

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** any 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 • Shoulder-to-shoulder hugs • Pats on the shoulder or back • Handshakes • High fives and hand slaps • Touching hand, shoulder, or arm • 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 the circumstance permits) • 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 Church and Safe Gatherings guidelines

Verbal Interactions. 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, threatened, or humiliate • Derogatory remarks about a Child, Vulnerable Adult, or their family

One-on-One Interactions. Most abuse occurs when an adult is alone with a Child or Vulnerable Adult. Program/Team Directors are encouraged to work with the Safety, Compliance, and Risk Management Lead Director to develop protocols to address situations where their ministry might anticipate one-on-one interactions (for example, counseling a youth, 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>Additional 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 and of security cameras • When possible, get parental or guardian consent before meeting • Avoid physical affection that can be misinterpreted • 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

- 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
- 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

Electronic and Telephonic Communication. Private electronic or telephonic communication between Staff or volunteers and a Protected Person, including the use of social networking websites (Facebook, Instagram, Snapchat, instant messaging, texting, apps, etc.) is prohibited. All communications between Staff or volunteers and Protected People must be transparent.

The following are examples of appropriate and inappropriate electronic communications:

<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 only 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 approved public forums • Utilizing approved applications like GroupMe to communicate with all participants at the same time 	<ul style="list-style-type: none"> • Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating comments • Sexually oriented conversations • Private messages between Pastors, staff, or volunteers and Protected People • Posting pictures of Protected People on social media other than as consented to by parents or guardians • Posting inappropriate comments on pictures • “Friending” or accepting a Friend request from a Protected Person on social media

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. For situations where a personal or organization-issued device must be used, for example in an emergency or while engaged in an off-site sponsored event, the device should be used only after obtaining approval of a Staff supervisor or the Program/Team Director.

Online Ministries. In a remote environment, without physical interaction or supervision, it 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 phone calls, text messages or 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.

The Basics. Two-deep leadership is expected, as are appropriate dress and online background (no alcohol, smoking, adult-themed material, etc.). Remember anything can be screen-shot. You should 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 online correspondence regarding remote 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. Recommendations:

- 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; you would not take student to a private area for 1:1 conversation, don't do it digitally
- Use group texts. If discussing a private matter, include another Safe Gatherings certified person
- Consider retaining messages communicating with youth

Parents/guardians should be notified of inappropriate activity, observations, or contacts in 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.

Social Media. Groups may be closed but should not be hidden. Have two administrators that 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
- Staff and volunteers should not submit friend requests or follow personal social media of – or request this from – Protected People
- 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

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 may include:

- There are no “secrets” online
- Encouraging parents to monitor their privacy settings and have students participate in online gatherings from a public area of the home
- Being alert to grooming (the graduated, calculated, escalating process of building trust). This could include requests to share pictures, IM, asking for inappropriate content and blackmailing, keeping secrets, 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 in online interactions, proof is not required to make a good faith report. Reach out to families with support, for example if you observe increased stress or evidence of food insecurity. Report to a Staff supervisor or Program/Team Director any disclosures received or observations that something does not seem right.

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.

High Risk:

- **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. When possible, doors to the bathroom should be propped open. An adult Staff or Covered Volunteer should stand outside the bathroom within hearing distance.
- **Transition and Free Times, 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 Volunteers and Protected People should be expected to stay within defined, visible program areas at all times. Staff and Volunteers should stay focused on visual observation and periodically sweep the entire activity area.
- **Transportation.** Two-deep supervision is required when transporting Protected People. Written consent of parents or guardians is required. Staff and volunteers on ministry business must avoid cell phone, even hands-free, use while driving in traffic, during hazardous weather conditions, and when it violates local law. 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 MVR check must be run and reviewed before any person is allowed to drive Protected People
 - Contact Director SCRM regarding any trip where Church 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)
- **Off-Site.** Many cases of abuse occur off-site and outside regularly scheduled activities. This contact may put Staff, volunteers, and the Church at increased risk. The Church strongly recommends that Staff and volunteers avoid outside contact with Protected People that participate in Church programs.
- **Overnight.** 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 overnight activities on a scheduled and periodic basis; 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 and roll checks conducted routinely throughout the event; participant rooms should be assigned by sex and age; Staff bunks should be positioned in a way to discourage sneaking out; Staff and Covered Volunteers should be in the halls or cabins at night for one hour after lights out and all rooms are quiet; Staff and Covered Volunteers should be assigned to monitor high risk areas such as bathrooms, entrances/exits, and hallways or periodic “walk-throughs” should be conducted; when performing room checks, Staff and Covered Volunteers should always go in pairs; it is recommended that at least one Staff or Covered Volunteer be awake overnight

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

- **Event Reports and Record Keeping.** Complete Event Reports promptly as required by Policy. Keep additional records to substantiate the report. For example, document supervision 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.** Ensure interactions comply with requirements and recommendations for physical, verbal, and electronic communications.

To review applicable Church policies, click the **Governance** link at the bottom of the home page for cor.org.

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

Anyone receiving a report of suspected violation should immediately notify the Safety, Compliance, and Risk Management Lead Director at Kate.Wood@cor.org