St. Jacob's (Stone) United Church of Christ Safety Management Policies

This organization 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 and cooperation with law enforcement.

I. General Definitions

A. Terminology for purposes of this policy

- **1.** The term <u>organization</u> refers to St. Jacob's (Stone) United Church of Christ, Glenville, Pennsylvania.
- **2.** The term <u>consumer</u> refers to any minor participating in any activity organized, sponsored, or approved by the leadership of St. Jacob's (Stone) United Church of Christ, Glenville, Pennsylvania.

B. Types of abuse

- 1. Physical abuse is injury that is intentionally inflicted upon a consumer.
- 2. <u>Sexual abuse</u> is any contact of a sexual nature that occurs between a consumer and an adult or between two consumers. This includes any activity which is meant to arouse or gratify the sexual desires of the adult or the other consumer.
- 3. <u>Emotional abuse</u> is mental or emotional injury to a consumer that results in an observable and material impairment in the consumer's growth, development, or psychological functioning.
- 4. <u>Neglect</u> is the failure to provide for a consumer's basic needs or the failure to protect a consumer from harm

II. Code of Conduct with Consumers

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.

Our organization provides our consumers with the highest quality services available. We are committed to creating an environment for consumers 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 dismissal from our organization. All reports of suspicious or inappropriate behavior with consumers or allegation of abuse will be taken seriously. Our organization will fully cooperate with authorities if allegations of abuse are made that require investigation.

The Conduct with Consumer outlines specific expectations of the employees and volunteers as we strive to accomplish our mission together.

- 1. Consumers will be treated with respect at all times.
- 2. Consumers will be treated fairly regardless of race, sex, sexual orientation, gender identification, age, or religion.
- 3. Employees and volunteers will adhere to uniform standards of displaying affection as outlined by our organization.
- 4. Employees and volunteers will avoid affection with consumers that cannot be observed by others.
- 5. Employees and volunteers will adhere to uniform standards of appropriate and inappropriate verbal interactions as outlined by our organization.
- 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.
- 9. Employees and volunteers will not have sexually oriented materials, including printed or online pornography, on our organization's property.
- 10. Employees and volunteers will not have secrets with consumers and will only give gifts with prior permission.
- 11. Employees and volunteers will comply with our organization's policies regarding interactions with consumers outside of our programs.
- 12. Employees and volunteers will not engage in inappropriate electronic communication with consumers.
- 13. Employees and volunteers are prohibited from working one-on-one with consumers in a private setting. Employees and volunteers will use common areas when working with individual consumers.
- 14. Employees and volunteers will not abuse consumers in anyway including (but not limited to) the following:

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

Verbal abuse: degrading, threatening, cursing

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

Mental abuse: shaming, humiliation, cruelty

Neglect: withholding food, water, shelter

15. Our organization will not tolerate the mistreatment or abuse of one consumer by another consumer. 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, we will take steps needed 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:

- 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 hurtful names.
- 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 postings (including blogs). Cyberbullying can involve:
 - 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.
 - 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 when bullying involves behaviors that are sexual in nature. Examples of sexualized bullying behaviors include sexting, bullying that involves exposures of private body parts, and verbal bullying involving sexualized language or innuendos.

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.

- 16. All employees must follow state specific mandatory reporting requirements. Employees should be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. Employees will:
 - a. Be familiar with the symptoms of child abuse and neglect, including physical, sexual, verbal, and emotional abuse.
 - b. Know and follow organization policies and procedures that protect consumers against abuse.
 - c. Report suspected child abuse or neglect to the appropriate authorities as required by state mandated reporter laws.

- d. Follow up to ensure that appropriate action has been taken.
- 17. Employees and volunteers will report concerns or complaints about other employees, volunteers, adults, or consumers to our organization's supervisor.
- 18. Our organization cooperates fully with the authorities to investigate all cases of alleged abuse. Any employees 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.
- 19. Employees and volunteers may not have engaged in or been accused or convicted of consumer abuse, indecency with a consumer, or injury to a consumer.

III. Training

All employees and volunteers will be required to complete training on all abuse and molestation prevention before starting employment and/or having access to the vulnerable population served. Annual training will need to be completed in order to continue employment or serving as a volunteer with the vulnerable population.

IV. Policies

A. Electronic Communication and Social Media Code of Conduct

In recent years, electronic communication and social media platforms have become increasingly popular. While these tools provide many benefits, they also present the potential for inappropriate behavior, increased access to vulnerable consumers, and privacy violations. Employees, volunteers, and consumers participating in this organization's programs, events, and activities shall adhere to the following Social Media Code of Conduct:

- 1. Do not engage in behavior or comments that are, or could be construed by any observer to be, harsh, abusive, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.
- 2. Do not engage in personal attacks, sexually oriented conversations, or discussions about sexual activity.
- 3. Be a positive role model by exhibiting professionalism in all interactions; portray an attitude of respect, loyalty, patience, courtesy, tact, and maturity.
- 4. Only program-related messaging may be communicated electronically between employees and volunteers of the organization and consumers, parents, and guardians. Such communication should generally occur during standard business hours.
- 5. Employees and volunteers are prohibited from sending private messages to consumers and/or replying to private messages from a consumer. If a consumer attempt to privately communicate with an employee or volunteer electronically, their supervisor must be notified immediately. If an employee or volunteer needs to contact only one consumer, the employee or volunteer will also send this message to another adult member of the group.

- 6. Personal social networking profiles and/or blogs of employees and volunteers shall be private and not shared with consumers. Employees and volunteers with profiles on social networking sites shall not request to be "friends" with or follow consumers or approve friend or follow requests from consumers.
- 7. When communicating with other family members or friends of consumers, including electronic communication and social media contact, employees and volunteers will adhere to the following:
 - Communication should not be or potentially be construed by any observer to be harsh, coercive, threatening, intimidating shaming, derogatory, demeaning, or humiliating.
 - Communication will not contain any sexually oriented messages or discussion about sexual activities.
 - Inappropriate pictures or inappropriate comments will not be posted.
- 8. Never reveal sensitive or confidential information, including identifiable details or photos of a consumer without written consent from their parent or legal guardian.
- 9. Employees and volunteers may not post or share on their personal social media accounts any photographs or videos of consumers participating in the organization's programs. The exception would be that the adult leaders of the Mission Trip group or other organized activity may use Facebook or another social media platform as a way of sharing pictures of the event if they are friends on the same social media platform with at least 4 of the other adult leaders and share these same posts with them. Written permission is required from the consumer's parent/guardian, recognizing that all posts will focus on the sharing and promoting of the organization's activities, story, and mission.
- 10. Employees and volunteers may not post or share inappropriate photos or comments on photos of consumers.
- 11. Do not make pornography in any form available to consumers participating in the organization's programs, events, and activities or assist consumers in any way in gaining access to pornography.
- 12. Employees and volunteers may not create web pages on behalf of the organization unless they have prior approval to do so and may not misrepresent their work with the organization or the organization itself.
- 13. Employees and volunteers engaging in social media and online communication become a public figure associated with the organization and are responsible to help protect the organization and its consumers. Always act in a professional and constructive manner and use sound judgement before posting or sharing content.
- 14. Rather than personally defend the organization's reputation, employees and volunteers should notify their supervisor or an administrator of a negative comment or online representation or if any member of the media contacts them about any matter related to the organization.
- 15. Employees and volunteers must adhere to uniform standards of electronic communication and social media use as outlined in any applicable organizational policies and procedures.
- 16. This Code of Conduct and associated policies and procedures shall be provided to the parents/guardians of consumers. It shall also be available on the organization's website for public view.
- 17. Consumers and Parents/guardians may request in writing that a consumer not be contacted through any form of electronic communication or social media by an employee or volunteer of the organization.

B. Monitoring High Risk Activities

1. Off-Site Activities:

The off-site procedures include:

- a. Requiring supervisor approval for all off-site activities.
- b. Requiring parent/guardian approval.
- c. Specifying employees-to-consumer ratios for the activity.
- d. Requiring employees and consumers to be easily identifiable.
- e. Including specific bathroom and locker room procedures as applicable to outing.
- f. Including transportation procedures.
- g. Including instructions for a supervisor to observe the off-site activities at scheduled times and random intervals.
- h. Considering specific recommendations based on the location and type of activity (for example, Amusement parks, Water Parks, Arcades, etc.).

2. Overnight Activities

Overnight stays present unique risks to consumers and employees. 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 employees.

Supervision Guidelines:

- a. All overnight activities must be documented and approved in writing by the Program Director
- b. Administrators are expected to regularly and randomly observe overnight activities on a scheduled and periodic basis.
- c. The Director should appoint a "lead" employee to supervise the overnight. A meeting with all employees is conducted to discuss the unique risks of overnight trips, unique elements of the specific overnight trip and to review the specific policies and procedures.
- d. Provide parents/guardians with written information about the overnight activity. All parents/guardians must sign a permission slip for their consumers to attend the overnight.
- e. Determine the appropriate employees-to-consumer ratios before the event and schedule employees accordingly.
- f. Meetings with the group should be hosted in open and observable areas; meetings should not be hosted in employees or consumer rooms.

IV. Administrative Practices

A. Critical Incident Management Plan

Proactive Prevention Practices

- All potential employees and volunteers will need to complete an interview process.
- In addition, potential employees will need to provide references and reference checks must be completed before hiring decisions can be made.

- Background checks will be completed on all potential employees and volunteers, and employees
 and volunteers will need to complete required training prior to starting employment and/or having
 access to the vulnerable population served.
- Annual training will also be required. Background checks will be conducted every five (5) years.

Prior to Allegation/Incident

- Determine who from your Organization will be on the Critical Incident Management Team.
- Educate all employees and volunteers on what to do if someone alleges current or historical abuse involving an Organization member, employee or volunteer.
- All employees and volunteers should know how to fulfill their duties as mandated reporters (if they are mandated reporters according to state law).
- All employees and volunteers should be trained on how to complete the appropriate critical incident forms for your Organization.

Immediate Safety

- Follow all mandated reporting requirements and contact the authorities as appropriate.
- Where applicable, prevent the accused from having further access to children until a thorough incident review is completed. Before beginning an internal incident review, verify with local authorities that this will not interfere with their investigation.
- If the accused person is an employee, follow progressive discipline procedures accordingly. This may involve suspending the accused during the investigation.
- When applicable, notify other employees.

Initial Communication Plan

- Designate a point person to respond to all inquiries from parents, the media, and other stakeholders.
 - o Prepare a short media statement in advance of getting a media inquiry.
 - All oral and written communication should speak with a voice of compassion and confidence.
 All employees and volunteers should know how to refer media inquiries to the appropriate person.
- As soon as possible, meet in person (not over the phone) with identified victims and their parents/guardians.
 - o Reassure them that you are taking this seriously.
 - o Find out what response they expect and be prepared to explain support you will offer, such as counseling.
- Consider reaching out in writing to parents/guardians of all children currently attending your Organization as well as those with past contact with the accused offender.
 - o The message should communicate:
 - **Empathy**: Begin by stating that such incidents run counter to your Organization's values.
 - **Facts**: Include a summary of the incident, including information about the arrest, suspension, investigation, etc.

- Contact Request. Ask parents to contact you or the specified authorities if they suspect their child may have been abused.
- Your Response: Explain that you are fully cooperating with the authorities. Describe proactive steps you are taking such as offering resources to parents, hosting a parent meeting, training employees, and conducting an independent investigation to learn from this incident so you can prevent it from happening again.
- Host a parent/guardian meeting to speak directly with concerned families and directly answer any questions before rumors or misinformation is spread.
 - o Communicate as much information as you can about the incident.
 - Provide information regarding the proactive steps leadership is taking in response to the incident.
 - o Describe resources you are providing families and give parents a chance to ask questions.
 - o Provide parents with information about how to talk to their children about abuse.

Ongoing Communication and Response

- Determine how to manage ongoing relations with authorities, parents, the community, and media.
 - o Consider adding a page to your website with updated details about the incident.
 - Designate specific individuals in your organization to handle various communications and outreach efforts.

Promote Prevention at All Levels of the Organization

- Educate parents on abuse prevention. Offer a workshop during which parents can learn how to protect their children from abuse. This is an educational session that is different from the parent meeting described above.
- Provide a consumer education program to all consumers involved with the organization on how to protect themselves from abuse and how to express concerns.
- Train (or -re-train) all employees and volunteers on how to identify and report "red-flag" behaviors that do not rise to the level of suspected abuse. This is an important part of the overall response and ongoing prevention effort.

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