

SafeConduct™ Policy & Procedure Template

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This template is provided as a service by the Insurance Board, a non-profit insurance and risk management ministry, as a service to churches and camps of the denominations it serves: The Christian Church (Disciples of Christ), Presbyterian Church USA and United Church of Christ. The materials provided are based, in part, on guidance provided by **Praesidium, Inc.**, our business partner and consultant in matters of abuse prevention.

Throughout this template, **information and comment will be provided in text boxes** to assist users in making choices and crafting policy that they can actually implement and live. It is not our intent to dictate policy, but to suggest details you will find constructive. We do not expect any organization will adopt all elements of the template; we understand that different organizations have different needs and different abilities, usually due to size, to implement policies and procedures.

The volume of material presented here may be found intimidating and beyond the ability or willingness of a church or camp to execute. It is the responsibility of church leaders to determine the necessary components of policy. (A significant part of the material below is guidance and sample forms.)

While this template is focused primarily on child abuse prevention, opportunities will be identified to address other issues that relate to **SafeConduct™**, to include sexual harassment, professional boundaries, sexual orientation, bullying and exploitation of vulnerable adults. Users will find that principles applying to abuse prevention can apply to and are easily adaptable to the other vulnerable groups although different specific techniques may apply.

Congregational Approval – Creating a policy for the first time will not always be easy and may take more time than expected. Some will resist the vetting and oversight that is implicit in an effective program. It will be important that you engage your congregation in the process and arrive at consensus. When it comes time to vote on adoption, the details of the policy and procedure must not be a surprise. Be sure to understand what your Constitution or By-Laws may require to obtain approval.

Policy Language – Throughout this template, procedures are expressed as imperatives (shall, will). Vague terms such as “should” or “may” are specifically avoided. Responsibility for specific actions are assigned to “individuals” (usually by title), not to groups or committees. Each individual must understand his/her specific responsibility.

CAUTION

Editing Required – *This template cannot be adopted “as is.” It requires tailoring to your church/camp management and program structure and to your ability to actually fulfill its requirements. NO POLICY/PROCEDURE CAN BE ADOPTED WHICH YOU CANNOT LIVE AND FULFILL COMPLETELY.*

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How to remove the “SAMPLE -- Editing Required” watermark (Word 2010):

Go to **Page Layout**.

Find **Watermark** in the tool bar and click on the drop-down arrow

Scroll down and click on **Remove Watermark**

Statement of Policy

This section is a broad statement of policy. It is drafted in a tone of expressing expectations – what we shall do -- over prohibitions or punitive response.

Depending upon the nature of your organization, whether a church, camp, or other non-profit, you may customize terms to suit your culture. For example, you may wish to insert a variety of scriptural references. This particular policy statement is very broad and goes beyond child sexual abuse to include elements of employment practices and other at-risk groups. For example, a church may routinely provide an overflow homeless shelter where families and persons with mental illnesses are present.

While many churches use terms such as “safe church”, “safe sanctuary” or similar terms for their policies, we have adopted throughout the policy template the term **SafeConduct™**. Our strategy is to focus less on a fortress place and more on the importance of personal behavior and personal responsibility in abuse prevention. *While SafeConduct™ is a trademarked term, any church or non-profit camp within the denominations we serve is free to use it.* Some have already chosen to incorporate it. We are pleased that you do.

Throughout, items within quotation marks (“---”) will have a definition included in a Definitions section.

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BIBLICAL REFERENCES

“Instead, as he who called you is holy, be holy yourselves in all your conduct.”
(1 Peter 1:15)

“He has told you, O mortal, what is good, and what does the LORD require of you but to do justly, and to love kindness, and to walk humbly with your God?”
(Micah 6:8)

“Whoever welcomes one such child in my name welcomes me”
(Matthew 18:5)

“If any of you put a stumbling block before one of these little ones. . . , it would be better for you if a great millstone were fastened around your neck and you were drowned in the depth of the sea”
(Matthew 18:6)

But Jesus said, *“Let the little children come to me, and do not stop them; for it is to such as these that the kingdom of heaven belongs.”*
(Mathew 19:14)

“But let justice rolls down like waters, and righteousness like an ever-flowing stream”
(Amos 5:24)

“You shall not wrong or oppress a resident alien, for you were aliens in the land of Egypt. You shall not abuse any widow or orphan. If you do abuse them, when they cry out to me, I will surely heed their cry.”
(Exodus 22:21-23)

Each reference above is from the New Revised Standard version.

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As a community of Christian faith, (Your Church) is committed to creating and maintaining programs, facilities and a community in which members, friends, staff and volunteers can worship, learn and work together in an atmosphere free from all forms of discrimination, harassment, exploitation or intimidation. The congregation of (Your Church) supports principles of SafeConduct, which include individual responsibility to fulfill the highest standards of personal conduct toward others and to lead and guide the congregation in fulfillment of the standards set by our Christian faith. (Your Church) strongly opposes and prohibits “sexual exploitation”, “sexual harassment” or any form of exploitation or abuse of others regardless of age, sex, sexual orientation, sexual identification or mental capacity. It is the intention of our congregation to affirmatively nurture good behavior, and to prevent and correct behavior that is contrary to this policy and, as necessary, discipline those persons who violate this policy.

Every member of the Congregation, whether “authorized clergy”, leader, lay staff, volunteer or parent, has a role to lead those who look to them individually for guidance, to monitor their behavior and redirect them as they cross boundaries of SafeConduct. Our congregation shall nurture good conduct as demonstrated by personal behaviors that are consistent with our Christian values. As we might conduct an orchestra, we shall guide and lead in ministry.

Ministers -- Ministerial Conduct

Consistent with our understanding of the priesthood of all believers, all “authorized clergy”, employees, elected and appointed lay leaders, and authorized volunteers are Ministers to the congregation. It is especially important that every Minister to the church be adequately prepared and educated for the ministry in which they serve others, and to understand the ways in which their use or misuse of authority may impact others. Each Minister is obligated to demonstrate and encourage SafeConduct by being attentive to self-care, continuing education, maintenance of personal boundaries, and support of those who are vulnerable, or in need of support or refuge. Every Minister should seek to protect vulnerable individuals of every kind and to comply with State laws as may be their statutory obligation.

Each Minister shall acquire knowledge of the details of this policy and related procedures in order to:

1. Prevent “sexual exploitation” or “sexual harassment” of parishioners, employees or others by anyone engaged in ministry on behalf of (Your Church).
2. Prevent abuse or exploitation of “vulnerable adults”, to include financial exploitation.
3. Prevent abuse or mistreatment of children to include abuse of one child by another.
4. Demonstrate appropriate physical contact or verbal interaction as defined in this policy and prevent or re-direct inappropriate interaction or physical contact by others.
5. Enforce standards for contact between employees, staff and children outside of scheduled programs.
6. Communicate to others and practice guidelines regarding electronic communications and social media.
7. Manage risk of one-on-one contact between adults and children.
8. Recognize the importance, and act upon observations or allegations of behavior outside policy boundaries to include personal interactions, use of social media and use of church computers.

9. Understand and accept obligations and know how to report suspected abuse of children or other “vulnerable adults” as required by this policy or as required by the State of (your state), and cooperate with investigations as may follow.
10. Recognize circumstances of “sexual harassment” and the obligation and means to report to church leadership.
11. Understand how, by their action or inaction, they individually pose a risk to the church in the form of legal liability or loss of reputation.

Every Minister shall refrain from using a position of power or authority to exploit an advantage over any other person, adult or child.

Ministers who are “authorized clergy” and serving the congregation in any capacity (active, retired, employee, volunteer) shall hold themselves to a higher standard of care with respect to their personal conduct and relationships with the congregation, church staff and volunteers, whether pastoral, administrative or personal in nature. Utmost care and good faith are expected.

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Screening & Selection

The process of screening and selecting staff and volunteers is an essential element of management due diligence. There are several elements required which serve a number of purposes. Criminal background checking by itself is inadequate simply because very few predators, or people who would become predators, have been through the penal system. A would-be predator requires three things: Access, Privacy & Control. Your screening process will communicate to applicants that prevention matters, you have a process and you are diligent about your responsibility to deny access by predators to your children.

In formulating screening steps, it is important to (1) create a process that you can fully execute and (2) resolve that exceptions to your process may not be granted under any circumstances.

Background checking services are available through the Insurance Board to any church or camp of the denominations we serve whether or not insured by the Insurance Board program. See the *SafeConduct™ Workbench* under *Safety Solutions* at www.insuranceboard.org.

Standing of “Authorized Clergy”: Each denomination served by the Insurance Board has a process of granting professional standing to clergy. Employment of clergy who do not fulfill denominational requirements may have an impact on insurance programs. Consult your insurance agent if there are concerns.

Position Descriptions: Modern employment practices require there be a “position description” for any kind of employment. The description outlines regular duties and obligations as well as educational and physical requirements for the work. With respect to work with children, it is important that position description include obligations to enforce security and organizational and statutory obligations to report suspected child abuse. While position descriptions for volunteers may be more generalized, their security and reporting obligations should be clear.

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Prior to beginning their duties as Ministers, each candidate for employment and volunteers who work with children or “vulnerable adults” shall be subject to the following qualifying steps:

Application & Qualification --

All employment candidates and volunteers who work with children shall

1. Complete an application reciting work history, education, (xx) years of residence history and disclosure of criminal convictions. An affirmative response is required to each and every question; no answers may be omitted. Falsification of any aspect of the application shall be grounds for immediate dismissal. **(Appendix B – Applications & Forms)**
2. Provide a minimum of three references, which shall include both work-related and personal.
3. Grant written permission to conduct a background check as specified by this policy.
4. Upon selection, sign an acknowledgement of these policies and procedures and fulfill all training obligations within one month after assuming duties.

Volunteers shall be active members of the church, or otherwise affiliated with the church, for no less than six months before being permitted to work in child oriented programs. There shall be

no exceptions to this policy, even when volunteer candidates come from another church with similar programs.

The (Chair, Employment Committee) and Director of (the related program) shall each interview separately and in person every candidate for employment or volunteer. Each shall employ behavioral interviewing techniques to assess suitability for working with children, and specifically discuss the church's commitment to protecting children and other vulnerable persons from abuse. (Appendix C – Interview & Reference Questions)

The (Chair, Employment Committee) shall directly contact and interview at least three references for each employment candidate or volunteer, a combination of professional and personal, ask standardized questions to assess suitability and document responses. (Appendix C – Interview & Reference Questions)

Background Checking --

The (Chair, Employment Committee) shall conduct a criminal background check on every employment candidate and volunteer meeting the following criteria:

1. National multi-state criminal records search
2. National sex offender registry search
3. Social security number trace and alias search
4. County criminal records search for every county where the applicant has lived or worked over the past (xx) years:

Written permission to conduct a background check shall be obtained from each applicant prior to executing the check.

Criminal background checks shall be repeated for employees and volunteers who perpetually work with children every three years. Seasonal employees or volunteers who have been absent from work more than six months, shall have a new background check prior to resuming work.

Note on Background Checks: It is most important when conducting a background check to **understand the sources** that are being used. For licensed activities such as day care, many States require that an organization conduct background checking through a State agency, such as the State Police. **It is not clear always which sources the State agency is using**, or whether they are conducting a check outside their own State. Without understanding what sources your State agency is using, such a background check may be inadequate, especially if the subject candidate employee/volunteer has lived or worked in another State. The levels of checking described above correspond to services available from Praesidium, Inc. through the Insurance Board. You must determine what level of checking you can afford and is appropriate for the position. It is fundamentally important that you be consistent.

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Approval Procedure --

A committee of three consisting of (Chair, Employment Committee), (Your Position 1) and (Your Position 2) shall review each background check and agree that the applicant is eligible for employment as Minister, employee or volunteer.

Where a criminal record exists, consideration shall be given to:

1. Seriousness of the crime;
2. Statutes that may legally disqualify the person from working with minors;
3. Length of time since the last offense;
4. Pattern of criminal activity; and
5. Activities the applicant has been involved in since the offense(s) occurred.

Conviction for the following crimes shall be considered barriers to employment or volunteer work with children:

1. Violent crimes
2. Sexual assault
3. Sexual abuse or neglect of a child
4. Drug offenses or driving offenses (depending upon position requirements)

Arrest data are not grounds for disqualification, only convictions. The status or relevance of other crimes will be considered individually.

Convicted or Registered Sex Offenders – Knowledge by a church leader that a convicted sex offender is a member or working in your church may void insurance coverage for the church for future acts of that offender. Be sure to understand the provisions of your church’s insurance policy.

EEOC -- Because of the disparate impact criminal history has upon the employment of some groups, the Federal EEOC has developed additional rules to assure that employment decisions are not arbitrarily based upon a criminal record. When an employer’s policy denies employment to an applicant because of a criminal conviction, the employer must demonstrate that it only did so to applicants whose criminal conduct and the dangers it indicates are linked to risks of the specific position. Caution is recommended.

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Following the review, each committee member shall sign and date one of two documents that becomes part of the applicant’s or employee’s permanent personnel file:

“We have reviewed the criminal history of Applicant X and determined, based on the information we had available at this time, the applicant would be **acceptable** for the position.”

OR

“We have reviewed the criminal history of Applicant X and determined, based on the information we had available at this time, the applicant is **not acceptable** for the position.”

Confidentiality –

At all times, the privacy and security rights of individuals are to be protected with utmost care. The (Chair, Employment Committee) shall assure that physical means and processes are in place to protect individual rights.

Note: Prior adult convictions for a crime are a matter of public record. Therefore, there can be no expectation of secrecy in regard to a prior conviction.

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Grandfathering Not Permitted –

Each board member, employee or volunteer now serving and regardless of length of service must be willing to set an example for all others who follow in their ministry. Therefore, at the time this policy is first adopted, all incumbent board members, employees and all incumbent volunteers who work with children shall execute and sign applications and submit to a background check as is required for candidate employees and volunteers.

Record Retention –

Volunteer applications shall be retained in the same manner as employee applications with due regard for the safety of private information such as Social Security numbers. The individual record shall include:

- Employee or volunteer application
- Permission to perform a background check (and credit check as may be required for employees).
- Results of the background check
- Background Investigation Results form (Appendix B – Applications & Forms)

Note: The OSHA standard for retention of employee health records is “term of employment **plus** 30 years”. The statute of limitations for injury to children is normally the age of majority (age 18) **plus** the term of the State’s injury statute (1 to 6 years). The implication is employers should expect to retain employment records for a substantial period of time in order to defend claims which may arise far in the future. These standards suggest the general need to make provisions for long term storage and security of employment records.

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Training

Training of employees and volunteers is the most important step that your church or camp can take toward preventing child sexual abuse. Yet this element is under-developed or missing in most policies.

The means to detect or prevent abuse are not widely known or understood. Excessive reliance is placed on the “two adult” rule and warnings of “stranger danger” while ignoring the serious risk of child-on-child abuse.

The Insurance Board, a not-for-profit ministry of the UCC, believes so strongly in training that it provides FREE training services to all churches and camps of the denominations it serves, whether or not your church or camp is participating in the Insurance Board insurance program.

The *Armatus* training suite by **Praesidium, Inc.** is a robust on-line training program that you administer at your church/camp. It is completely paperless and provides a perpetual record of training. The program covers all curriculum outlined below, except for (1) the specifics of your policies and (2) your reporting procedures. Information about the training program can be found in the **Administrators Guide** at our website: www.InsuranceBoard.org Click on **Safety Solutions**, then **SafeConduct™ Workbench**.

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The mission of (Your Church) is first to prevent abuse of children and other “vulnerable adults”. We wish to identify and nurture SafeConduct™, to lead and to guide through adequate training. It is difficult to comprehend that those among us, our friends and family, would commit such acts willingly. Nevertheless, persons who have been presented no behavior standards and do not understand boundaries may unwittingly engaged in behaviors that may be perceived as predatory. Their personal reputations and that of (Your Church) are then at risk.

To fulfill our leadership obligation to our Ministers, each new employee and new volunteer shall complete a specific program of training within 30 days of assuming duties. Fulfillment of training requirements shall be documented by the (Training Administrator – *Armatus* program) and respective program Director (Christian Education; Youth Choir; Day Care; Pre-School, etc.).

Training shall be repeated annually. Records shall be maintained by the (Training Administrator – *Armatus* Program) and respective program Directors. Training records shall be audited annually by the (Chair, Employment Committee).

Note: The *Armatus* training suite by Praesidium, available from the Insurance Board at no cost, is a convenient way to provide training to both Ministers and parents.

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Abuse prevention curriculum shall include:

1. Organization level
 - Review of expected conduct and boundaries defined in this policy. (Appendix E – Code of Conduct)
 - Review of standards applicable to ministry (Appendix F – Ministry Standards)
 - Explanation of procedures for reporting violations of standards of conduct and suspected child abuse.
 - Explanation of individual statutory reporting obligations
 - Identifying and managing high-risk situations such as bathroom use, transition times, and free times
 - Physical security procedures
2. Abuse prevention education:
 - Effects of sexual abuse.
 - Types of child molesters.
 - Characteristics of abusers.
 - How child molesters operate: access, privacy, and control.
 - Protecting oneself from false allegations.
 - Examples of child-on-child sexual abuse, even among young children.
 - Characteristics of children more likely to act out sexually.
 - Characteristics of children more likely to be abused.
 - High-risk activities and circumstances.
 - Specific monitoring and supervision activities to prevent child-on-child sexual activity.
 - How to respond to incidents of sexual activity between children.

(Your Program Directors) shall assure that each employee and volunteer has mastered requirements and provide additional supervision and guidance as required to assure required conduct.

Monitoring & Supervision

Many safe church policies are found to be reactive and punitive in their tone. However, the objective of a process of monitoring and supervision is not to catch and prosecute sexual predators nor is it spying on employees. Instead, *the spirit and intent of monitoring and supervision is leadership, guidance and personal development.*

While disciplinary action may be required in some circumstances, it must be consistent with modern employment practices and provide for individual rights to privacy and due process.

In the context of SafeConduct™ policy, supervision must make a distinction between policy violations and actual abuse. Policy violations may occur without intent and reflect a failure of your training process rather than deliberate boundary testing. In most instances, a verbal warning will be sufficient while a protracted investigation would be an over-reaction. Likewise, excessively punitive processes will likely result in resistance to adopting a policy or attrition among volunteers.

Policies must be clear, their intent understood and their execution continuously supervised.

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Each Minister who is in a position of leadership shall regularly supervise and provide leadership in the fulfillment of our congregation's **Code of Conduct (Appendix E)** and **Ministry Standards (Appendix F)**.

Our intent is to sustain relationships which encourage employees and volunteers to meet our abuse prevention objectives while being mutually supportive as a team. All must be comfortable in reporting repeated violations of the **Code of Conduct** or **Ministry Standards** to leadership. The objective of monitoring is, first, to protect children, then to protect staff from false allegations, and to protect the reputation of (Your Church) and its ministries.

In support of a practice of "progressive discipline", violations of the **Code of Conduct** and **Ministry Standards** are to be recorded in personnel files. (See [Your Church's] employment practices policies.) Concurrently, employees and volunteers are to understand that their job descriptions include the obligation to observe and report patterns of behavior that violate the **Code of Conduct** or **Ministry Standards**.

(Leadership Titles, e.g., Director of Christian Education; Director of Pre-School, etc.) shall continuously monitor performance using a variety of techniques including:

1. Scheduled visits;
2. Unannounced random visits at unpredictable times;
3. Spontaneous interviews with children;
4. Planned interviews or surveys of children, employees, and volunteers;
5. Meeting regularly with individual employees and volunteers;
6. Group supervision meetings;
7. Reviewing site documentation (e.g. progress notes, incident logs, etc.).

(Leadership Title, e.g., Business Manager) shall:

1. Monitor computer use and internet use.
2. Utilize filtering, firewalls and encryption technology to the extent practicable
3. Assure that employees have signed the computer use policy

Monitoring efforts are to be documented and individual employment records annotated as appropriate. Efforts and results shall be reported (quarterly, semi-annually) to (Your Committee) of the (Board of Directors).

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Internal Feedback Systems

Every organization is characterized by some degree of hierarchy with power relationships inherent. Likewise, because of peer pressure or other fears such as bullying, an observer or victim may be reluctant to come forward. At the same time early reporting of situations may be important to creating a solution before the condition blossoms into a crisis. For these reasons, a multi-channel system of internal reporting is necessary.

To assure confidentiality in an era of e-mail and caller ID, it may be appropriate to identify an “ombudsman”. Throughout this template “ombudsman” is used as a term of convenience to indicate someone who is independent of other governing structures, and who is able to receive information and preserve confidentiality. Your church may wish to assign the Sr. Pastor or Associate Pastor in this role as an equivalent independent avenue of reporting.

In most instances, the Director of a child-serving ministry or clergy may be considered a “mandatory reporter” under State statutes. They must be careful to distinguish between obligations to investigate policy or conduct violations as a personnel management matter versus their obligations to report “suspected child abuse” to police or child welfare authorities.

When creating channels of reporting, such a channel must not be identified as a Committee or other group.

REPORT to POSITIONS/PERSONS (Director, Christian Education), **not** to vague COMMITTEES (Program Committee). Recall the expression, “When everyone’s in charge, no one’s in charge.”

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In ordinary administrative matters we expect employees and volunteers to address concerns with their immediate supervisors. However, situations affecting the health and welfare of children and “vulnerable adults” require a direct and expedited means of communication to Ministers in leadership who can act upon concerns when an observer or victim is uncertain their concerns will be given attention.

When any employee or volunteer observes violations of the **Code of Conduct**, whether committed by an employee, volunteer or other person, or observe any other circumstance they find suspicious or feel is inappropriate, or may rise to the level of “suspected abuse”, they have a **right and duty to report** it directly to the Director of the particular ministry to which the observation applies (primary contact). Respective Directors are identified in **Appendix D – Leadership & Reporting Roster**.

If for any reason, the observer believes that the primary contact has failed to respond or has not given credibility to the observer, the latter may contact the church **Ombudsman** to report the observation. **The observer or victim shall be permitted to report violations of policy or circumstances of abuse anonymously.**

The **Ombudsman** (**Appendix D – Leadership & Reporting Roster**), while respecting and protecting the confidentiality wishes of the observer or victim, if any, shall ascertain with

reasonable certainty the relationship of the observer to the incident and the credibility of the information being provided. The **Ombudsman** shall report the circumstances to the (Chair, Employment Committee). The (Chair, Employment Committee) shall initiate (1) investigation of the facts, (2) corrective action or (3) reporting as may be required by statute.

In the conduct of annual training, respective **Directors** shall identify themselves and the **Ombudsman** as a contact for reporting violations or suspicious circumstances or activity.

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Congregational Awareness

While it is critical that staff and volunteers receive training regarding procedures, SafeConduct™ and recognizing signs of abuse, it is equally important that people served be educated.

The constituencies of children and parents or “vulnerable adults” and guardians should be provided an education regarding their individual rights and the procedures of your ministries. Your congregation must take care to have consensus among parents about the role your church might play in sexuality education. Where sexuality education is considered a role reserved to parents, parents may need more information to guide them.

At a minimum, children and parents must know how your programs are monitored, the standards for contact between staff and children, and who parents or children may contact to express concerns. Children must be made part of the team. The same applies to “vulnerable adults” and guardians.

Unfortunately, when considering this area of policy, especially how or what a parent or guardian might or might not report to whom, it is possible to get bogged down in hypothetical situations. The focus here should be on creating channels of communication.

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We are dedicated to a policy of open communication and education for the benefit of the children, parents, “vulnerable adults” and guardians we serve. They are entitled to know what to expect of our ministries, the Ministers who serve them, and to know the related policies and procedures created to protect the respective ministry constituencies. Constituencies include the children, the parents, the “vulnerable adults”, the guardians, and the Ministers.

This entire policy shall be posted on the (Your Church) website, www.yourchurch.org, under (Your Subject). The webmaster will keep it up to date at the direction of (Chair, Employment Committee).

At the time children or “vulnerable adults” are enrolled in (Your Church) programs, parents or legal guardians shall be provided:

1. A copy of the (Your Church) Code of Conduct (Appendix E), and Ministry Standards (Appendix F);
2. A summary of the content of the orientation to be provided to children and “vulnerable adults” regarding boundaries and reporting.
3. Information regarding the means to report violations of policy or suspicions of abuse.
4. Information regarding their personal obligation to report suspected abuse as it may exist under the laws of the State of (Your State).
5. An invitation to visit programs in progress at any time at their convenience.

Children and “vulnerable adults” shall be provided an orientation covering the following subjects:

1. Age-appropriate information about boundaries (with reference to the Code of Conduct);
2. How to protect themselves from abuse; and
3. How to report boundary violations or incidents of abuse.

The orientation shall be provided:

1. Individually at the time a child or “vulnerable adult” begins participation in a ministry of the church; or
2. As a group at the opening of a school term, event or league; and
3. Annually when a program, event or league is perpetual.

Parents and guardians shall be invited to receive the same “abuse prevention” training as provided to Ministers to be taken at their option.

Note: The *Armatus* training suite by Praesidium, available from the Insurance Board at no cost, is a convenient way to provide training to both Ministers and parents/guardians.

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Parents/guardians shall be encouraged to report violations of policy, boundaries or suspected abuse to the Director of the respective ministry at which an incident has occurred or the Director of (Your Description, at a higher level). Alternatively, they may report incidents to the Ombudsman. Anonymous reporting is permitted in the same manner and with the same precautions as reporting by Ministers or other observers.

If for any reason, parent/guardian believes that the primary contacts have failed to respond or have not given credibility to the parent’s/guardian’s concerns, the latter may contact the church **Ombudsman** to report those concerns.

Responding

The responses that should follow a number of circumstances, from first time policy or boundary violations to the level of incidents of suspected abuse, are varied. Often the policies that we have an opportunity to review are punitive in character; that is, they are one-size-fits-all with potentially damaging results. The same policies usually fail to identify the variety of situations that might occur which require different responses.

The distinction we wish to make here is that an **isolated violation of policy or boundaries does not constitute abuse, per se**. Also, while there may be an impulse to investigate and adjudicate given some incident, this step may be beyond church jurisdiction. That is, **statutory “mandatory reporters” have obligations that supersede church policies**.

Policies are often written based on the assumption that someone will be a firsthand witness to actual abuse. The procedures above are intended that such an event will never occur, yet there will be circumstances that require correction, counseling, training, re-direction, recording or other responses short of notifying police or child welfare authorities.

With respect to investigation and reporting of suspected child sexual abuse, the Insurance Board warns against creating elaborate investigation and discipline procedures, except as may be required by the denomination for authorized clergy. With respect to employees or volunteers in matters related to procedure violations, a system of “progressive discipline” and termination is recommended. Incidents or circumstances of suspected abuse or neglect that rise to the level of “mandatory reporting” by State laws fall outside the jurisdiction, authority and skills of the church to investigate.

Finally, an incident of a serious nature is potentially damaging to the reputation of your church, its programs and even whole families. Means need to be in place to respond to crisis and manage information in the interest of the victim, parties accused and the church.

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(Your Church) is committed to prompt, professional and measured response to all circumstances, which may range from violations of these policies and procedures to suspicions or allegations of abuse. We are committed to (1) seriously consider the concerns of victims; (2) undertake a fair investigation of policy violations; (3) protect the confidentiality of parties involved in investigation; (4) report to as required and cooperate fully with public authorities; and (5) communicate fully with the congregation within the bounds of individual rights to confidentiality.

Fulfillment of this commitment requires every Minister to assume responsibility as part of their respective duties, whether “authorized clergy”, employee or volunteer.

Responsibility of Employees and Volunteers –

Each employee or volunteer is obligated to fulfill the Code of Conduct ([Appendix E](#)) and Ministry Standards ([Appendix F](#)) both by living the standard and helping others to do the same. Each is obligated to guide and gently correct others as they would in a circumstance of high personal risk. When another person, regardless of status, rank or power, repeats a violation of the Code

of Conduct or Ministry Standards, the employee/volunteer observer must report the violation to his/her own immediate supervisor, or the next level of authority if necessary.

Reporting responsibility includes incidents of child-on-child sexual activity, dangerous behaviors, employee-on-employee “sexual harassment”, bullying of any kind, exploitation of a “vulnerable adult” or circumstances which rise to the level of abuse requiring action by a “mandatory reporter”.

Responsibility of Authorized Clergy, Lay Leaders & Supervisory Employees (Leaders) -- (Your Church) expects that Ministers, and Leaders especially, will relate to each other in a cordial and professional manner and in matters of SafeConduct™ will support, encourage and mentor each other.

Each person in a ministry leadership capacity is required to fulfill the standards for **Monitoring & Supervision** along with the **Code of Conduct** and **Ministry Standards**. Church Leaders shall foster SafeConduct™ by example and by correcting, mentoring and counseling followed by “progressive discipline”. Whether upon direct observation or as a result of reports from others, each church Leader shall take affirmative steps to correct behavior or enforce policies. Each Leader shall document by notes in an individual file actions taken to counsel and correct individuals to include verbal warnings or written notices.

At such time as verbal warnings are found to be ineffective and a written notice is required in order to correct behavior, each Leader shall do so with the advice and approval of his/her supervisor. A Leader may proceed to a higher level of supervision if he/she feels there is a conflict of interest created by another relationship such as family ties.3333

At such time as warnings, verbal and written, are deemed unsuccessful, and termination from ministry, employment or volunteer status is required, a termination letter shall be issued only with the authority and over the signature of the (Chair, Employment Committee).

A Leader may be expected to recuse him/herself from the reporting and disciplinary process in situations where there appears to be a conflict as a result of family ties or outside-of-church relationships, but may not do so when he/she is a “mandatory reporter” as prescribed by (your State) law.

Responsibility of Mandatory Reporters --

Regardless of procedures outlined herein, each person who is considered a “mandatory reporter” under the statutes of (Your State) shall in good faith report: (reportable “abuse” as defined by (Your State). **Example: CT** – “Physical, sexual, or mental abuse inflicted by a person responsible for a child’s health, welfare or care, or by a person given access to such child by such responsible person.”

(Your Church) prefers that a “mandatory reporter” first report circumstances requiring reporting to authorities to (Chair, Employment Committee). Without delay, the highest level leader who is considered to be a “mandatory reporter” shall make the initial report to police or child welfare authorities on behalf of (Your Church).

Nothing in this policy shall be considered a restraint of an individual’s statutory obligation to report to authorities. Furthermore, no person shall be restrained from reporting an incident on the basis that (s)he is not a “mandatory reporter”.

Other Reportable Abuse –

While the State has defined abuse for the purpose of child protection statutes and mandatory reporting, other kinds of abuse occur which are outside the bounds of SafeConduct™ and to which (Your Church) requires a response. The following circumstances constitute reportable abuse which require response to include counseling, correction, progressive discipline and termination.

1. Child-on-child sexual activity;
2. Dangerous behaviors (hazing, truth or dare, drinking, etc.);
3. Bullying, whether child-on-child or adult-on-child;
4. Exploitation of a “vulnerable adult”, physically, mentally or financially.

All such activity shall be reported by Employees/Volunteers or Leaders in the same manner as any violation of the Code of Conduct or Ministry Standards. In the event of out-of-program circumstances where there is not an identifiable direct Minister supervisor, reports shall be made to the (Chair, Employment Committee) or Ombudsman.

Other Disciplinary Processes –

Other behaviors not necessarily involving children or “vulnerable adults”, or which may not be considered strictly illegal, are subject to other disciplinary practices as may be set out in governing documents of the congregation or of the denomination. Behaviors subject to other adjudication may include but are not limited to:

1. “Sexual harassment”, whether among employees or volunteers;
2. Clergy professional boundary violations;
3. “Sexual exploitation”;
4. Sexual relationships between a Minister and a minor even though permitted by law.

All such activity shall be reported by Employees/Volunteers or Leaders in the same manner as any violation of the Code of Conduct or Ministry Standards. In the event of out-of-program circumstances where there is not an identifiable direct Minister supervisor, reports shall be made to the (Chair, Employment Committee) or Ombudsman.

Cooperation with Investigations –

(Your Church) expects and requires the cooperation of all Ministers and other employees in the investigation of violations of the Code of Conduct, Ministry Standards or other misconduct, including a complainant, witness, and the accused offender. We may interview these individuals privately and take oral and/or written statements from them. Any person who fails to cooperate with such an investigation or to provide complete and truthful information may be subject to disciplinary action.

Notification of Parents –

A minor child may be party to an incident either as an initiator or as the victim. Whether a child is initiator or victim may not be clear in all circumstances, such as a child-on-child incident. And violation of policy does not necessarily create a victim. While notification of parents of such circumstances may be warranted, utmost care in communication is required.

Therefore, a Minister having knowledge of an incident which warrants communication to a parent shall first advise their immediate supervisor, who shall consult with (Chair, Employment Committee). While communicating with a parent, and **being mindful of the importance of timely communication**, care shall be given to assessing:

1. The specific facts;
2. Whether a disciplinary or termination process is required;

3. Whether a child should be dismissed from a program (requiring notification of other parents/guardians);
4. Whether “mandatory reporting” is a factor;
5. Who shall and in what manner communicate with the parents/guardian;
6. Whether the Pastor should be involved in the communication;
7. Tentative remedial steps to prevent a further incident.

Notification of parents shall not be delayed when immediate medical care is required.

The factors outlined above are suggested in the spirit of avoiding incidents which occur from time to time as a result of zero tolerance policies and which are exploited by the media to the detriment of the institution (usually schools).

Crisis Management Services: The Insurance Board insurance program (as do some others) provides crisis management and counseling services. These include making available professional public relations experts and psychological counseling services in the aftermath of a covered incident. The coverage applies to bodily injury events broadly and is not confined to incidents of sexual misconduct.

(Delete this box.)

Victim Needs –

In the event of cases of reportable abuse, the policy of (Your Church) is to be responsive to the needs of victims within the constraints or obligations imposed under insurance contracts. In general, we will attend to the immediate needs of victims by providing support and pastoral care.

(Insurance Board clients only) An incident of alleged abuse that requires medical or psychological care for a victim or family shall be reported to the Insurance Board by the (Chair, Financial Committee). The latter shall discuss with the Insurance Board Claims Department whether the circumstances warrant initiation of Crisis Management services which may include psychological counseling. Upon approval, counseling services may be offered to a perceived victim(s), which may include family members.

Responding to Media --

Media publicity following an incident of abuse or exploitation may be detrimental to the reputations of individuals, the congregation and (Your Church). Without intending ever to evade the media, contacts with media must be managed and conducted only by a person specifically designated by the Board of Directors to represent the church. No other person(s) may speak on behalf of the church. Unless designated differently by the Board in a particular circumstance, the exclusive spokesperson for the church shall be the (Board Chair).

Prior to speaking to media, (Board Chair) shall contact and consult with (Region (DOC), Presbytery (PCUSA), Conference (UCC)) Legal Counsel, to obtain an understanding of appropriate statements or admissions and issues of privacy that may apply to the situation.

(Insurance Board clients only.) (Board Chair) shall give immediate consideration to securing Insurance Board media relations and crisis management resources. Considering the speed of news cycles, a prompt determination is required, erring on the side of seeking help.

Crisis Management Services: The Insurance Board insurance program (as do some others) provides crisis management and counseling services. These include making available professional public relations experts and psychological counseling services in the aftermath of a covered incident. The coverage applies to bodily injury events broadly and is not confined to incidents of sexual misconduct.

(Delete this block.)

SAMPLE --- Editing Required

Administrative Practices

Reporting to Leadership--

Each ministry of (Your Church) is directly responsible to the Board of Directors to report activities and developments which may have a bearing on the well-being of a member of the congregation or its constituents, or the reputation of the church, its ministries and its congregation. The Director of each ministry shall report directly to (Chair, Employment Committee) incidences of suspicious or inappropriate interactions (adult-child; child-child; adult-vulnerable adult), sexual activity between children, and allegations of abuse or violations of professional boundaries.

Ministry Standards –

Ministries subject to this standard shall include: music, education, counseling, pre-school, day care, Sunday school, nursery, sports, mission activity in which children or “vulnerable adults” are constituents, or off-site activity in which children participate.

No new ministry or program may be created in the name of (Your Church) without the expressed written consent of the Board of Directors, after consideration of the benefits to the church, intended constituents of the program, financial viability, the risks attendant to the activity and methods to be employed to manage risk.

Each ministry of the church, based upon its activities, participants and constituent interests, shall establish ministry standards governing its activities, to include such details as age eligibility, safety practices, training of staff, documentation, etc. Ministry standards shall be consistent with and not in conflict with the church’s ministry standards defined at “**Appendix F – Ministry Standards.**”

When ministry is subject to State regulation (for example, day care, pre-school) such regulations shall constitute minimum requirements. Without creating unnecessary duplication, Ministry Standards shall apply in addition to regulatory requirements.

Prior to use of church facilities by an outside organizations (lessees) to conduct activities equivalent to those sited above, and whether or not rent or contributions are provided to the (Your Church) (lessor), there shall be an evaluation of whether the organization has established sufficient standards to be regarded as a competent partner in ministry. A lease or use agreement shall be required with the organization, which lease shall cite fulfillment of the organization’s written or statutory standards as a condition of continued occupancy of church property. The use agreement shall contain terms requiring that “lessee hold harmless, defend and indemnify lessor for claims arising out of its occupancy of and activities on lessor’s property” (or equivalent language). The organization shall be required to demonstrate maintenance of insurance, to include personal property, workers compensation, general liability and professional liability coverages that may apply to the activity (for example, sexual misconduct liability, professional counseling liability, educators professional liability).

Monitoring Compliance with Standards —

In a community of faith in which you may have faith in each other to a greater degree than in your other business and community contacts, it is most difficult to articulate the necessity to be vigilant regarding the behaviors of others. It smacks of *big brother* and connotes suspicion and paranoia. However, as Ministers, you are managers of your respective congregations. Therefore, take comfort from the words of Matthew:

Behold, I am sending you out as sheep in the midst of wolves. So be as wise as serpents and as innocent as doves. (Matthew 10:16) (New Revised Standard)

You must lead with strength and healthy skepticism, while guiding and nurturing. You must have the wits to recognize what is not right and the courage to take action. Nevertheless, you can do these things with kind words and demonstrate care and loyalty to all of those you serve. Sometimes introspection is required: Failure of an individual to fulfill your standards for SafeConduct™ may reflect a failure on your part to lead or to train, rather than malicious intent by those you supervise.

(Delete this block.)

The success and strength of this policy is not created by its words, but by the actions of our Ministers who must carry it out. While the policy generally prescribes SafeConduct™, Ministers are called upon to document that they are engaged in achieving the objectives of the policy. From time to time Ministers will be required to re-direct, correct and remediate individuals who have not maintained the Code of Conduct (Appendix E) or Ministry Standards (Appendix F). While violations of the Code of Conduct or Ministry Standards, do not constitute an incident of “suspected abuse” requiring statutory reporting, they do require a response.

In the aftermath of an incident of “suspected abuse” or a significant violation of the Code of Conduct or Ministry Standards, it may be necessary for the church and its Ministers to defend their actions which support this policy. Therefore, every Minister of the church shares in the obligation to regularly observe and document their good management.

Following the pattern of good employment practices, Ministers shall follow a process of “progressive discipline” in supervisory relationships with both employees and constituents. This process recognizes that an isolated violation of the Code of Conduct or Ministry Standards may not be intended or malicious; the first transgression may simply indicate the failure to properly train. Nevertheless, repeated violations cannot be tolerated.

Each Minister shall employ “progressive discipline”, and maintain records of both monitoring and disciplinary activity. (Monitoring activity is described above under Monitoring & Supervision.) As required elsewhere in this policy, reports shall be provided to supervisors and the Board which shall document regular monitoring activity and that steps in “progressive discipline” have been taken. While in most situations “progressive discipline” will be the normal process, it is understood that an egregious violation of the Code of Conduct or Ministry Standards may

require immediate termination of an employee or volunteer, subject to the conditions for termination specified in Appendix A – Definitions, “Progressive Discipline”.

SAMPLE --- Editing Required

APPENDIX A -- Definitions

Mandatory Reporter--

Those persons required by (Your State) law to report “suspected abuse” to police or child welfare agencies are defined as follows: (Enter the statutory language or your state including the obligations or exemptions that may apply to ordained clergy.)

Authorized Clergy --

Includes any person who is admitted to ministry by (Your Denomination), who serves the congregation in any capacity whether called as pastor or serving in a retired, *emeritus*, administrative or volunteer capacity. Clergy who are active, have pastoral responsibilities and are called by the congregation shall have fulfilled the background checking requirements of the (Your Denomination).

Progressive Discipline --

A system of escalating discipline as an alternative to summary termination for a policy infraction, even a minor one. Progressive steps in discipline are as follows:

1. Counseling or a verbal warning -- It is necessary to document that such a meeting occurred. It is sometimes appropriate that more than one supervisory person be present for this step.
2. Written warning -- A formal letter is prepared and delivered to the employee/volunteer, while a copy is maintained in the employee/volunteer file.
3. Suspension or demotion – This may be appropriate for repeated violations of Ministry Standard violations. This step might be skipped for Code of Conduct violations.
4. Termination – Repeated willful violations of the Code of Conduct or Ministry Standards call for termination of employment, whether employee or volunteer. However, no Minister has authority to terminate an employee or volunteer unilaterally; at least two levels of supervision must make a judgment on termination. No one shall be terminated without the advice of legal counsel.

In extreme circumstances it will be appropriate to skip steps and proceed with immediate termination. However, the same rules apply to a summary termination.

An equivalent to progressive discipline shall apply to children and “vulnerable adults” (clients) served by our church. When clients are observed engaging in inappropriate interactions or sexual contact, it is expected that they will be immediately stopped or redirected to another activity. When violations are repeated and the client is unresponsive, the next step is to engage the parent or guardian in a meeting about the behavior with the expectation that the parent will provide follow-up discussion and discipline of the client. If this step fails to achieve positive results, then additional steps must be taken culminating with expulsion of the client from the church program. Legal counsel shall also be engaged before expulsion, especially if there may be the appearance of unjustified discrimination.

Note: U.S. law generally supports the rights of churches to govern themselves, especially with respect to their internal organization, daily management, disposition of assets, theological doctrine, selection and qualification of clergy and discipline of clergy. Some denominations have thoroughly codified their processes in this regard, a notable example being the PCUSA “Book of Order”. Generally, State and Federal courts will decline to be involved in litigation involving these matters unless the issues fall into areas outside the realm of ecclesiastical. These boundaries may be exceeded in matters of property ownership, employment law or criminal law, to cite familiar examples.

For the purpose of implementing this policy, **when addressing matters of discipline** around activities or acts that potentially fall within the scope of **employment law** (not involving ordained clergy), **criminal statutes** or civil law involving **personal injury** (for example, defamation), it is recommended that more expedient steps be taken consistent with good employment practices and the reporting requirements of child protection statutes.

(Delete this box.)

Sexual Exploitation --

Sexual activity or contact (not limited to sexual intercourse) in which a Minister engaged in the work of the church takes advantage of the vulnerability of a participant by causing or allowing the participant to engage in sexual behavior with the Minister.

Sexual Harassment --

Repeated or coercive sexual advances toward another person contrary to his or her wishes. It includes behavior directed at another person's sexuality or sexual orientation with the intent of intimidating, humiliating, or embarrassing the other person, or subjecting the person to public discrimination. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

- Submission to such conduct is made either explicitly or implicitly a term or condition or circumstance of instruction, employment, or participation in any church activity;
- Submission to, or rejection of, such conduct by an individual is used as a basis for evaluation in making personnel or church-related decisions affecting an individual; or
- Such conduct has the purpose or effect of unreasonably interfering with an individual's performance or participation in church activities or creating an intimidating, hostile, or offensive work or church environment.

Prohibited sexual harassment includes unsolicited and unwelcome contact that has sexual overtones, particularly:

- Written contact, such as sexually suggestive or obscene letters, notes, or invitations including through use of social media through e-mail, texting, Tweeting or Facebook comments;
- Verbal contact, such as sexually suggestive or obscene comments, threats, slurs, epithets, jokes about gender-specific traits or sexual orientation, sexual propositions;
- Physical contact, such as intentional touching, pinching, brushing against another's body, impeding or blocking movement, assault, coercing sexual intercourse; and
- Visual contact, such as leering or staring at another's body, gesturing, displaying sexually suggestive objects or pictures, cartoons, posters, or magazines.

Sexual harassment also includes continuing to express sexual interest after being informed directly that the interest is unwelcome and using sexual behavior to control, influence, or affect the career, salary, work, learning, or worship environment of another. It is not permissible to suggest, threaten, or imply that failure to accept a request for a date or sexual intimacy will affect a person's job prospects, church leadership, or comfortable participation in the life of the church. For example, it is forbidden either to imply or actually withhold support for an appointment, promotion, or change of assignment, to suggest that a poor performance report will be given because a person has declined a personal proposition; or to hint that benefits, such as promotions, favorable performance evaluations, favorable assigned duties or shifts, recommendations or reclassifications, will be forthcoming in exchange for sexual favors.

Suspected Abuse --

Actual abuse consists of physical, sexual or mental abuse inflicted by a person responsible for a child's health, welfare or care, who may be a parent, guardian or other person having access to a child. Abuse may include neglect of a person's health as a result of failure to properly feed, clothe or attend to apparent illness or mental well-being. As a caregiver in ministry, one need not directly witness, nor is one likely to directly witness actual abuse. It is sufficient to suspect abuse based upon observations of general health, physical condition, patterns of irregular behavior and environmental factors. Examples of observations might include: bruising on multiple occasions, weight loss, chronic physical illness, and anti-social or excessively withdrawn behavior. Environmental factors may include highly contentious divorce and custody battles, or parental drug use. One must use judgment in assessing multiple factors which lead to suspicion of abuse.

While "suspected abuse" is defined here for the benefit of "mandatory reporters", the definition, for the purpose of this policy, includes "suspected abuse" of a "vulnerable adult".

Vulnerable Adult --

Any adult person who by reason of profound physical disability or dependence, developmental disability, mental illness, relative social power or cultural circumstances may be susceptible to physical abuse, sexual exploitation, financial exploitation or manipulation as a consequence of being unable to physically resist, or render judgments regarding physical, mental, financial or environmental well-being. Such persons may be unable to act independently and may, to their detriment, manifest high levels of trust or fear of persons of perceived power or authority.

APPENDIX B – Applications & Forms

1. Application and Self-Disclosure
2. Authorized Adult Employee & Volunteer Application and Disclosure Form
3. Authorized Children & Youth Volunteer Application and Disclosure Form
4. Background Investigation Results
5. Professional Reference Interview Form
6. Personal Reference Interview Form
7. Limited Access Agreement
8. Field Trip Preparation Checklist
9. Qualification Form & Agreement for Use of Personally Owned Vehicles

SAMPLE --- Editing Required

APPLICANT:

I have never been convicted of, nor pled guilty or no contest to a crime. (*Exclude convictions that have been sealed, expunged or legally eradicated, misdemeanor convictions for which probation was completed and the case was dismissed, or offenses about which inquiry is not permissible in this state*)

True Not true

If not true, please briefly describe the nature of the crime(s), the date and place of conviction and the legal disposition of the case. The church will not deny a position to any applicant solely because the person has been convicted of a crime. The church, however, may consider the nature, date and circumstances of the offense, as well as whether the offense is relevant to the duties of the position applied for.

Is there any fact or circumstance involving you or your background that would call into question your being entrusted with the responsibilities of the position for which you are applying?

Yes No

If yes, please provide a brief explanation.

The covenants between persons seeking authorized volunteer positions in the church require honesty, integrity, and truthfulness for the health of the church. To that end, I attest that the information set forth in this application is true and complete. I understand that any misrepresentation or omission may be grounds for rejection of consideration for, or termination of, the position I am seeking to fill. I acknowledge that it is my duty in a timely fashion to amend the responses and information I have provided if I come to know that the response or information was incorrect when given or, though accurate when given, the response or information is no longer accurate.

Beginning such relationships with an open exchange of relevant information builds the foundation for a continuing and healthy covenant between volunteers and the church they seek to serve. To that end, I authorize (**Your Church**) and/or its agents to make inquiries regarding my character and qualifications, including all statements I have set forth above. I also authorize all entities, persons, former employers, supervisors, courts, law enforcement, and other public agencies to respond to inquiries concerning me, to supply verification of the statements I have made, and to comment on and state opinions regarding my background, character, and qualifications. To encourage such persons and entities to speak openly and responsibly, I hereby release them from all liability arising from their responses, comments, and statements.

(**Your Church**) authorized volunteer recruitment process involves the sharing of information regarding applicants with those persons in a position to recruit, secure, and supervise both the position I am seeking to fill and program I am seeking to participate in. To that end, I authorize (name of Local Church) and its agents to circulate, distribute, and otherwise share information gathered in connection with this application to such persons for these purposes. I understand that (name of Local Church) will share with me information it has gathered about me, if I request it to do so.

If I am offered and accept employment or volunteer service with the church, I agree to comply with its published policies and rules, including those related to harassment of employees, reporting known or suspected child neglect or abuse and similar requirements. If requested to do so, I will cooperate with any church investigation of a possible violation of church policies and rules by providing complete and truthful information in an oral and/or written statement.

I acknowledge my receipt and understanding of the (**Your Church**) SafeConduct™ Policy.

PRINT NAME & SIGN

DATE

Background Investigation Results

EMPLOYEE/VOLUNTEER APPLICANT:

Personal interview conducted by _____ on _____
DATE

Reference inquiries completed by _____ on _____
DATE

A criminal background check was conducted on the candidate using the following sources:

- € National multi-state criminal records search
- € National sex offender registry search
- € Social security number trace and alias search
- € County criminal records search for every county where the applicant has lived or worked over the past (xx) years:
- € Motor Vehicle Record

- € Other (Identify)

The (Employment Committee) has reviewed the investigation with the following result:

€ We have reviewed the criminal history of Applicant and determined, based on the information we had available at this time, the applicant would be acceptable for the position.”

OR

€ We have reviewed the criminal history of Applicant and determined, based on the information we had available at this time, the applicant is not acceptable for the position.”

This clearance shall remain as a permanent record in the employment file.

MEMBER _____
Signature Date

MEMBER _____
Signature Date

MEMBER _____
Signature Date

APPLICANT:

I have never been convicted of, nor pled guilty or no contest to, a crime. *(Exclude convictions that have been sealed, expunged or legally eradicated, misdemeanor convictions for which probation was completed and the case was dismissed, or offenses about which inquiry is not permissible in this state)*

True Not true

If not true, please briefly describe the nature of the crime(s), the date and place of conviction and the legal disposition of the case. The church will not deny a position to any applicant solely because the person has been convicted of a crime. The church, however, may consider the nature, date and circumstances of the offense, as well as whether the offense is relevant to the duties of the position applied for.

No civil lawsuit alleging actual or attempted sexual discrimination, harassment, exploitation, or misconduct; physical abuse; child abuse; or financial misconduct has ever resulted in a judgment being entered against me, been settled out of court, or been dismissed because the statute of limitations has expired.

True Not True

If not true, give a short explanation of the lawsuit. (Please indicate the date, nature, and place of the incident leading to the lawsuit; where the lawsuit was filed; and the precise disposition of the lawsuit.)

I have never terminated my employment, professional credentials, or service in a volunteer position or had my employment, professional credentials, or authorization to hold a volunteer position terminated for reasons relating to allegations of actual or attempted sexual discrimination, harassment, exploitation, or misconduct; physical abuse; child abuse; or financial misconduct.

True Not True

If not true, give a short explanation. (Please indicate the date of termination; name, address, and telephone number of employer or volunteer supervisor; and nature of the incident(s) leading to your termination.)

Do you have a valid drivers' license?

Yes No

With respect to my driving record, I have not had my license suspended or revoked within the last five years due to reckless driving or driving while intoxicated and/or under the influence of a controlled substance.

True Not True

Is there any fact or circumstance involving you or your background that would call into question your being entrusted with the responsibilities of the position for which you are applying?

Yes No

If yes, provide a brief explanation.

APPLICANT:

The covenants between persons seeking authorized volunteer positions in the church require honesty, integrity, and truthfulness for the health of the church. To that end, I attest that the information set forth in this application is true and complete. I understand that any misrepresentation or omission may be grounds for rejection of consideration for, or termination of, the position I am seeking to fill. I acknowledge that it is my duty in a timely fashion to amend the responses and information I have provided if I come to know that the response or information was incorrect when given or, though accurate when given, the response or information is no longer accurate.

Beginning such relationships with an open exchange of relevant information builds the foundation for a continuing and healthy covenant between volunteers and the church they seek to serve. To that end, I authorize **(Your Church)** and/or its agents to make inquiries regarding my character and qualifications, including all statements I have set forth above. I also authorize all entities, persons, former employers, supervisors, courts, law enforcement, and other public agencies to respond to inquiries concerning me, to supply verification of the statements I have made, and to comment on and state opinions regarding my background, character, and qualifications. To encourage such persons and entities to speak openly and responsibly, I hereby release them from all liability arising from their responses, comments, and statements.

(Your Church) authorized volunteer recruitment process involves the sharing of information regarding applicants with those persons in a position to recruit, secure, and supervise both the position I am seeking to fill and program I am seeking to participate in. To that end, I authorize (name of Local Church) and its agents to circulate, distribute, and otherwise share information gathered in connection with this application to such persons for these purposes. I understand that (name of Local Church) will share with me information it has gathered about me, if I request it to do so.

If I am offered and accept employment or volunteer service with the church, I agree to comply with its published policies and rules, including those related to harassment of employees, reporting known or suspected child neglect or abuse and similar requirements. If requested to do so, I will cooperate with any church investigation of a possible violation of church policies and rules by providing complete and truthful information in an oral and/or written statement.

I acknowledge my receipt and understanding of the (name of Local Church) Safe Church Policy.

PRINT NAME & SIGN

DATE

PRINT NAME & SIGNATURE PARENT OR GUARDIAN FOR APPLICANTS UNDER 18

DATE

NOTES: (Not True and No answers above)

Background Investigation Results

EMPLOYEE/VOLUNTEER APPLICANT:

Personal interview conducted by _____ on _____
DATE

Reference inquiries completed by _____ on _____
DATE

A criminal background check was conducted on the candidate using the following sources:

- € National multi-state criminal records search
- € National sex offender registry search
- € Social security number trace and alias search
- € County criminal records search for every county where the applicant has lived or worked over the past (xx) years:
- € Motor Vehicle Record

- € Other (Identify)

The (**Employment Committee**) has reviewed the investigation with the following result:

€ We have reviewed the criminal history of Applicant and determined, based on the information we had available at this time, the applicant would be **acceptable** for the position.”

OR

€ We have reviewed the criminal history of Applicant and determined, based on the information we had available at this time, the applicant is **not acceptable** for the position.”

This clearance shall remain as a permanent record in the employment file.

MEMBER _____
Signature Date

MEMBER _____
Signature Date

MEMBER _____
Signature Date

Professional Reference Interview Form

Employee/Volunteer Applicant: _____ Date: _____

Name of Reference: _____

Address: _____

Phone Numbers: _____

Hello, my name is _____ with (Your Church). (Applicant) has applied for a position with us and said you might be able to tell us about his/her previous work with children. Is this a good time for you to talk with me?

I would like to start by letting you know that the applicant has applied for a position working with children, so it is extremely important for us to make sure that every applicant is suitable for this type of position. I appreciate your help with this.

How long have you known the applicant? _____

How do you know the applicant? _____

How would you rate the applicant's ability to learn new information and skills?

____ Above satisfactory ____ Satisfactory ____ Below satisfactory

Can you give me an example of when the applicant was able to learn something new and use it in his/her work?

We are looking for someone who will adhere to the standard policies of our organization. How would you rate the applicant's ability to follow policies and procedures?

____ Above satisfactory ____ Satisfactory ____ Below satisfactory

How would you rate the applicant's ability to work with and relate to other adults?

____ Above satisfactory ____ Satisfactory ____ Below satisfactory

Have you observed the applicant working with children? ____ Yes ____ No

If yes, how would you rate the applicant's ability to relate to children?

____ Above satisfactory ____ Satisfactory ____ Below satisfactory

Can you give me an example of how the applicant relates to children?

In what types of situations have you observed the applicant working well with children (enjoying the work, being effective)?

In what types of situations have you observed the applicant not working well with children (becoming frustrated, angry, resentful or non-productive)?

How would you rate the applicant's ability to use good judgment in normal conditions?

___ Above satisfactory ___ Satisfactory ___ Below satisfactory

How would you rate the applicant's ability to maintain appropriate boundaries with children?

___ Above satisfactory ___ Satisfactory ___ Below satisfactory

How would you rate the applicant's ability to use good judgment in stressful conditions?

___ Above satisfactory ___ Satisfactory ___ Below satisfactory

Can you give me an example of when the applicant used good judgment?

Are you aware of any reason why we should not allow the applicant to work with the children we serve?

Do you have any additional comments or questions?

Signature of Screening Manager

Date

Personal Reference Interview Form

Employee/Volunteer Applicant: _____ Date: _____

Name of Reference: _____

Address: _____

Phone Numbers: _____

Hello, my name is _____ with (Your Church). (Applicant) has applied for a position with us and said you would be a good person for us to talk with about him/her. Do you have a few minutes to talk with me now? I would like to start by letting you know that (Applicant) has applied for a position working with children, so it is extremely important for us to determine that every applicant is suitable for this type of position. I appreciate your help with this.

How long have you known the applicant? _____

What is your relationship to the applicant? _____

How would you rate the applicant's ability to work with and relate to children?

____ Above satisfactory ____ Satisfactory ____ Below satisfactory

Can you give me an example of how the applicant relates to children?

We are looking for someone who can stay calm and control frustration even under very frustrating conditions with children. How would you rate the applicant's ability to be patient and stay calm?

____ Above satisfactory ____ Satisfactory ____ Below satisfactory

Can you give me an example of how the applicant relates to children?

Have you ever known the applicant to use harsh or abusive discipline with a child?

Would you be comfortable placing one of your own loved ones in the care of the applicant? Why or why not?

What are the applicant's hobbies and recreational activities?

How would you rate the applicant's ability to relate to adults?

___ Above satisfactory ___ Satisfactory ___ Below satisfactory

Can you give me an example of how the applicant relates to adults?

We need a person who can be supportive and understanding of a child's needs. How would you rate the applicant's ability to be genuinely supportive and understanding to a person in need?

___ Above satisfactory ___ Satisfactory ___ Below satisfactory

Think of a time when the applicant was able to show genuine concern for another person who needed comfort. Tell me about that time.

How would you rate the applicant's ability to maintain appropriate boundaries with children?

___ Above satisfactory ___ Satisfactory ___ Below satisfactory

Do you have any additional comments or questions?

Signature of Screening Manager

___/___/___
Date

Limited Access Agreement for Cases of Convicted Sex Offenders

NOTICE: This agreement form is provided by the Insurance Board as a “sample”. In every instance the agreement must be customized to the circumstances of the individual parties, both the congregation and the individual petitioner. In all cases, consultation with an attorney and other behavioral professionals is strongly encouraged before setting the terms of any Limited Access Agreement.

This Limited Access Agreement is executed between:

(Your Church), referred to below as “we”, “the congregation” and “clergy”;
And
(Petitioner Name), referred to below as “you” and “your”

(Your Church), is an “open and affirming congregation” and as such affirms the dignity and worth of all persons as expressed in our Welcome Statement. We are committed to being a religious community open to those who are in need of worshiping with us, especially in times of distress and serious personal troubles. However, based on your background, we have concerns about your contact with children and youth in our congregation. The following guidelines are designed to reduce the risk to both you and them of an incident or accusation. We welcome you to our congregation and our membership but your participation will be limited to ensure the safety of our children and youth and to assure that you will not be subject to future accusations.

Within these guidelines, the congregation welcomes your participation in worship services, coffee hour, meetings, adult education, and all adult social events. Do not enter the classroom wing or the lower level of the church building. You are to avoid all contact with children and youth on church property or congregation-sponsored events. This includes the following:

- Do not talk with children.
- Do not volunteer or agree to lead, chaperone or participate in events for children and youth including such things as religious education classes, stories or talks for worship, youth group events, activities during intergenerational events, driving or otherwise transporting children and/or youth.
- You will remain in the presence of a Parish Associate who knows your situation at all times. You must meet that person before coming onto church property (or before arriving at any church-sponsored event), remain with him at all times, and depart with him.
- If a child or youth in the congregation approaches you, either at church or in a community place, politely and immediately excuse yourself from the situation.
- Avoid being in the church or any church-owned building or church-rented space at any time without a Parish Associate present with you at all times.
- Do not ask for, seek access to, nor remove from the church any materials, files, directories, etc. listing members and friends of the church.
- We ask that you limit your time in coffee hour to about ten minutes.

As a part of this agreement it is understood that you will have three (3) members of this congregation, approved by the clergy, who know thoroughly your history and are willing to

serve as your Parish Associates. You will be welcome on church property and at church-sponsored events but must be accompanied at all times by one of the Parish Associates named below:

(Named Parish Associate 1)

(Named Parish Associate 2)

(Named Parish Associate 3)

To engage your integration into the congregation and to assist you in maximizing your experience with the church it is agreed that you will meet on a bi-monthly basis with the Parish Associates and a member of the clergy together or separately to discuss matters of mutual interest and concern. These meetings will also serve as an ongoing review of the implementation of this agreement.

Implementation of this agreement is based upon a review by the clergy of the most current supporting documents as follows:

- A statement from the court as to the nature of the conviction.
- A risk assessment from a qualified therapist.
- A report from a certified treatment provider indicating that you are not at too high a risk for recidivism.

Any change in the above must be reported immediately to a member of the clergy.

REASONS FOR EXCLUDING A PERSON FROM ALL CONGREGATIONAL ACTIVITIES INCLUDE, BUT ARE NOT LIMITED TO:

- Refusal to allow the clergy to contact the treatment provider and parole officer.
Refusal to go for a risk assessment with a qualified therapist.
- Report by a treatment provider that the individual is at too high a risk for recidivism.
Refusal to sign a Limited Access Agreement.
- Refusal to comply with the requirements of the Limited Access Agreement.

This agreement will remain in effect until/unless:

- You fail to honor the terms of the agreement, thus nullifying it.
- It is superseded by any policies and procedures put in place by the church's SafeConduct™ Committee. The SafeConduct™ Committee in consultation with the clergy is the body responsible for providing you with guidelines, support and counsel for your participation in the life of the congregation.
- You, the clergy, and the SafeConduct™ Committee mutually agree to change the terms of this agreement.

ATTEST: I have reviewed the terms of the above limited access agreement and agree to abide by its provisions. Failure to honor its terms will result in my being denied access to church property and all church events.

Signature

Date

Petitioner Name

Address

WITNESS FOR THE CHURCH:

Signature

Date

Name

Church Official Title

YOUR CHURCH
(Address)

SAMPLE --- Editing Required

Field Trip Preparation Checklist

1. Specific location of the off-site activity. (Example: The Children's Museum)

2. Name of the primary contact at the off-site location (Example: Mary Smith, Director of Group Sales at the Children's Museum)

3. Address and telephone number for the location.

4. Parent permission sheet attached to this document for review.

5. Name and cell phone number of the supervisor for the off-site activity.

6. The employee to child ratio for the trip and names of all who will be attending.

7. Required attire for employee and child during the off-site activity.

8. Amount of time required for the off-site activity.

9. Estimated departure time and estimated return time.

10. Method of transportation.

11. Completed seating chart attached.

12. Overall supervision guidelines for location (employees will be assigned groups of children to monitor throughout the trip, employees will monitor children in "zones," etc.).

13. Location of restrooms/locker rooms at off-site location.

14. Cost of the activity.

Last Minute Checklist:

1. **All permission sheets returned and compiled for the off-site activity (children cannot participate without a permission slip). Employees must take permission slips to the off-site activity to ensure correct parent contact information.**
2. **Roll sheets printed and distributed to all employees for all children attending the off-site activity.**
3. **All required employees present.**
4. **All employees and children are in approved attire.**

SAMPLE --- Editing Required

VOLUNTEER DRIVER (Model)
Qualification Form & Agreement for Use of Personally Owned Vehicles
(Your Church)

Name: _____ Birth Date: _____

Home phone: _____ Work phone: _____ Cell phone: _____

Years of driving experience _____

Driver license No. & State*: _____ Expiration Date : _____

Insurance Carrier _____ Expiration date: _____

Liability Policy Limit -- Bodily Injury _____ Property Damage _____

1. Are all licensed vehicles you own covered by insurance as required by law? Yes, No
2. Have you ever been denied a driver's license or had one suspended or revoked? Yes, No
3. Have you had any moving traffic violations or accidents in the past three years? Yes, No

If the answer to questions 2 or 3 is YES, explain. Give dates and details of violations and accidents on the back of this form.

I AGREE to the following as a condition of being permitted to act as a Volunteer Driver:

1. The vehicle owner's insurance is the primary liability insurance coverage in the event of an accident.
2. The owner of the vehicle which I am driving is responsible for keeping the vehicle in safe working order.
3. The owner of the vehicle is responsible for all damage to the owned vehicle however caused.
4. The owner of the vehicle shall maintain liability insurance in the amount of at least
 - Bodily Injury -- \$50,000 per person and \$100,000 per accident or \$200,000 combined single limit; and
 - Property Damage -- \$25,000 per accident
5. The church's insurance shall apply in excess of the vehicle owner's liability insurance limits in the event the primary limits are exhausted, and only to the extent the church is legally obligated to pay damages.
6. **I will not receive or initiate phone calls while operating a vehicle for church activities, to include receiving or initiating text messages.**
7. I will indemnify and hold the church harmless from liabilities and damage resulting from my operation of a motor vehicle not owned by the church. The church will indemnify and hold harmless the volunteer driver for liabilities and damages resulting from acts or negligence of the church.

I hereby AFFIRM that the information I have given is stated truthfully and that I shall abide by the terms of the church's Vehicle Use Policy.

Attach a copy of Driver's License and current Insurance ID Card

Driver Signature: _____

Date: _____

APPROVED: _____ **Date:** _____ **Expiration:** _____

APPENDIX C – Interview Questions

Source 1: *Preventing Child Sexual Abuse Within Youth-serving Organizations: Getting Started on Policies and Procedures*, Centers for Disease Control and Prevention, U.S. Dept. of Health & Human Services, 2007.

The following questions may be used in a written application or personal interview. A single answer should not determine whether an applicant is selected or rejected. Along with other forms of information, answers to these questions can help you build a more complete picture of an applicant.

- ***What type of supervisory situation do you prefer?***

If applicants are very independent, they may not fit in an organization whose policies and procedures require close supervision.

- ***What age/sex of youth do you want to work with? How would you feel about working with a different age/sex?***

If an applicant seems fixated on one age/sex, be wary. However, it may be that the applicant has experience or is gifted with working with certain age groups. Asking follow-up questions about why an applicant has a strong preference can help you determine if there is cause for concern.

- ***Is there anyone who might suggest that you should not work with youth? Why or why not?***

- ***Why do you want the job?***

- ***What would you do in a particular situation?***

Set up scenarios that involve potential concerns, boundary issues, or youth protection policies and interactions to gauge the applicant's response. Be concerned if applicants disregard the organization's policies and procedures or handle a situation poorly.

- ***What makes you a good candidate for working with youth? What would your friends or colleagues say about how you interact with youth?***

- ***What other hobbies or activities do you enjoy?***

Determine if applicants have mature, adult relationships—not just relationships with youth

Source 2: *Policies & Procedures Resources*, Praesidium, Inc.

A more exhaustive set of interview questions along with an interpretive guide is available as part of a program self-assessment, which can be accessed at the Insurance Board website:

www.insuranceboard.org. Go to **Safety Solutions/ SafeConduct™ Workbench**. Click on **Self-Assessment**. This resource is especially recommended for programs that deal with large numbers of children and where careful hiring decisions are required.

APPENDIX D – Leadership & Reporting Roster

The persons listed below are considered “primary contacts” for reporting for their respective Ministry or program. Each is also a “mandatory reporter” in the State of (Your State) for the purpose of reporting “suspected child abuse” to law enforcement or child welfare authorities.

Any employee, volunteer, Minister or member of the congregation of (Your Church) may report policy or procedure violations or circumstances of “suspected child abuse” to any of the persons listed below, but preferably to the person in whose ministry or program the incident has occurred.

Position	Name	Telephone	e-Mail address
Media Spokesperson			
OMBUDSMAN (Your Church’s confidential reporting option)			
Law Enforcement Agency			
Child Welfare Agency			

Prior to making an anonymous report, a person reporting must take into account how technology may reveal their identification (caller i.d., e-mail address, etc.). Nevertheless, the Ombudsman will take care not to further compromise confidentiality.

APPENDIX E – Code of Conduct

Appendix E – Code of Conduct and Appendix F – Ministry Standards, taken together, constitute the details of abuse prevention. They are active behaviors or administrative steps which define the conduct of each ministry. The distinction between the two is that the **Code of Conduct** outlines those actions or behaviors which each **individual is personally responsible** to fulfill, while **Ministry Standards** constitute processes which are the responsibility of persons in **leadership** positions to **deploy and enforce**.

Individual behavior is strongly influenced by culture, which might be family culture, regional culture or ethnic culture. It is learned by long association with others from childhood. It informs our notions of what is right or wrong. For one cultural community, certain behaviors may be absolutes. Actions which are normal and well-accepted in one place or one context, may be offensive to another community. While some cultures object to left-handedness, other groups may not be at all aware of the distinction and think right hand or left hand dominance is perfectly normal. When in a particular setting these differences rise to the level of being absolutely right or wrong, there can be confusion about what is correct conduct. With the rapid proliferation of social media, major areas of culture are being formulated daily as the consequences of technology become apparent.

Because of the diversities in social culture and uncertainties of a rapidly changing environment, it is important for church leaders, especially in the sensitive matter of caring for children and “vulnerable adults”, to take the guess work out of standards of behavior. When employees and staff must guess at what is correct conduct, they will be tempted to improvise. Improvisation can lead to patterns of behavior that may result in disaster. In this fluid environment, leaders must define correct conduct – SafeConduct™.

(Delete this box.)

This Code of Conduct defines individual responsibilities as Ministers, leaders, employees or volunteers to meet the expectations of (Your Church) with respect to behavior or conduct in the service of the ministries of the church, especially those which serve children and “vulnerable adults”.

General Requirements --

Each person subject to this Code shall

1. Act as a team member in fulfilling ministry objectives
2. Treat children and “vulnerable adults” (clients) with respect, and fairly without regard to race, age, gender, sexual orientation or religion
3. Practice those behaviors we regard as necessary and positive as well as to refrain from those behaviors which have been defined as prohibited.

General Prohibitions --

The following behaviors are prohibited at all times:

1. Display affection toward a child/client in privacy.
2. Use profanity or tell off-color jokes.
3. Discuss their sexual encounters with or around children or in any way involve children in their personal problems or issues.

4. Date or become romantically involved with children.
5. Use or be under the influence of alcohol or illegal drugs in the presence of children.
6. Possess sexually oriented materials, including printed or online pornography, on Church property.
7. Have secrets with clients
8. Stare at or comment on children's bodies.
9. Engage in inappropriate or unapproved electronic communication with children.
10. Work one-on-one with children in a private setting.
11. Abuse clients in anyway including (but not limited to) the following:
 - Physical abuse: hit, spank, shake, slap, unnecessarily restrain
 - Verbal abuse: degrade, threaten, curse
 - Sexual abuse: inappropriately touch, expose oneself, or engage in sexually oriented conversations
 - Mental abuse: shame, humiliate, act cruelly
 - Neglect: withhold food, water, shelter
 - Permit children to engage in the following: Hazing, bullying, derogatory name-calling, games of Truth or Dare, ridicule or humiliation or sexual activity
12. Manipulate or exploit a "vulnerable adult" in any way.

Reporting Obligations --

Each Minister or statutory "mandatory reporter" shall report:

1. Concerns or complaints about other employees and volunteers, other adults, or children to a supervisor. (Appendix D – Leadership & Reporting Roster)
2. Allegations or incidents of "suspected abuse" to the designated law enforcement or child welfare authority. (Appendix D – Leadership & Reporting Roster)

Specific Interaction Standards –

This section contains specific rules for interaction with clients, especially children. Whether or not to include this level of specific guidance in this area is optional. However, **it is fundamentally important that these specific behavior standards be published in some way and identified in the course of training.** As indicated above, because of the diversity of cultural understanding of one-on-one behavior and especially the rapidly evolving standards around social media, your church must define what is SafeConduct™ within your own programs.

Policies commonly mandate "**appropriate**" behavior, or to refrain from "**inappropriate**" behavior. **These words are too vague and an insufficient guide to individual behavior in the absence of more specific standards.** While we may like to rely upon notions of common sense, in practice, what we call common sense is based upon actual experience and knowledge derived in training. Young volunteers are most likely to be lacking worldly experience or specific education in these relationships. You must make it clear for them.

(Delete this box.)

Each Minister, employee or volunteer worker of (Your Church) shall conduct him/herself in a manner that fosters understanding of SafeConduct™ in the context of serving children and "vulnerable adults". The standards articulated below serve two purposes:

- To protect children and “vulnerable adults” from abuse or grooming for abuse elsewhere; and
- To protect/prevent church staff from engaging in patterns of behavior that may be construed as abusive or predatory. While a single infraction of guidelines may not constitute abuse, a pattern of repeated violations will result in disciplinary action up to and including dismissal from ministry.

1. **Approval and Affection** – In providing approval or affection, the following guidelines apply:

<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
<ul style="list-style-type: none"> • Side hugs • Shoulder-to-shoulder or “temple” hugs • Pats on the shoulder or back • Handshakes • High-fives and hand slapping • Verbal praise • Pats on the head when culturally appropriate • Touching hands, shoulders, and arms • Arms around shoulders • Holding hands (with young children in escorting situations) <p>These may be inappropriate if unwanted by the child or the employee or volunteer.</p>	<ul style="list-style-type: none"> • Full-frontal hugs • Kisses • Showing affection in isolated area • Lap sitting • Wrestling • Piggyback rides • Tickling • Allowing a child to cling to an employee’s or volunteer’s leg • Any type of massage given by or to a child • Any form of affection that is unwanted by the child or the employee or volunteer • Compliments relating to physique or body development • Touching bottom, chest, or genital areas

2. **Verbal Interactions** – The manner of speaking with children establishes respect. The following guidelines apply:

<i>Appropriate Verbal Interactions</i>	<i>Inappropriate Verbal Interactions</i>
<ul style="list-style-type: none"> • Positive reinforcement • Appropriate jokes • Encouragement • Praise 	<ul style="list-style-type: none"> • Name-calling • Discussing sexual encounters or in any way involving children in the personal problems or issues of employees and volunteers • Secrets • Cursing • Off-color or sexual jokes • Shaming • Belittling • Derogatory remarks • Harsh language that may frighten, threaten or humiliate children • Derogatory remarks about the child or his/her family

3. Out-of-Program (Off-Site) Contact –

Two models for out-of-program contact are provided, one preferred and highly restricted. You must decide you will employ one or both models

(Delete this block.)

Option 1 – Preferred

(Your Church) prohibits off-site contact with clients unless approved by the Board of Directors

Option 2 --

(Your Church) strongly recommends that Ministers, employees or volunteers do not have outside contact with children from church programs. However, if off-site contacts are unavoidable, the following forms of outside contact are appropriate and inappropriate:

Appropriate Outside Contact	Inappropriate Outside Contact
<ul style="list-style-type: none"> • Taking groups of children on an outing • Attending sporting activities with groups of children • Attending functions at a child’s home, with parents present 	<ul style="list-style-type: none"> • Taking one child on an outing without the parents’ written permission • Visiting one child in the child’s home, without a parent present • Entertaining one child in the home of a church employee or volunteer • A lone child spending the night with a church employee or volunteer

In addition, when outside contact is unavoidable, the following steps are to be taken:

- A supervisor shall identify for employee and volunteers what types of outside contact are appropriate and inappropriate (above)
- A supervisor shall assure that the employee or volunteer has the parents’ permission to engage in outside contact with the child. When time permits, parents shall execute a permission form with a waiver of liability (if permitted by state law).

4. One-on-One Interactions –

Many safe church policies rely almost exclusively on the “two adult rule” as the means to prevent child abuse. While it is a valuable tool, there will be situations in which one-on-one interaction is appropriate or necessary. The need for one-on-one interaction will be infrequent, but it must be well regulated and well documented.

(Delete this box.)

Because most abuse occurs when an adult is alone with a child, private one-on-one meetings with a child are prohibited unless approved in advance by (Chair, Employment Committee). When so permitted, the following guidelines shall apply:

One-on-One Interaction Guidelines

- When meeting one-on-one with a child, always do so in a public place 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 employees and volunteers that you are alone with a child and ask them to randomly drop in. (Ask to be supervised.)
- 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.

To the extent any of these guidelines may appear to be in conflict, the spirit of them is that one shall seek to be under the supervision of others while meeting privately with a child.

5. Social Media – Electronic Communications –

While also an opportunity for congregational development, managing social media is one of the most complex challenges facing church leadership, especially when leadership is not computer savvy. Based on opportunities, skills available, and resources to supervise, each church must make decisions regarding social media, its deployment and supervision. While there are administrative aspects to managing social media, what actually happens, good or bad, will depend on actions by individuals, especially young users. For this reason, social media is addressed here in the Code of Conduct.

Two broad strategies are available for using social media, either restrictive and prohibitive or encouraging communication, albeit under supervision. You must select a strategy based on your objectives, needs and perceived opportunities. Select options below based upon program needs and ability to supervise. With care, elements of Option 1 may be blended with Options 2 and 3 to create a coherent policy. Choose carefully and reconcile the elements.

(Delete this box.)

General Social Media Policy -- No Minister, employee, volunteer or member of (Your Church) shall create or use a media site (web, Facebook, YouTube, or similar) in the name of or purporting to represent the church without the explicit written permission of the Board of Directors. When clergy or staff, acting in their capacity as a representative of the church, lead or coordinate a group activity using social media, each may use only official church sites/channels when they have been made available by the church. These may include web pages, Facebook, e-mail and similar means.

Communication with Children – (Option 1 – Restricted Communication) – Due to the attendant risk of electronic communications with children, especially the inability to supervise, the following standards shall apply:

- Employees and volunteers are prohibited from sending text messages to children and/or replying to text messages from children.
- If a child attempts to communicate with an employee or volunteer via text, a supervisor must be notified immediately.
- Employees and volunteers are prohibited from instant messaging with children.
- Any e-mail communications with children must include the child's parents or guardians. E-mail communications shall be limited to logistical matters, e.g., meeting dates, times and places.
- Employees and volunteers are prohibited from communicating with children using social networking websites such as Facebook, Twitter, or MySpace.
- Personal social networking profiles and blogs of employees and volunteers must be private and inaccessible to children.
- Employees and volunteers with profiles on social networking sites may not request to be friends with children or approve friend requests from children.

Social Media Communications – (Option 2 – Official Church Sites – Preferred over Option 3)

In order to extend the life of the congregation, enhance communication and develop participation of young people in the life of the church and its ministry, (Your Church) will authorize certain Ministers to manage the church's official website and organization Facebook page. Use by Ministers of private pages and private profiles are prohibited.

Note: Organization pages on Facebook may be created only by someone who has a personal Facebook page. By default, the person who created the Organization page is able to control access to the Organization Facebook page.

(Delete this box.)

Ministers who shall create public pages on behalf of church programs are responsible to monitor communications and to assure that employees and volunteers do not have private (and possibly inappropriate) conversations with children.

Ministers having Facebook privileges on behalf of the church, shall treat unsolicited communication or "friending" from children under age XX (You decide) as an unauthorized text message. No reply may be given except to indicate by a posting that accepting a "friend" invitation by under-age children is a violation of the Code of Conduct.

If a child reveals abuse or inappropriate interactions with an adult, the Minister must report this information in the manner of any "suspected abuse".

When using Facebook to communicate with children, the authorized Minister shall inform parents/guardians of each child that the latter is communicating with the Minister via Facebook, providing the parent/guardian the opportunity to disapprove or to participate in a Group.

Social Media Communications -- Facebook – (Option 3 – Private Sites)

In order to extend the life of the congregation, enhance communication and develop participation of young people in the life of the church and its ministry, (Your Church) will authorize only certain Ministers to communicate through personal Facebook pages under the following conditions and settings:

- Each authorized Minister shall maintain a Facebook profile setting at “public” to permit supervisory viewing of communications with children.
- “Secret” or “Closed” Groups may not be used on a personal Facebook page for communication with children.

In limited situations, authorized ministers, in the context of pastoral counseling, might find Closed or Secret Groups to be useful. Authorized ministers should be wary of the dangers, especially of Secret groups and volunteer to be supervised by other clergy. Note also, that posting in a Group setting will void pastoral privilege.

(Delete this box.)

- Only “Open” Groups may be used on a personal Facebook page for communications with children.
- “Membership Approval” shall be set to require Admin approval of new members.
- Contact via Facebook from a child known to be under age XX (You decide) shall be reported in the same manner as an unauthorized texting contact.
- The Social Networking Code of Conduct shall be posted as a Doc in the Group.

Note: As of early 2012, Facebook permitted only persons age 13 and older to have a personal profile. This limitation was commonly ignored by parents who permit younger children to have a Facebook profile. Facebook then changed its rules to permit personal profiles by younger children with parental permission and parental controls installed. The guidance of the Insurance Board is that you should not permit your standard to be set by Facebook. Rather, you must decide the lower age limit for participation in a church Facebook environment, whether younger or older than 13.

(Delete this box.)

Ministers having Facebook privileges on behalf of the church shall treat unsolicited communication or “friending” from children under age XX (You decide) as an unauthorized text message. No reply may be given except to indicate by a posting that accepting “friend” invitations by under-age children is a violation of the (Your Church) Code of Conduct.

If a child reveals abuse or inappropriate interactions with an adult, the Minister must report this information in the manner of any “suspected abuse”.

When using Facebook to communicate with children, the authorized Minister shall inform parents/guardians of each child that the latter is communicating with the Minister via Facebook, providing the parent/guardian the opportunity to disapprove or to participate in a Group.

Social Networking Code of Conduct – (Applies to both Option 2 and 3, above)

Each Minister who leads using the resources of social media shall apply this Social Networking Code of Conduct:

- Prohibit comments that are, or could be construed by any observer, to be harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.
- Prohibit sexually oriented conversations or discussions about sexual activities.
- Prohibit private messages between employees and volunteers and children.
- Prohibit posting inappropriate pictures (for example, sexually suggestive, exploitive or voyeuristic) or inappropriate comments on pictures.
- Provide children and their parents with this Social Networking Code of Conduct.
- Encourage parents to play a role in monitoring their children's interactions with employees and volunteers.
- Continuously remind children how to interact appropriately through social networking sites.
- Deny participation by individuals who repeatedly violate the Code of Conduct.

At the institution of the use of social media, the authorized Minister shall present this Social Networking Code of Conduct to children (or other client group) and parents/guardians.

If offered a position as Minister, employee or volunteer, I affirm that application disclosures are complete and truthful. I agree to comply with the policies and rules contained in this SafeConduct™ policy, to include training, monitoring, reporting and ministry administrative procedures. I agree to meet standards for one-on-one relationships with children/clients as defined above. If requested to do so, I will cooperate with any investigation of a possible violation of church policies and rules by providing complete and truthful information in an oral and/or written statements.

Signature

Date

Name

APPENDIX F – Ministry Standards

These ministry standards are intended to provide a safe environment for children and “vulnerable adults” in a variety of circumstances. From time to time it may not be possible to fulfill the standard to the letter. Permission is granted to Ministers in leadership to waive a standard with justification. If it is found that consistent fulfillment of a standard is not practicable, the matter shall be elevated to the (Your Committee) for resolution or amendment of these standards.

Adult-Child Ratios –

State laws governing licensed activities may require specific ratios in certain circumstances. Statutory standards are considered to be a minimum standard. You may set a higher standard.

(Delete this box.)

For all activities an adult-child ration of (xx):1 shall be maintained, except that a ratio of (yy):1 may apply to a classroom environment with children above the age of (zz). Employees or volunteers under the age of 18 are not included in the ratio.

In all cases, an employee or volunteer under the age of 18 working with minor children shall be under the supervision of an adult over the age of 21.

Employees or volunteer leaders under the age of 21 shall not supervise or lead a youth group in which the oldest participating minor child is less than three years younger than the supervisor/leader.

Bathrooms, Locker Room and Out-of-the-Way Locations –

The physical layout of your church and security needs may require that certain areas such as closets, basements, storerooms or whole wings be locked or made off limits. These requirements must be understood by all staff and evident to visitors through key control and signage.

(Delete this box.)

The following practices shall apply to supervision of bathrooms and changing areas:

1. Minimize presence of diverse child age groups at the same time.
2. No employee/volunteer shall enter with a single unrelated child unless the entry door is ajar (propped open) in a way that (s)he can be observed by others.
3. Children shall not enter alone in pairs.
4. Children shall not enter unsupervised.
5. Require children to ask permission before using bathrooms.

Employees and volunteers in leadership are to frequently and randomly check bathrooms to assure their security.

The following areas are to be locked at all times: (Your rules)

The following areas are to be off-limits: (Your rules. Typically a place where a predator and child might find unsupervised privacy, such as an unsupervised floor, basement, balcony , or adjacent building.)

Transition and “Free” Time --

Especially during day long, off-site or overnight activities, children will periodically not be engaged in a supervised activity. Supervision shall be maintained during transition times through the use of chaperones, hall monitors and escorts to minimize the opportunity for security breach or child-on-child incidents.

(Leadership titles) shall assess at what times and places additional duties are to be assigned to employees and volunteers to assure supervision of transition and free time.

Transportation of Children –

Transportation of children, whether on buses, motor coaches or private passenger vehicles, is a serious responsibility. Especially when utilizing church owned vehicles or private vehicles of employees and volunteers, utmost care shall be taken in view of the risks associated with managing transportation.

The following standards shall apply:

1. No employee or volunteer shall transport a single child that is not his/her own, except as may be required in an emergency with the approval of a supervisor. Communications shall be established to verify the whereabouts, expected arrival and change of custody of the child.
2. Any driver operating a vehicle which holds 16 passengers or more, including the driver, shall possess a valid Commercial Driver License (CDL).
3. Any person who drives on behalf of (Your Church) sponsored programs shall be previously qualified under our transportation and driver qualification procedure. (Appendix B – Applications & Forms)
4. Adult-child ratios shall be maintained and within the safe loading limits of the vehicles being used.
5. As practicable, mixed age groups are not to sit together.
6. Employees and volunteers are not to make unauthorized or unplanned stops.
7. On each trip, a vehicle log shall be maintained which documents the departing time, arrival time, destination, mileage, names of passengers and supervising staff and volunteers and any unusual occurrences.
8. All passengers are to be seated and to use safety belts as available.
9. Employees and volunteers are to be seated on larger vehicles in a way that permits them to supervise young passengers.
10. When passengers must disembark at a rest facility or destination, care shall be taken to obtain a headcount on arrival and departure. All passengers shall be required to complete a trip on the same vehicle to assure accountability .

While so-called “15-passenger” vans escape the requirement for the operator to possess a Commercial Driver License (CDL), qualifying drivers in this way is recommended.

When organization own van/bus style vehicles which may be operated by different drivers, a vehicle log book is strongly recommended. The purpose of the log is to verify the regular maintenance of the vehicle and to place responsibility upon drivers to identify defects and take steps to report defects to persons responsible to see to their maintenance.

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Off-site Activities (Day Trips) --

Off-site activities require special additional planning, taking into account the nature of the destination and exposure to the public at large. For example, attendance at a public venue, such as an amusement park, will require greater supervision than a visit to a sister church. Due to the increased risk of a child becoming lost or injured during an off-site activity, extra care shall be taken to assure adequate supervision.

The following are minimum requirements:

1. All off-site activities shall be approved in advance by (Leadership title).
2. The trip leader shall provide a plan outlining transportation and supervision for the activity.
3. Parent/guardian permission shall be obtained. Permission forms are to site the destination(s) and activities in which the child might engage (.e.g., climbing wall, horseback riding, soccer, baseball, etc.)
4. Parent/guardian providing permission shall indicate who will receive the child on return if other than the person signing the permission.
5. Adult-child ratios shall be increased by at least one person, which may include a person age 16 or older who is qualified to drive. One adult may supervise only one person under the age of 18 (employee or volunteer).
6. Each employee or volunteer shall be assigned to a specific group of children to supervise. Each employee or volunteer must then maintain a roll sheet listing all of the children in his or her group. Head counts and roll checks will be conducted routinely.
7. Standards for bathroom activities, transition time and transportation shall be maintained.
8. Parents/guardians shall be provided a means to make emergency contact with the trip leader.

Over-night Activities --

Camps generally have the experience and staffing to adopt different standards than these below. The assumption for the purpose of this standard is lodging at a public hotel in an unfamiliar city.

As with off-site activities, over-night activities present an even higher level or risk to children than day trips due to isolation from parents and the 24-hour supervision that is required throughout the activity.

The following standards will apply in addition to standards for off-site activities:

1. All overnight activities, whether on the church site or not, shall have prior approval of (Leadership title).
2. All overnight activities include a minimum of two adult chaperones over 21 years of age.

3. All volunteers and employees under 18 years of age must be supervised at all times.
4. Parent/guardian permission shall be obtained. Permission forms are to site the destination(s) and activities in which the child might engage (.e.g., climbing wall, horseback riding, soccer, baseball, etc.)
5. The parent/guardian providing permission shall indicate who will receive the child on return if other than the person signing the permission.
6. At all times through the night an employee or volunteer must remain on duty at a location to supervise the coming and going of any child and to assure safe evacuation during an emergency and to prevent children sneaking out. (Maximum two hour watches through the night are recommended.)
7. Trip leaders or other designated adult shall conduct routine walk-throughs of high risk areas
8. For the event of a building evacuation, an outdoor rally point will be designated in advance.
9. A roster will be maintained of the room assignments for each child and adult.
10. A bed check will be conducted at a specific time known to all.
11. Adult-child ratios are to be maintained for outings away from the lodging site.
12. A daily schedule of events shall be maintained with supervisory duty assignments included.
13. Double-queen lodging is preferred at hotels, four to a room. Children in each room will be of similar age. No adult will share a bed with a child.
14. Adult rooms will be scattered among rooms occupied by children. There shall be at least one adult lodged on any floor on which children are sleeping.
15. Standards for bathroom, out-of-the-way, off limits locations and transition time shall be maintained as the site circumstances and facilities may require

APPENDIX G -- Registered Sex Offender Policy

Your church faces the prospect that a Registered Sex Offender (RSO) will either request to participate in the life of your church, whether by occasional worship or full membership. Or a member, otherwise in good standing, may be required to register as a sex offender. Given the prospect, it will be easier for a church to establish a policy before an RSO presents himself, rather than after. (An RSO may be either a woman or a man, but for economy of expression herein, we will use the male gender (he, him, his) to discuss the subject.) After the situation presents itself, personal prejudice and passions will take over, and agreement on an approach will be more difficult to achieve. For this reason, the Insurance Board is providing a template that takes into account the need to provide a safe place for all, ecclesiastic concerns and mandates and the very real liability exposures and insurance coverage limitations that may result.

Some congregations may have strong feelings that it is their duty to minister to RSO's, to assist in their healing and rehabilitation. At the same time, there may be child-serving ministry ongoing, most commonly a pre-school or day care. There is inherent tension between the two ministries. In addition, there may be a variety of statutory requirements and limitations surrounding an RSO, including restricted access to certain places and employment limitations. Finally, not all sexual offenses are the same. Offenders fit into two broad categories: (1) Preferential offenders and (2) situational offenders. Preferential offenders (for example, one who prefers boys between 8 and 10 years old) are generally considered incurable. Situational offenders (for example, 19 year old has a relationship with a 17 year old) may have been involved in a variety of crimes with a range of recidivism risk. That is, **each RSO must be evaluated in relation to the specific crimes committed and the risk they pose to your congregation**, along with statutory requirements and insurance considerations.

There is risk in all ministry. It is in the nature of people of faith to engage in rescue, care, health and healing ministries that other public and non-profit agencies are unable or unwilling to pursue. The risks of harm in most such activities are nominal with the exception of the risk of sexual misconduct by persons who insinuate themselves in an organization for the purpose of gaining access to children or other vulnerable persons. Well publicized cases have resulted in very large judgments largely because people in a management role ignored warning signs of abuse and shielded suspected offenders. For this reason, the insurance marketplace has drawn a bright line regarding liability coverage for sexual misconduct. **That is, coverage is simply not available for the circumstance in which church management knows of the prior sexual misconduct of church employees, volunteers and members.**

The Insurance Board does not prescribe what activities or ministry in which a congregation may engage. Our mission is to encourage conduct of ministry in a manner which minimizes the risk of harm to potential victims, and risk to your church, which goes beyond the mere financial. An incident of sexual misconduct may irreparably damage the reputation of your church and impact your very survival.

In adopting a policy regarding your church's approach to RSO's, **the following elements must be considered and included:** (1) Specific offenses of the individual; (2) Statutory requirements; (3) Judicial requirements; (4) Insurance limitations; (5) Notice to the congregation and client groups; and (6) Limited access agreement.

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As a community of faith, serving by the example of Jesus Christ, we also seek to attend to the needs of all who seek healing, redemption and fellowship among us. We shall be prepared to accept in our midst those who have violated the most sacred mores of our society at large, in order to provide them refuge, peace, example and support in their recovery and penitence. We commit to doing so with utmost care for the welfare of our congregation, collectively and individually, and the community we serve.

We accept that there are risks to be born in our deliberate association with and ministry to sex offenders who are considered a pariah among the community-at-large as evidenced by the many constraints placed upon their interaction with the community. We agree to honor the needs of the congregation and our community to have reasonable assurance that a sex offender in our care will not have an opportunity to re-offend as a result of lapses in our management of the offender.

We shall consider limited participation or membership of a sex offender in our congregation with utmost care which shall include the following elements:

1. Document understanding of the statutory limitations applying in the State of (Your State) to the movement and activities of a sex offender, taking into account the programs of the church or the operations of tenants. (Examples: Sunday school, day care, pre-school, sports leagues, seasonal camps and associations which serve children and “vulnerable adults”.)
2. Consider and understand the character of the crimes which have resulted in requiring an individual to register as a sex offender, the passage of time without repeated conduct or behavior and the risk and opportunity of re-offending that is presented by the particular programs of our congregation.
3. Document understanding of limitations and prohibitions placed upon the offender by courts and probation authorities. The opinion of a mental health professional regarding the suitability of the person to participation in the life of the church shall be obtained. In all cases where probation is in force, we shall obtain the explicit approval of and conditions of participation specified by the probation officer. A recommendation by law enforcement or mental health professionals to deny participation to an offender shall be honored in all cases.
4. Understanding that, with respect to a person who is an employee, volunteer or member, who has previously been conviction for acts of sexual misconduct as defined by insurance contracts, knowledge by church leaders and managers of such prior conviction will have the effect of voiding coverage for the individual employee, volunteer or member and for the church for future acts of sexual misconduct by that person.
5. Given that criminal convictions are a matter of public record, there shall be no expectation of secrecy on the part of the offender. As a condition of participation in our faith community, the offender must agree that the leadership of the church shall make it known to the members, constituencies and customers of the church that we have accepted among us a registered sex offender. The conditions and limitations that apply to participation in the life of the church shall be known to all.
6. With the advice of legal counsel, and in all cases, the conditions of participation by a registered offender shall be defined by a “limited access agreement” (Appendix B – Applications & Forms) executed by the offender and church. Such agreement shall be approved by probation authorities as may be necessary according to para. 3., above. The agreement shall be reviewed annually to validate on going eligibility. Violation of the

agreement by the offender shall be considered as grounds for immediate cancellation of the agreement.

The following additional considerations shall apply:

Victims in the congregation – In such case as the victim of a RSO (registered sex offender) is a member of the congregation, employee or is a client of other services provided by the congregation, the RSO shall not be permitted to attend the church or church activities.

Clergy-penitent privilege – “Clergy-penitent privilege” is a “Rule of Evidence” defining or limiting information which clergy may reveal in a court of law only. “Clergy penitent privilege” does not prevent clergy from informing the congregation of matters which may be relevant to their safety; it does not require clergy to hold information in secrecy.

Ordained clergy shall assume responsibility and take extraordinary care to understand the scope and limitations of clergy-penitent privilege in the State of (Your State), and the parameters of confidence and privilege as defined by our denomination. Authorized clergy shall inform the leadership of the church of the general principles of confidence and privilege under which (s)he performs his/her clerical duties.

Note: Ordained clergy must use extraordinary care when asserting clergy-penitent privilege, carefully considering whether such assertion with respect to a particular individual will stand up in the course of litigation. There is a delicate balance between the individual right to clergy-penitent privilege and protecting the interests of children. Furthermore, the customs, discipline and practice of your denomination may provide latitude in the matter of confidentiality when there is risk of harm to others.

As an example, the PCUSA “Book of Order” (G-4.0301) states the following: *A teaching elder or a ruling elder commissioned to pastoral service may reveal confidential information when she or he reasonably believes that there is risk of imminent bodily harm to any person.* The PCUSA “Book of Order” (G-4.0302) states further: *Any member of this church engaged in ordered ministry and any certified Christian educator employed by this church or its congregations, shall report to ecclesiastical and civil legal authorities knowledge of harm, or the risk of harm, related to the physical abuse, neglect, and/or sexual molestation or abuse of a minor or an adult who lacks mental capacity when (1) such information is gained outside of a confidential communication as defined in G-4.0301, (2) she or he is not bound by an obligation of privileged communication under law, or (3) she or he reasonably believes that there is risk of future physical harm or abuse.*

(Delete this box.)

Escorts (Parish Associate) – Conditions of limited access for a RSO will commonly require that the offender have an escort while on the church premises or at church events elsewhere. A person serving as an escort shall not be a spouse, partner or relative of the offender.

Approval & Supervision –

With the advice and prior approval of the Church Board, a Limited Access Agreement with a Petitioner (known RSO) may be signed only by the Senior Pastor.

The Senior Pastor, in association with other “authorized clergy” and parish associates (escorts), who shall be named in the Limited Access Agreement, shall be responsible for the general supervision of the Petitioner in all of the latter’s activity in relation to the church. Elements of supervision shall include the following:

- Knowledge of the terms of the Limited Access Agreement, including activity limitations placed upon the Petitioner.
- Knowledge of the Petitioner’s offense history sufficient to understand the risks of association with the church and its ministries.
- Willingness to assert activity limitations and to report any violation of restrictions placed upon the Petitioner.
- Willingness to intervene in any onset of a risky or problem behavior.
- Willingness to report all cases of non-compliance to the Senior Pastor.

The Senior Pastor shall assess, prior to selection, whether a proposed parish associate is willing to fulfill the above elements of supervision.

Professional privacy – Members who are employed in certain occupations may have a statutory obligation to maintain privacy around the criminal history of their clients who may also be parishioners. Such members shall decline to accept leadership roles which may put them in a position of decision-making regarding individuals who may be their professional clients.

Juveniles – While the criminal record of a juvenile is ordinarily concealed by the courts, the church may come to know the juvenile’s history by other means. Honest disclosure by a juvenile and parents in the volunteer application and screening process may reveal that a record exists without knowing the specifics. While a limited access agreement will be required for the juvenile, as for others, every precaution will be taken to preserve the privacy and confidentiality which the law affords a juvenile.