

SafeConduct™ Appropriate Boundaries for Churches Policy & Procedure Template

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This template is provided as a service by 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, Alliance of Baptists, 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.

It is the responsibility of church leaders to determine the necessary components of policy.

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.

Depending upon the nature of [CHURCH NAME], 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.

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.

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SAMPLE

Indemnity Statement

Praesidium provides Sample Policies and Procedures to assist in the prevention of organizational abuse. However, it must be noted that no system can guarantee prevention of abuse. This information is not legal advice, either expressed or implied. Consultation with qualified legal counsel is recommended.

When all recommendations are implemented and maintained, a risk for abuse continues to exist, as the problem of abuse is pervasive and no system to date can assure complete safety.

Accordingly, **PRAESIDIUM MAKES NO WARRANTIES, EXPRESS OR IMPLIED, INCLUDING WARRANTIES OF FITNESS FOR A PARTICULAR PURPOSE AND MERCHANTABILITY, REGARDING THE SUCCESS OR FAILURE OF THE PRAESIDIUM SAMPLE POLICIES AND PROCEDURES IN PREVENTING OR REDUCING THE INCIDENCE OF ABUSE**

THESE POLICIES CONTAIN MODEL LANGUAGE BUT SHOULD BE REVIEWED BY LEGAL COUNSEL PRIOR TO USE TO ENSURE COMPLIANCE WITH LOCAL, STATE, AND FEDERAL LAW

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Policy and Procedure Implementation

The policies within this document represent key areas any church, camp, or non-profit organization that serves youth or vulnerable populations must address to reduce risk of abuse. To ensure the best implementation, all leadership must have a consensus on policy adoption. There is a higher level of responsibility for leadership within your church to understand the policy in its written format and how it will be implemented into congregational activities.

Language Statement

Praesidium uses general language throughout these Sample Policies and Procedures that can be modified to meet the needs of the organization and the consumers they serve. For example, an congregation may choose to change consumer(s) to student, participant, youth, member, etc.; or to use more inclusive language such as gender identity instead of gender.

Best practices:

The policies should be reviewed by the leadership to customize each policy to the population being served and who has access to them.

Examples of populations served	Who has access
<ul style="list-style-type: none">- Children, Adolescents and Teens- Persons with disabilities including mental, physical, or intellectual- Homeless, Refugees or undocumented people- Trafficking victims- Elderly or homebound	<ul style="list-style-type: none">- Church leaders- Lay employees- Long term volunteers- One-time volunteers- The general congregation of your church- Public- when hosting public events

Consider the policies from the perspective of your church leaders, employees, and volunteers.

- What do they need to know about sexual abuse prevention to keep the population served safe?
- How will your church communicate these policies in writing and verbally, to help church leaders, employees, and volunteers keep youth and vulnerable adults safe?

Additional sample policies are available in the (Add Final Doc Name HERE) to customize additional policies for the types of programs or support your church offers to your congregation and community.

This is not a comprehensive list of policies that address and reduce risk of sexual abuse of children or vulnerable adults in a program setting. It is the “essentials” that any church needs that may have children or vulnerable adults in their congregation.

Definition of Terms

Employees are paid staff of the church or organization. Employees are responsible for ensuring policies and procedures are followed as they relate to youth and vulnerable adult protection.

High-Access Volunteers typically interact often or over an extended period with consumers (youth or vulnerable adults). Such volunteers may be readily known to (consumers) under their supervision and to other volunteers and employees in the program. They may also supervise (consumers) with or without an employee present. High-Access Volunteers may carry a substantial amount of responsibility in a program serving consumers and may have opportunities to develop relationships with consumers over time. Examples of High-Access Volunteers include a Sunday School teacher, VBS volunteer, volunteer program instructor, a regularly scheduled volunteer coach, or a mentor for a (consumer).

Minor Volunteers are under the age of 18. These volunteers should not supervise any (consumers) without an adult present. Minor volunteers can assist with activities but should not engage in high-risk activities such as diaper changing or bathroom procedures.

Vulnerable Adults can include adults with disabilities, such as physical, emotional, or intellectual disabilities. Elders, defined as those over age 60 by NIH, are also vulnerable. Risks to vulnerable adults extend beyond physical or sexual abuse and may include financial abuse.

Youth encompass children from birth to age 18 that are served in your church or programs. This includes not only very young children, but also adolescents and teens. While older children and teens can assist in their own safety, adults including employees, volunteers, and parents/guardians are primarily responsible for abuse prevention.

Sample Language Defining Abuse

The topic of abuse, neglect and mistreatment of a child can not only be disturbing but can also be confusing. To ensure that all consumers, employees, parents/guardians and volunteers understand what your organization means when it uses these terms, it is important to construct a lexicon that outlines the differences between terms when used.

Please refer to all applicable codes and statutes for current legal definitions, which may differ from the definitions in this resource. [State, Territory, and Tribal Laws and Resources-Child Welfare Information Gateway](#)

Sample definition of financial abuse is found here. [Financial Abuse- National Institutes of Health](#)

Below is an example of how this can be constructed:

“Abuse exists when there is endangerment of a Consumer’s physical or mental health due to injury by act or omission. Abuse and neglect include the following:

a. “Neglect” includes failure, refusal, or inability on the part of a caregiver, for reasons other than poverty, to provide necessary care, food, water, clothing, medical or dental care or shelter to seriously endanger the physical health of the consumer.

b. “Physical Abuse” includes physical injury inflicted on a consumer by other than accidental means. Physical injury includes, but is not limited to, lacerations, fractured bones, burns, internal injuries, severe or frequent bruising, or great bodily harm. Conduct qualifying as Physical Abuse may include, but is not limited to, hitting, spanking, shaking, slapping, unnecessary restraints, pushing, or other forceful physical contact.

c. “Verbal Abuse” includes language that is degrading or threatening, and includes verbal interactions such as name calling, insults, cursing, derogatory remarks, belittling, and shaming.

d. “Sexual Abuse” includes a wide spectrum of interactions with consumers including rape, certain physical assault, sexual battery, physical sexual contact, sexually explicit or offensive verbal communication, verbal sexual harassment, voyeurism, sexually oriented conversations, sexual intercourse or sexual touching of a consumer, sexual exploitation, exposing of genitalia, viewing of sexual activity, or permitting, allowing or encouraging a consumer to engage in prostitution.

e. “Emotional Abuse” includes conduct that reasonably causes harm to a consumer’s psychological or intellectual functioning, which is exhibited by emotional damage such as severe anxiety, depression, withdrawal, or aggression. Emotional damage may be demonstrated by substantial and observable changes in behavior, emotional response, or learning, which are incompatible with the consumer’s age or stage of development. Emotional Abuse includes the following: shaming, humiliation, and cruelty.

f. “Financial Abuse” includes misuse, mismanagement, or exploitation of property, belongings, or assets. This form of abuse includes using an older adult’s assets without consent, under false pretenses, or through intimidation or manipulation.

Sample Policy Prohibiting the Abuse or Mistreatment of Consumers

(CHURCH NAME) has **zero tolerance** for abuse and will not tolerate the mistreatment or abuse of consumers in its programs. Any mistreatment or abuse by an employee or volunteer will result in disciplinary action, up to and including termination of employment or volunteer service. Further, this organization will fully cooperate with law enforcement and child protective services throughout the investigation and resolution of mistreatment or abuse incidents.

Sample Policy Prohibiting the Abuse or Mistreatment of One Consumer by Another Consumer

(CHURCH NAME) has **zero tolerance** for abuse, mistreatment, or sexual activity among consumers within the organization. This organization is committed to providing all consumers with a safe environment and will not tolerate the mistreatment or abuse of one consumer by another consumer. Conduct by consumers that rises to the level of abuse, mistreatment, or sexual activity will result in intervention or disciplinary action, up to and including, dismissal from the program.

In addition, our organization will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, the organization will take the necessary steps to eliminate such behavior.

Sample Policy Defining Appropriate and Inappropriate Physical Contact

(CHURCH NAME) physical contact policy promotes a positive, nurturing environment while protecting consumers, employees, and volunteers. Our church encourages appropriate physical contact with consumers and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by employees or volunteers towards (consumers) will result in disciplinary action, up to and including termination.

The church's policies for appropriate and inappropriate physical interactions include but are not limited to:

<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
Contact initiated by the consumer such as: <ul style="list-style-type: none">• Side hugs• Shoulder-to-shoulder or "temple" hugs• Pats on the shoulder or back• Handshakes• High-fives and fist bumps• Pats on the head when culturally appropriate• Touching hands, shoulders, and arms• Arms around shoulders	<ul style="list-style-type: none">• Full-frontal hugs• Kisses• Showing affection in isolated areas or while one-on-one• Lap sitting• Wrestling• Piggyback rides• Tickling• Giving gifts or money

<ul style="list-style-type: none"> • Holding hands (with young children in escorting situations) • Asking for permission before touching or guiding in how to do an activity (such as fastening safety equipment or showing how to swing a golf club) 	<ul style="list-style-type: none"> • Allowing a consumer to cling to an employee's or volunteer's leg • Allowing consumers, older than kindergarten, to sit on an employee or volunteer's lap • Any type of massage given by or to a consumer outside of accepted and documented medical treatment • Any form of affection that is unwanted by the consumer or the employee or volunteer • Touching bottom, chest, or genital areas that is outside authorized and documented personal care assistance
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Sample Policy Defining Appropriate and Inappropriate Verbal Interactions

Employees and volunteers are prohibited from speaking to consumers in a way that is or could be construed by any observer as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.

Employees and volunteers must not initiate sexually oriented conversations with consumers. Employees and volunteers are not permitted to discuss their own sexual activities with consumers.

Our organization's policies for appropriate and inappropriate verbal interactions include, but are not limited to:

Appropriate Verbal Interactions	Inappropriate Verbal Interactions
<ul style="list-style-type: none"> • Positive reinforcement • Appropriate jokes • Encouragement • Praise • Strength-based conversations • Self-disclosure as a supervised therapeutic tool by licensed clinicians, medical professionals, and pastoral counseling 	<ul style="list-style-type: none"> • Name-calling • Discussing sexual encounters or showing sexual materials • Involving consumers in the personal problems or issues of employees and volunteers • Flirting • Secrets • Cursing • Off-color or sexual jokes • Shaming, belittling • Oversharing personal history • Derogatory or discriminatory remarks

	<ul style="list-style-type: none"> • Harsh language that may frighten, threaten or humiliate consumers • Derogatory remarks about the consumer or their family • Compliments relating to physique or body development
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Sample Policy for Managing One-on-One Interactions Between Employees, Volunteers, and Consumers

One-on-one interactions with consumers are strongly discouraged and are only permissible in authorized situations outlined below. Policy consideration: In adopting this policy, it is important to consider what situations are most likely to occur in a one-on-one context, such as counseling services, ministry guidance or mentorship. Churches should define what is an “authorized situation” such as in a professional therapy setting

Authorized Interactions

Prior approval must be given by church leaders in writing for ANY one-on-one meetings between a (consumer) and employee. Parent/guardian permission must be given. Volunteers are prohibited from one-on-one interactions with (consumers).

Procedure for One-on-one Interactions

- Meetings with a (consumer) must be scheduled in advance. Employees must communicate with a supervisor the time, place, and reason for each meeting.
- Inform a supervisor and/or parents/guardians that you are alone with a (consumer) and encourage them to randomly drop in or pass by the interaction, when appropriate.
- 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, except when this conflicts with confidentiality of professional/client relationship.
- To the extent possible, ensure one-on-one interactions take place in a room with windows or glass in the door, and/or are communicated to your supervisor. If possible, the adult should be in view of a window where they can remain visible while maintaining confidentiality of the (consumer).
- Avoid physical interactions and/or affection during one-on-one interactions at all costs. If physical interactions occur, ensure appropriate physical and verbal interactions align with this church’s established policies and are limited to the task at hand. Immediately share the nature and extent of physical interactions that occurred during the one-on-one interaction with your supervisor immediately.
- Ensure one-on-one interactions are documented, especially if behind closed doors. Keep documentation of these meetings (such as in shared calendar, case notes, etc.) and share with your supervisor.

- Document and immediately report any unusual incidents, including physical interactions, disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted or that made you uncomfortable.

Except in authorized situations, two adults should always be present with youth or vulnerable adults in programs at (CHURCH NAME). Our church aims to clearly communicate expectations and gives examples of appropriate behavior of employees and volunteers interacting with (consumers).

The following guidelines limit the risk of abuse or false allegations of abuse:

- Meet (consumers) in a public place where you are in full view of others.
- If a (consumer) asks to speak to you in private, remain in a public area, but away from where others may hear the discussion. If the (consumer) discloses abuse or distressing information, ask to include another safe adult for support of the (consumer).
- Any accidental one-on-one situations must be reported to a supervisor and documented immediately. Frequent occurrence of accidental one-on-one situations should be reviewed for possible policy or supervision changes needed to prevent such occurrences.
- (Consumer) transportation must include a group of three or more. Youth should ride in the backseat whenever possible.

Sample Electronic Communication and Social Media Policy

[The terms “electronic communications” and “social media” or “social network” refer to activities that integrate technology, telecommunications, and social interaction using words, images, video, or audio tools. Examples include, but are not limited to: social websites, blogs, message boards, wikis, podcasts, image- and video-sharing sites, text and voice chat platforms for gaming, live webcasting, and real-time web communities. Additionally, sending text messages between two or more mobile phones or fixed or portable devices over a phone or wireless network is included within these definitions.]

[The church will need to define in written policy whether and to what extent they will allow electronic communication and/or social media and define parameters for those interactions using the criteria. Choose an option below.]

Option One

(CHURCH NAME) prohibits all electronic and social media communication directly with (consumers). If your church chooses this option, ensure employees and volunteers follow these guidelines:

- Employees and volunteers are prohibited from sending text messages to (consumers) and/or replying to text messages from a (consumer). If a (consumer) attempts to

communicate with an employee or volunteer via text, a supervisor must be notified immediately.

- All e-mail communications with (youth) must be directed to the consumer's parents/guardians and should be done using a church email instead of a personal email. A church may also designate an employee to be copied on all electronic communication with (consumers). Employees and volunteers are prohibited from all other forms of electronic communications and instant messaging with (consumers).
- Employees and volunteers are prohibited from communicating with (consumers) using social networks, including direct messaging through social media and gaming platforms.
- Personal social media accounts and blogs of employees and volunteers must be private and inaccessible to (consumers). Employees and volunteers with profiles on social media sites may not request to be friends with or follow (consumers) or approve friend/follow requests from (consumers).

Option Two

(CHURCH NAME) strongly encourages employees and volunteers to refrain from electronic communication and/or social media use with (consumers). However, if these interactions are part of programming or otherwise unavoidable, this church offers the following guidelines:

a. Require employees, volunteers, (consumers), parents/guardians to sign a Social Media Code of Conduct that includes guidelines about appropriate and inappropriate communication with (consumers). *[This allows parents/guardians to play a role in monitoring consumer's interactions with employees and volunteers. In addition, it teaches (consumers) how to interact appropriately through social media sites.]* Program administrators should review this Code of Conduct with (consumers) at the program orientation. At a minimum, the Code of Conduct should:

- Prohibit comments that are or could be construed by any observer to be harsh, coercive, threatening, intimidating, shaming, derogatory, discriminatory, demeaning or humiliating.
- Prohibit sexually oriented conversations or discussions about sexual activities.
- Prohibit private messages between employees, volunteers, and (consumers).
- Prohibit posting inappropriate pictures or inappropriate comments on pictures or posts.

b. Program administrators create a public social media page for the program. Then employees, volunteers, and (consumers) are instructed to communicate through this public page instead of through individual personal profiles. This approach allows the administrators to monitor communication and ensures that employees and volunteers do not have private (and possibly inappropriate) conversations with (consumers).

- The church monitors its social media pages and removes any posts that violate the church's policies for appropriate behavior.

- c. The church informs parents/guardians of any such prohibited posts or online behavior.
- d. Encourage employees and volunteers to have “private” profiles so that (consumers) do not have access to their private information. Common settings to check are:
- What information on certain platforms is always available to the public (e.g., name or username, bio, profile photos, associated networks)
 - Who can send the user a friend or follow requests, search for them by email address or phone number, and send them direct messages?
 - Who can tag the user in photos or posts and potentially give away location or personal information?
 - Can the user prohibit search engines from linking to their social media profile or allowing it to appear in public searches?
- e. Encourage employees and volunteers to use platforms designed for smaller groups, clubs, or team communication and which allow all communication to be seen by all (consumers) and/or parents/guardians (e.g., Remind, GroupMe, Slack). Consider adding a supervisor to these groups to ensure adherence to communication standards.
- f. Most social media sites try and limit usage to only youth who are 13 years or older. There are very limited circumstances in which an employee or volunteer should need to electronically contact a youth under the age of 13.
- g. Churches are encouraged to set “office hours” outside of which employees and volunteers may not send or respond to electronic communications.
- h. Employees and volunteers should keep communications professional in nature and limit discussion to programmatic purposes.
- i. Train employees and volunteers on how to respond to private electronic communication from (consumers). The responding procedure should include:
- Alert a supervisor about private communication. Document and forward the communication according to the church’s guidelines. For most churches, employees and volunteers should not respond privately to (consumers) except to state that such communications are prohibited by the Code of Conduct.
 - Exceptions may be made under emergency situations wherein private messages may occur to locate a consumer and secure their safety, but all such contact must be documented accordingly.
 - If a consumer reveals abuse or inappropriate interactions with an adult or child, the employee or volunteer must report this information to a supervisor and child protective services or law enforcement immediately.

- j. Some churches allow private communications with (consumers) within a mentor relationship.
- Before using electronic communication or social media in this instance, employees and volunteers should evaluate whether it is necessary for that consumer and consult a supervisor for approval. Using social media should be a last resort.
 - Employees and volunteers should engage in electronic and social media communication only with the consumer with whom they have a professional relationship and their parents/guardians, not with the consumer's other family members.
- k. Employees and volunteers may choose or be required to include a supervisor or the church in their direct communications with a consumer.
- l. Provide (consumers) and parents/guardians with information about how to respond to inappropriate communication from employees and volunteers. The responding procedure should include:
- Contact information for the program administration.
 - An anonymous method for reporting concerns.
- m. Requests to discontinue – Parents/guardians may request in writing that a consumer not be contacted through any form of electronic communication or social media by the church.

Sample Policy Requiring Adherence to (CHURCH NAME) Policies

(CHURCH NAME) requires all employees and volunteers to sign a statement of acknowledgement and compliance with all church policies upon hire and repeated annually.

Code of Conduct with (Consumers)

A Code of Conduct communicates to employees and volunteers the church's commitment to abuse prevention and expectations for interactions with (consumers) you serve and care for. Every employee and volunteer should review and sign the document before interacting with (consumers) and annually.

(CHURCH NAME) provides our (consumers) with the safest environment for them to flourish as children of God. We are committed to creating an environment for (consumers) that is safe, nurturing, empowering, and that promotes growth and success. The following policies are intended to assist employees and volunteers in making decisions about interactions with (consumers). For clarification of any guideline, or to inquire about behaviors not addressed here, contact your supervisor.

Abuse of any kind will not be tolerated, and confirmed abuse will result in immediate dismissal from (CHURCH NAME). The church will report and fully cooperate with authorities if allegations of abuse are made.

The Code of Conduct with (Consumers) outlines specific expectations of employees and volunteers as we strive to accomplish our mission together.

1. (Consumers) will always be treated with respect.
2. (Consumers) will be treated fairly, regardless of race, sex, sexual orientation, age, gender, immigration status, or religious preference.
3. Employees and volunteers will adhere to appropriate boundaries governing physical affection as outlined by the church.
4. Employees and volunteers will avoid physical affection with (consumers) that cannot be observed by others.
5. Employees and volunteers will adhere to appropriate and inappropriate verbal interactions as outlined by our church.
6. Employees and volunteers will not stare at or comment on (consumers)' bodies.
7. Employees and volunteers will not date or become romantically involved with (consumers).
8. Employees and volunteers will not use or be under the influence of alcohol or illegal drugs in the presence of (consumers), or provide (consumers) with alcohol, cigarettes, or illegal drugs.
9. Employees and volunteers will not have sexually oriented materials, including printed or online pornography, on our church's property, or show (consumers) any sexually oriented materials.
10. Employees and volunteers will not keep secrets with (consumers) and will only give gifts in accordance with congregational policies.
11. Employees and volunteers will comply with our church's policies regarding interactions with (consumers) outside of our programs.
12. Employees and volunteers will adhere to church policies regarding electronic communication and social media with (consumers).
13. Employees and volunteers will adhere to church policies regarding working one-on-one with (consumers) in a private setting.
14. Employees and volunteers will not abuse (consumers) in any way, including (but not limited to) the following:
 - a. Physical abuse: hitting, spanking, shaking, slapping, unnecessary restraints
 - b. Emotional abuse: degrading, threatening, cursing, shaming, humiliation, cruelty
 - c. Sexual abuse: inappropriate touch, exposing oneself, sexually oriented conversations, or coercing a consumer to expose themselves
 - d. Neglect: withholding food, water, shelter, appropriate care, appropriate supervision
15. The church will not tolerate the mistreatment or abuse of one consumer by another consumer. In addition, our church will not tolerate any behavior that is classified under the definition of bullying, and we will take steps needed to eliminate such behavior.

Anyone who sees an act of bullying, and who then encourages it, is engaging in bullying. This policy applies to all (consumers), employees, and volunteers.

Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength. Bullying can take on various forms, including:

- a. Physical bullying: when one person engages in physical force against another person, such as by hitting, punching, pushing, kicking, pinching, or restraining another.
- b. Verbal bullying: when someone uses their words to hurt another, such as by belittling or calling another a hurtful name.
- c. Nonverbal or relational bullying: when one person manipulates a relationship or desired relationship to harm another person. This includes social exclusion, friendship manipulation, or gossip. This type of bullying also includes intimidating another person by using gestures.
- d. Cyberbullying: the intentional and overt act of aggression toward another person by way of any technological tool, such as email, instant messages, text messages, digital pictures or images, or website or social media postings (including blogs).

Cyberbullying can involve:

1. Sending mean, vulgar, or threatening messages or images.
 2. Posting sensitive, private information about another person.
 3. Pretending to be someone else to make that person look bad, or creation or use of AI generated images or content.
 4. Intentionally excluding someone from an online group.
- e. Hazing: an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers that person regardless of that person's willingness to participate.
 - f. Sexualized bullying: when bullying involves behaviors that are sexual in nature. Examples of sexualized bullying include sexting, bullying that involves exposures of private body parts, and verbal bullying involving sexualized language or innuendos.

16. Employees and volunteers will report concerns or complaints about other employees and volunteers, other adults, or (consumers) to a supervisor who can be reached at [*insert telephone number*] or the [*Anonymous Helpline if you have one*] at [*insert telephone number*].

17. Employees and volunteers will report allegations or incidents of abuse to the proper state authority. Please refer to the specific guidelines of your state regarding mandated reporting.

State reporting or regulatory number: _____

State reporting or regulatory website to report (if applicable):

18. Employees and volunteers may not engage in or have previously been accused or convicted of consumer abuse, indecency with a consumer, or injury to a consumer.

Acknowledgement of Policies, Code of Conduct, or Standards

All employees and volunteers shall confirm that they have read and agree to comply with the church's abuse prevention policies, Code of Conduct, and consumer protection standards by signing a written acknowledgment upon hire and annually thereafter.

I attended an orientation that describes and explains the church *Code of Conduct* adopted by the (CHURCH NAME) on *<insert date of policy adoption here>*. I understand and voluntarily agree to abide by these policies.

Please Print

Date _____
Name _____
Title _____
Department _____
Program _____

Signature _____

The church shall ensure that all employees and volunteers have signed a written acknowledgment upon hire and annually thereafter by keeping signed acknowledgement forms in personnel files or in electronic personnel files.

Sample Policy Requiring Repeat Background Checks

(CHURCH NAME) will conduct a criminal background check and National Sex Offender Registry Search on all continuously employed employees and high-access volunteers at least once every two years or more frequently if required by local, state, or federal law or program-specific requirements. For employees or high-access volunteers who are returning, rehired, or seasonal workers, the church will conduct a criminal background check and National Sex Offender Registry Search when the employee returns from an absence longer than six months, and at least once every two years. The church will keep documentation that the checks have been completed and reviewed in the employee or volunteer's personnel file.

Sample Policy Requiring Notification of Arrest or Conviction

THIS POLICY CONTAINS MODEL LANGUAGE BUT SHOULD BE REVIEWED BY LEGAL COUNSEL PRIOR TO USE TO ENSURE COMPLIANCE WITH LOCAL, STATE, AND FEDERAL LAW

Any employee or volunteer who, after their engagement with our church, is arrested for, or convicted of (including pleas of guilty and no contest [*organization determined time frame such as, immediately, within 24 hours, or as soon as physically possible*] of such arrest or conviction. Supervisors must immediately notify the church's Human Resources department who will notify legal counsel. Employees and volunteers need not report convictions for routine traffic infractions such as speeding unless driving is a required part of the employee or volunteer's job duties.

The arrest or conviction of an employee or volunteer may result in corrective action. Corrective action depends upon a review of all factors involved - including whether the crime was work-related, the nature and severity of the act, or any resultant circumstances that adversely affect the employee or volunteer's ability to function in their role. Such corrective actions may include termination. Corrective action may only be taken after consultation with the church's legal counsel.

Any employee or volunteer's failure to report an arrest or a conviction for a misdemeanor or felony within [*organization determined time frame such as, immediately, within 24 hours, or as soon as physically possible*], or misrepresentation of the circumstances of an arrest or conviction, will result in disciplinary action up to and including termination. Volunteers and independent contractors who fail to disclose an arrest or conviction after their engagement with our church will have their relationship terminated immediately.

Sample Policy Requiring Training of All Employees and High-Access Volunteers Prior to Having Access to Consumers

(CHURCH NAME) requires that all employees and high-access volunteers are trained on the following foundational abuse prevention topics prior to having access to consumers:

- Policies related to preventing and responding to abuse
- How to maintain appropriate boundaries with consumers
- Definitions of abuse
- Facts about sexual abuse
- How abuse happens in churches
- Information about sexual grooming
- How to manage high-risk activities (i.e., bathroom and locker room activities, diapering and toileting, transportation, camps, in-home visits etc.)
- How to prevent false allegations

- How to recognize and respond to suspicious or inappropriate behaviors and policy violations
- How to recognize and respond to suspicions or allegations of abuse
- How to respond to (consumer-to-consumer) sexual activity

All employees and high-access volunteers will receive this training upon hire and prior to having access to consumers. The church keeps documentation of training records for all employees and high-access volunteers.

Sample Policy Requiring Annual Abuse Prevention Training

(CHURCH NAME) recognizes the importance of providing training and professional development activities that relate to our employee and volunteer roles and responsibilities. Examples of training and professional opportunities offered by the organization include but are not limited to eLearning, workshops, courses, classes, and professional conferences. Annual abuse prevention training serves as a refresher for previously learned concepts and provides additional knowledge and skills to enhance the ability of employees and volunteers to protect consumers. All employees and high-access volunteers are responsible for annually completing training on the following concepts:

- The organization’s up-to-date policies related to preventing and responding to abuse;
- How to maintain appropriate boundaries with consumers; and
- Additional topics that contribute to employee and volunteers’ skills and knowledge related to abuse prevention. These may vary according to an employee’s role within the organization [*front line employees, supervisors, hiring managers, board of directors*].

The organization keeps documentation of training records for all employees and high-access volunteers. Failure to complete required training will result in disciplinary actions up to and including termination or removal from the organization.

Sample Policy Requiring Reporting of Red-Flag or Inappropriate Behaviors and/or Policy Violations

Our organization has zero tolerance for abuse. It is imperative that every employee or volunteer actively participates in the protection of consumers.

If employees or volunteers observe red-flag or inappropriate behaviors and/or policy violations by other employees or volunteers, or consumers, it is their professional and personal responsibility to immediately report their observations in accordance with the organization’s reporting procedures.

Remember, at our organization, the policies apply to everyone.

The following are examples of red-flag or inappropriate behaviors that all employees and volunteers are required to report:

- Any violation of the organization’s abuse prevention policies
- Seeking unauthorized private time or one-on-one time with consumers
- Seeing or visiting with a consumer outside of scheduled programming
- Buying gifts for individual consumers
- Sending unauthorized electronic communications through text messaging, social media, online gaming, etc. in violation of the organization’s electronic communication policy
- Making suggestive comments to consumers
- Showing favoritism towards a consumer or type of consumer
- Consumers disclosing that an employee or volunteer makes them feel uncomfortable

All reports of suspicious or inappropriate behavior with consumers will be taken seriously. Our procedures will be carefully followed to ensure that the rights of all those involved are protected.

If employees or volunteers witness suspicious or inappropriate behaviors or policy violations from another employee or volunteer, the individual is instructed to do the following:

- Interrupt the behavior.
- Immediately report the behavior to a supervisor, director, or other authority.
- If you are not comfortable making the report directly, make it anonymously.
- If the report is about a supervisor or administrator, contact the next level of management.
- Complete an internal report, but do not conduct an investigation.
- Keep reporting until the appropriate action is taken.

A sample Incident Report can be found in Appendix A.

Sample Procedures for Employee and Volunteer Response to Allegations or Incidents of Abuse

Policy Note: Your church must designate below who in your church can receive an internal report of abuse or neglect. Best practice is to provide the name, role, and phone number of each person. Please include who receives a report for an allegation regarding the highest level of your church leadership. Sample Incident Reports can be found in Appendix A.

As required by mandated reporting laws, employees and volunteers must report any suspected abuse or neglect of a consumer—whether on or off organization property or

whether perpetrated by employees, volunteers, or others—to state authorities. Reports may be made confidentially or anonymously. A person who reports suspected abuse is immune from civil or criminal liability if the report was made in good faith and without malice. **Refer to state specific mandated reporting requirements for definitions of abuse, good faith reporting, and more specific reporting information.* For a complete list of each state’s mandated reporting requirements and contact information, please see the *RAINN State Law Database* for reporting child abuse:

[RAINN | Rape, Abuse and Incest National Network](https://apps.rainn.org/policy/compare/children.cfm)
<https://apps.rainn.org/policy/compare/children.cfm>

Internal Reporting

In addition to reporting to state authorities, employees and volunteers are required to report any suspected or known abuse of a consumer that was perpetrated by an employee or volunteer directly to leadership so that immediate and proper steps may be taken to ensure the safety of alleged survivors and others who may be at risk. Reports of suspected or known abuse may be made confidentially to the following:

[Fill in the specific names and contact details of leadership at your church who will receive reports.]

1. Immediate supervisor
2. Directors
3. Administrators

Additional guidelines for employee and volunteer response to incidents or allegations of abuse:

- If you witness abuse, safely interrupt the behavior immediately.
- If abuse is disclosed to you, assure the individual disclosing that he or she did the right thing to tell you.
- Protect the alleged survivor from intimidation, retribution, or further abuse to the extent possible.
- Be sure to document the incident, disclosure, or any circumstances causing your suspicion of abuse according to incident reporting and documentation requirements. State only the facts.
- Immediately report the allegation or incident to the appropriate local authorities (based on mandatory reporting requirements). Make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency.
- It is not your job to investigate the incident, but it is your job to report the incident to your supervisor in a timely manner.
- Check back to make sure appropriate steps were taken. If not, report again to your supervisor or the designated organization authority.

Sample Procedure for Employee and Volunteer Responding to Consumer Sexualized Behavior

Consumer sexualized behaviors can include inappropriate touching, exposing body parts, using sexualized language, making threats of sexual activity, engaging in sexual activity, showing pornography, and similar types of interactions.

If employees or volunteers witness consumer sexualized behaviors that are contrary to defined behavioral expectations between consumers, they are instructed to follow these guidelines:

- If you observe sexual activity between consumers, you should safely separate them as soon as possible.
- Calmly explain that such interactions are not permitted and separate the consumers.
- Notify your supervisor and parent/guardian (when applicable).
- Complete an incident report and any other necessary documentation including what you observed and how you responded.
- Follow your supervisor's instructions regarding notifying the authorities and informing the parents/guardians of the consumers involved.
- Do not attempt to determine whether the consumer's behavior was "sexual curiosity". There is not a standard definition of what normal sexual curiosity looks like. Any sexual activity between youth consumers is inappropriate at the organization's facilities or during any program activities. If there are concerns of sexual abuse or assault, an external body, such as child protective services, utilizes criterion to investigate and determine whether the consumer's behavior is sexual curiosity.
- If the problem is recurring, additional action may be required including not allowing one or both consumers to return to the program. Follow the Consumer Progressive Discipline Policy to determine next steps.
- Identify how consumers will be managed or supported to prevent further occurrences of sexual activity (i.e., safety or behavioral plans including additional supervision requirements).