

Safety, Risk Management, Environmental and Cadet Protection

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SUMMARY of CHANGE

CR 2-1

Safety, Risk Management, Environmental, and Cadet Protection

This is a major update to a previously published regulation to include:

- o Addition of figures detailing Heat and Cold Training safety concerns
- o Addition of figure detailing risk assessment matrix
- o Guidance for transgender cadets
- o Guidance for cyberbullying
- o Guidance for electronic communication between adults and cadets
- o Inclusion of the Cadet Protection Policy

Safety, Risk Management, and Environmental Protection

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History. This is significant update to a previously published regulation.

Summary. This regulation provides guidance for including safety, youth protection, risk management, and environmental protection into training and operations within the California Cadet Corps.

Applicability. This regulation applies to all commandant and cadet personnel in active service or enrollment with the California Cadet Corps. It applies to all units organized within the California Cadet Corps.

Proponent and exception authority. The proponent of this regulation is the Executive Officer, California Cadet Corps. The proponent has the authority to approve exceptions or waivers to this regulation that are consistent with controlling law and regulations. The proponent may

delegate this approval authority, in writing, to a HQCACC staff officer or State Projects Officer. Activities or units may request a waiver to this regulation by providing full justification that includes a full analysis of the expected benefits. All waiver requests will be endorsed by the senior commandant officer of the requesting activity or unit and forwarded through their higher headquarters to the policy proponent. When these regulations are in conflict with local school or district policies, the more restrictive of the two policies shall be used.

Supplementation. Supplementation of this regulation and establishment of command and local forms are prohibited without prior approval, in writing, from the Executive Officer, California Cadet Corps. Send a draft copy of each supplement to Youth Programs, California Cadet Corps, ATTN: Executive Officer, Building 1301, Camp San Luis Obispo, CA.

Suggested improvements. Users are invited to send comments and suggested improvements in memorandum form directly to the address listed above.

Distribution. This publication is available in electronic media only and is intended for all levels of the California Cadet Corps organization and is authorized for public distribution. Printed copies of this publication may be provided, within budget limitations, at the discretion of the Joint Force Headquarters, California (HQ CACC).

Contents (Listed by paragraph and page number)

Chapter 1, Introduction

- 1-1. Purpose and Authority, *page 1*
- 1-2. References and Definitions, *page 1*
- 1-3. Responsibilities, *page 2*

Chapter 2, Safety in Training and Training Safely

- 2-1. General, *page 3*
- 2-2. Safety in Training Relative to the CACC Standards, *page 3*
- 2-3. Safety considerations at typical cadet training events and operations, *page 3*

Chapter 3, Risk Management

- 3-1. Fundamentals, *page 7*
- 3-2. The Risk Management Process, *page 7*

Chapter 4, Environmental Protection

- 4-1. General, *page 9*
- 4-2. Guiding Principles, *page 9*
- 4-3. Principles in Practice, *page 9*

Chapter 5, The Risk Management Worksheet

- 5-1. General, *page 10*
- 5-2. Completing the Worksheet, *page 10*

Chapter 6, Cadet Protection

- 6-1. General, *page 11*
- 6-2. Key Organizational Policies, *page 11*
- 6-3. Decorum and Fraternalization, *page 11*
- 6-4. Universal Standards of Practice, *page 12*
- 6-5. Alignment of Training Goals and Training Intensities, *page 13*
- 6-6. Reporting Requirements, *page 13*
- 6-7. Investigations, *page 14*

Figures

- 2-1. Work/Rest Times & Fluid Replacement Guide, *page 6*
- 2-2. Cold Weather Training, *page 6*
- 3-1. Risk Management Table, *page 8*

Appendices

- A. Form 203, Report of Medical History, *page 15*
- B. Form 21, Risk Management Worksheet, *page 17*

Chapter 1

Introduction

1-1. Purpose and Authority.

Section 501, California Military and Veteran's Code provides that "Cadet companies shall at all times be under the guidance and control of the principal, president, director or chief administrative officer of the college, community college or high school, whose duty it shall be to make regulations with the approval of the Adjutant General regarding the moral, educational, and physical welfare of the cadets." This regulation sets forth guidance on how California Cadet Corps units shall plan, implement, and evaluate training so as to maximize safety, mitigate and manage risk, and maintain maximum protection of the environment.

1-2. References and Definitions.

a. Reference Dept. of the Army Pamphlet 385-10, Army Safety Program,, dated 23 May 2008 and ATP 5-19, Risk Management, dated 14 April 2014.

b. The following definitions are used in this regulation.

(1) Hazard. Any actual or potential condition that can cause injury, illness, or death to personnel, or damage to or loss of equipment/property.

(2) Risk. The probability of exposure to injury or loss from a hazard.

(3) Risk Assessment. The identification and assessment of hazards, setting of values on risk elements, comparing risks against training benefits, and eliminating unnecessary risks.

(4) Safety in Training. What we train in terms of prevention and risk control.

(5) Training Safely. How we train by identifying the hazards and integrating safety into training practice.

(6) Training vs. Operations. Training events are events at which cadets primarily learn new material (such as at a leadership school or bivouac). Operations are events at which cadets compete (general Drill Competitions, IMAs, rifle matches, etc.) or provide support (School and community service, CERT, etc.)

(7) Abuse. California State law defines child abuse as (a) physical injury inflicted on a child by another person, (b) sexual abuse, or (c) emotional abuse. Child neglect is defined as negligent treatment which threatens the child's health or welfare. See (CPC 11164)

(i) Actions can violate this policy without rising to actual abuse. See "boundary concerns" in paragraphs 1-2(11) of this regulation.

(ii) In CACC's military-style training environment, it is important to distinguish emotional *abuse*, which by definition inflicts *serious harm*, from an inappropriately high training intensity, which though momentarily unpleasant is not abusive because it does not inflict *serious harm*. See Chapter 6 of this regulation for guidance on training intensity

(8) Sexual Abuse. Building upon the definition of "abuse" in the paragraph above, cadet sexual abuse includes:

(i) All sexual contact between an adult leader/volunteer/chaperone, and a cadet, regardless of whether there is deception or the cadet understands the sexual nature of the activity is a violation of the law.

(ii) Sexual contact that is accomplished by force or threat of force, regardless of the age of the participants.

(iii) Sexual contact between an older and a younger cadet if there is a significant disparity in age, development, or size, rendering the younger cadet incapable of giving informed consent and

(iv) Sexual penetration, sexual touching, or non-contact sexual acts such as exposure or voyeurism.

(9) Reasonable Suspicion of Abuse. A CACC member may form a reasonable suspicion of abuse when two factors are present: first, the member has specific, credible information that a cadet has been hurt or harmed by another person, and second, another experienced adult leader would suspect abuse if given the same information. It is possible to have a *reasonable suspicion* of abuse without having *proof* of abuse.

(10) Hazing and Bullying. Hazing and bullying are defined as any conduct whereby someone causes another person to suffer or to be exposed to any activity that is cruel, abusive, humiliating, oppressive, demeaning, harmful, or coercive against one's will.

(i) By definition, hazing and bullying are forms of abuse.

(ii) Questions of hazing often pertain to the intensity level of military-style training in cadet programs. Training intensity is evaluated in context. For example, a training intensity that is too stern and demanding in class at school may be appropriate at some HQS CACC events.

(iii) Cyberbullying is the use of electronic communication to bully a person, typically by sending, posting, or sharing messages of an intimidating or threatening nature, or to cause emotional harm. Cyberbullying will not be tolerated in the CACC and will be considered the same as bullying.

(11) Boundary Concern. A boundary concern occurs when a member's action might not be considered a best practice without meeting the definition of abuse or hazing; akin to a gray area.

(12) Adult Supervisors. CACC has a number of membership categories available to adults who serve in a supervisory and mentoring role over cadets. The terms "assistant commandant, volunteer and chaperone" are used in this policy as a shorthand for all adults who supervise cadets, but the terms do not include cadets.

(13) Field Conditions. Field conditions are off-road, backcountry training environments that are not in a standard classroom setting.

1-3. Responsibilities.

a. Executive Officer. The Executive Officer, California Cadet Corps has overall responsibility for ensuring the safe operation of training events and operations conducted by the HQCACC. The M-Day S-2 (Safety and Security Officer) is delegated authority to ensure Cadet Protection, safety, risk management, and environmental protection functions are properly administered. The 10th Corps Commander and staff, particularly the Cadet 10th Corps S-2 have responsibility for promoting the safe operation of training events and operations conducted by the 10th Corps.

b. Headquarters CACC S-2. The S-2, HQ, California Cadet Corps has overall responsibility for ensuring the safe operation of state level training events and promulgating the provisions of this regulation.

c. Brigade Advisors. Brigade Advisors have overall responsibility for ensuring the safe operation of training events and operations conducted by Brigades. The cadet Brigade Commander and staff, particularly the Cadet Brigade S-2 have responsibility for promoting the safe operation of training events and operations conducted by the Brigade.

d. Regimental Advisors. Regimental Advisors have overall responsibility for ensuring the safe operation of training events and operations conducted by Regiments. The cadet Regimental Commander and staff, particularly the Cadet Regimental S-2 have responsibility for promoting the safe operation of training events and operations conducted by the Regiment.

e. Principals. Principals have overall responsibility for monitoring the safety of cadet activities to ensure compliance with applicable school and school district regulations.

f. Commandants of Cadets. Commandants have primary responsibility for ensuring the safe operation of training events and operations conducted by school units. Cadet unit commanders and staffs have responsibility for promoting safety at all unit training events and operations.

g. Individual Cadets. Each cadet shall have a personal responsibility for ensuring the safety of him/herself and those around them. Cadets will notify their Commandant Leadership of any safety concerns as soon as they are known or identified.

Chapter 2

Safety in Training and Training Safely

2-1. General.

- a. Safety in Training refers to the incorporation of safety instruction into all aspects of cadet training.
- b. Training Safely refers to conducting training in ways that avoids hazards and minimizes risk to cadets, to property, and to the environment.
- c. Accountability of cadets is the most important responsibility of both adult and cadet leaders. Leaders should always know who is supposed to be present at training, at activities, and where they are.

2-2. Safety in Training Relative to the CACC Standards.

- a. General. It is an expectation that safety training be incorporated into all CACC instructional standards.
- b. Specifications. Cadets shall be taught the hazards inherent in the following activities

Performing basic military drill skills (e.g. in inclement weather)

Conflict resolution (e.g. violence)

Participating in guard duty (e.g. intruders, fire, natural disaster)

Bivouacking (field hygiene, sanitation, animals, etc; see CR 3-6, Bivouacs)

Survival situations (see CR 3-5, Survival Training, e.g. need for water, psychological response to survival situations)

Hunter safety (see California Hunter Safety Manual)

Marksmanship activities (e.g. safe operation of a firearm, safe operation of a firing range, duties of a range NCOIC or OIC or safety officer/NCO)

Fitness and wellness activities (e.g. proper warm up and cool down activities, safe strength building activities, proper techniques for promoting healthy weight)

Drill and ceremonies (e.g. safe movement on streets and military installation roadways, selecting the safest path of travel)

First aid and CPR (e.g. standard precautions, body substance isolation, heat and cold injuries, avoiding injury to rescuers)

Emergency preparedness (e.g. psychological response to emergencies, need for water, sheltering in place)

Map and compass use (e.g. getting lost, navigating rough or unfamiliar terrain)

Leadership (looking out for the welfare of cadets, including hydration, exposure to heat and cold, fatigue)

Basic understanding of the tenants of safety discussed within this regulation

2-3. Safety Considerations at Typical Cadet Training Events and Operations. The following considerations must be made when conducting cadet training events and operations.

- a. Hydration. Consideration must be given to ensure that cadets remain well hydrated during training events. Water should be available in abundance and cadets should be required to drink water frequently. As a rule, 5 minutes out of each hour should be set aside for hydration in moderate weather conditions. When the weather is warmer, the length of time between required hydration sessions should be shortened. When the temperature exceeds 85 degrees, hydration sessions should occur no less than every 40 minutes. When the temperature exceeds 89 degrees, hydration sessions should occur no less than every 30 minutes, and when temperatures exceed 100 degrees, hydration session should be required every 15 minutes. Hydration sessions should be monitored by cadet and adult leaders and should include the requirement that all cadets drink no less than one 16-ounce container of water each session. Cadets should be provided canteens or water bottles and access to potable water. Do not use untreated water from streams and/or lakes.

b. Cold and Heat Injuries. Exposure to the cold and heat is a common occurrence at cadet events. Consider the type of uniform being worn, adding layers for warmth in cold climates and allowing for loose clothing and protection from direct sunlight in warm climates. Sun guard of SPF 15 or greater and lip balm of SPF 15 or greater are also important provisions. Caps should be available and worn to protect from heat and sun exposure. The Wet Bulb Globe Temperature (WGBT) should be calculated and used to determine the extent of work cadets should be required to perform and the water intake required for the circumstances. WGBTs below 85 (Heat Category 1 – White or Heat Category 2 – Green) can be considered normal. Cadets can perform moderate and hard levels of work in those temperatures for periods less than one hour. When the WGBT is between 85 and 88 (Heat Category 3 – Yellow), work levels should be decreased to easy or moderate tasks and water intake increased accordingly. When the WGBT is between 88 and 89 degrees Fahrenheit (Heat Category 4 – Red), work should be dramatically reduced and water intake dramatically increased. Cadets should NEVER be required to do anything more than “easy” work if the WGBT exceeds 90 degrees (Heat Category 5 – Black), and if the WGBT exceeds 92 degrees, all outdoor training must cease until the WGBT drops below 92. Shaded rehabilitation areas should be provided on warm and/or sunny days. In cold weather at or below freezing, UV protection eyewear must be used. See Figures 2-1 and Figures 2-2 for additional guidance and direction.

c. Cadet horseplay. The age level of cadets will contribute to their overall maturity level. Horseplay, if not properly prevented and controlled, can lead to serious injury and even death. Proper supervision by both cadet and adult leaders is critical to avoiding and correcting horseplay.

d. Uneven terrain. Many cadet events take place at outdoor sites with uneven terrain. Cadets by their nature like to run rather than walk. Running on uneven terrain can lead to strains, sprains, and broken bones as well as lacerations and more serious injuries. Cadets should never be required to run on uneven terrain.

e. Rule of Three. Cadets should be required to remain in groups of three or more at all times. This lowers the likelihood of misbehavior and increases the chances cadets will follow other safety precautions. This applies in closed rooms, training areas, supply areas, laundry rooms, etc. as well as during transit. Two cadets of opposite genders should never be alone together in a closed room. If three cadets are present, and one is asked to leave, they should refuse that request as a violation of this policy.

f. Hygiene and Sanitation. Cadets must be taught proper sanitation and hygiene techniques and those techniques must be monitored by senior cadets and adult supervisors. Proper techniques include washing of hands and face/neck areas, sanitizing hands after restroom use, before and after eating, and after handling refuse. Proper placement of latrines and refuse are important considerations. Portable or stationary sanitary restroom facilities should be available for cadet field events. It is also important to keep feet dry, change wet socks, and treat “hot spots” on feet before blisters develop.

g. Cadet allergies and other medical conditions. Leaders must be aware of known allergies to medications, food, and other “triggers” as well as any known medical conditions that might impact a cadet’s health and safety at an event (epilepsy, asthma, diabetes, etc). Leaders should be familiar with any instructions provided by a cadet’s physician for treatment in the event a known health problem arises at a cadet event. Medication should be administered in accordance with school and school district policies and controlled substances should be maintained by adult supervisors, not by cadets themselves or cadet leaders. Complete medical histories should be obtained on a CACC Form 203 prior to cadet participation in significant cadet training events. See Appendix A for Form 203. IAW school and school district policies, rescue inhalers and epi-pens should be kept near cadets requiring them when in the field.

h. Medical Services. An appropriate level of medical expertise and appropriate first aid kit must be on hand at all cadet events. The number of total persons present at an event and the nature of the activities at that event should drive the decision about the type of medical services to have on hand. As a general rule, events with less than 100 cadets in attendance should have a First Aid provider (certified in CPR and First Aid by a recognized training and accrediting body, such as the American Heart Association, American Safety and Health Institute, or the American Red Cross). Events with between 100-250 cadets in attendance should have a basic aid provider available (an individual with the skillset equivalent to an Emergency Medical Technician - EMT-1 or military Field Medic -91/68 Bravo or 91/68-Whiskey) in attendance throughout the event. Events with between 250-600 cadets should have an advanced aid Provider in attendance; advanced aid providers are defined as a California Licensed or Certified

Paramedic (EMT-P), California Licensed Physician, California Licensed Physician's Assistant, or California Registered Nurse. Events with greater than 600 cadets should have one advanced aid providers and one basic aid provider in attendance throughout the event. In general, the higher the likelihood of serious injury or illness occurring at an event, the more advanced the medical services that should be available. Contact information for local Emergency Medical Services providers (hospital, trauma center, ambulance, fire department, etc) must be obtained prior to all cadet events. Directions to and contact information for EMS facilities should be available for all adult chaperons. A plan and reasonable method to evacuate an injured person must be in place for all cadet activities. Adequate medical/first aid supplies should be on hand.

i. Travel by Foot on Military Installations. Consider the best path of travel by foot. Plan where and how road guards will be utilized. Consider reflective vests, flashlights, adult vehicles to lead or trail marching units, and similar controls.

j. Communications. Two forms of communication must be available at all field activities. Those forms of communication must be capable of summoning emergency assistance. Examples include cell phone and radio, or two separate cell phones from two different carriers whose cell coverage/service availability has been confirmed prior to the event.

k. Fire Suppression. A fire extinguisher and shovel are required for overnight events involving camp fires and/or cooking fires. These fire suppression apparatuses are recommended in ratio to the number of cadets attending the event and the number of potential fire sources. Firewatch guard duty should be performed when "red flag" conditions are present. No other uses of open flame are permitted (i.e. candles, smoking, torches, etc). Portable flameless chemical heaters (catalytic) are forbidden at cadet events indoors or in tents. Although these heaters don't have flames, they burn gas and can cause carbon monoxide to build up inside enclosed spaces.

l. Work gloves. Activities that pose a hazard to hands of injury, wound or splinter should have gloves available.

m. Water Activities. Activities in an around water such as boating or swimming should have a designated and qualified lifeguard/safety officer.

n. Knives and weapons. Other than dining cutlery, no knives or weapons are allowed at cadet events (except survival bivouacs as monitored by adult leaders).

o. Weather. Weather forecasts should be reviewed prior to field operations or training. If lightning is encountered, suspend training and seek shelter away from high trees, power lines, or metal fences.

p. Buses and Transportation. Cadets should only ride in buses or vehicles with seatbelts for every occupant. All vehicles must be operated by properly licensed drivers with insurance that meets or exceeds the requirements of the State of California. All buses in which cadets' ride must be SPAB certified and buses must have current positive safety inspections from the California Highway Patrol.

q. Proper footwear during activities. Cadets should wear footwear at all times while walking. Sandals or shower shoes should only be worn while walking directly to or from the shower. Tennis shoes or proper uniform footwear shall be worn at all times while walking otherwise. When in uniform or during any physical/outdoor activity (i.e. off pavement), closed-toed shoes shall be worn

Figure 2-1.

Work/Rest Times and Fluid Replacement Guide

Heat Category	WGBT Index (°F)	Easy Work Walking on hard surface 2.5 mph, <30 lb. load		Moderate Work Patrolling, walking in sand 2.5 mph, no load calisthenics		Hard Work Walking in sand, 2.5 mph with load; heavy lifting		This guidance will sustain performance and hydration for at least four hours of work in the specific heat category. Fluid needs can vary based on individual. Differences and exposure to full sun or full shade. Rest means that physical activity (Sitting/Standing) should be in the shade as best as possible
		Work/Rest (Minutes)	Fluid Intake (quarts/hour)	Work/Rest (Minutes)	Fluid Intake (quarts/hour)	Work/Rest (Minutes)	Fluid Intake (quarts/hour)	
1 (White)	<=81.9°	NL	1/2	NL	3/4	40/20	3/4	
2 (Green)	82°-84.9°	NL	1/2	50/10	3/4	30/30	1	
3 (Yellow)	85°-87.9°	NL	3/4	40/20	3/4	30/30	1	
4 (Red)	88°-89.9°	NL	3/4	30/30	3/4	20/40	1	
5 (Black)	>90°	50/10	1	20/40	1 1/2	10/50	1	
NL = No Limit to work time per hour (Appropriate breaks should be offered)								

* Caution: Hourly fluid intake should not exceed 1 1/2 quarts. Daily fluid intake should not exceed 12 quarts

Figure 2-2

Cold Weather Training Precautions

Wind Chill	40° - 20°F Low	20° - 0°F Medium	(-1°) - (-20°F) High	<(-21°) Extreme
Mandatory Preventive Measures	<p>Cadets must wear a jacket, hat, and gloves or be able to keep hands in pockets.</p> <p>Training must be conducted in mostly dry conditions.</p> <p>A 20-minute warming break is required every 50 minutes.</p>	<p>Cadets must wear a warm base layer, jacket, winter hat with ear protection, and gloves.</p> <p>Training must be conducted in dry conditions.</p> <p>A 20-minute warming break is required every 50 minutes.</p>	<p>Cadets must wear a warm base layer, jacket, winter hat with ear protection, and gloves.</p> <p>Training must be conducted in dry conditions.</p> <p>A 20-minute warming break is required every 30 minutes.</p>	<p>No outdoor cadet activities are authorized</p>

Chapter 3

Risk Management

3-1. Fundamentals.

a. Risk Management is the process of identifying, assessing, and controlling risks arising from cadet activities and making decisions that balance risk costs with mission benefits.

b. Cadets and leaders at all levels can and should use risk management. Both the probability and severity of a potential risk must be considered when planning for a cadet event. Failure to properly manage risks can cause injury, death, loss of property, poor public relations, damage to the environment, and poor morale, to name a few serious ramifications. Adult on-site safety officers should be on duty during all field activities and are required for “high risk” operations and should be fully empowered to cease unsafe operations. Activities involving rappelling, mountaineering, or marksmanship are automatically classified as “high risk” for the purposes of this paragraph.

c. The following principles undergird the California Cadet Corps Risk Management philosophy.

(1) Risk management must be incorporated into mission planning, preparation, execution, and evaluation.

(2) Decisions about levels of acceptable risk must be made at the appropriate level, recognizing that the next higher level in the chain of command may well need to be aware of the risks that a lower level leader has determined to be acceptable.

(3) No unnecessary risk should EVER be accepted.

(4) Local school districts always have the final decision-making authority in determining acceptable risk.

d. It is an expectation that all units will report in written form to the HQS, CACC any serious injury or death, serious safety lapse, or “near miss” at a cadet activity within 24 hours of the occurrence. Electronic mail to the Executive Officer, CACC is the preferred method of communication.

3-2. The Risk Management Process.

a. Five Steps in the Process.

(1) Identify hazards

(2) Assess hazards to determine risks

(3) Develop controls and make risk decisions

(4) Implement controls

(5) Supervise and Evaluate

b. Step 1. Identify all possible hazards for the cadet activity. Go through EACH line on the training schedule and ask the question, “is there a way cadets or property could be at risk in this activity.” This includes such things as movement of cadets to/from locations, activities in classrooms and on training ranges, meals, “commander’s time,” personal hygiene time, etc. Consider the terrain, the weather, emotional health of cadets.

c. Step 2. For each hazard, ask yourself two questions, “How likely is the hazard to occur?” (unlikely, seldom, occasional, likely, frequent) and “How severe could the consequences be if that hazard occurred?” (negligible, marginal, critical, catastrophic). Once you have determined the answers to those two questions, identify the overall risk level on Figure 3-1 below:

Figure 3-1:

PROBABILITY→ SEVERITY↓	FREQUENT	LIKELY	OCCASIONAL	SELDOM	UNLIKELY
CATASTROPHIC (death/serious, non-reversible injury and/or environmental damage)	Extremely High	Extremely High	High	High	Moderate
CRITICAL (extensive injuries and/or environmental damage)	Extremely High	High	High	Moderate	Low
MARGINAL (minor injury/illness/environmental damage)	High	Moderate	Moderate	Low	Low
NEGLIGIBLE (first aid, very minor loss)	Moderate	Low	Low	Low	Low

d. Step 3. For each hazard, identify which controls you will put into place and whether after those controls are in place the risk is acceptable. Remember that controls must be suitable to the situation and reasonable within budget, time, and personnel constraints. Controls can include:

(1) **Educational** Controls: individual and collective training that ensures cadets know how to be safe in that situation.

(2) **Physical** Controls: barriers, guards, signs, oversight personnel. Always identify and flag known hazards (e.g. poison oak, bee hives, etc) as part of the risk assessment process.

(3) **Avoidance**: the leader makes sure cadets are prevented from contact with the hazard

e. Step 4. For each set of identified controls, implement them, making sure it is clear who is responsible for implementation and who will monitor their implementation.

f. Step 5. Supervise the implementation of the controls as part of the larger mission and evaluate whether those controls are adequate to mitigate the risk.

g. After this process if implementation of controls cannot mitigate risk to an acceptable level, the event or training cannot be conducted

h. CACC Units will not conduct training or operations which have a risk rating of “Extremely High”

i. All training or operations with a risk rating of “High” will have a risk management plan with approval from next higher headquarters.

Chapter 4

Environmental Protections

4-1. General.

Cadets and adult members of the California Cadet Corps have a responsibility to be good stewards of the earth. At no time should a cadet activity leave our planet in a worse condition than when that activity began.

4-2. Guiding Principles.

- a. Principle #1. Cadets will always leave an area better than when it was found.
- b. Principle #2. Cadet Corps leadership will be familiar with applicable local, state, and national policies regarding environmental impact and fully comply with those policies.
- c. Principle #3. Cadet Corps activities will strive to mitigate any negative impact on the environment and will, whenever possible, avoid such impact.

4-2. Principles in Practice.

- a. Principle #1. Cadets will always leave an area better than when it was found.
 - (1) Conduct frequent police calls and a thorough police call at the conclusion of all cadet events.
 - (2) Take digital photographs of areas upon arrival and departure to document adherence to this principle.
- b. Principle #2. Cadet Corps leadership will be familiar with applicable local, state, and national policies regarding environmental impact and fully comply with those policies.
 - (1) Secure copies of applicable policy documents from facility officials.
 - (2) Read all such documents thoroughly and act upon them.
 - (3) Use the information from those documents as a source of training material for cadet leaders and cadets.
- c. Principle #3. Cadet Corps activities will strive to mitigate any negative impact on the environment and will, whenever possible, avoid such impact.
 - (1) Comply with all impact mitigation expectations of the host facility.
 - (2) Coordinate mitigation efforts with Environmental Compliance Officers (or their equivalent).
 - (3) Stay on trails to avoid disruption to the environment, minimize disturbance to natural habitats, and maintain natural erosion patterns.

Chapter 5

The Risk Management Worksheet

5-1. General.

- a. A Risk Management Worksheet (CACC Form 21, found at Appendix B) will be completed for all CACC training events and operations from the unit level up to the state level. The normal expectation is that the worksheet is completed no less than 30 calendar days prior to the event.
- b. Copies of the worksheet will be maintained at the unit headquarters and made available to school, CACC, or event facility officials upon request.
- c. Cadet Safety and Security (S-2) Officers or their staff equivalent will normally prepare the worksheets initially and present them to adult CACC leaders for modifications and approval. Cadet commanders are responsible for the timely and accurate completion of the worksheets well in advance of the 30-day suspense identified in 5-1(a) above.
- d. Unit leaders will brief all cadets on the controls in place that mitigate risk.

5-2. Completing the Worksheet.

- a. Entry Point 1 – Identify the unit name and unit ID number (e.g. 49th Battalion, Oakland Military Institute)
- b. Entry Points 2 and 3 – Identify page x of y
- c. Entry Point 4 – Identify the name of the event (e.g. Leadership School, Land Navigation Bivouac, etc)
- d. Entry Points 5,6,7 – Identify the begin and end dates of the event and the date the worksheet was prepared.
- e. Entry Point 8 – List separately EACH event (task) on the training schedule that has potential hazards.
- f. Entry Point 9 – For the corresponding event (task), list ALL hazards for that event.
- g. Entry Point 10 – Identify the Initial Risk Level for each hazard using the Chart in Paragraph 3-2 of this regulation.
- h. Entry Point 11 – Identify all controls you plan to put into place for that hazard.
- i. Entry Point 12 – Use the same chart from para 3-2 and if the controls are fully and properly implemented, identify the “new” risk level
- j. Entry Point 13 – Provide details on the controls you identified at Entry Point 12 (when will the controls be implemented, how, where?). **Details should include methods to summon assistance, along with the contact info for local emergency services.**
- k. Entry Point 14 – Identify the cadet/adult who will have primary responsibility for implementing the control AND who will provide oversight/supervision of that cadet/adult
- l. Entry Point 15 – Look at column 13 and identify the HIGHEST remaining risk level. That is your OVERALL risk level. Check that level.
- m. Entry Point 16 - Identify the level of medical support required.
- n. Entry Points 17 and 18 – List rank, last name, and duty assignment of the cadets who prepared and reviewed the form. (Cadet commander should sign the form indicating his/her review of the content.
- o. Entry Point 19. The Risk Decision Authority is the commandant of cadets for any event with an overall risk level of LOW. Regimental or Brigade Advisors must approve any event with an overall risk level of MODERATE. Only the Executive Officer, CACC may authorize an event with an overall risk level of HIGH, and the CACC **does not allow any event with an EXTREMELY HIGH risk level.**

Chapter 6

Cadet Protection

6-1. General.

a. The purpose of this section is to serve as policy for events and activities conducted by HQS, CACC, including summer encampment as well as transportation to and from such events. Additionally, this section will provide direction in those situations where local school policy and guidance does not cover local activities.

6-2. Key Organizational Policies.

a. *The Cadet Environment.* California Cadet Corps (CACC) conducts its program in a positive, safe, age-appropriate environment that follows a military model emphasizing Cadet Corps traditions and values. Cadets have opportunities to lead, encounter challenges, and have fun as they work.

b. *Commitment to Safety.* CACC's policy asserts that there is no place for physical, sexual, or emotional abuse in any of its programs. CACC will report to law enforcement all reasonable suspicions of child abuse and other criminal activity as required by local law, and will cooperate with law enforcement investigations.

c. *Scope.* This regulation governs all participants in CACC activities conducted by HQS, CACC and applies to all CACC members, cadets and commandants, adult volunteers, chaperones and any non-members who may have any interaction with CACC cadets. When non-CACC members, such as guest speakers, military personnel, trainers, or visitors interact with cadets, CACC members will supervise to ensure that the non-CACC adults adhere to basic, socially acceptable norms. Non-members who are working with cadets (i.e. military members, school chaperones) will be briefed on this policy prior to working with cadets.

d. At CACC events co-sponsored by HQS CACC and local school districts, the more restrictive of this and district policy shall apply and must be complied with. Adults from the local school district (i.e. chaperones, Commandants, or supervisors) are responsible for being familiar with, and ensuring compliance with local policies relative to cadets from their respective districts.

6-3. Decorum and Fraternization.

a. **Decorum.** All members are expected to conduct themselves in a professional and appropriate manner throughout HQS CACC conducted events.

b. **Cadet-to-Cadet Fraternization.** Regardless of the relationship cadets may have at home, cadets will not engage in any sexual or romantic behavior at HQS CACC events, to include inappropriate touching or displays of affection by kissing, hugging, or similar conduct.

c. **Adult Leader-to-Cadet Fraternization.** Adult supervisors will not have an intimate romantic relationship with a cadet at any time, regardless of the circumstances. Relationships between adult supervisors and cadets will remain professional at all times. Adults will not hang out, party, or engage in any sexual or romantic activity with cadets (for purposes of this provision, structured and scheduled social events, with appropriate supervision as specified elsewhere in this policy, are not considered a "party").

d. **Electronic Communication.** Adults will not communicate electronically (ex. text or email) with cadets about non-CACC related content and will maintain a professional relationship with cadets. Adults will not discuss matters of a personal nature through electronic communication with cadets. Consider including a third person on all communications to maintain the concept of the "rule of three" in long communications.

6-4. Universal Standards of Practice.

a. Proximity of Supervisor. Because each physical environment, mixture of cadets' grades and ages, and nature of activity is different, CACC does not set a firm rule regarding the proximity between a group of cadets and their adult supervisor. If supervisors do not have direct line of sight contact with cadets, they must nevertheless be aware of where the cadets are, what they are doing, and check up on them periodically. For example, a cadet unit may practice drill in the parking lot while the adult supervisor remains in the barracks, but the unit may not leave for dinner at the DFAC without the adult supervisor.

b. Semi-Private Discussions. Adult supervisors who need to mentor or counsel cadets individually during official activities should do so in the presence of a third person when reasonably possible. Alternatively, one-on-one meetings are permitted but not recommended if conducted in a semi-open setting (e.g. office door kept open, or conversing away from, but in sight of, the group, or other circumstances). Cadets are prohibited from meeting one-on-one in a closed environment; an adult leader must be present or other arrangements must be made to minimize the risk of misconduct, such as keeping the door fully open.

c. Transportation. If an adult leader transports cadets other than his or her family members to, from, or during a CACC activity, the party must number at least three (adult driver plus two cadets; or adult driver, second adult, and one cadet). Exceptions to this policy may be granted by the CACC XO if parental/legal guardian permission is attained. In emergency situations, this rule may be waived if the cadet needs to be driven to get medical care; the officer in charge will make the call to waive the three-person requirement, including consideration of having another cadet or adult accompany them to watch over the patient.

d. Field Conditions. Cadets will observe the rule of three when out in the field. They may be separate from adult supervisors in a controlled situation such as land navigation courses and survival, as long as they have a method of obtaining adult assistance. It is preferred that cadets stay in groups of four so two can go for help and one can stay with an injured cadet in case of emergency.

e. Favoritism and Gifts. Showing favoritism and receiving gifts from cadets connotes quid pro quo regardless if this is the intent and therefore is strongly discouraged. It breeds resentment and adversely affects morale, esprit de corps and the ability to train effectively. Because of the leadership training model of the CACC, promotions and awards come from performance and are considered appropriate without the perception of favoritism. Conversely, there are appropriate consequences for poor performance that are used to influence better performance and behavior within the CACC training concept. Both adult and cadet leaders will ensure that promotions/awards and/or consequences for poor performance do not present the appearance of favoritism.

f. Social Media. Prior to posting anything on social media sites regarding HQS CACC events, the poster will coordinate with the CACC S5.

g. Adult Supervisors' Quarters. No adult supervisor will lodge in a tent or barracks room with a cadet who is not a member of his or her immediate family. There will be an adult supervisor assigned to monitor cadets in the barracks after lights out. When facility limitation requires that adults and cadets be housed in the same room/bay, they will be separated as much as possible, and this is never acceptable for just one adult and one cadet.

h. Segregation by Gender. Male and female cadets will be assigned to separate quarters. Adult supervisors will establish clear guidelines as to when and how personnel of one gender may enter areas designated for personnel of the opposite gender.

i. Transgender Cadets. The California Education Code Section 220 prohibits gender identity discrimination against students in educational programs and activities. The CACC shall make reasonable accommodations for any transgender cadet that wishes to participate in activities as facilities are available.

j. Personal Care Time. CACC will respect cadets' reasonable expectations of privacy during times designated for sleeping, dressing, and showering. If all participants share a single shower facility, adult supervisors and cadets will use the showers at separate times, and the ranking cadets will maintain good

order in the shower area. Adult supervisors are not to enter the cadet shower and latrine areas during personal care time except in case of emergency. Photography and recording is strictly prohibited in the shower and latrine area. Devices that have cameras are prohibited from the shower areas and must be stowed away when cadets are undressing in the dorm or barracks area.

k. Confidentiality. CACC cadets and adults will respect a broad right to confidentiality of all event participants regarding medical and health information. Such information will only be shared on a “need to know” basis in order to protect the health and wellness of the cadet, and then only the information required for appropriate care of the cadet will be shared. Except as provided by law, parents will be privy to all medical and health information of their respective cadets, which will typically be shared by adult medical or mental health staff with the parents.

l. Training. Adult and cadet leaders participating in cadet training or activities that extend beyond two nights (ex. Summer Leadership Camp, Advanced Camp, etc.) shall require a briefing that reviews the cadet protection concepts identified in this regulation. Topics in the briefing should include identifying abuse and hazing, appropriate training and intensity levels for cadet activities, how to report violations of the policy, fraternization, and appropriate decorum during the event.

6-5. Alignment of Training Goals and Training Intensities.

a. Adult supervisors who supervise cadets must ensure that the activity’s training goals and the intensity level of military-style training are age-appropriate and properly aligned. In a training environment, even members of the cadet leadership are learning, and it is to be expected that they will sometimes pursue an inappropriately high training intensity. The system of boundary concerns allows cadet leadership room to make mistakes and learn from them without resorting to formal disciplinary action. Nevertheless, adult supervisors shall not tolerate inappropriate training intensity levels for extended periods of time; if a situation does occur, the ranking officer (by duty assignment) on-scene is responsible for correcting the training methods so that they match the guidelines of CR-3.

b. Mismatched Goals and Intensities.

(1) An inappropriately high level of training intensity does not meet this policy’s definition of abuse or hazing unless it causes serious physical harm or serious emotional harm. Inappropriate yelling, using overly stressful physical training (PT) as punishment, and creating an overly-stressful environment and other conduct are examples of inappropriately high training intensities that will be treated as boundary concerns.

(2) If the act causes *serious emotional harm* or *serious physical or sexual harm* it is then deemed abusive.

c. Hazing. By definition, hazing is abusive conduct that takes the form of physical, emotional, or sexual abuse. Hazing shall not be tolerated in CACC, and as with any other instance of suspected abuse, must be reported per paragraph 6-6. To avoid mistakenly deeming that hazing has occurred, first review paragraphs 6-5 a & b.

6-6 Reporting Requirements.

a. Members who develop a reasonable, good faith suspicion or belief that a cadet has been sexually abused, physically abused, neglected, or emotionally abused will first ensure that the cadet is safe from imminent harm. The member will then contact the XO or IG. Members who fail in this duty will be subject to disciplinary action. For a definition of “abuse” and “reasonable suspicion of abuse,” see Section 1-2. If a cadet does not wish to make a formal report or name an abuser, CACC leaders will still work with the school and parents to provide counseling or medical resources to help them. Mandatory reporters must still follow proper procedures of reporting.

b. Cadets as Reporters. In the event introductory briefing, cadets will be encouraged to report their reasonable suspicions of abuse to trusted adults, but unlike with adult supervisors, CACC does not discipline cadets for not reporting.

c. Self-Reporting. Members who believe they have been subject to abuse may file a complaint directly to the first adult in the cadet’s chain of command, directly to the XO, the IG, or to any trusted adult, who

will report it directly to the XO.

d. Mandatory Reporters. Due to their profession, some members are required to report their suspicions of abuse to law enforcement. Mandatory reporters will report in accordance with law, in addition to taking any other actions required by this policy.

e. False Reports. Accusing someone of violating this policy is a serious matter. The repercussions can affect an individual's personal and professional life. In reporting a reasonable suspicion of abuse, members must strictly limit their report to facts that they personally know to be true. If HQ CACC determines that a member (including cadets) made a report that he or she knew to be false, that individual(s) will be subject to disciplinary action.

f. Non-retaliation. Persons reporting violations of this policy will not be retaliated against or have any adverse action initiated by the CACC unless an investigation reveals that the reported allegation was intentionally false and intended to inappropriately impugn another.

6-7 Investigations.

a. Immediately after receiving a report that alleges a reasonable suspicion of sexual, physical, or emotional abuse as described above, the XO will confer with legal counsel. Depending on the nature and severity of the offense, the XO will determine whether the accused member is removed from contact with cadets, retrained, or sent home. The accused member may be retained in a non-supervisory capacity while an investigation is conducted, and if applicable, to interview with law enforcement personnel.

b. The complaint and investigation process for allegedly abusive behavior is explained in CR 1-2. After reporting a reasonable suspicion of abuse, members are prohibited from undertaking any further action on the matter without specific authorization. CACC will not undertake an internal investigation if an external investigation is being conducted by the CA Military Department or law enforcement.

c. Complaints that are categorized as boundary violations, but don't rise to the level of abuse as defined in this regulation, will be addressed by the chain of command through counseling and training.

APPENDIX A

CALIFORNIA CADET CORPS	REPORT OF MEDICAL HISTORY	<i>FOR OFFICIAL USE ONLY</i>	
NOTICE			
<p>The information requested below is required to provide the medical examiner an accurate history of illnesses and injuries that may affect the applicant's ability to perform the strenuous physical exercise and exposure to living and working environments that are a part of the CACC training program. Also this information will be provided to medical examiners in case of injury or illness while participating in CACC activities. THE INFORMATION YOU PROVIDE MUST BE ACCURATE AND COMPLETE. You are encouraged to consult your private physician regarding past illnesses. Proof of immunization for Polio, Measles, Mumps, Rubella and Diphtheria, Pertussis and Tetanus (DPT) plus Diphtheria and Tetanus (DT) booster may be required. Please attach a photocopy of the cadet's health insurance card, if available.</p>			
1a. School Name and Battalion # (if known)		1b. Grade	
2a. Last Name	2b. First Name	2c. MI 2d. Rank	
2e. Age	2f. Date of Birth (DDMMYY)	2g. Sex <input type="checkbox"/> Male <input type="checkbox"/> Female	
2h. Parent/Guardian Name			
2i. Home Address	2j. City	2k. State 2l. Zip Code + 4	
2m. Home Phone	2n. Name of Health Insurance Provider	2o. Health Insurance identification number or plan number (please attach a copy of the Health Plan ID card if available)	
3. CURRENT MEDICATION (prescription and over-the-counter)		4. ALLERGIES (including insect bites/stings, medicine, and other substances)	
5. MEDICAL HISTORY (Mark each item "YES" or "NO" Every item marked yes must be fully explained in block 6)			
HAVE YOU EVER HAD OR DO YOU NOW HAVE ANY OF THE FOLLOWING CONDITIONS:			
	YES	NO	
5a. Tuberculosis	<input type="checkbox"/>	<input type="checkbox"/>	5n. Head injury, memory loss, or amnesia
5b. Lived with someone with Tuberculosis	<input type="checkbox"/>	<input type="checkbox"/>	5o. Seizures, convulsions, epilepsy, or fits
5c. Asthma or breathing problems related to exercise, pollen, etc.	<input type="checkbox"/>	<input type="checkbox"/>	5p. Car, train, sea, and/or air sickness
5d. Been prescribed or use an inhaler	<input type="checkbox"/>	<input type="checkbox"/>	5q. A period of unconsciousness
5e. Loss of vision in either eye	<input type="checkbox"/>	<input type="checkbox"/>	5r. Heart trouble or murmur
5f. Loss of hearing or wear a hearing aid	<input type="checkbox"/>	<input type="checkbox"/>	5s. Received counseling for emotional or behavior disorder
5g. Impaired use of arms, legs, hands, feet	<input type="checkbox"/>	<input type="checkbox"/>	5t. Eating disorder (bulimia, anorexia)
5h. Knee problems	<input type="checkbox"/>	<input type="checkbox"/>	5u. Sleepwalking
5i. Broken bones(s) (cracked or fractured)	<input type="checkbox"/>	<input type="checkbox"/>	5v. Bedwetting
5j. Diabetes	<input type="checkbox"/>	<input type="checkbox"/>	5w. Been hospitalized (if yes, why, when, where)
5k. Anemia (including sickle cell)	<input type="checkbox"/>	<input type="checkbox"/>	5x. Any illness or injury not mentioned above (if yes, explain)
5l. Dizziness or fainting spells (including after exercise)	<input type="checkbox"/>	<input type="checkbox"/>	5y. Advised to avoid certain physical activities (if yes, explain)
5m. Frequent or severe headaches	<input type="checkbox"/>	<input type="checkbox"/>	5z. Note any dietary restrictions (e.g. diabetics)
6. EXPLANATION OF "YES" ANSWER(S) (Describe answer(s), give date(s) of problems, name of doctor(s) and/or hospitals, treatment given and current medical status)			

CALIFORNIA CADET CORPS*REPORT OF MEDICAL HISTORY*

7. IMMUNIZATION RECORDS (Indicate date of last immunization and attach proof of immunization if available)

7a. Measles

7b. Rubella

7c. DPT/DT-
Tetanus

7d. Mumps

7e. Polio

7f. TB Test

7g. Other

8. REMARKS (please include and other medical history that you or your physician deems important)

9. ENDORSEMENT

"I certify that to the best of my knowledge that the information provided is true and accurate and that I have disclosed all pertinent medical history"

9a. Parent/Guardian (Type or Print)

9b. Signature

9c. Date (DD MMM YY)

**CACC FORM 203 (REV 07/2018),
Reverse**

PREVIOUS EDITIONS ARE OBSOLETE

APPENDIX B

RISK MANAGEMENT WORKSHEET
CALIFORNIA CADET CORPS FORM 21

1. Organization and Unit Location:

2. Page

of

3.

4. Mission/Task:

5. Begin Date:

6. End Date:

7. Date Prepared:

8. Tasks	9. Identify Hazards	10. Initial Risk Level	11. Develop Controls	12. Residual Risk Level	13. Implement Controls ("How To")	14. Who/How Supervised

15. Determine Overall Mission/Task Risk Level After Countermeasures Are Implemented:
(Check Highest Remaining Risk Level) **LOW (L)** – **MODERATE (M)** – **HIGH (H)** – **EXTREMELY HIGH (E)** –

16. On-site Medical Support to be provided (Circle one): Paramedic EMT Military Field Medic Individual Trained at Combat Life Support First-Aid Responder None

17. Prepared by Cadet S-3 or S-2: (Rank, Last Name, Duty Position)

18. Reviewed by Cadet Commander: (Rank, Last Name, Duty Position and Signature):

19. Risk Decision Authority (Signature Block and Signature):

Extremely High Risk: Not Allowable for Cadet Corps
High Risk: XO, CACC
Moderate Risk: Brigade/Regimental Advisor
Low Risk: Commandant