

YMCA OF GREATER OMAHA  
ABUSE PREVENTION GUIDELINES  
**CONSUMER INFORMATION**



# Youth & Vulnerable Adult Abuse Prevention Guidelines

## Interactions

### Physical Interaction

The YMCA of Greater Omaha’s physical contact with youth & vulnerable adult policy promotes a positive, nurturing environment while protecting staff, volunteers and those in our care. Our organization encourages appropriate physical contact and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by staff or volunteers towards while in our programs will result in disciplinary action, up to and including termination of employment.

Appropriate Physical Interactions	Inappropriate Physical Interactions
<ul style="list-style-type: none"><li>• Side hugs</li><li>• Shoulder-to-shoulder or “temple” hugs</li><li>• Pats on the shoulder or back</li><li>• Handshakes</li><li>• High-fives and hand slapping</li><li>• Pats on the head when culturally appropriate</li><li>• Touching hands, shoulders, and arms</li><li>• Arms around shoulders</li><li>• Holding hands (with young children in escorting situations)</li><li>• Respect physical boundaries</li><li>• Respect cultural differences in what is acceptable physical interactions</li></ul>	<ul style="list-style-type: none"><li>• Showing affection in isolated areas</li><li>• Kisses</li><li>• Lap sitting</li><li>• Wrestling</li><li>• Piggyback rides</li><li>• Tickling</li><li>• Allowing a youth to cling to an employee’s or volunteer’s leg</li><li>• Any type of massage given or received</li><li>• Any form of affection that is unwanted by the participant, staff or volunteer</li><li>• Lingering touches</li><li>• Unsolicited physical assistance when moving or helping individuals up</li></ul>



## Verbal Interaction

Staff and volunteers are prohibited from speaking to those in our care in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Staff and volunteers must not initiate sexually oriented conversations. Staff and volunteers are not permitted to discuss their own sexual activities with those in our care.

Our organization's policies for appropriate and inappropriate verbal interactions are:

Appropriate Verbal Interactions	Inappropriate Verbal Interactions
<ul style="list-style-type: none"><li>• Positive reinforcement</li><li>• Appropriate jokes</li><li>• Encouragement</li><li>• Praise</li></ul>	<ul style="list-style-type: none"><li>• Name-calling</li><li>• Bullying, unwanted and/or harmful comments</li><li>• Discussing sexual encounters or in any way involving those in our care in the personal problems or issues of staff and volunteers</li><li>• Secrets</li><li>• Cursing</li><li>• Off-color or sexual jokes</li><li>• Shaming, belittling, derogatory remarks</li><li>• Harsh language that may frighten, threaten or humiliate youth</li><li>• Derogatory remarks about a person or their family</li><li>• Compliments relating to physique or body development</li></ul>

## One-on-One Interaction

Most abuse occurs when an adult is alone with a youth or vulnerable adult. Our organization aims to eliminate or reduce these situations and prohibits private one-on-one interactions unless approved in advance by the organization administration.

In those situations where one-on-one interactions are approved, staff and volunteers should observe the following additional guidelines to manage the risk of abuse or false allegations of abuse:

### Additional Guidelines for One-on-One Interactions

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

Tutoring/Private Coaching:

One-on-one situations, such as tutoring and private coaching sessions, introduce additional risks for false allegations:

- Staff and volunteers must have supervisor approval for any tutoring or private coaching sessions.
- Tutoring and coaching sessions may not occur outside the organization.

Supervisors must keep a schedule of private tutoring and coaching sessions, which should include times, person involved, and location of sessions.

Off-Site Contact

Many cases of organizational abuse occur off-site and outside of regularly scheduled activities. This contact outside of regularly scheduled activities may put staff, volunteers, and the YMCA of Greater Omaha at increased risk.

Our organization prohibits interactions outside of regularly scheduled program activities unless approved by the YMCA.

Our organization strongly recommends that staff and volunteers do not have outside contact with youth or vulnerable adults from the organization. However, if off-site contact is unavoidable (such as during mentoring programs), our organization has determined that the following forms of outside contact are appropriate and inappropriate:

Appropriate Outside Contact	Inappropriate Outside Contact
<ul style="list-style-type: none"><li>• Taking groups on an outing</li><li>• Attending sporting activities with a group</li><li>• Attending functions at home, with parents/ caregivers present</li></ul>	<ul style="list-style-type: none"><li>• One-on-one off-site interaction with a member or participant under the age of 19</li><li>• Visiting a person in their home, without another adult present</li><li>• Entertaining one person in the home of staff or volunteers</li><li>• A lone youth or adult spending the night with staff or volunteers</li></ul>

In addition, when outside contact is unavoidable, ensure that the following steps are followed:

- Any outside contact must be communicated with and approved by supervisor prior to contact occurring. If unplanned contact occurs, supervisor must be notified within 72 hours of initial contact.
- Supervisors should identify for staff and volunteers what types of outside contact are appropriate and inappropriate.
- Ensure that staff or volunteers have the parent/caregivers’ permission to engage in outside contact outside of regular operations. Parents will be asked to sign a release-of-liability statement.
- For staff or volunteers with a prior relationship with youth or their families who have outside contact with youth participating in YMCA programs, a release-of-liability statement may be required.

## Technology Use Expectations

Our organization utilizes technology in nearly every facet of programming, communication, and operation. This policy outlines expectations for the use of technology, both provided by the organization and personally owned (during programming), by employees, volunteers, and consumers ("Users"). Technology is a comprehensive term including, but not limited to, all organization and personally owned computers, projectors, televisions, iPads, tablets, multimedia players, cameras, cell phones, smartwatches, and/or other technologies.

All members of our community have a responsibility to use both personal and organization owned technology in a responsible, lawful, and ethical manner. User use of technology during programming must be consistent with our organization's philosophy, goals, and ethical standards. This organization will educate Users regarding the acceptable and responsible use of technology, appropriate online behavior and interaction on social networking websites, and an awareness of, and response to, cyberbullying.

All communication that takes place using personally-owned (during programming) or organization-owned technology must reflect the mission and values of our organization. This includes but is not limited to emails, texts, messages, and posts online. Additionally, User communications must be through official organizational email accounts for all programmatic and organization-related business. Official organization email accounts will be provided for Users for such purposes. Email is intended for use for programmatic purposes only.

In order to responsibly communicate online Users MAY NOT:

1. Access, send, receive, download, produce, or distribute any offensive, profane, threatening, pornographic, or sexually explicit material at any time, for any reason.
2. Access websites, newsgroups, or chat areas that contain material that is counter to the organization's mission or that promote illegal acts.

When using technology, Users are expected to:

1. Use technology tools and hardware for programmatic purposes only.
2. Refrain from using personal or organization owned devices in restrooms, locker rooms, or other areas where there is a reasonable expectation of privacy.
3. Refrain from using cell phone cameras and/or any recording functions, on the cell phone or within apps, during programming unless permission is granted. If permission is granted, the camera or recording feature is only to be used as directed by the employee or volunteer only for that particular purpose.
4. Not use the network for any activity or to transmit any material that violates federal, state, or local laws.
5. Refrain from harassing, bullying, taunting, hazing, or otherwise acting in a manner toward employees, volunteers, and consumers that is counter to the organization's mission, including its prohibition against bullying and hazing. This organization has zero tolerance for cyberbullying.
6. Refrain from engaging in personal attacks, harassing others, posting confidential and/or personal information about others, or posting in a libelous, disrespectful, or harassing manner will face serious disciplinary action, up to and including removal from the organization.
7. All social media posts related to the YMCA must use approved media provided by the YMCA of Greater Omaha's marketing department or the designated social media champion at the branch.

## Expectation of Privacy

Users do not have an expectation of privacy in communications transmitted through organization devices or technology. Our organization reserves the right to monitor and track online behaviors and interactions via organization-owned technology. Emails, messages, and other information sent through the organization's network can be inspected and files saved onto organization computers may be reviewed at any time.

In addition, Users have a limited expectation of privacy when using their own technology, particularly when activity violates the law or organization policy, and/or compromises the safety and wellbeing of other members of the organization. We will investigate reports of inappropriate posts or other online activity, and hold employees, volunteers, and consumers accountable for online activity that violates the law or organization policy, and/or compromises the safety and wellbeing of other members of the organization.

## Gift Giving/Receiving to Minors Under the Age of 19

Molesters or those planning to take advantage of those in our care routinely groom victims by giving gifts, thereby endearing themselves to the person. They might instruct the person to keep the gifts a secret, which can encourage the person to keep secrets from their parent or guardian. For this reason, staff and volunteers should only give gifts to groups, and only under the following circumstances:

- YMCA branch or association leadership must be made aware of and approve the gift.
- Parents or guardians must be notified.

## Monitoring & Supervising Youth

### General Overview

When staff and volunteers are adequately supervised, potential offenders are less likely to act on their impulses because they face detection. When youth are adequately supervised, they too are less likely to engage in inappropriate interactions with others. Similarly, the facility must be monitored, particularly out-of-the-way locations or locations that might permit an offender undue access to or privacy with a youth. Effective supervision and monitoring require that a variety of methods be used frequently, at both scheduled and random times.

### Facility Monitoring

In order to protect those in our care, the YMCA of Greater Omaha is committed to maintaining safe and welcoming facilities and program sites for all of our participants and their families. In order to ensure that all locations are properly and consistently monitored, all staff are asked to monitor the facility for actions or areas that may provide an opportunity for abuse to occur.

### Checking into Facilities

- When anyone (members, guests, participants, spectators, vendors, maintenance, etc.) enters the facility during operational hours, they must check in with the Welcome Center.
- Process for checking into our facilities:
  - Members must check-in utilizing their YMCA issued membership card and provide picture ID, if requested
- All Non-members:
  - Must check-in with Welcome Center and provide picture ID, complete non-member form and submit to national sex-offender registry search before entering facility for the first time
  - Future visits will require photo ID, verification of facility visit

## General Supervision Procedures

**Administrative and Supervisory Visits to Youth and Vulnerable Adult Programs** - Supervisors as well as Branch and Association leaders will regularly visit all youth programs to ensure that all activities are well-managed policies are observed by all in attendance.

**Ratios** - Each program will follow the ratio requirements that are directly related to the goals of the program and the design of the program area. The staff or volunteer-to-youth ratio will be adjusted for programs that serve youth with special needs.

**Mixed Age Groups** - Each program is responsible for establishing specific guidelines for additional monitoring and supervision of activities that involve youths from different age groups. Staff and volunteers must be aware that close a line of sight supervision is required when monitoring programs that mix age groups.

### Supervision for unique consumers

The YMCA of Greater Omaha makes every effort to provide a high-quality experience for all youth participating in programs. However, not all programs can meet the needs of all youth. When the demands placed on employees and volunteers by specific youth exceed the skills of the employees and volunteers or the scope of the program, accidents or abuse may occur.

We understand each youth is different and responds differently in certain situations. Through behavior management, we will try preventing problems, using redirection, having clear rules, which are developmentally appropriate, and giving positive reinforcement.

Prior to participating in a YMCA program, parents/guardians must complete a form which inquires about their child's medical and/or behavioral needs.

The YMCA will utilize the following questions to determine if a program fits a youth's unique needs:

- Can the YMCA's employees and volunteers adequately supervise this specific youth without compromising the interactions with other youth?
- Has this youth previously posed a threat to others?
- Has the YMCA made a solid attempt to meet this youth's needs while ensuring the safety of others enrolled in the program?
- Does this youth pose a risk to the safety and well-being of others?

If YMCA staff answer these questions and conclude the program is not the right program for a particular youth, YMCA staff will schedule a meeting with the youth's parents/guardians, caseworker, etc. to discuss the conclusions. The YMCA will try to locate an alternative resource for the family, if possible.

### Responding

Because the YMCA of Greater Omaha is dedicated to maintaining zero tolerance for abuse, it is imperative that every staff member and volunteer actively participate in the protection of those in our care. In the event that suspicious or inappropriate behaviors and/or policy violations are observed, it is their personal responsibility to immediately respond to the situation and report their observations.

The YMCA of Greater Omaha is committed to taking every allegation of abuse or misconduct seriously and will fully cooperate with authorities to investigate all cases of alleged abuse or misconduct. All employees and volunteers are expected to fully cooperate with any external investigation by outside authorities or any internal investigation conducted by the organization or by individuals 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.
- Maintaining the confidentiality of information learned or transmitted during the investigation, unless otherwise directed by legal authorities.
- Preserving all relevant information and documents.

Failure to cooperate with an investigation will result in disciplinary action, up to and including termination of employment or dismissal from the organization.

## Responding to Suspicious or Inappropriate Behaviors or Policy Violations

### Staff/Volunteers Response to Suspicious or Inappropriate Behaviors and/or Policy Violations

- Interrupt the behavior.
- Report the behavior to a supervisor, director, or other authority.
  - Iowa – 800-362-2178
  - Nebraska – 800-652-1999
- If you are not comfortable making the report directly, make it anonymously.
- If the report is about a supervisor or administrator, contact the next level of management.
- Document the report but do not conduct an investigation.
- Keep reporting until the appropriate action is taken.
- Report to Praesidium Helpline: 855-347-0751 for additional support or guidance, as needed.

### Supervisors and Administrators Response to Suspicious or Inappropriate Behaviors and/or Policy Violations

- Report to the next level of administration and determine the appropriate administrator to respond to the concern.
- Determine the appropriate response based on the report.
- Speak with the staff or volunteer who have been reported.
- Review the file of the staff or volunteer to determine if similar complaints were reported.
- Document the report on the appropriate form.
- If at any point in gathering information about a report of suspicious or inappropriate behavior, a concern arises about possible abuse, contact the state authorities and file a report.
- If appropriate, notify parents and/or guardians.
- Advise the person who reported the behavior that the report is being taken seriously.
- Report to Praesidium Helpline: 855-347-0751 for additional support or guidance, as needed.



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

- Increase monitoring or supervision of the staff, volunteer, or program.
- Need for additional training.
- If policy violations are confirmed, the staff or volunteer is subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the Progressive Disciplinary Process outlined in our handbook.
- If more information is needed, interview and/or survey other staff and volunteers or participants.

## Responding to Suspected Abuse by an Adult

### Staff/Volunteer Response to Incidents or Allegations of Abuse

- If you witness abuse, interrupt the behavior immediately.
- If abuse is disclosed to you, assure the individual disclosing that they were correct to tell you.
- Protect the alleged victim from intimidation, retribution, or further abuse.
- Immediately report the allegation or incident to the proper organization authorities.
  - Iowa – 800-362-2178
  - Nebraska – 800-652-1999
- Report to Praesidium Helpline: 855-347-0751 for additional support or guidance, as needed.
- Be sure to document 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 to your supervisor in a timely manner.
- Check back to make sure appropriate steps were taken. If not, report again to your supervisor or the designated organization authority.

### Supervisor and Administrators Responding to Allegations or Incidents of Abuse

- First, determine if the youth is still in danger and if so, take immediate steps to prevent any further harm.
- 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 your notes may be read by others. Stick to the facts.
- Contact the appropriate local authorities as indicated by your mandatory reporting procedures. Make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency. Report to Praesidium Helpline: 855-347-0751 for additional support or guidance.
- Notify your crisis management team and follow your crisis management plan.
- Suspend the accused staff or volunteer until the investigation is completed.

## Responding to Youth-to-Youth Sexual Abuse and Sexualized Behaviors

### Staff and Volunteers Responding to Youth-to-Youth Sexual Activity

- If you observe sexual activity between youths, you should immediately separate them.
- Calmly explain that such interactions are not permitted and separate the youths.
- Notify your supervisor.
- Complete the necessary paperwork including what you observed and how you responded
- Follow your supervisor's instructions regarding notifying the authorities and informing the parents of the youth involved.
- In some cases, if the problem is recurring discipline may be required including not allowing one or both youths to return to the program.

### Supervisors and Administrators Responding to Youth-to-Youth Sexual Activity

- Meet with the staff who reported the sexual activity to gather information.
- Confirm that the youths involved have been separated or placed under increased supervision.
- Review the steps taken by the staff on duty.
- Review the incident report to confirm it is accurately and thoroughly completed.
- Meet with parents of the youths involved.
- Determine what actions should be taken to make sure there is no recurrence, including assessing the suitability of the program for the children involved.
- Notify the proper authorities.
  - Iowa – 800-362-2178
  - Nebraska – 800-652-1999
- Report to Praesidium Helpline: 855-347-0751 for additional support or guidance, as needed.
- Develop a written corrective action or follow-up plan in response to the incident

### Organizational Response

- Review the need for additional supervision.
- Review the need for revised policies or procedures.
- Review the need for additional training.
- Alert others in the organization.

## Whistleblower & Reporting Concerns

### Whistleblower Policy

This policy is applicable to all employees, volunteers and its affiliates and is intended to assist those who believe that they have uncovered errors or lapses in ethical responses to known problems, including:

- Fraud or fraudulent reporting
- Failure to comply with legal obligations
- Danger to the health and safety of employees
- Criminal activity
- Attempts to conceal any of the above actions

This policy is not to be used to reconsider any matters that have been addressed under established harassment or disciplinary procedures. Other policies and procedures are in place to address grievances, discipline, harassment and personnel matters. However, there are formalities within this policy that may assist any employee who wants to make a good faith disclosure involving gross misconduct and/or a lapse in ethical behavior that has not been resolved.

## Purpose

The purpose of this Whistleblower Policy is:

- To protect any employee who engages in good faith disclosure of alleged wrongful conduct to a supervisor and/or Human Resources
- To encourage employees to disclose wrongful conduct so that prompt, corrective measures can be taken by the Association
- To inform employees of how allegations of wrongful conduct can be reported
- To protect employees from retaliation as a result of disclosing wrongful conduct
- To provide employees, who believe that they have been subjected to reprisal or false allegations, a fair opportunity to seek relief

## Definitions

- Whistleblower - An employee who reports or reveals wrongdoings in the practices of/or its employees.
- Wrongful conduct - A serious violation of policy; a violation of state and federal laws; wrongful use of company property, and wrongful use of authority for personal gain.
- Protected disclosure - Communication about actual or suspected wrongful conduct by an employee based on a good faith belief that the conduct has been observed and is unacceptable under applicable policies or laws.
- Retaliation - Actions against an employee because they made a protected disclosure or participated in an investigation involving a disclosure.

## Procedures

### Acting in Good Faith

Employees making a protected disclosure concerning a violation or suspected violation must be acting in good faith and must have a reasonable belief that the information disclosed is a violation of company policy and/or state and federal law.

### False Allegations

Employees who knowingly give false information concerning wrongful conduct or a subsequent false report of retaliation will be subject to disciplinary action, including termination. Allegations that are not substantiated but are made in good faith will not be subject to disciplinary action.

### Retaliation

Employees who make a protected disclosure are protected from harassment or adverse employment consequences. Any individual who retaliates against an employee making a protected disclosure is subject to discipline, including termination. Disciplinary or retaliatory actions prohibited under this policy include the following:

- Removal or suspension
- Withholding a salary increase, bonus or benefits
- Transferring or reassigning an employee
- Denying a promotion to which the employee would otherwise be entitled to
- Reducing the employee's pay, position or title

## **Confidentiality**

Disclosures may be made on a confidential basis. Protected disclosures and investigatory records will remain confidential to the extent possible and in accordance with investigation procedures.

## **Anonymous Reporting**

### **Praesidium Helpline:**

Call: 855-347-0751

The YMCA of Greater Omaha is committed to creating an environment where everyone is encouraged to share their concerns, and those concerns are taken seriously. To this end, we have partnered with Praesidium to establish a helpline that is available to everyone (employees, volunteers, parents/guardians, consumers, community members, etc.) 24 hours a day, seven days a week, 365 days a year.

### **What is the Praesidium Helpline?**

The Praesidium Helpline is a consultation line anyone in the organization can call to discuss observations of inappropriate behaviors, suspicious behaviors, policy violations, instances of consumer-to-consumer sexual activity, and any other abuse prevention questions and issues.

### **What can you expect when you call?**

One of Praesidium's experts will be ready to answer your call and gather any information relevant to your concern or question. If the matter the caller shares is one deemed to be suspected or known sexual abuse, the caller will be instructed by Praesidium to immediately call the civil authorities.

### **What happens once you get off the call?**

Praesidium's team of risk management experts comprised of social workers, attorneys, and other professionals will staff the concern or situation and develop recommended responses and next steps. Praesidium will then share the concern and the recommendations with stakeholders at the organization.



## Annual Review of Abuse Prevention Policies

The YMCA of Greater Omaha is committed to maintaining effective and up-to-date abuse prevention policies. To ensure the continued relevance and effectiveness of these policies, the organization will conduct an annual review to:

1. Ensure the purpose and goals of the policy remain relevant.
2. Evaluate whether the policy should be combined with another policy or rescinded.
3. Confirm that the policy is compliant with current laws and regulations.
4. Identify any necessary changes to improve the effectiveness or clarity of the policy and/or associated procedures.

Any changes to organizational policy manuals and/or procedures resulting from this review will be communicated in writing within seven (7) days of the change. The organization will establish an official mode of communication for disseminating these updates and will ensure that changes are communicated effectively to all relevant stakeholders, including consumers, parents, and guardians.

Training Any training necessary to implement policy or procedure changes will be assigned to relevant employees and volunteers. This training is expected to be completed as soon as practicable to ensure that all parties are fully informed and capable of adhering to the updated policies and procedures.

## YMCA Consumer Code of Conduct

The YMCA of Greater Omaha is committed to providing a safe and welcoming environment for all members and guests. To promote safety and comfort for all, we ask individuals to always act appropriately when they are in our facility or participating in our programs.

Our Code of Conduct does not permit any language or action that can hurt or frighten another person, or that falls below a generally accepted standard of conduct. Specifically, this includes:

- Inappropriate attire – suitable family attire must be worn at all times.
- Angry or vulgar language, including swearing, name calling, or shouting.
- Physical conduct with another person in any angry or threatening way.
- Any demonstration of sexual activity or sexual contact with another person.
- Harassment or intimidation by words, gestures, body language, or any other menacing behavior.
- Theft or behavior that results in the destruction of property.
- Any other conduct of an inappropriate, threatening, or offensive nature.

## Also, please be aware that:

- The YMCA of Greater Omaha strictly forbids the possession, use, or display of weapons/firearms in or around YMCA property including all buildings and surrounding areas, including sidewalks, driveways, parking lots, and vehicles.
- Using or possessing illegal chemicals or alcohol on Y property, in Y vehicles, or at YMCA sponsored programs is not allowed.
- Smoking and vaping are not allowed on YMCA property – the YMCA and its property are tobacco and nicotine free environments.
- Loitering within or on the grounds of the YMCA is not allowed.
- To ensure the safety and wellbeing of all employees, members, and other visitors, the YMCA of Greater Omaha reserves the right to inspect and/or search all areas of the YMCA of Greater Omaha and your belongings in appropriate circumstances.
- Use of electronic devices, cameras or video recording devices is prohibited in ALL locker rooms and restrooms. Cellular devices are highly discouraged from being used on the wellness floor, as a courtesy to surrounding members and guests.

- The YMCA of Greater Omaha will block or filter content over its internet and technology that the organization considers inappropriate. This includes pornography, obscene material, and other material that may be harmful to consumers or against the mission and standards of this organization. The organization reserves the right to block or filter other content deemed to be inappropriate, lacking educational or work-related content or that poses a threat to the network.
- The YMCA conducts regular sex offender screenings on all members, participants, and guests. If a sex offender match occurs, the YMCA reserves the right to cancel membership, end program participation, and remove visitation access.