

Sampson's Mills Presbyterian Church
Child Protection Policy
Approved June 18, 2018

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I. Statement of Policy

As a community of Christian faith, Sampson’s Mills Presbyterian Church is committed to creating and maintaining programs, facilities, and a community in which members, friends, Clergy,

employees, and volunteers can worship, learn and work together in an atmosphere free from all forms of discrimination, harassment, exploitation or intimidation. The congregation of Sampson's Mills supports principles of SafeConduct™, 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. Sampson's Mills strongly opposes and prohibits sexual exploitation, sexual harassment or any form of exploitation or abuse of others regardless of age, gender, sexual orientation, sexual identification, or mental capacity. It is the intention of our congregation to affirmatively nurture good behavior, and to prevent and correct behavior that is contrary to this policy and, as necessary, discipline those persons who violate this policy.

Every member of the Congregation, whether "authorized clergy", leader, employee, volunteer, or parent, has a role to lead those who look to them individually for guidance, to monitor their behavior, and 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. As we might conduct an orchestra, we shall guide and lead in ministry.

II. General Definitions

1. Physical abuse is injury that is intentionally inflicted upon a youth.
2. Sexual abuse is any contact of a sexual nature that occurs between a youth and an adult or between two youths. This includes any activity that is meant to arouse or gratify the sexual desires of the adult or the other youth.
3. Emotional abuse is mental or emotional injury to a youth that results in an observable and material impairment in the youth's growth, development, or psychological functioning.
4. Neglect is the failure to provide for a youth's basic needs or the failure to protect a youth from harm.
5. A Minor is anyone under the age of 18 (also referred to as youth throughout policy).
6. A Vulnerable Adult is 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 him or herself, or unable to protect him or herself against significant harm or exploitation.
7. Mandatory Reporters are those persons required by Pennsylvania law to report suspected abuse to police or child welfare agencies.
8. Authorized Clergy includes any person who is admitted to ministry by PC (USA), who serves the congregation in any capacity whether called as pastor or serving in a retired, emeritus, administrative, or volunteer capacity.

III. Code of Conduct with Youth and Vulnerable Adults

The following Code of Conduct is intended to assist Clergy, employees, and volunteers in making decisions about interactions with youth and vulnerable adults. For clarification of any guideline, or to inquire about behaviors not addressed here, contact the Director of Christian Education and/or the pastor.

Sampson's Mills provides our youth and vulnerable adults with the highest quality services available. We are committed to creating an environment for youth 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 dismissal for employees from Sampson's Mills and immediate removal from any youth activities for all volunteers. All reports of suspicious or inappropriate behavior with youth and vulnerable adults or allegation of abuse will be taken seriously. Sampson's Mills will fully cooperate with authorities if allegations of abuse are made that require investigation.

The Conduct with Youth and Vulnerable Adult outlines specific expectations of the Clergy, employees, and volunteers as we strive to accomplish our mission together.

1. Youth and vulnerable adults will be treated with respect at all times.
2. Youth and vulnerable adults will be treated fairly regardless of race, sex, age, or religion.
3. Clergy, employees, and volunteers will adhere to uniform standards of displaying affection as outlined by Sampson's Mills.
4. Clergy, employees, and volunteers will avoid affection with youth and vulnerable adults that cannot be observed by others.
5. Clergy, employees, and volunteers will adhere to uniform standards of appropriate and inappropriate verbal interactions as outlined by Sampson's Mills.
6. Clergy, employees, and volunteers will not stare at or comment on youth and vulnerable adults' bodies.
7. Clergy, employees, and volunteers will not date or become romantically involved with youth and vulnerable adults.
8. Clergy, employees, and volunteers will not use or be under the influence of alcohol or illegal drugs in the presence of youth and vulnerable adults.
9. Clergy, employees, and volunteers will not have sexually oriented materials, including printed or online pornography, on Sampson's Mills' property.
10. Clergy, employees, and volunteers will not have secrets with youth and vulnerable adults and will only give gifts with prior permission.
11. Clergy, employees, and volunteers will comply with Sampson's Mills' policies regarding interactions with youth and vulnerable adults outside of our programs.
12. Clergy, employees, and volunteers will not engage in inappropriate electronic communication with youth and vulnerable adults.

13. Clergy, employees, and volunteers are prohibited from working one-on-one with youth and vulnerable adults in a private setting. Clergy, employees, and volunteers will use common areas when working with individual youth and vulnerable adults.

14. Clergy, employees, and volunteers will not abuse youth and vulnerable adults in any way 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; and

Neglect: withholding food, water, shelter

15. Sampson's Mills will not tolerate the mistreatment or abuse of one youth or vulnerable adult by another youth or vulnerable adult. In addition, Sampson's Mills 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 youth and vulnerable adults, Clergy, employees, and volunteers.

16. All Clergy, employees, and volunteers must follow state-specific mandatory reporting requirements. 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:
 - 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 youth and vulnerable adults 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. Clergy, employees, and volunteers will report concerns or complaints about other employees, volunteers, adults, or youth to Sampson’s Mills’ Director of Christian Education, pastor, Personnel Committee or Praesidium’s Anonymous Helpline at 855-347-0751.

18. Sampson’s Mills cooperates fully with the authorities to investigate all cases of alleged abuse. Any Clergy, employee, 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. Clergy, employees, and volunteers may not have engaged in or been accused or convicted of youth and vulnerable adult abuse, indecency with a youth and vulnerable adult, or injury to a youth and vulnerable adult.

IV. Policies for Working with Youth

This section defines the bandwidth of acceptable behavior in an organization. Because offenders often violate policies to gain access to youths, 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

Sampson’s Mills’ physical contact policy promotes a positive, nurturing environment while protecting youths, Clergy, employees, and volunteers. Sampson’s Mills encourages appropriate physical contact with youths and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by Clergy, employees, and volunteers towards youths in the organization’s programs will result in disciplinary action, up to and including termination of **employment**.

Sampson’s Mills’ policies for appropriate and inappropriate physical interactions are:

<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
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<ul style="list-style-type: none"> ● Side hugs ● Shoulder-to-shoulder or “temple” hugs ● Pats on the shoulder or back ● Handshakes ● High-fives and hand slapping ● Verbal praise ● Pats on the head when culturally appropriate ● Touching hands, shoulders, and arms ● Arms around shoulders ● Holding hands (with young children in escorting situations) 	<ul style="list-style-type: none"> ● Full-frontal hugs ● Kisses ● Showing affection in isolated area ● Lap sitting ● Wrestling ● Piggyback rides ● Tickling ● Allowing a youth to cling to an employee’s or volunteer’s leg ● Any type of massage given by or to a youth ● Any form of affection that is unwanted by the youth or the staff or volunteer ● Compliments relating to physique or body development ● Touching bottom, chest, or genital areas
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B. Verbal Interactions

Clergy, employees, and volunteers are prohibited from speaking to youths in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Clergy, employees, and volunteers must not initiate sexually oriented conversations with youths. Clergy, employees, and volunteers are not permitted to discuss their own sexual activities with youths.

Sampson's Mills policies for appropriate and inappropriate verbal interactions are:

<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 or in any way involving youths in the personal problems or issues of Clergy, employees, and volunteers• Secrets• Cursing• Off-color or sexual jokes• Shaming• Belittling• Derogatory remarks• Harsh language that may frighten, threaten or humiliate youths• Derogatory remarks about the youth or his/her family

C. One-on-One Interactions

Most abuse occurs when an adult is alone with a youth. Sampson's Mills aims to eliminate or reduce these situations and prohibits private one-on-one interactions unless approved in advance by the Christian Education Team and/or Session.

In those situations where one-on-one interactions are approved, Clergy, employees, 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 youth, 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 outside of regularly scheduled activities may put staff, volunteers, and Sampson's Mills at increased risk.

Sampson's Mills has determined that the forms of outside contact considered appropriate and inappropriate include, but are not limited to:

<i>Appropriate Outside Contact</i>	<i>Inappropriate Outside Contact</i>
<ul style="list-style-type: none">• Taking groups of youths on an outing• Attending sporting activities with groups of youths• Attending functions at a youth's home, with parents present	<ul style="list-style-type: none">• Taking one youth on an outing without the parents' knowledge• Visiting one youth in the youth's home, without a parent present• Entertaining one youth in the home of staff or volunteers• A lone youth spending the night with staff or volunteers

In addition, ensure that the following steps are followed:

1. The Director of Christian Education and the Christian Education Team should identify for Clergy, employees, and volunteers what types of outside contact are appropriate and inappropriate.
2. Ensure that staff or volunteers have the parents' permission to engage in outside contact with the youth. Consider requiring the parents to sign a release-of-liability statement.

E. Electronic Communication

Any private electronic communication between clergy, staff, volunteers, and youths, including the use of social networking websites like - Facebook, Instagram, instant messaging, texting, etc. must be transparent. Snapchating is prohibited.

The following are examples of appropriate and inappropriate electronic communication:

<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 youth • Communicating through “organization group pages” on Facebook or other approved public forums • “Private” profiles for Clergy, employees, and volunteers, which youths cannot access 	<ul style="list-style-type: none"> • Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating comments • Sexually oriented conversations • Private messages between Clergy, employees, and volunteers with youths • Posting pictures of organization participants on social media sites • Posting inappropriate comments on pictures

In addition, this information must be provided to participants’ parents so that they know what behaviors are appropriate or inappropriate with regarded to staff.

V. Screening and Selection

A. Background Checks

Criminal history and sexual offender registry checks should be conducted for all applicants, paid or volunteer, working with children and youth. Generally, the information should be obtained prior to employment of the applicant; however, if the length of time needed to receive the results of these checks is unduly long, Sampson’s Mills could have the applicant start the position and remain in the position until the criminal background results are obtained and reviewed. New employees and volunteers should not be left unsupervised with youths until the criminal history results are returned.

The background check(s) should include the following:

- Act 34 (PA criminal Background Check)
- Act 151 (Child Abuse Clearance)
- FBI Fingerprints (for Employees only)

Each person will be responsible for obtaining these background check. Sampson’s Mills will reimburse as necessary.

In addition, all applicants responsible for transportation should have a driver’s license check performed to identify past driving concerns. If a parent is taking an additional child, other parent must give written permission.

VI. Training

The mission of Sampson's Mills is first to prevent abuse of children and other vulnerable adults. We wish to identify and nurture SafeConduct™, to lead and to guide through adequate training. It is difficult to comprehend that those among us, our friends and family, would commit such acts willingly. Nevertheless, persons who have been presented no behavior standards and do not understand boundaries may unwittingly engaged in behaviors that may be perceived as predatory. Their personal reputations and that of Sampson's Mills are then at risk.

To fulfill our leadership obligation, each new employee and new volunteer shall complete a specific program of training within 30 days of assuming duties. Fulfillment of training requirements shall be documented by the Director of Christian Education and/or the chair of the Christian Education team.

Training shall be repeated annually. Records shall be maintained by the Director of Christian Education and/or the chair of the Christian Education Team.

Abuse prevention curriculum shall include:

- Organization level
 - Review of expected conduct and boundaries defined in this policy.
 - Review of standards applicable to ministry.
 - Explanation of procedures for reporting violations of standards of conduct and suspected child abuse.
 - Explanation of individual statutory reporting obligations.
 - Identifying and managing high-risk situations such as bathroom use, transition times, and free times.
 - Physical security procedures.
- Abuse prevention education:
 - 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 youth more likely to act out sexually.
 - Characteristics of youth more likely to be abused.
 - 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 youths.

The Director of Christian Education and the Christian Education team shall assure that each employee and volunteer has mastered requirements and provide additional supervision and guidance as required to assure required conduct.

VII. Monitoring and Supervision

When Clergy, employees, and volunteers are adequately supervised, potential offenders are less likely to act on their impulses because they face detection. When youths are adequately supervised, they too are less likely to engage in inappropriate interactions with others. Similarly, the facility must be monitored, particularly out-of-the-way locations or locations that might permit an offender undue access to or privacy with a youth. Effective supervision and monitoring require that a variety of methods be used frequently, at both scheduled and random times.

A. Facility Monitoring

Building architecture can increase or mitigate the risk of an incident or accident. Because most incidents of sexual behavior occur in private, the extent to which privacy is managed, risk is managed. In order to ensure that all of the locations are properly and consistently monitored, designate a staff member who must complete a site inspection checklist.

B. General Supervision

General supervision procedures:

1. Administrative and Supervisory Visits to Youth Programs- The Director of Christian Education and members of the Christian Education team will regularly visit all youth programs to ensure that all activities are well- managed and that youth policies are observed by all in attendance.
2. Ratios- Each program will follow the ratio requirements that are directly applicable to the goals of the program and the design of the program area. The employee or volunteer-to-youth ratio should be adjusted for programs that serve youths with special needs. Pennsylvania requires the following ratios (adult to children): Preschool- 1:10, Young School-Age-1:12, Older School-Age- 1:15.
3. Mixed Age Groups- In most incidents involving one youth abusing another youth, the youths are from different age groups. Each program is responsible for establishing specific guidelines for additional monitoring and supervision of activities that involve youths from different age groups. Clergy, employees, and volunteers must be aware that close line of sight supervision is required when monitoring programs that mix age groups.

C. Monitoring Youth in Facilities

Because Sampson's Mills is responsible for all youths in the facility, we recommend implementing the following practices:

1. Require a parent or legal guardian to complete a form which includes identifying information, any special medical or behavioral circumstances, the youth's date of birth, and emergency contact information. In addition, require all youths to sign-in AND to sign-out of the facilities so that the program has a record of the youth who are in the facility at all times.
2. Require youths to sign a Code of Conduct that outlines the program's behavioral expectations and policies regarding appropriate and inappropriate interactions. This Code of Conduct should

also include a systematic disciplinary policy which explains that youths will be suspended or dismissed from the program for policy violations. Require parents to sign this Code of Conduct as well, so that they are aware of the program's policies and progressive disciplinary procedures.

3. While a parent orientation may not be feasible in all circumstances, we recommend encouraging parents to attend an information session with a program representative. This meeting will provide an opportunity to review expectations and requirements, and the chance to establish a relationship with the parents. This can be helpful if any problems arise in the future.
4. While in the facility, youths can be supervised directly, indirectly, or with a combination of the two techniques.
 - a. For direct supervision, the program may offer structured, scheduled activities like basketball tournaments, swimming activities, arts and crafts, etc. These activities should have one or more staff assigned to lead and supervise.
 - b. For indirect supervision, the program must designate certain building areas as authorized areas. Authorized areas could include a gymnasium, a game area, or a classroom for doing homework and so on. Authorized areas must be easily visible and routinely and systematically checked by staff. Youths should know that they will be supervised by staff at all times, and all staff should know which areas are authorized and which are not.
5. Develop supervision standards for the authorized areas. For example:
 - a. Determine how frequently authorized areas should be monitored by staff.
 - b. Assign staff specific supervision responsibilities over authorized areas.
6. All program staff/volunteers should wear name tags or identifying clothing so that the youth can easily recognize them as staff.
7. Train all staff:
 - a. To greet youths that enter the facility; to direct youths to the structured activities or authorized areas; and, to redirect youths who are not in an authorized area or who are not participating in a structured activity.
 - b. To be aware of the risks involved with mixing age groups and how to monitor activities involving mixed age groups.
 - c. To routinely monitor high risk areas (such as bathrooms, locker rooms, and unused rooms).

Ultimately, all youth must be supervised at all times, regardless of age. The key to remember is that they can be supervised directly in structured activities and indirectly when they are in authorized areas.

D. Monitoring High Risk Activities

i. Bathroom Activities

Most incidents of youth-to-youth abuse occur in the bathrooms. Therefore, the following supervision guidelines are recommended:

When supervising restroom use, adult staff members or volunteers should first quickly scan the bathroom before allowing youths to enter.

- a. For “Group Bathroom Breaks”:
 - Require staff or volunteers to take groups of two or more youths to the bathroom – following the “rule of three” or more.
 - If the bathroom only has one stall, only one youth should enter the restroom while the others wait outside with the staff or volunteers.
 - If there are multiple stalls, only send in as many youths as there are stalls.
 - Minimize youths of different ages using the bathroom at the same time.
 - Require staff or volunteers to stand outside the bathroom door but remain within earshot.
- b. For single use restrooms:
 - Require youths to ask permission to use the bathroom.
 - Require all staff or volunteers to frequently check bathrooms.
- c. Prohibit staff or volunteers from using the bathroom at the same time as youths.
- d. If assisting young youths in the stalls, the staff or volunteers should keep the door to the stall open.

ii. Transition Times and Free Times

Transition times and free-choice times (or free times) pose a high risk for incidents because during these times, Clergy, employees, and volunteers may not be assigned a particular group of youths to supervise. To decrease the risk of incidents, implement the following procedures:

- a. Require youths to remain in line-of-site of staff at all times.
- b. Specify the staff-to-youth ratio.
- c. Specify narrow geographic boundaries in the program areas.
- d. Ensure that all staff or volunteers are assigned specific areas to supervise (“zone monitoring”).
- e. Include bathroom procedures.
- f. Require periodic roll calls for each age group.
- g. Require volunteers to conduct periodic check-ins and sweeps of the entire activity area.

iii. Transportation Activities

Transporting youths may increase the risk of abuse or false allegations of abuse because Clergy, employees, and volunteers may be alone with a youth or may make unauthorized stops with youths. In addition, transportation activities may provide a time for unsupervised youths to engage in youth-to-youth sexual activity.

The transportation guidelines:

- a. Require parent permission from all youths on the trip. Staff take these permission forms and medical releases with them on the trip.

- b. Require staff and volunteers to have a list of the youths on the trip. The staff take roll when boarding the vehicle, when leaving the vehicle, periodically throughout the trip, and then again when boarding the vehicle.
- c. Specify staff-to-youth ratios. When possible, do not count the driver in the supervision ratio.
- d. Require staff to sit in seats that permit maximum supervision.
- e. Discourage mixed age groups from sitting together. When possible, high risk youths are seated by themselves or with a staff member.
- f. Prohibit drivers from making unauthorized stops.
- g. Require documentation of any unusual occurrences.

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

- a. The Director of Christian Education, Christian Education Team and Session must be notified of all transportation activities.
- b. Use the “rule of three” when transporting youths: At least two adults must transport a single youth, or at least two youths must be present if transported by a single adult.
- c. Youths must never be transported without permission from a parent.
- d. Youths must be transported directly to their destination. No unauthorized stops may be made.
- e. Staff and volunteers must avoid unnecessary physical contact with youths while in vehicles.
- f. When possible, staff and volunteers should avoid engaging in sensitive conversations with youths.

iv. Off-Site Activities

The off-site procedures include:

- a. Requiring session approval for all off-site activities.
- b. Requiring parental approval.
- c. Specifying staff-to-youth ratios for the activity.

v. Overnight Activities

Overnight stays present unique risks to youths, volunteers, and staff. 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.

Supervision Guidelines:

- a. All overnight activities must be documented and approved in writing by the Session.
- b. The Director of Christian Education and designees from the Christian Education team are expected to regularly and randomly observe overnight activities on a scheduled and periodic basis.

- c. The Director of Christian Education should appoint a “lead” staff to supervise the overnight. A meeting with all staff and volunteers 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 with written information about the overnight activity. All parents must sign a permission slip for their youths to attend the overnight.
- e. Determine the appropriate staff-to-youth ratios before the event and schedule staff and volunteers accordingly.
- f. Meetings with the group should be hosted in open and observable areas.

Overnights at the Facility:

- a. Physical boundaries within the organization must be clearly defined and explained to the youths.
- b. Assign staff or volunteers to high risk areas in Sampson’s Mills facility, such as the bathrooms, entrances and exits, hallways, etc. If it is not possible to assign specific staff or volunteers to these areas, assign specific staff to conduct periodic facility “walk-throughs”.
- c. With regards to sleeping arrangements, separate the male and female youths into separate rooms and post staff or volunteers at the entrances and exits to these rooms. If this is not feasible, separate males and females by as much space as possible.

VIII. Responding

How an organization responds to suspicious or inappropriate interactions, policy violations, and incidents or allegations of abuse can dramatically affect the harm to the individuals involved and the damage to the organization. Once a Clergy member, employee, volunteer, youth, or parent has expressed a concern or made an allegation about the treatment of a youth, swift and determined action must be taken to reduce any subsequent risk to the youth, to the accused staff member or volunteer, and to the organization. Organizations must establish precise, unequivocal requirements for reporting to the authorities and for adhering to a serious-incident response plan.

A. Responding to Suspicious or Inappropriate Behaviors or Policy Violations

Because Sampson's Mills is dedicated to maintaining zero tolerance for abuse, it is imperative that everyone actively participates in the protection of youths. In the event that a Clergy member, employee, or volunteer observe any suspicious or inappropriate behaviors and/or policy violations on the part of others, it is their personal responsibility to immediately report their observations.

Remember, at Sampson's Mills, the policies apply to everyone.

Examples of Suspicious or Inappropriate Behaviors Between Employees/Volunteers and Youth

- Violation of the abuse prevention policies described above
- Seeking private time or one-on-one time with youths
- Making suggestive comments to youths

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

i. Employee and Volunteer Response:

If an employee or volunteer witness suspicious or inappropriate behaviors or policy violations from another employee or volunteer, they are instructed to do the following:

Guidelines for Employees/Volunteers Response to Suspicious or Inappropriate Behaviors and/or Policy Violations

- Interrupt the behavior.
- Report the behavior to the Director of Christian Education, pastor, or other authority.
- If you are not comfortable making the report directly, make it anonymously.
- If the report involves SMPC staff, contact the Personnel committee.
- Document the report but do not conduct an investigation.
- Keep reporting until the appropriate action is taken.

ii. Supervisor and Administrator Response:

In the event that a supervisor or an administrator receives a report of suspicious or inappropriate behaviors or policy violations from a staff member or volunteer, the supervisor is instructed to do the following:

Guidelines for Supervisors and Administrators (most commonly the Director of Christian Education and pastor) Response to Suspicious or Inappropriate Behaviors and/or Policy Violations

- Report to the next level of administration and determine the appropriate administrator to respond to the concern.
- Determine the appropriate response based on the report.
- Speak with the employee or volunteer who has been reported.
- Review the file of the employee or volunteer to determine if similar complaints were reported.
- Document the report on the appropriate form.
- If at any point in gathering information about a report of suspicious or inappropriate behavior, a concern arises about possible abuse, contact the state authorities and file a report.
- If appropriate, notify parents and/or guardians.
- Advise the person who reported the behavior that the report is being taken seriously.

Based on the information gathered, the following may be required:

- a. Increase monitoring or supervision of the employee, volunteer, or program.
- b. If policy violations with youths are confirmed, the employee or volunteer must be subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the Progressive Disciplinary Process outlined in this manual.
- c. If more information is needed, interview and/or survey other Clergy, employees, and volunteers or youths.

iii. Organizational Response:

Guidelines for Organizational Response

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

B. Responding to Suspected Abuse by an Adult

i. Employee or Volunteer Response to Abuse:

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

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

- a. Director of Christian Education
- b. Pastor
- c. Chair of Personnel and/or Clerk of Session

Additional Guidelines for Employee/Volunteer Response to Incidents or Allegations of Abuse

- 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.
- Protect the alleged victim from intimidation, retribution, or further abuse.
- Immediately report the allegation or incident to the proper organization authorities (based on mandatory reporting requirements) and the designated authority.
- 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 your supervisor or the designated organization authority.

ii. Supervisors and Administrators Response to Abuse:

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

Guidelines for Supervisor and Administrators Responding to Allegations or Incidents of Abuse

- First, determine if the youth is still in danger and 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 your notes may be read by others. Stick to the facts.
- Contact the appropriate local authorities as indicated by your mandatory reporting procedures. Make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency.

- If the alleged abuse involves an employee or volunteer, notify your crisis management team and follow your crisis management plan.
- Suspend the accused employee or volunteer until the investigation is completed.

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. Youth-to-Youth sexual activity and sexualized behaviors often remain unreported in organizations because Clergy, employees, and volunteers are not comfortable documenting these situations, or may not know how.

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. Sampson’s Mills recognizes that the following interactions are high risk and should be prohibited:

- | <i>Prohibited Youth-to-Youth Interactions</i> |
|--|
| <ul style="list-style-type: none"> • 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 sexual activity between youths and sexualized behaviors of youths must be consistently documented.

i. Employee 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:

- | <i>Guidelines for Clergy, employees, and volunteers Responding to Youth-to-Youth Sexual Activity</i> |
|--|
| <ul style="list-style-type: none"> • If you observe sexual activity between youths, you should immediately separate them. • Calmly explain that such interactions are not permitted and separate the youths. • Notify the Director of Christian Education and/or pastor. • 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 youth involved.
- In some cases, if the problem is recurring discipline may be required including not allowing one or both youths to return to the program.

ii. Supervisors and Administrators Response:

In the event that the Director of Christian Education, Christian Education team, and/or pastor receives a report of a youth's sexualized behavior or youth-to-youth sexual activity, the Director of Christian Education or the pastor should do the following:

Guidelines for Supervisors and Administrators Responding to Youth-to-Youth Sexual Activity

- Meet with the staff who reported the sexual activity to gather information.
- Confirm that the youths involved have been separated or placed under increased supervision.
- Review the steps taken by the staff on duty.
- Review the incident report to confirm it is accurately and thoroughly completed.
- Meet with 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

Based on the information gathered, the following may be required:

- a. Review the need for additional supervision.
- b. Review the need for revised policies or procedures.
- c. Review the need for additional training.
- d. Alert others in the organization.

iii. 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 reoccurrence, such as:

Guidelines for Organizational Response

- Review the need for additional supervision.
- Review the need for revised policies or procedures.
- Review the need for additional training.
- Alert others in the organization.

D. Responding to Victims

In the event of cases of reportable abuse, the policy of Sampson’s Mills 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.

E. Notification of Parents

A minor child may be party to an incident either as an initiator or as the victim. Whether a child is initiator or victim may not be clear in all circumstances, such as a child-on-child incident. And violation of policy does not necessarily create a victim. While notification of parents of such circumstances may be warranted, utmost care in communication is required.

While 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;
- 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, the congregation and Sampson’s Mills. Without intending ever to evade the media, contacts with media must be managed and conducted only by a person specifically designated by the Session to represent the church. No other person(s) may speak on behalf of the church. Unless designated differently by the Session in a particular circumstance, the exclusive spokesperson for the church shall be the pastor and/or Clerk of Session.

Prior to speaking to media, the pastor and/or Clerk of Session shall contact and consult with Presbytery (PCUSA) Legal Counsel, to obtain an understanding of appropriate statements or admissions and issues of privacy that may apply to the situation.

XI. Congregational Awareness

We are dedicated to a policy of open communication and education for the benefit of the children, parents, vulnerable adults and guardians we serve. They are entitled to know what to expect of our ministries, the Ministers who serve them, and to know the related policies and procedures created to protect the respective ministry constituencies. Constituencies include the children, the parents, the vulnerable adults, the guardians, and the Ministers.

This entire policy shall be posted on the Sampson's Mills website (include location).

At the time children or vulnerable adults are enrolled in Sampson's Mills programs, parents or legal guardians shall be provided:

- A copy of the Code of Conduct.
- A copy of the Policies for Working with Youth.
- A summary of the content of the orientation to be provided to children and vulnerable adults regarding boundaries and reporting.
- Information regarding the means to report violations of policy or suspicions of abuse.
- Information regarding their personal obligation to report suspected abuse as it may exist under the laws of the State of Pennsylvania.
- An invitation to visit programs in progress at any time at their convenience.

Parents/guardians shall be encouraged to report violations of policy, boundaries or suspected abuse to the Director of Christian Education and/or pastor. Alternatively, they may report incidents to the pastor and/or Clerk of Session. Anonymous reporting is permitted in the same manner and with the same precautions as reporting by Ministers or other observers.

If for any reason, parent/guardian believes that the primary contacts have failed to respond or have not given credibility to the parent's/guardian's concerns, the latter may contact the church Clerk of Session to report those concerns.

II. Acknowledgment of SafeConduct Policy and Procedure

I have read and agree to comply with my organization's policies regarding sexual abuse prevention.

Signature of Employee or Volunteer

Date
