors, and preventive measures against this type of behavior. If you witness or experience any behavior of this nature, notify the appropriate council staff for guidance. The CDC provides excellent resources on this topic, including:

- [CDC Youth Violence](#)
- [CDC Bullying](#)
- [CDC Youth Violence Prevention](#)

Child Abuse and Mandated Reporter

All states, the District of Columbia, American Samoa, Guam, the Northern Mariana Islands, Puerto Rico, and the U.S. Virgin Islands have laws which identify persons who are required to report suspected child abuse to an appropriate agency. Therefore, if you witness or suspect child abuse or neglect, whether inside or outside of Girl Scouting, always notify the appropriate council staff immediately and follow your council's guidelines for reporting your concerns to the proper agency within your state. For more information, please review these available resources:

- Child Welfare Information Gateway about [Child Abuse and Neglect](#)

- How to Report [Child Abuse and Neglect](#)
- [CDC Child Abuse and Neglect Prevention](#)

Adult Supervision Requirements

Girl Scouts requires that whenever youth members meet, whether in person or virtually, there are to be *at least* two unrelated, registered, and Girl Scout–approved adults who have been background checked, and one of whom is female, supervising Girl Scout members. A registered and Girl Scout–approved adult volunteer is someone who has passed a background check and has been through the council’s volunteer onboarding and training process. The two adult volunteers must not be related to each other (for example, not a sibling, spouse, domestic partner, parent, child, or anyone who would be considered a family member) and may not live in the same residence.

This requirement applies to every Girl Scout gathering, including troop meetings (in person and virtual), day trips, camp, sleep-away travel, special events, activities, and projects. Members should be advised of this policy so that they can report to the council if there is a violation.

Troop leaders providing supervision must always be adults. Youths or youth members are not permitted to substitute for adult supervision. This rule applies to every Girl Scout gathering, including troop meetings (in person and virtual), day trips, camp, sleep-away travel, events, activities, and projects. There are no exceptions to this rule.

Background Checks for All Adult Volunteers

All adult volunteers in Girl Scouts must successfully pass a background check in accordance with their local Girl Scout council’s procedures.

Adult-to-Child Communications

In Girl Scouts, adults are not permitted to make one-to-one contact with youth members. This also applies to social media and electronic/online communications such as e-mail, text, IM, chat, etc. Girl Scout volunteers and adults should not make private direct contact with youth members. There should always be at least one other supervising adult or parent involved when contacting troop members.

III. Section 2.1. GSK Code of Conduct for Adult Interactions with Children

All adults, children, and youth involved with GSK programs are expected to respect each other's boundaries and engage in healthy and positive interactions. The following expectations and rules detailed below will be followed in order to ensure healthy boundaries and interactions happen between adults, children and youth.

Interactions, Communications, and Connections with Children/Youth Two Adult Policy/Group Travel

Minimum of two adults at all times. This means two properly screened, unrelated adults, one of whom must be a woman and both of whom must be 18 years of age or older, are required for GSK events whenever and wherever children/youth are present. At GSK, we require group situations to ensure multiple adults are available to supervise children/youth.

If a group is traveling as a group with more than one vehicle the entire group must meet the above guidelines for adult supervision as well as the required girl-volunteer ratios. Care should be taken so that a single car is not separated from the group for an extended length of time. The buddy system should be observed with at least 2 children/youth in each car. Individual children/youth may only ride in a car with their own caregiver/parent or with two unrelated adults.

Avoid Private Interactions

An adult should not have private interactions with children/youth or be involved in one-on-one situations with children/youth that cannot be easily viewed or interrupted by others. For example, a personal meeting, such as a troop leader's conference, should be conducted in view of other adults and children/youth. Or, as another example, a child/youth and adult can have a private conversation on a park bench at a day camp, easily viewed by others. Adults should avoid being in a position where the interaction with a participant cannot be verified by another adult.

If an adult is confronted with an unavoidable situation that results in them being alone with a child/youth at a GSK activity, the adult and participant should seek to be in an area where other people can view them while waiting for the parent/caregiver or other adult (such as being outside the building or in front of a window). If possible, the adult should also call or text another GSK adult volunteer/employee to share the plan for how the child/youth will be connected to their caregiver or parent.

Overnight Stays

When on an overnight stay, appropriate boundaries and separation shall be observed. Consistent with the requirement of two adults, while it is not mandatory that an adult sleep in the sleeping area with youth members, if an adult female does share the sleeping area, there must always be at least two unrelated adult females present. Male volunteers shall not sleep in the same space with girl members. Family members, however, may sleep together in an area specifically designated to accommodate families during events such as parent-daughter or family overnights. When separate shower facilities are not available, separate male and female shower times should be scheduled and posted. Likewise, children/youth and adults must shower at different times.

Invasion of Privacy with Cell Phone Use

Respecting privacy is a part of providing a safe and healthy experience. The inappropriate use of cell phones, cameras, imaging, or digital devices is prohibited. It is inappropriate to use a device record or transmit video or visual images of persons in shower houses, restrooms, or any other areas where privacy is reasonably expected by participants. If there is any doubt about the propriety of cell phone or camera use, the individual should avoid its use.

Inappropriate Touch

No inappropriate touch is tolerated. Except in limited circumstances, such as performing first aid or giving instruction for an activity such as archery, physical contact between children/youth and the adults at GSK should be initiated by the child/youth. Physical contact should be brief and take place in view of other adults. This would include physical interactions initiated by the child/youth such as embracing in a hug. Touch should always be appropriate, public, and non-sexual. Most importantly, touch and physical interactions should be consensual and appropriate for the age of the child or adolescent. Types of physical contact to be avoided include (but are not limited to): tickling, roughhousing, and/or wrestling, piggyback/shoulder rides, any type of massage, back scratching, any form of unwanted affection, which includes remarks that refer to physique or body development.

Privacy at Camp

Adults must respect the privacy of children/youth. This, of course, includes situations such as changing clothes and taking showers at camp. Adults must protect their own privacy in similar situations and should act with appropriate modesty. Adults should

not help children/youth dress or undress, unless the adult is the parent or guardian of the children/youth. In the case of an emergency (e.g., in the restroom, problem with a swimsuit, etc.) where a child/youth involved needs/requests help, then two adults will respond if possible. Use descriptive language to verbally express how you are assisting the child (e.g., “I am helping you get your underwear off the Velcro on your shoe so you can pull them up over your bottom.”).

Proper Clothing

Proper clothing and attire for activities is required for adults and children/youth. Swimwear should be comfortable and functional and appropriate for the GSK environment. Appropriate swimwear includes suits that prohibit exposure of any private body area. Clothing should not contain inappropriate or hateful language, inappropriate or hateful graphics, or promote alcohol/drug consumption or violence. All shorts/pants and skirts should be long enough to prohibit exposure of any private body area. Likewise, all tops should avoid exposure of any private body area.

Use of Discipline

Discipline used in Girl Scouting should be constructive and reflect Girl Scout values. Adults are expected to use positive techniques of guidance/discipline including redirection, positive reinforcement, and encouragement. When a child or adolescent is expressing behaviors that are deemed to be verbally aggressive or physically threatening, the adult will never mirror these behaviors. This policy applies to adults when disciplining their own children. Further, it is expected that adults and volunteers share discipline or redirection occurrences used with a child or group of children/youth. Adults should complete a [GSK Incident/Accident Report](#) to document occurrences when the incident involves aggression, threatening behavior, results in harm or creates the threat of harm to a child or adult.

No Corporal Punishment

GSK adults, employees, and volunteers will never use corporal punishment with children/youth. No adult will inflict any physical or emotional abuse, such as striking, spanking, shaking, slapping, humiliating, ridiculing, threatening, or degrading a child/youth with words or gestures. Adults may need to change the tone of their voice briefly to direct the child or adolescent to a cool down area or when implementing discipline. The use of physical force or touch with the participant when they are escalated and/or challenged in regulating their emotions is prohibited. Use of physical restraint by all GSK adults, employees, and volunteers, is permitted only when a child's

behavior poses imminent danger of physical harm to self or others in a clearly unavoidable emergency circumstance. This policy against corporal punishment applies to adults addressing behavior of their own children when engaged in GSK activities.

Safety in Cyberspace

The policy of two adults extends into cyberspace. Another adult should be copied on any electronic communication between an adult and a child/youth. Private communication with a single child or adolescent through social media, computers, mobile phones, or other electronic devices is strictly prohibited. If a text message is necessary for communication, other adults and/or other children/youth will be included in such communications.

Appropriate Language

Profanity, inappropriate sexual jokes, and sharing intimate details of one's personal life in the presence of children/youth are all strictly prohibited at GSK. It is expected that adults and volunteers are intentional and cognizant of the language used in, and the topic of conversations with, children/youth of all ages. Remember that it is not uncommon for children or adolescents to repeat things out of context or simply not understand certain topic areas.

Inappropriate Conduct

Physical violence, theft, misuse of prescription drugs or other substances, the use of illegal drugs/substances, and consumption of alcohol when children/youth are present have no place in the Girl Scout program. Verbal insults, physical bullying, and cyber bullying are prohibited. Physical hazing and initiations are banned as part of any Girl Scouting activity. Violation of any of these expectations may result in the revocation of a child/youth membership, revocation of volunteer privileges or termination of employment. Alcohol is only permitted for GSK approved adult events when no children are present.

Appropriate Types and Tone of Communication

Adults are expected to be mindful of the impact of their communications with children/youth. Communication includes body language, facial expressions, and tone of voice, as well as choice of words in written and verbal expression. Adults are expected to use kind and compassionate communication. Adults should model healthy ways of

resolving conflict including apologizing and seeking to restore trust and confidence in relationships. Adults are expected to monitor their self-disclosures such that they are for the good of the child/youth, age appropriate, and do not result in unclear boundaries. This particularly applies to sharing information about one's own sexual activity and substance use. Adults should never encourage or condone illegal or unsafe activities.

Grooming Behavior Prohibited

Grooming behavior is the action of an adult attempting to establish an emotional connection with a child, and/or her family, to lower the child's inhibitions with the objective of abuse. Adults should avoid the appearance of grooming by singling out an individual child/youth with inappropriate gifts, preferential treatment, or other special attention that may create an inappropriate sense of obligation on the part of a child/youth.

Distribution of Prescription Medications

All prescriptions or over-the-counter medications will be collected and managed. The distribution of prescription or over-the-counter medications will only occur after the permission of the parent/guardian has been provided to the GSK adult volunteer or employee. This distribution of medication will be safely performed and recorded on the appropriate document. Medication sign in/administration logs will be kept confidential. EpiPens and asthma inhalers should always remain in the possession of the child/youth and adult.

Adult Supervision of Youth

Adults must supervise youth members who are leading activities for younger children/youth to ensure the leadership techniques used by youth in leadership positions are appropriate and that all GSK policies are followed. Youth leaders still need to be supervised by adults.

IV. Section 3.0. GSK Child Protection and Compliance Policy

This policy is intended to have broad application to any persons connected with Girl Scouts of Kentuckiana (GSK). For purposes of this policy, any reference to “adults” is defined broadly and refers to anyone who is at least eighteen (18) years of age and who is affiliated with GSK as an employee, volunteer, or anyone in any other capacity who has contact with a child involved with GSK. Any reference to “child/youth” or “children/youth” refers to any minor affiliated with any of the programs of GSK, including, but not limited to, “tagalongs” and other children who attend any Girl Scout meeting or event.

Child Protection Officer

To support this policy and ensure compliance throughout the organization, the GSK Chief People Officer, or selected designee, serves as the primary Child Protection Officer or a selected designee serves, as the contact for all violations of this Child Protection and Compliance Policy. The Chief People Officer is responsible for, among other things, ensuring the following standards are observed:

- Training/Education: Provide, where appropriate, training for all people subject to this policy.
- Child/Youth Protection Training: GSK employees are trained annually. Volunteers are provided with notification and access to training at registration.
- Adult Interaction with Children and Youth: All adults are required to read, understand, and comply with the Code of Conduct for Adults’ Interactions with Children and Youth.
- Recordkeeping/Compliance Auditing: Maintain in a written/ digital, auditable, and confidential manner the screening, training, notification, and reporting provisions of this policy.
- Background Checks: All GSK employees will be background checked at hiring and at three-year intervals afterward. All volunteers who work with children/youth will be background checked at registration and at three-year intervals afterward.

Notification/Communication

Assure that everyone associated with GSK is aware of GSK's Child Protection and Compliance Policy and, as appropriate, its procedures and practices. All employees and volunteers have access to a copy of the Child Protection and Compliance Policy and GSK's Code of Conduct before employment or volunteering with child/youth participants.

Mandatory Reporting of Child Abuse

All persons involved in Girl Scouting shall report to local authorities (as defined below) any good-faith suspicion or belief that any child/youth is dependent, or has been physically or sexually abused, physically or emotionally neglected, exposed to any form of violence or threat, exposed to any form of sexual exploitation, including the possession, manufacture, or distribution of child pornography, online solicitation, enticement or showing of obscene material. Definitions of child abuse are listed below in the Child Abuse Definitions section*.

By law, all GSK employees, volunteers, parents, and caretakers are mandated reporters. This means that any adult involved in the organization is required to report any suspected child abuse, neglect, or dependency that has occurred to Kentucky Child Protective Services and to report any suspected child abuse or neglect to the Indiana Department of Child Services, in accordance with applicable state statutes and administrative regulations.

Kentucky and Indiana's statutes provide that it is the duty of anyone who has reasonable cause to believe that a child is being abused or neglected to report such information. In addition, Kentucky requires reporting whenever there is reasonable cause to believe child dependency has occurred. When anyone has reasonable cause to suspect a reportable event has occurred, they must call the state's child protection hotline: Kentucky (800.752.6200 or 877.597.2331), Indiana (800.800.5556) or file a report via the appropriate state's child protection agency. If you believe a child/youth is in imminent danger and needs immediate protection, call the local police department first.

***Child Abuse Definitions**

The Centers for Disease Control defines child abuse and neglect (also referred to generally as child maltreatment) as "any act or series of acts of commission or omission by a parent or other caregiver (e.g., clergy, coach, teacher) that results in harm, potential for harm, or threat of harm to a child".

A “dependent child” is subject to mandatory reporting in Kentucky (not Indiana) and is a child who is not abused or neglected but is under improper care, custody, control, or guardianship. For example, a parent who is unfit or unable to care for their child would have a “dependent child” for purposes of Kentucky mandatory reporting.

Child Abuse and Neglect Inflictions

- Physical: Slapping, pushing, punching, kicking, shaking, or burning a child or not allowing a child to eat, drink, or use the bathroom.
- Emotional: Verbal insults, constant criticism, harsh demands, threats, and yelling, ignoring, humiliating, and isolating.
- Sexual: Rape, incest, fondling, indecent exposure, or exposing a child to pornographic material.
- Medical: Intentionally trying to make a child sick or not treating a medical condition.
- Neglect: Failure to meet a minor child’s basic needs, such as food, clothing, shelter, and education.
- Human Trafficking: Using a child in pornography production or distribution, the exchange of something of value for sex with a child/youth, forced labor, sexual exploitation on the internet, and caregivers engaging with traffickers to force children into commercial sex.

Procedure for Making a Report

Reports should include:

- The name and address of the child and their parents/guardians or person(s) having custody of such child, if known.
- The child’s age and the nature and extent of the child’s dependency, injuries, abuse, or neglect, including any evidence of previous injuries, abuse, or neglect.
- Other information that might help in establishing the dependency, or the cause of the injury, abuse, or neglect.
- Record the name of the intake worker who takes the report and note the date that the report is made.

Notify GSK of Any Reports of Suspected Abuse

Immediately notify the Chief People Officer of any reports of suspected abuse or neglect to your local Child Protection Services Agency or state intake number. Complete a [GSK Incident/Accident Report](#) or verbal notification to the Chief People Officer within 24 hours after making a report. Do not share this information with anyone other than the local Child Protection Services, the Chief People Officer, and the CEO at GSK unless instructed by law enforcement. GSK will retain the highest regard for confidentiality for those reporting suspected abuse, neglect, or dependency by ensuring only the appropriate and legal parties are provided information regarding the suspected dependency, abuse, or neglect.

Reporting Violations of GSK's Child Protection and Compliance Policy/Anti-Retaliation

Violations of GSK's Child Protection and Compliance Policy should immediately be reported to the CEO. GSK prohibits retaliation against any child/youth or adult who reports a good faith complaint of abuse and who participates in any related investigation. GSK and state law prohibit knowingly making false abuse allegations, as well as deliberately providing false information during an investigation. Anyone who violates this rule is subject to disciplinary action, up to and including termination or removal from any affiliation with GSK. If there are any questions about the applicability of this policy or any aspect of this policy, one should err on the side of protecting the safety of the children/youth and call and discuss any questions with the Chief People Officer.

In the event the CEO is in violation of GSK's Child Protection and Compliance Policy, it should immediately be reported to the Board Chair.

GSK reserves the right to terminate, to dismiss, or to take any appropriate action in response to anyone who violates this policy or who is found guilty of child abuse and/or neglect.

GSK's Additional Child Protection Policies

- GSK has adopted the following policies for the safety and well-being of those that it serves. While these policies are primarily for the protection of children/youth, they also serve to protect adults.
- Background Checks: All GSK employees will be background checked at hiring and at three-year intervals afterward. All volunteers who work with children/youth will be background checked at registration and at three-year intervals afterward.

- Child/Youth Protection Online Training Module: All GSK employees and all GSK volunteers are required to take child/youth protection training prior to working with children.

Interaction with Children and Youth

All adults are required to read, acknowledge, and comply with the Code and Policies set forth above. All active members agree to the following:

- To have read and understand this Code of Conduct.
- To agree to abide by the policies and best practices described in the Code of Conduct.
- To understand that they may be removed as a member, employee, or volunteer working with GSK if they violate any of the Code and Policies set forth above.

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