Monroe Congregational Church
United Church of Christ
SafeConduct Policy and Procedure

Approved by Council on September 23, 2019

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#### I. Policy Prohibiting Abuse, Exploitation, and Harassment

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

As a community of Christian faith, the Monroe Congregational Church, United Church of Christ ("MCC"), 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. MCC supports principles of SafeConduct<sup>TM</sup>, 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. MCC recognizes that the principles of SafeConduct are sacred values ensuring the safety and well-being of those whom we serve.

All persons associated with MCC should be aware that the church is strongly opposed to sexual exploitation and sexual harassment or any form of exploitation or abuse of others on the basis of age, sex, sexual orientation, sexual identification, or mental capacity, and that such behavior is prohibited by church policy. It is the intention of the church to take action in an attempt to prevent and correct behavior that is contrary to this policy and, if necessary, to discipline those persons who violate this policy.

Every member of MCC, whether clergy, staff, volunteer, parent, or guardian has a responsibility to lead those who look to them individually for guidance, to monitor their behavior, and to 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.

This policy replaces the Monroe Congregational Church, United Church of Christ, Safe Church Policy that was approved by the Church Council on March 27, 2007, and most recently amended on October 27, 2012. It uses the term "SafeConduct" rather than "Safe Church" to demonstrate its fidelity to the SafeConduct policy template established by the Insurance Board (a UCC-related organization). For the purposes of compliance with MCC's constitution, however, the terms "SafeConduct" and "Safe Church" are synonymous.

#### **II. General Definitions**

**Clergy:** any person who holds ordained ministerial standing or has been commissioned or licensed by an association of the United Church of Christ or region of the Christian Church (Disciples of Christ) and who has been installed by or is otherwise employed by MCC.

**Staff:** any layperson who is employed full-time or part-time by MCC.

**Volunteer:** a member or nonmember of MCC who undertakes a service to MCC on a one-time or recurring basis and who is not compensated for this service.

**Supervisor:** the primary person—whether clergy, staff, or volunteer—supervising a given church group or activity.

**Adult:** any person 18 years of age or older.

**Vulnerable adult:** anyone aged 18 or over who is or may be in need of community care services by reason of mental or other disability, age, or illness, and who is or may be unable to take care of himself or herself, or unable to protect himself or herself against significant harm or exploitation.

**Minor:** any person under the age of 18.

**SafeConduct Committee ("SCC"):** the organization within MCC that is empowered to carry out the practices and procedures outlined in this document.

**Sexual abuse:** (1) sexual activity or contact (not limited to sexual intercourse) in which an individual who is engaged in a relationship with another takes advantage of the vulnerability of the other person; (2) any incident involving a minor's non-accidental exposure to sexual behavior.

Sexual abuse in this context includes but is not limited to the following:

- Rape
- Penetration: digital, penile, or foreign objects
- Oral/genital contact
- Indecent exposure for the purpose of sexual gratification of the offender, or for purposes of shaming, humiliating, shocking, or exerting control over the victim
- Incest
- Fondling, including kissing, for the purpose of sexual gratification of the offender, or for purposes of shaming, humiliating, shocking, or exerting control over the victim
- Sexual exploitation, including the following: possession, manufacture, or distribution of
  pornography; online enticement of a minor or vulnerable adult for sexual acts,
  prostitution, or sex tourism; unsolicited obscene material sent to a minor or vulnerable
  adult; promotion of a misleading domain name likely to attract a minor or vulnerable
  adult to an inappropriate website
- Coercing or forcing a minor to participate in, or be negligently exposed to, pornography and/or sexual behavior
- Disease or condition that arises from sexual transmission
- Using other verbal, written, or physical behavior that is not overtly sexual but is likely designed to "groom" a minor for future sexual abuse

**Sexual harassment:** repeated or coercive sexual advances toward another person contrary to his or her wishes. This includes behavior directed at another person 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, or 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, 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 that individual; and/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.

Sexual harassment includes unsolicited and unwelcome contact that has sexual overtones,

#### particularly:

- written contact, such as sexually suggestive or obscene letters, notes, invitations, emails, and social media communications:
- verbal contact, such as sexually suggestive or obscene comments, threats, slurs, epithets, jokes about gender-specific traits, and sexual propositions;
- physical contact, such as intentional touching, pinching, brushing against another's body, impeding or blocking movement, assault, coercing sexual intercourse; and/or
- visual contact, such as leering or staring at another's body, gesturing, and 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 impermissible 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. 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.

**Physical abuse:** any of the following, according to the Connecticut General Statutes:

- an injury that has been inflicted other than by accidental means
- a condition that is the result of maltreatment such as, but not limited to, malnutrition, sexual molestation, deprivation of necessities, emotional maltreatment or cruel punishment
- injuries at variance with the history given of them

Evidence of physical abuse includes any of the following:

- excessive physical punishment
- bruises, scratches, lacerations
- burns, and/or scalds
- reddening or blistering of the tissue through application of heat by fire, chemical substances, cigarettes, matches, electricity, scalding water, friction, etc.
- injuries to bone, muscle, cartilage, ligaments: fractures, dislocations, sprains, strains, displacements, hematomas, etc.
- head injuries
- internal injuries
- death
- misuse of medical treatments or therapies
- malnutrition related to acts of commission or omission by an established caregiver

resulting in a minor's malnourished state that can be supported by professional medical opinion

- deprivation of necessities
- acts of commission or omission by an established caregiver resulting in physical harm to a minor
- cruel punishment

#### Emotional maltreatment/abuse: any act, statement, or threat that

- has had, or is likely to have an adverse impact on the minor or vulnerable adult, and/or
- interferes with the positive emotional development of a minor or vulnerable adult

Evidence of emotional maltreatment/abuse includes, but is not limited to, the following:

- rejecting (defined as dismissing another person as inadequate; failure to show concern for)
- degrading (defined as treatment that humiliates, debases, and causes a lack of self-respect)
- isolating and/or victimizing a minor or vulnerable adult by means of cruel, unusual, or excessive methods of discipline
- exposing a minor or vulnerable adult to brutal or intimidating acts or statements

#### III. Code of Conduct with Minors and Vulnerable Adults

The following code of conduct is intended to assist clergy, staff, and volunteers in making decisions about interactions with minors and vulnerable adults. For clarification of any guideline, or to inquire about behaviors not addressed here, contact your supervisor.

MCC is committed to creating an environment for minors and vulnerable adults that is safe, nurturing, empowering, and that promotes growth and success. No form of abuse will be tolerated, and confirmed abuse will result in immediate action and appropriate response from the SafeConduct Committee. Clergy, staff, and volunteers may not have engaged in or been accused or convicted of any abuse of a minor or vulnerable adult, indecency with a minor or vulnerable adult, or injury to a minor or vulnerable adult.

All reports of suspicious or inappropriate behavior with minors and vulnerable adults or allegations of abuse will be taken seriously. MCC will cooperate fully with authorities if allegations of abuse are made that require investigation.

The following Code of Conduct with Minors and Vulnerable Adults outlines specific expectations of the clergy, staff, and volunteers as we strive to accomplish our mission together.

- 1. Minors and vulnerable adults will be treated with respect at all times.
- 2. Minors and vulnerable adults will be treated fairly regardless of race, sex, age, or religion.
- 3. Clergy, staff, and volunteers will adhere to uniform standards of displaying affection as outlined by MCC. [See IV.A.]
- 4. Clergy, staff, and volunteers will avoid demonstrations of affection with minors and

vulnerable adults that cannot be observed by others.

- 5. Clergy, staff, and volunteers will adhere to uniform standards of appropriate and inappropriate verbal interactions as outlined by MCC. [See IV.B.]
- 6. Clergy, staff, and volunteers will not stare at or comment on the bodies of minors and vulnerable adults.
- 7. Clergy, staff, and volunteers will not date or become romantically involved with minors and vulnerable adults in their care.
- 8. Clergy, staff, and volunteers will not use or be under the influence of alcohol or illegal drugs in the presence of minors and vulnerable adults.
- 9. Clergy, staff, and volunteers will not have sexually oriented materials, including printed or online pornography, on MCC's property.
- 10. Clergy, staff, and volunteers will not have secrets with minors and vulnerable adults and will not give gifts to individual minors. If a confirmation sponsor wishes to give a gift to a confirmand, however, he/she may do so with prior permission from a confirmation instructor.
- 11. Clergy, staff, and volunteers will comply with MCC's policies regarding interactions with minors and vulnerable adults outside of our programs.
- 12. Clergy, staff, and volunteers will not engage in inappropriate electronic communication with minors and vulnerable adults. [See IV.E.]
- 13. Clergy, staff, and volunteers are prohibited from working one-on-one with minors and vulnerable adults in a private setting. Clergy, staff, and volunteers will use common areas when working with individual minors and vulnerable adults.
- 14. Clergy, staff, and volunteers will not abuse minors and vulnerable adults in any way including (but not limited to) the following:

Physical abuse: hitting, spanking, shaking, slapping, using unnecessary restraints

Verbal abuse: degrading, threatening, cursing

Sexual abuse: inappropriate touching, exposing oneself, engaging in sexually oriented conversations

Mental abuse: shaming, humiliation, cruelty

Neglect: withholding food, water, and/or shelter

15. MCC will not tolerate the mistreatment or abuse of one minor or vulnerable adult by another minor or vulnerable adult. In addition, MCC will not tolerate any behavior that is classified under the definition of bullying, and we will take steps to eliminate such behavior.

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:

*Physical bullying*: when one person engages in physical force against another person, such as by hitting, punching, pushing, kicking, pinching, or restraining

Verbal bullying: when someone uses words to hurt another, such as by belittling or

#### calling another hurtful names

*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.

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 postings (including blogs). Cyberbullying can involve (but is not limited to) the following:

- sending mean, vulgar, or threatening messages or images;
- posting sensitive, private information about another person;
- pretending to be someone else in order to make that person look bad; and
- intentionally excluding someone from an online group.

*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.

*Sexualized bullying*: bullying that involves behaviors that are sexual in nature, such as sexting, bullying that involves exposure of private body parts, and verbal bullying involving sexualized language or innuendos.

Anyone who sees an act of bullying and who then encourages it or ignores it is engaging in bullying. This policy applies to all minors and vulnerable adults, clergy, staff, and volunteers.

- 16. All clergy, staff, and volunteers must follow state-specific mandatory reporting requirements. [In CT, only clergy are mandated reporters. However, it is MCC's policy that all clergy, staff, and volunteers act as though they were.] They should be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. They will:
  - be familiar with the symptoms of child abuse and neglect, including physical, sexual, verbal, and emotional abuse;
  - know and follow organization policies and procedures that protect minors and vulnerable adults against abuse;
  - report suspected child abuse or neglect to the appropriate authorities as required by state mandated reporter laws; and
  - follow up to ensure that appropriate action has been taken.
- 17. Clergy, staff, and volunteers will report concerns or complaints about other staff, volunteers, adults, or youth to MCC's SafeConduct Committee.
- 18. MCC cooperates fully with the authorities to investigate all cases of alleged abuse. Any clergy, staff, or volunteer shall cooperate to the fullest extent possible in any external investigation by outside authorities or internal investigation conducted by the organization or persons given investigative authority by the organization. Failure to cooperate fully may be grounds for termination.

#### **IV. Policies for Working with Minors**

Policies define the scope of acceptable behavior in an organization. Because offenders often violate policies to gain access to minors, when staff know and understand policies, they can identify, interrupt, and report policy violations. Simply interrupting a policy violation can prevent a false allegation of abuse or put an offender on notice that no one works in private, the rules apply to everyone, and violations will be detected.

#### A. Physical Contact

MCC's physical-contact policy promotes a positive, nurturing environment while protecting minors, clergy, staff, and volunteers. MCC encourages appropriate physical contact with minors and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by clergy, staff, and volunteers toward minors in the organization's programs will result in disciplinary action, up to and including termination of employment. Examples of appropriate and inappropriate physical contact are as follows:

Appropriate Physical Interactions	Inappropriate Physical Interactions
<ul> <li>Side hugs</li> <li>Shoulder-to-shoulder or "temple" hugs</li> <li>Pats on the shoulder or back</li> <li>Handshakes</li> <li>High-fives and hand slapping</li> <li>Pats on the head when culturally appropriate</li> <li>Touching hands, shoulders, and arms</li> <li>Arms around shoulders</li> <li>Holding hands (with young children in escorting situations)</li> </ul>	<ul> <li>Full-frontal hugs</li> <li>Kisses</li> <li>Showing affection in isolated area</li> <li>Lap sitting</li> <li>Wrestling</li> <li>Piggyback rides</li> <li>Tickling</li> <li>Allowing a youth to cling to an employee's or volunteer's leg</li> <li>Any type of massage given by or to a youth</li> <li>Any form of affection that is unwanted</li> <li>Compliments relating to physique or body development</li> <li>Touching bottom, chest, or genital areas</li> </ul>

#### **B.** Verbal Interactions

Clergy, staff, and volunteers are prohibited from speaking to minors in a way that is harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Clergy, staff, and volunteers must not initiate sexually oriented conversations with minors. Clergy, staff, and volunteers are not permitted to discuss their own sexual activities with minors. Examples of appropriate and inappropriate verbal interactions are as follows:

Appropriate Verbal Interactions	Inappropriate Verbal Interactions
<ul> <li>Positive reinforcement</li> <li>Appropriate jokes</li> <li>Encouragement</li> <li>Praise</li> </ul>	<ul> <li>Name calling</li> <li>Discussing sexual encounters or in any way involving minors in the personal problems or issues of clergy, employees, or volunteers</li> <li>Telling secrets</li> <li>Cursing</li> <li>Sharing off-color or sexual jokes</li> <li>Shaming</li> <li>Belittling</li> <li>Making derogatory remarks</li> <li>Using harsh language that may frighten, threaten, or humiliate minors</li> </ul>

#### C. One-on-One Interactions

Most abuse occurs when an adult is alone with a minor. MCC aims to eliminate these situations and prohibits private one-on-one interactions unless approved in advance by the supervisor.

In those situations where one-on-one interactions are approved, clergy, staff, and volunteers should observe the following additional guidelines to manage the risk of abuse or false allegations of abuse.

#### Additional Guidelines for One-on-One Interactions

- When meeting one-on-one with a minor, always do so in a public place where you are 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 clergy, employees, and volunteers that you are alone with a youth, and ask them to randomly drop in.
- 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.

#### **D.** Off-site Contact

Many cases of organizational abuse occur off-site and outside of regularly scheduled activities. This contact may put staff, volunteers, and MCC at increased risk. MCC strongly recommends that staff do not have outside contact with minors from the organization. However, if off-site contacts are unavoidable (such as during mentoring programs), MCC has identified the following appropriate and inappropriate forms of outside contact:

Appropriate Outside Contact	Inappropriate Outside Contact
<ul> <li>Taking a group of minors on an outing</li> <li>Attending a sporting activity with a group of minors</li> <li>Attending functions at a minor's home, with parents present</li> <li>Sponsors meeting with their confirmands*</li> </ul>	<ul> <li>Taking one youth on an outing</li> <li>Visiting one youth in the youth's home, without a parent present</li> <li>Entertaining one youth in the home of staff or volunteers</li> <li>Inviting a lone youth to spend the night with staff or volunteers</li> </ul>

<sup>\*</sup>When a sponsor meets with a confirmand one on one, it is to be in a public place such as a coffee shop or restaurant. The parent or guardian of the confirmand shall provide the confirmand's transportation to and from the meeting. Parents will sign a permission form at the beginning of Confirmation Class, and sponsors will inform the confirmation instructors when meetings with confirmands are happening.

#### **E. Electronic Communication**

Any private electronic communication between minors and clergy, staff, and volunteers, including the use of social networking websites such as Facebook, Instagram, Snapchat, instant messaging, texting, etc., is prohibited. All electronic communication between staff and minors must be transparent. MCC has identified the following appropriate and inappropriate forms of electronic communication:

# Appropriate Electronic Communication

# Inappropriate Electronic Communication

- Sending and replying to emails and text messages from minors *only* when including a supervisor or the youth's parent
- Communicating through "organization group pages" on Facebook or other approved public forums
- Social media profiles for clergy, employees, and volunteers that minors cannot access

- Making harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating comments
- Engaging in sexually oriented conversations
- Exchanging private messages with minors
- Posting pictures of organization participants on social media sites
- "Friending" minors on social networking sites

#### F. Gift Giving

Molesters routinely groom minors by giving gifts, thereby endearing themselves to those minors. A potential molester might instruct a minor to keep the gifts a secret, which then starts teaching the minor to keep secrets from parents. For this reason, clergy, staff, and volunteers should only give gifts to groups of minors, and only under the following circumstances:

- 1. The supervisor must be made aware of and approve the gift.
- 2. Parents must be notified.

An exception can be made for a confirmation sponsor who wants to give a gift to a confirmand, but only under the circumstances listed above.

#### V. Requirements for Ministry with Minors

Clergy and staff (when needed) will attend all boundary workshops required by the Connecticut Conference, or will attend at least one workshop on this topic every three years, whichever is more frequent. This training will be documented with the SCC.

MCC is committed to providing a safe and healthy environment in which young people can learn about and experience God's love. In order to promote this, we have established the following guidelines in addition to the general requirements for ministry to the church.

 All volunteers who regularly work with minors or vulnerable adults will complete and submit MCC's Volunteer Application for Working with Minors and Vulnerable Adults (appendix A). They will be made aware that the disclosure form they submit will be reviewed by the SCC and that they may be interviewed by a member or members of the SCC to resolve questions and/or discrepancies.

- Volunteers must have been regular attendees of worship and participants in church activities for a minimum of one year.
- Before beginning their duties, all prospective staff and volunteers over the age of 18 will undergo a background check, including but not necessarily limited to inquiries of references and a criminal-history verification by a third-party vendor.
- All volunteers and staff who regularly work with minors will receive orientation regarding MCC's SafeConduct policy before their involvement with minors begins. This training will be repeated annually as long as that individual works with minors. At the time of training, the SCC will also conduct a sex-offender review for each trained individual by searching for that person's name on the Department of Justice website (www.nsopr.gov) or in another appropriate database. Records relating to training and the sex-offender review will be maintained by the SCC and will be kept confidential. If the information shows a conflict with MCC's SafeConduct policy or poses a potential danger to our children or youth, the individual will not be permitted to work with minors.
- It is the policy of this church to provide adequate supervision and safeguards for children's and youth activities. In situations where participants are not readily visible to others, there will be no fewer than two unrelated adults present with minors. Youth over the age of 16 may assist an unrelated adult in supervising children's and youth activities; however, such assistance does not alter the requirement that at least **two** unrelated adults be present. In this context, "readily visible" is defined as either within sight of another adult or in a location that is readily visible from a public space that is occupied or could be expected to be occupied. An example would be a classroom or individual's office in which the door between it and a hallway or a public office is open. This policy shall not apply when minors are being transported in a vehicle. In that case, a single adult will be accompanied by at least two minors unless waived by written permission from a parent or guardian.
- Written consent of one parent or guardian of a minor will be required for all activities off church property and for any overnight activities.

#### VI. Training

MCC is committed to preventing abuse of children and other vulnerable adults. We wish to identify and nurture safe conduct, and to lead and to guide through adequate training. It may be difficult to comprehend that those among us, our friends and family, would commit abusive acts willingly. Nevertheless, persons who have been presented no behavior standards and do not understand boundaries may unwittingly engage in behaviors that are perceived as predatory. In doing so, they put their personal reputations and that of MCC at risk.

MCC also recognizes our SafeConduct as sacred work, so pastoral presence at trainings is suggested.

To fulfill our leadership obligation, each new staff and new volunteer shall complete SafeConduct training before assuming duties. Fulfillment of training requirements shall be documented by the SCC and the respective program director (Christian Education, Preschool, etc.).

**Training shall be repeated annually**. Records shall be maintained by the SCC and respective program directors. Training records shall be audited annually by the SCC.

The abuse-prevention curriculum shall include the following:

- Review of MCC's Code of Conduct with Minors and Vulnerable Adults
- Review of standards applicable to ministry
- Explanation of individual statutory reporting obligations
- Explanation of procedures for reporting violations of standards of conduct and suspected abuse
- Identifying and managing high-risk situations such as bathroom use, transition times, and free times
- Physical security procedures

The curriculum shall also include the following topics concerned with responding to sexual abuse or suspected sexual abuse:

- 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 with sexualized behaviors
- 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

The SCC shall ensure that each staff and volunteer has fulfilled requirements and shall provide additional supervision and guidance as required to ensure required conduct.

#### VII. Monitoring and Supervision

When clergy, staff, and volunteers are adequately supervised, potential offenders are less likely to act on their impulses. When minors are adequately supervised, they too are less likely to engage in inappropriate interactions with others. For that reason, the facility must be monitored, particularly its out-of-the-way locations or locations that might permit an offender undue access to or privacy with a minor. Effective supervision and monitoring require that a variety of methods be used frequently, at both scheduled and random times.

#### A. General Supervision

Administrative and supervisory visits to youth programs. Youth supervisors and administrators will regularly visit all programs for minors to ensure that activities are well managed and that SafeConduct policies are observed by all in attendance.

**Ratios**. Each program will follow the ratio requirements that are set forth by the SCC. (Babies ratio: children/worker, 2:1; ones and twos ratio: children/worker, 3:1; threes/pre-

K ratio: children/worker, 4:1; kindergarten ratio: children/worker, 5:1; youth ratio: youth/workers, 8:1). These ratios should be adjusted for programs that serve minors with special needs.

**Mixed-age groups**. In most incidents involving one minor abusing another minor, the minors are from different age groups. Each program is responsible for establishing specific guidelines for additional monitoring and supervision of activities that involve minors from different age groups. Clergy, staff, and volunteers must be aware that close line-of-sight supervision is required when monitoring programs that mix age groups.

#### **B.** Monitoring Minors in High-Risk Activities

#### Nursery

- Each child will be signed in, with the parent or guardian providing their cell phone number.
- If a child utilizing the nursery needs the bathroom or a diaper change, the nursery attendant will text the parent or guardian to come and help the child.
- If there is an emergency, the nursery attendant will seek assistance from the staff or volunteer on duty.

#### **Bathroom Activities**

Most incidents of minor-to-minor abuse occur in the bathrooms. Therefore, the following rules must be followed when supervising bathroom use:

- During activities such as Sunday school and Vacation Bible School, the outer door of each bathroom shall remain open.
- Take groups of two or more minors to the bathroom, following the "rule of three (or more)."
- Quickly scan the bathroom before allowing minors to enter.
- If the bathroom only has one stall, only send one minor at a time into the bathroom while the others wait outside with you.
- If there are multiple stalls, only send in as many minors as there are stalls.
- Minimize situations in which minors of different ages use the bathroom at the same time.
- Stand outside the bathroom door, but remain within earshot.
- Do not use the bathroom at the same time as minors.
- If assisting young children in a stall, keep the door to the stall open.

#### **Transportation Activities**

Transporting minors can pose unique risks of abuse or false allegations of abuse. In addition, transportation activities may provide a time for unsupervised minors to engage in youth-to-youth sexual activity. Therefore, the following rules must be followed when transporting minors:

- Require written parent permission for all minors on the trip. Staff or volunteers take these permission forms and medical releases with them on the trip.
- Require staff or volunteers to have a list of the minors on the trip. The staff or volunteers take roll when boarding the vehicles, when leaving the vehicles, periodically throughout the trip, and then again when boarding the vehicles.
- Specify adult-to-minor ratios. When possible, do not count the driver in the ratio.
- Require staff or volunteers to sit in seats that permit maximum supervision.
- When possible, seat high-risk[potentially disruptive?] minors by themselves or with a staff member or volunteer.
- Prohibit drivers from making unauthorized stops.
- Require documentation of any unusual occurrences.

#### When public transportation is used:

- In addition to the transportation procedures listed above, minors should remain in one area of the bus, if possible.
- Clergy, staff, and volunteers that are assigned to a group should remain with that group on the bus.
- Take a head count or call roll immediately after entering and leaving the bus.

In situations where staff transport youths in non-organization vehicles:

- Administrators must be notified of all transportation activities.
- Use the "rule of three" when transporting minors: At least two adults must transport a single minor, or at least two minors must be present if transported by a single adult.
- Minors must never be transported without written permission from a parent.
- Minors must be transported directly to their destination. No unauthorized stops may be made.
- A staff member or volunteer must document beginning and ending times and mileage; the names of minors and all clergy, staff, and volunteers who are involved in transportation; the purpose of the transportation; and the destination.
- Staff must avoid unnecessary physical contact with minors while in vehicles.

#### **Overnight Activities**

Overnight stays present unique risks to minors, staff, and volunteers. They often involve changing clothes, groups of both genders and different ages in a more intimate atmosphere than usual, more unstructured activities, and increased supervision demands for staff. Therefore, the following rules must be followed when supervising minors in an overnight activity:

• There should be a "lead" staff or volunteer to supervise the overnight. The leaders should discuss the unique risks of overnight trips and elements of the specific overnight trip, and should review the specific policies and procedures.

- Provide parents with written information about the overnight activity. All parents must sign a permission slip for their youths to attend the overnight.
- Follow the appropriate staff-to-minor ratios before the event, and schedule staff accordingly.
- Meetings with the group should be hosted in open and observable areas; meetings should not be hosted in staff or youth rooms.

#### Overnights at MCC

- Physical boundaries within the organization must be clearly defined and explained to the minors.
- Assign each staff a specific group of minors to supervise. Each staff should then
  maintain a role sheet that lists all of the minors in his or her group. Head counts
  and roll checks should be conducted routinely throughout the event.
- Assign staff to high-risk areas in the building, such as the bathrooms, entrances and exits, hallways, etc. If it is not possible to assign specific staff to these areas, assign specific staff to conduct periodic facility "walk-throughs."
- With regard to sleeping arrangements, assign the males and females to separate rooms, and post staff at the entrances and exits to these rooms. If this is not feasible, separate males and females by as much space as possible.
- When performing room checks, staff should always go in pairs.

#### Overnights Away from MCC

- Overnight stays at private homes are prohibited unless approved by the administration.
- Physical boundaries at the off-site location must be clearly defined and explained to the minors.
- Assign each staff a specific group of minors to supervise. Each staff should then
  maintain a role sheet that lists all of the minors in his or her group. Head counts
  and roll checks should be conducted routinely throughout the event.
- In a cabin-type setting, the staff should be placed in bunks to maximize supervision around the cabin and in a way that decreases the chance of minors sneaking out (such as by the door).
- All staff are to be on duty in the halls or cabins at night until an hour after lights out and all rooms are quiet.

#### VIII. SafeConduct Committee (SCC)

The SCC is the body responsible for ensuring that the practices described in this document are carried out and properly documented. The SCC shall consist of at least three persons selected and authorized by the Church Council. At least one member must be male and one female. The members of the SCC may not be members of the Church Council (i.e., board chairs, authorized ministers, or church officers) or of any pastor's PRC. They may not be related to any clergy member, staff member, or each other. The members of the SCC may serve up to two consecutive two-year terms.

The actions and records of the SCC are to be kept confidential except as required to exercise the responsibilities as described below.

#### The SCC shall:

- respond to complaints according to the protocols described in Section IX of this document;
- manage and review all completed disclosure forms and searches;
- conduct sex-offender reviews;
- manage training as required by Section VII of this document;
- retain records in a secure place accessible only to members of the committee; and
- make formal reports to authorities as required should a reportable incident occur.

#### IX. Responding

#### A. Responding to Suspicious or Inappropriate Behaviors or Policy Violations

Because MCC is dedicated to maintaining zero tolerance for abuse, it is imperative that everyone actively participates in the protection of minors and vulnerable adults. In the event that a clergy member, staff member, or volunteer observes any suspicious or inappropriate behaviors and/or policy violations on the part of others, it is that person's personal responsibility to immediately report their observations.

At MCC, the policies apply to everyone.

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

#### Employee and Volunteer Response

If a clergy member, staff member, or volunteer witnesses suspicious or inappropriate behaviors or policy violations from another clergy member, staff member, or volunteer, that person must do the following:

- Interrupt the behavior.
- Report the behavior to the SCC immediately.
- If you are not comfortable making the report directly, make it anonymously.
- Document the report but do not conduct an investigation.
- Keep reporting until the appropriate action is taken.

#### SCC Response

In the event that the SCC receives a report of suspicious or inappropriate behaviors or policy violations from a staff member or volunteer, the SCC must do the following:

- Report the incident to one of the following, as appropriate: the Monroe Police
  Department (203-261-3622); the State of CT Department of Children and Families
  (800-842-2288); the State of CT Department of Social Services, People with
  Intellectual Disabilities Abuse Investigation Division (844-878-8923); or the State
  of CT Protective Services for the Elderly (888-385-4225; if calling during a
  holiday or outside of regular business hours, call 211).
- Tell the person who reported the behavior that the report is being taken seriously.

#### B. Responding to Suspected Abuse by an Adult

#### Employee's or Volunteer's Response to Abuse

Clergy, staff, and volunteers must report any suspected abuse or neglect of a youth—whether on or off organization property and whether perpetrated by clergy, staff, volunteers, or others—to the SCC, who will then aid in contacting state authorities. Reports may be made confidentially or anonymously. A person who mistakenly reports suspected abuse is immune from civil or criminal liability as long as the report was made in good faith and without malice.

Clergy, staff, and volunteers who witness or learn of suspected abuse or neglect are to respond according to these guidelines:

- If you witness abuse, interrupt the behavior immediately.
- If abuse is disclosed to you, assure the individual disclosing that he or she was correct to tell to you.
- Immediately report the allegation or incident to the SCC.
- Be sure to document the incident, disclosure, or any circumstances causing your suspicion of abuse. State only the facts.
- 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 the SCC.

#### Supervisor's Response to Abuse

In addition to the above response procedures, supervisors should ensure the following:

- First, determine if the youth is still in danger; if so, take immediate steps to prevent any further harm.
- Gather as much information about the allegation as you can—for example, who made the report, who was allegedly abused, who was the alleged abuser, what was the nature of the alleged abuse, where and when did the alleged abuse occur, etc.
- Accurately record everything you learn in as much detail as you can. Remember that your notes may be read by others. Stick to the facts.

- Contact the appropriate local authorities. Make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency.
- Suspend the accused staff member or volunteer until the investigation is completed.
- Report to the SCC immediately.

#### C. Responding to Youth-to-Youth Sexual Abuse and Sexualized Behaviors

The thought that one youth may sexually abuse another youth does not occur to many people. Unfortunately, abuse between peers has increased dramatically in the past few years. Youth-to-youth sexual activity and sexualized behaviors often remain unreported in organizations because clergy, staff, and volunteers are not comfortable documenting these situations, or may not know how to.

Most serious incidents of youth-to-youth abuse are preceded by more subtle incidents such as name-calling, taunting, or roughhousing. Interrupting these interactions early and establishing and communicating standards of conduct can keep the program environment safe. MCC recognizes that the following interactions are high risk and should be prohibited:

- Hazing
- Bullying
- Derogatory name-calling
- Games of Truth or Dare
- Singling out one child for different treatment
- Ridicule or humiliation

In order to adequately respond to and track incidents within the organization, all observed and reported sexual activity between youths and sexualized behaviors of youths must be consistently documented.

#### Staff and Volunteer Response

Youth-to-youth sexual behaviors can include inappropriate touching, exposing body parts, using sexualized language, making threats of sexual activity, engaging in sexual activity, and similar types of interactions.

If employees or volunteers witness youth-to-youth sexual behaviors, they are instructed to follow these guidelines:

- If you observe sexual activity between youths, immediately separate them. Calmly explain that such interactions are not permitted.
- Notify your supervisor.
- Complete the necessary paperwork, including what you observed and how you responded.
- Follow your supervisor's instructions regarding notifying the authorities and informing the parents of the youths involved.

• If the problem is recurring, discipline may be required, including forbidding one or both youths to return to the program.

#### Supervisors Response

If a supervisor receives a report of a youth's sexualized behavior or youth-to-youth sexual activity, the supervisor should do the following:

- Meet with the staff member or volunteer who reported the sexual activity to gather information.
- Confirm that the youths involved have been separated and, if appropriate, placed under increased supervision.
- Review the steps taken by the staff member or volunteer on duty.
- Review the incident report for accuracy and thoroughness.
- Meet with the parents of the youths involved.
- Determine what actions should be taken to make sure there is no recurrence, including assessing the suitability of the program for the children involved.
- Notify the proper authorities.
- Develop a written corrective action or follow-up plan in response to the incident.

#### Organizational Response

After the internal review of the sexualized behavior or youth-to-youth sexual activity, the organization will determine what can be done to prevent a recurrence. Based on the information gathered, the following additional steps may be required:

- Review the need for additional supervision.
- Review the need for revised policies or procedures.
- Review the need for additional training.

#### **D.** Responding to Victims

In the event of cases of reportable abuse, the policy of MCC 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.

When victims meet with the SCC, there shall be two members of different genders present as well as pastoral presence.

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 of trustees. The latter shall discuss with the Insurance Board's 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, which may include family members.

#### E. Notification of Parents

A minor may be party to an incident either as an initiator, a victim, or a witness. Whether a minor is an initiator or victim may not be clear in all circumstances, such as a child-on-child

incident. And violation of this policy does not necessarily create a victim. While notification of parents of such circumstances may be warranted, utmost care in communication is required.

In communicating with a parent, and being mindful of the importance of timely communication, care shall be given to assessing:

- the specific facts;
- whether a disciplinary or termination process is required;
- whether a child should be dismissed from a program (requiring notification of other parents/guardians);
- whether "mandatory reporting" is a factor;
- who shall and in what manner communicate with the parents/guardian;
- whether the pastor should be involved in the communication; and
- tentative remedial steps to prevent a further incident.

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

#### F. Responding to Media

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

Prior to speaking to media, the moderator or designee shall consult with the Connecticut Conference UCC's legal counsel to obtain an understanding of appropriate statements or admissions and issues of privacy that may apply to the situation.

The moderator 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.

#### **G.** Reporting Resources

- State of CT Department of Children and Families reporting hotline, 800-842-2288
- Monroe Police Department, 203-452-2830
- State of CT Department of Social Services, People with Intellectual Disabilities Abuse Investigation Division, 844-878-8923
- State of CT Protective Services for the Elderly, 888-385-4225 during regular business hours and 2-1-1 during holidays and outside of regular business hours
- Praesidium's anonymous helpline, 855-347-0751
- Rev. Dr. Michael Ciba, Regional Minister, 860-921-8204, michaelc@ctucc.org
- Heather Kimmel, Associate General Counsel, UCC, 216-736-2138, kimmelh@ucc.org

# Appendix A

**Printed name** 

# **Acknowledgment of Receipt of SafeConduct Policy and Procedure**

I have read and agree to comply with Monroe oprevention.	Congregational Church's policies regarding abuse
Signature	Date

**Relationship to MCC** 

# Appendix B

Monroe Congregational Church
Volunteer Application for Working with Minors and Vulnerable Adults

Name				
Street address				
City		State	Zip	
Home phone		Email _		
For what position a	re you applying?			
References				
Name	Address	Daytime phone	How long have you known this person?	Has this person agreed to provide a reference?
(Professional/civic)				
(Personal)				
and secure programs in this application is dour community. Pleas  / declare that	nal Church appreciates for our members is of esigned to help us prose initial each of the state all statements contactation or omission is defined as a second content of the state of the	utmost importa vide the highes itements below nined in this ap	ince to us. The info it quality programs oplication are true	ormation gathered for the people of e and that any
	m my position. that I can withdraw f	rom the applic	cation process at	any time.
My signature	indicates that I have	read and und	derstand the abou	•
Signature			Date	

#### **Code of Ethics**

Our staff will exhibit the highest ethical best practices and personal integrity.

Our staff will provide a professional work environment that is free from physical, psychological, written, or verbal intimidation or harassment.

Our staff will not physically, sexually, or emotionally abuse or neglect a minor or vulnerable adult.

Our staff will share concerns about suspicious or inappropriate behavior with their supervisor or administrator.

Our staff will report any suspected abuse or neglect of a minor to the state authorities.

Our staff will accept their personal responsibility to protect minors and vulnerable adults from all forms of abuse.

Name	Date
Position	
Signature	
I have reviewed this application and have noted any miss	sing information.
Signature of Screening Manager	Date

# Appendix C

### **Reference Form**

Name of applicantDate		
Name of reference		
Address		
<the a="" and="" applicant's="" applied="" be="" first="" for="" good="" has="" i="" last="" like="" me="" name="" now?="" p="" person="" position.<="" slast="" talk="" to="" us="" with="" would=""></the>	last name> with Monroe Congregational Church. ne> has applied for a position with us and said you talk with about him/her. Do you have a few minutes to start by letting you know that <the adults,="" and="" applicant="" applicant's="" children="" determine="" every="" first="" for="" help="" is="" suitable="" th="" that="" this="" this.<="" tion="" to="" vulnerable="" with="" working="" youth=""></the>	
1. How long have you known the	applicant?	
2. What is your relationship to the applicant?		
3. How would you rate the applic vulnerable adults?	ant's ability to work with and relate to minors /	
Above satisfactory _	Satisfactory Below satisfactory	
•	who can stay calm and control frustration with minors / frustrating conditions. How would you rate the d stay calm?	
Above satisfactory _	Satisfactory Below satisfactory	
5. Have you ever known the appl vulnerable adult?	licant to use harsh or abusive discipline with a minor /	
6. Would you be comfortable place applicant? Why or why not?	cing one of your own loved ones in the care of the	
8. How would you rate the applic	ant's ability to relate to adults?	
Above satisfactory _	Satisfactory Below satisfactory	
•	e supportive and understanding of the needs of minors u rate the applicant's ability to be genuinely supportive	

Signature of Screening Manager	Date
Thank you very much for your time.	
12. Do you have any additional comments or ques	stions?
Above satisfactory Satisfactor	y Below satisfactory
11. How would you rate the applicant's ability to minors / vulnerable adults?	naintain appropriate boundaries with
Above satisfactory Satisfactor	y Below satisfactory
and understanding to a person in need?	

### **High-Risk Indicators for References**

- References were reluctant.
- References did not know the applicant well.
- References have short-term relationships with the applicant.
- References refused to answer particular questions.
- Information from references differed from that in the applicant's account.
- References described the applicant as having high-risk characteristics.
- References provided evasive responses.
- References reported specific concerns about the applicant.

#### Appendix D

#### **Volunteer Driver Qualification Form**

Name		Birth date
Home phone	Work phone	Cell phone
Years of driving experience		
Driver's license no. and state		Expiration
Insurance carrier Expiration		Expiration
Liability policy limits: Bodily inj	ury	Property damage
I. Are all licensed vehicles you	own covered by in	surance as required by law?
Yes No		
2. Have you ever been denied	a driver's license o	r had one suspended or revoked?
Yes No		
3, Have you had any moving t	raffic violations or a	ccidents in the past three years?
Yes No		
If the answer to question 2 of	or 3 is YES, explair	n. Give dates and details of
violations and accidents on	the back of this fo	orm.

#### Agreement for Use of Personally Owned Vehicles

# 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 that 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 it is 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
  - Property damage—\$25,000 per accident

- 5. MCC'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 MCC is legally obligated to pay damages.
- 6. I will not receive or initiate phone calls while operating a vehicle for MCC activities, to include receiving or initiating text messages.
- 7. I will indemnify and hold MCC harmless from liabilities and damage resulting from my operation of a motor vehicle not owned by MCC. MCC will indemnify and hold harmless the volunteer driver for liabilities and damages resulting from acts or negligence of MCC.

I hereby AFFIRM that the information I have given is stated truthfully and that I shall abide by the terms of MCC's Agreement for Use of Personally Owned Vehicles.

Signature	Date
APPROVED	Date
Expiration	

Attach a copy of the volunteer's driver's license and current insurance ID card