

BEST PRACTICES FOR WORKING WITH PROTECTED PEOPLE

Policies define the boundaries of acceptable behavior in an organization. Because offenders often violate policies to gain access to Children or Vulnerable Adults, knowing and understanding the Church’s Policy regarding Safety of Children and Vulnerable Adults will empower pastors, staff, and volunteers to **identify, interrupt, and report** violations. Simply interrupting a policy violation can prevent a false allegation of abuse or put an offender on notice that the rules apply to everyone and violations will not be tolerated.

Physical Contact. The Church’s Best Practices relating to physical contact encourage a positive, nurturing environment while protecting Children, Vulnerable Adults, Staff, and volunteers. Any inappropriate physical interaction must be reported as a violation of Policy.

<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
<ul style="list-style-type: none"> • Side hugs • Pats on the shoulder or back • Handshakes • High fives and fist bumps • Holding hands to escort young children 	<ul style="list-style-type: none"> • Full-frontal hugs • Kisses • Showing affection in private • Lap sitting • Wrestling • Piggyback rides • Tickling • Allowing older children to cling to a Staff or volunteer’s leg (pre-school aged children will be redirected as soon as circumstances permit) • Any type of massage given by or to a Protected Person • Any form of affection that is unwanted by the Protected Person, Staff, or volunteer • Compliments relating to physique or body development • Touching bottom, chest, or genital areas except as required for diapering and bathroom assistance in accordance with Procedures

Verbal Interaction. Staff and volunteers are prohibited from speaking to Protected People in a way that is, or could be construed by a reasonable observer, as overly harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Staff and volunteers may not initiate or engage in sexually oriented conversations with Protected People. Any inappropriate verbal interaction must be reported as a violation of Policy.

<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 • Involving Children or Vulnerable Adults in the personal problems and issues of Staff or volunteers • Secrets • Cursing • Off-color or sexual jokes or innuendo • Shaming • Belittling • Harsh language that may frighten, threaten, or humiliate • Derogatory remarks about a Child, Vulnerable Adult, or their family, characteristics or attributes

One-on-One Interaction. Most abuse occurs when an adult is alone with a Child or Vulnerable Adult. Program/Team Directors are encouraged to consult with SCRM to develop protocols to address situations where their ministry might anticipate one-on-one interactions (for example, counseling a youth, care home visits, an emergency medical situation, etc.). In those situations where one-on-one interactions are necessary, Staff and volunteers should consider the following additional guidelines to manage the risk of abuse or false allegations of abuse:

<i>Guidelines for One-on-One Interactions</i>
<ul style="list-style-type: none"> • When meeting one-on-one with a Protected Person, do so in a public place where you are in full view of others • Depart from the public place separately • Get parental or guardian consent before meeting if not an emergency • Avoid physical affection that could be misinterpreted • Schedule the meeting to be held at the Church • If meeting in a room or office, leave the door open and move to an area that can be easily observed by others passing by • Hold the meeting in an area covered by a security camera

*Approved by Executive Team June 22, 2021; Last Amended August 10, 2023
Safety, Compliance, and Risk Management Lead Director*

- Inform other Staff and volunteers that you are alone with a Protected Person and ask them to drop in unannounced
- Share your calendar with your supervisor and promptly report any unscheduled event resulting in 1:1 time with a Protected Person
- If a Protected Person is the first to arrive or last to be picked up, wait outside. If bad weather, remain near the entry with the door open
- 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
- Even where families are friends outside of Church, the perception of the behavior is important. Staff and volunteers should not be alone with a child who is not their own

Electronic and Telephonic Communication. Recognizing that electronic communication is a reality of modern engagement, transparency is important and extra care should be given when considering your interaction. Communications should be visible to others or documented. Group communication is encouraged. Questionable or suggestive communications should be reported to the Staff supervisor or ministry lead.

In order to authentically engage with Protected People through their preferred communication channels, Staff and Covered Volunteers may follow Protected People on public social media. Protected People should primarily be directed to follow official Church and Staff accounts.

When assigned to work with Protected People, Staff and volunteers are not permitted to use electronic communication devices except during breaks and in emergency situations. Internet use, text messaging, and emailing pictures while assigned to work with Protected People is discouraged whether for business or personal reasons.

Regarding crisis communications and other one-on-one spiritual counseling, a parent/guardian's consent should be obtained and supervisor notice provided as soon as the situation permits. Spiritual counseling should follow the guidelines for one-on-one interaction, generally be limited to 30 minutes in duration, and for a maximum of four sessions. Where appropriate, a professional referral should be considered as soon as possible.

Parents/guardians must be made aware of the Church's communication protocols and provided the opportunity to opt-out.

<i>Appropriate Electronic Communication</i>	<i>Inappropriate Electronic Communication</i>
<ul style="list-style-type: none"> • Sending and replying to emails and text messages from Protected People when copying a Program/Team Director, Staff supervisor, a Safe Gatherings certified peer, or the Protected Person’s parent or guardian • Communicating through “organization group pages” on Facebook or other public forums • Utilizing applications like GroupMe to communicate with all participants at the same time • Accepting a “friend”, “follow” or similar social media request from a Protected Person, with the understanding that you will include only content befitting your role as a Church representative on any such platform • Initiating a short call, text or other direct communication related to a prayer request, event attendance, scheduling, or crisis response that is appropriate to the Protected Person’s age and circumstances where disclosure of this possibility has previously been provided in writing to the parent or guardian without objection and any material communication is promptly reported to the Staff Supervisor 	<ul style="list-style-type: none"> • Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating comments • Sexually oriented conversations • Private or direct messages between Pastors, Staff, or volunteers and Protected People other than those limited communications using the controls described as <i>Appropriate Electronic Communications</i> • Posting pictures of Protected People on social media other than as consented to by parents or guardians • Posting inappropriate comments on pictures • Initiating any “friend”, “follow” or similar social media connection, or engaging in any of the foregoing, with a Protected Person

Social Media. Groups may be closed but should not be hidden. Have two administrators regularly monitor content and use a notification system to approve or report posts. Block users who post inappropriate content. Additional recommendations:

- Disable You-Tube “suggested videos”
- Remember all socials reflect on the Church
- Be sensitive to tagging or revealing a minor’s location
- Administrators should remove access of adult leaders and former ministry participants who are no longer active

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Online Ministries. In a remote environment, without physical interaction or supervision, engagement may feel more casual, but online interaction requires the same boundary awareness as in-person activity. Be aware that different but equally significant issues can arise. Be on the lookout for any conduct harmful to a Child or Vulnerable Adult's mental, emotional, or physical welfare. Examples include inappropriate digital interaction; Zoom-bombing or hacking of software or technology; inappropriate social media content; private meetings or chats between an adult leader and young person; grooming behaviors; crossing boundaries whether purposeful or inadvertent. Remember humor and sarcasm can be easily misinterpreted and screenshots can last forever.

The Basics. Two-Deep Supervision is expected, as is appropriate dress and online background (no alcohol, smoking, adult-themed material, etc.). Monitor and promptly correct other leader behavior and statements. Do not take pictures or post images on social media without parent/guardian approval and never post pictures on a personal account. Do not post pictures that might make a person feel self-conscious, vulnerable, or would subject the person to ridicule. Report concerns to Staff supervisor or Program/Team Director and document both the incident and your report.

Transparency is Key. Include parents/guardians in electronic correspondence regarding online activities. Advise parents/guardians if you intend to communicate with Protected People by text and offer other options. Special rules may apply if collecting information from children under the age of 13; have parents complete any registration forms. It is recommended that you:

- Set and publicize hours of availability. Children may be more likely to reach out after hours in an online environment
- Make all communication visible to others; do not engage in 1:1 digital communication except in an emergency situation and otherwise in accordance with Procedural guidelines
- Use group texts. If discussing a private matter, the best option is to include another Safe Gatherings certified person. Understanding this may not be possible in all circumstances, promptly report any such communication to your Staff Supervisor
- For your protection, consider retaining all messages communicating with youth. Parents/guardians should be notified of inappropriate activity, observations, or contacts during online interaction. Promptly notify a Staff supervisor or Program/Team Director when boundaries are crossed, inadvertently or otherwise.

Use Secure Technologies. When interacting with Protected People in an online environment, review privacy policies and settings and consider whether a paid application is necessary to access preferred features. Users should not have to create an account to participate. Additional recommendations:

- Provide ID/passwords directly, do not post in public space like on the Church's website
- Use waiting room so the meeting cannot begin without the host
- Lock meeting once session has begun
- Consider whether to record or limit this meeting feature
- Monitor who is entering/exiting the meetings
- Regularly hop into break-out rooms
- Limit file and screen sharing to host only
- Mute lines
- Know how to remove a participant from the meeting and turn off camera
- Control chat feature and disable private chat.

*Approved by Executive Team June 22, 2021; Last Amended August 10, 2023
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Advocacy – Empower Young People. Remind Protected People that, just like in-person, they should not share personal information, join a meeting, or friend someone they do not know. You can advise Protected People to tell a trusted adult if they experience or observe cyberbullying or inappropriate content. Other reminders:

- There are no “secrets” online
- Encourage parents to monitor their privacy settings and have students participate in online gatherings from a public area of the home
- Be alert to grooming (the graduated, calculated, escalating process of building trust) which could include requests to share pictures, IM, ask for inappropriate content, blackmailing, sending pornography, or asking to communicate without a parent’s knowledge or consent

Awareness. Always consider mandatory reporting obligations. If a reasonable person would suspect abuse or neglect based on what you observe during online interaction, proof is not required to make a good faith report. Involve a supervisor or Program/Team Director to connect with families who may need support (for example, you observe increased stress or evidence of food insecurity) or if you observe or hear something that does not seem right.

Overnights. Overnight stays present unique risks to Children, Staff, and volunteers. They often involve changing clothes, different genders and ages, more unstructured activity, and an increased demand for supervision.

Supervision guidelines. Leaders are expected to regularly and randomly observe activities. A “lead” Staff member should be assigned and a meeting held with all participating Staff and volunteers to discuss the unique risks of the specific outing. Group meetings should be held in open and observable areas, not in Staff or participants’ rooms.

Off-Site Host Locations. Physical boundaries should be clearly defined and explained to participants. Each Staff and Covered Volunteer should be assigned a specific group of participants to supervise with head counts conducted routinely throughout the event. Staff and Covered Volunteers should be assigned to monitor or periodically walk-through high risk areas such as bathrooms, entrances/exits, and hallways.

Participant rooms should be assigned by age/maturity and gender preference. Adult bunks should be thoughtfully positioned to reinforce the guidelines in these Procedures. Two unrelated Staff / Covered Volunteers should monitor activity until all rooms are quiet and Protected People appear to be asleep. Where there are “hotel style” accommodations (i.e., private room with a door), youth should be housed with youth and adults with adults. At least two youth should be assigned to a room.

Bathrooms and Showers. Staff and volunteers should discourage Children of different ages from using the bathroom or showering at the same time. Adults and Children should not use the facilities at the same time. Only as many people as number of toilet or shower stalls should be in the bathroom at the same time. Swimsuits should be worn when locker-room style showers are used. When possible, doors to the bathroom should be propped open. An adult Staff or Covered Volunteer should stand outside the bathroom within hearing distance. It is inappropriate to be alone with a Child of any age (other than your own) in a bathroom.

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- **Infant.** Diapering should be done in the nursery by a parent/guardian, Staff person or regularly scheduled Covered Volunteer. Diapering should be done in the open, never in a secluded spot or without the presence of other workers.
- **Toddler potty training.** If a toddler has an accident, ideally the parent/guardian should change them. If the parent cannot be reached, Staff can change the underwear/clothing in a space where they are visible to other workers.
- **Children who are potty-trained.** Staff or a Covered Volunteer should escort children who are potty-trained to the bathroom unless the entrance to the bathroom is inside the enclosed space already monitored by such individual. Staff or Covered Volunteer should ensure the bathroom is clear, then wait outside the bathroom door with the door slightly open. Workers should not be in a closed-door situation or assist without the child's request and another Staff or Covered Volunteer present.
- **Children or adults with special needs.** Paperwork should be on file to specifically address how the situation should be handled.

Traditionally Gendered Spaces. Access to traditionally gendered spaces like sleeping quarters and bathrooms will be based on the accommodation that best suits the Protected Person's gender identification.

Community Engagement. Many cases of abuse occur off-site and outside regularly scheduled activities. This contact may put Staff, volunteers, and the Church at increased risk and should be thoughtfully considered.

- Staff and volunteers may attend sporting events, concerts, or other public activities in support of a Protected Person. Staff and Covered Volunteers are encouraged to acknowledge the Protected Person's parents/guardians when they arrive and advise their supervisor or ministry lead of plans to attend.
- Unscheduled one-on-one engagement (e.g., a publicly advertised event results in only one student attending), should be promptly reported to a supervisor.

Transportation. Two-Deep Supervision is required when transporting Protected People. Written consent of parents or guardians is required and Staff and Covered Volunteers on ministry business must comply with the Best Practices included in the Church's Driver Packet. Mixed-age participants should be discouraged from sitting together. Staff and Covered Volunteers should remain alert to the potential for peer-to-peer abuse.

- An Motor Vehicle Report must be run and reviewed before any person is allowed to drive Protected People
- SCRM should be notified of any trip where Staff or volunteers will be driving and (1) the drive time is expected to exceed eight hours in one day, (2) the vehicle is designed for 15 or more passengers, (3) the weight of the vehicle alone or with a towed item exceeds 10,000 pounds, or (4) the Church is charging a fee / transportation "for hire" (does not apply when transportation is part of the overall cost of event participation)

Transition Time, Free Time, and Playgrounds. Transition, free, and playground times pose a potential risk for incidents because Staff and Covered Volunteers may not be assigned to supervise a particular group of Children. During these times, "zone monitoring" may be utilized by Staff and Covered

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Volunteers and Protected People should be expected to stay within defined, visible program areas at all times. Staff and Covered Volunteers should stay focused on visual observation and periodically sweep the entire activity area.

Gift Giving. Offenders often groom Protected People by giving gifts to endear themselves to the Protected Person. An offender may instruct a Protected Person to keep a gift secret to encourage the person to keep secrets from their parents or guardians. For these reasons, pastors, Staff, and volunteers should only give gifts when given to all people in the same setting.

Program/Event Monitoring. Ongoing monitoring is key to supporting an environment safe for Protected People. The following are recommendations for conducting meaningful periodic observations.

- **Record Keeping.** In addition to attendance reports required by Policy, consider additional records to document supervisory visits. Include information like arrival and departure times. Use this information to provide feedback to Staff and volunteers
- **Vary Observation Times.** Do not develop a predictable pattern. Drop in at different times on different days. Occasionally leave and immediately return
- **Arrive Before Staff.** Check punctuality and routine used to prepare for Protected People's arrival
- **Survey the Physical Environment.** Is the area suitable for the planned activity and number of participants
- **Watch Activities.** Are they planned and well organized? Are Staff and Covered Volunteers actively involved? Ask to see a schedule of activities and compare to what is actually going on
- **Observe Bathroom Activities.** Observe to ensure established policies and procedures are being followed
- **Observe Interactions.** Determine if interactions comply with requirements and recommendations for physical, verbal, and electronic communications

If a Protected Person Discloses Abuse. First and foremost, listen to their story and consider the following guidelines:

If a Child or Vulnerable Adult Discloses Abuse

- Provide a safe environment to talk with the person. Make sure you are visible to others but will not be interrupted
- Ask the person if it is okay to include another trusted adult in the conversation
- Document your recollection of the conversation in writing either during or as soon after the conversation as possible to provide accurate information to your supervisor, ministry lead or other appropriate person of authority
- Comfort and sit near the person, but do not touch them without them initiating contact
- Stay calm. Do not express shock, as that may affect their comfort level
- Reassure the person they did nothing wrong and that you believe them
- Try to get who/what/when/where details but do not “interrogate” the person or lead their responses. Listen to the explanation
- Be supportive, not judgmental
- If they ask to keep the information a secret, respond honestly. “I will not tell other children or workers but I may have to tell someone who can help you.”
- Examples of what to say:
 - Thank you for telling me.
 - I am sorry this happened to you.
 - I’ll do my best to get help for you.
 - How are you feeling right now?
 - What are you most worried about?
 - You are very brave to tell me this, and it’s okay to be upset.
- Do not say:
 - You can tell me anything; I promise I won’t tell anyone else.
 - I promise I will never let this happen again.
 - The person who did this is terrible / sick / should go to jail.

If You Witness Abuse. If you see something, say something! When you have witnessed behavior that causes concern but the Protected Person has not disclosed abuse to you, you should:

If You Witness Abuse

- Consult with a supervisor immediately. If that supervisor is of concern, go up your chain of command or to the Lead Director HR, SCRM, or the Chair of Staff-Parish Relations Committee
- Keep a written record of the concerns and your follow-up actions
- Name specific behaviors you have seen and state your reaction
- In an emergency, call 911
- Consider your duties if a mandatory reporter

If you suspect a violation of policy, law, or ethical standards, report immediately to your Staff Supervisor, a higher level supervisor, the Program/Team Director, a Lead Director, Lead Director HR, or SCRM. Anyone receiving a report of suspected violation should immediately notify the Safety, Compliance, and Risk Management Lead Director at Kate.Wood@cor.org.