

**ADVENT LUTHERAN**  
**CHURCH**  
**SAFE SANCTUARY**  
**POLICY**

**ADVENT LUTHERAN CHURCH**  
**SAFE SANCTUARY POLICY**

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**PURPOSE:** To provide a safe, secure environment to teach and care for the children and vulnerable adults of our faith family.

**GOAL/SCOPE OF POLICY:** To protect children and vulnerable adults from all types of abuse and inappropriate conduct, including, but not limited to, inappropriate behavior of a sexual nature. This policy prohibits sexual abuse, child molestation, physical abuse, and any type of inappropriate sexual or physical behavior by employees or volunteers of the church. The policy is also intended to protect employees and volunteers from false accusations, and to protect good faith reporters of alleged violations from retaliation for making an allegation in good faith.

**STATEMENT OF COVENANT:** Therefore, as a Christian community of faith, Advent Lutheran Church pledges to conduct the ministry of the gospel in ways that reasonably assure the safety and spiritual growth of all our children, youth, and vulnerable adults as well as all those who work with children, youth, and vulnerable adults. We will take reasonable safety measures in the selection and recruitment of workers; we will implement prudent operational procedures in all programs and events for children, youth and vulnerable adults; we will educate all of our workers with children, youth, and vulnerable adults regarding our policy, required safety measures, and operational procedures; we will have a clearly defined procedure for reporting a suspected incident of abuse that conforms to the requirements of law; and we will be prepared to respond to media inquiries if an incident occurs.

Adopted by Church Council 9/22/2019

# I. General Definitions

## A. Types of abuse

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

## **II. Code of Conduct with youth or vulnerable adults**

The following policies are intended to assist staff and volunteers in making decisions about interactions with youth or vulnerable adults. For clarification of any guideline, or to inquire about behaviors not addressed here, contact an Advent staff member.

No form of abuse will be tolerated. All reports of suspicious or inappropriate behavior with youth or vulnerable adults or allegation of abuse will be taken seriously. Advent Lutheran Church will fully cooperate with authorities if allegations of abuse are made that require investigation.

The Conduct with youth or vulnerable adult outlines specific expectations of the staff 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, sexual orientation, gender identification, age, or religion.
3. Staff and volunteers will adhere to uniform standards of displaying affection as outlined by Advent Lutheran Church.
4. Staff and volunteers will avoid affection with youth and vulnerable adults that cannot be observed by others.
5. Staff and volunteers will adhere to uniform standards of appropriate and inappropriate verbal interactions as outlined by Advent Lutheran Church.
6. Staff and volunteers will not stare at or comment on youth or vulnerable adults' bodies.
7. Staff and volunteers will not date or become romantically involved with youth or vulnerable adults.
8. Staff and volunteers will not use or be under the influence of alcohol or illegal drugs in the presence of youth or vulnerable adults.
9. Staff and volunteers will not have sexually oriented materials, including printed or online pornography, on Advent Lutheran property or when working with youth or vulnerable adults.
10. Staff and volunteers will not have secrets with youth and vulnerable adults and will only give gifts with prior permission.
11. Staff and volunteers will comply with Advent Lutheran Church policies regarding interactions with youth and vulnerable adults outside of our programs.
12. Staff and volunteers will not engage in inappropriate electronic communication with youth and vulnerable adults.

13. Staff and volunteers are prohibited from working one-on-one with youth and vulnerable adults in a private setting. Staff and volunteers will keep doors open or use rooms with doors with windows, when working with individual youth and vulnerable adults.

14. Staff and volunteers will not abuse youth and vulnerable adults 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. Advent Lutheran Church will not tolerate the mistreatment or abuse of one youth or vulnerable adult by another youth or vulnerable adult. In addition, Advent Lutheran Church will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, 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, staff and volunteers.

16. All staff must follow state specific mandatory reporting requirements. Staff should be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. Staff will:
  - a. Be familiar with the symptoms of child abuse and neglect, including physical, sexual, verbal, and emotional abuse.
  - b. Know and follow Advent Lutheran Church 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. Staff and volunteers will report concerns or complaints about other staff, volunteers, adults, or youth and vulnerable adults to the Pastor and/or Council.
18. Advent Lutheran Church will cooperate fully with the authorities to investigate all cases of alleged abuse. Any staff or volunteer shall cooperate to the fullest extent possible in any external investigation by outside authorities or internal investigation conducted by Advent Lutheran Church or persons given investigative authority by Advent. Failure to cooperate fully may be grounds for termination.
19. Staff and volunteers may not have engaged in or been accused or convicted of youth or vulnerable adult abuse, indecency with a youth or vulnerable adult, or injury to a youth or vulnerable adult.
20. Staff and volunteers should have a current background check every 3 years.
21. Staff or volunteers transporting youth or vulnerable adults should have a Motor Vehicle Record search and be at least 25 years old.
22. Staff or volunteers transporting youth must use a car seat or booster seat for children less than age 8 or less than 80 pounds. A car seat is suggested for children less than 4 or according to the individual car seat manufacturers recommendation



### III. Policies

Policies define the bandwidth of acceptable behavior in an organization. Because offenders often violate policies to gain access to youth and vulnerable adults, 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

Any inappropriate physical contact by staff or volunteers towards youth or vulnerable adults will result in disciplinary action, up to and including termination of employment. The Advent Lutheran Church policies for appropriate and inappropriate physical interactions are:

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

## B. Interaction

Advent Lutheran Church policies for appropriate and inappropriate verbal interactions

are:

<i>Appropriate Verbal Interactions</i>	<i>Inappropriate Verbal Interactions</i>
<ul style="list-style-type: none"><li><input type="checkbox"/> Positive reinforcement</li><li><input type="checkbox"/> Appropriate jokes</li><li><input type="checkbox"/> Encouragement</li><li><input type="checkbox"/> Praise</li></ul>	<ul style="list-style-type: none"><li><input type="checkbox"/> Name-calling</li><li><input type="checkbox"/> Discussing sexual encounters or in any way involving youth and vulnerable adults in the personal problems or issues of staff and volunteers</li><li><input type="checkbox"/> Secrets</li><li><input type="checkbox"/> Cursing</li><li><input type="checkbox"/> Off-color or sexual jokes</li><li><input type="checkbox"/> Shaming</li><li><input type="checkbox"/> Belittling</li><li><input type="checkbox"/> Derogatory remarks</li><li><input type="checkbox"/> Harsh language that may frighten, threaten or humiliate youth and vulnerable adults</li><li><input type="checkbox"/> Derogatory remarks about the youth or vulnerable adult or his/her family</li></ul>

## C. One-on-One Interaction

In those situations where one-on-one interactions are approved, 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 youth or vulnerable adult, always do so in a public place where you are in full view of others, room with door open or room with a door with a window.
- 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 staff and volunteers that you are alone with a youth or vulnerable adult 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.

### 1. Tutoring/ Private Coaching:

One-on-one situations, such as tutoring and private coaching sessions, introduce additional risks for false allegations. Staff and volunteers should be aware of our policies regarding tutoring and private coaching:

- a. Staff and volunteers must have supervisor approval for any tutoring or private coaching sessions.
- b. Tutoring and coaching sessions with Advent's youth and vulnerable adults may not occur outside of the church without parental consent
- c. Supervisors must keep a schedule of private tutoring and coaching sessions, which should include times, youth and vulnerable adults involved, and location of sessions.

## D. Off-site Contact

### 1. Preferred Option One:

Advent Lutheran Church prohibits interactions outside of regularly scheduled program activities unless approved by staff and parent(s).

### 2. Option Two:

Advent Lutheran Church has determined that the following forms of outside contact are appropriate and inappropriate:

<i>Appropriate Outside Contact</i>	<i>Inappropriate Outside Contact</i>
<ul style="list-style-type: none"> <li><input type="checkbox"/> Taking groups of youth and vulnerable adults on approved outings/mission trips</li> <li><input type="checkbox"/> Attending sporting activities with groups of youth and vulnerable adults</li> <li><input type="checkbox"/> Attending functions at a youth or vulnerable adult's home, with parents/guardians present</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Taking one youth or vulnerable adult on an outing without the parents'/guardians' written permission</li> <li><input type="checkbox"/> Visiting one youth or vulnerable adult in the youth or vulnerable adult's home, without a parent/guardian present</li> <li><input type="checkbox"/> Entertaining one youth or vulnerable adult in the home of staff or volunteers</li> <li><input type="checkbox"/> A lone youth or vulnerable adult spending the night with staff or volunteers</li> </ul>

1. Ensure that staff or volunteers have the parents'/guardians' permission to engage in outside contact with the youth or vulnerable adult. Require the parents/guardians to sign a release-of- liability statement.

## E. Electronic Communication

Any private electronic communication between staff/volunteers and youth and vulnerable adults, including the use of social networking websites like - Facebook, Instagram, Snapchat, instant messaging, texting, etc. - is prohibited. All communication between staff and youth and vulnerable adults must be transparent. Pictures of minors may be used on social media sites only after obtaining permission from the parent.

<i>Appropriate Electronic Communication</i>	<i>Inappropriate Electronic Communication</i>
<ul style="list-style-type: none"> <li><input type="checkbox"/> Sending and replying to emails and text messages from youth ONLY when copying in a supervisor or the youth's parent/guardian or with parental consent</li> <li><input type="checkbox"/> Communicating through "organization group pages" on Facebook or other approved public forums</li> <li><input type="checkbox"/> "Private" profiles for staff and volunteers which youth and vulnerable adults cannot access</li> </ul>	<ul style="list-style-type: none"> <li><input type="checkbox"/> Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating comments</li> <li><input type="checkbox"/> Sexually oriented conversations</li> <li><input type="checkbox"/> Private messages between staff and volunteers with youth and vulnerable adults without parental consent</li> <li><input type="checkbox"/> Posting pictures of participants on social media sites without written permission</li> <li><input type="checkbox"/> Posting inappropriate comments on pictures</li> <li><input type="checkbox"/> "Friending" participants on social networking sites</li> </ul>

In addition, provide this information to your minor participant's parents/guardians so that they know what is appropriate and inappropriate from your staff.

### 1. Cell Phone Use:

While assigned to work with youth and vulnerable adults, staff are not permitted to use electronic communications device except during approved breaks and emergency situations. Internet use, text messaging and/or emailing pictures while assigned to work with youth and vulnerable adults is strictly prohibited regardless of the type of device used and whether for business or personal reasons. Employees need to ensure that friends and family members are aware of this policy.

Use of personal electronic communication devices to contact (via voice, text, or pictures/video) organization members and/or program participants for personal and/ or inappropriate reasons shall be grounds for discipline up to and including termination of employment.

## **2. Acceptable Use of Cell Phones during Program Hours:**

There are occasions in which staff will need to use personal or organization issued electronic communication devices. In these cases, staff will have explicit direction from supervisors governing use. Situations which may require use of electronic communication devices include:

- a. Field Trips
- b. Off-site Programs
- c. Emergencies
- d. Used as an educational tool (ie. Sunday School, etc)

## **F. Gift Giving**

Molesters routinely groom youth and vulnerable adults by giving gifts, thereby endearing themselves to the youth or vulnerable adult. They might instruct the youth or vulnerable adult to keep the gifts a secret, which then starts teaching the youth or vulnerable adult to keep secrets from parents/guardians. For this reason, staff and volunteers should only give gifts to groups of youth and vulnerable adults, and only under the following circumstances:

1. Administration must be made aware of and approve the gift.
2. Parents/guardians must be notified.

## IV. Training Requirements

### A. General Training Requirements

\*Armatus® is an online training platform offered by Praesidium. Courses include specific learning objectives, exceptional content, engaging graphics, frequent interactivity and a content mastery quiz. Armatus® Online Training is a possible delivery method for the above mentioned content areas. The following chart lists the Armatus® modules that personnel can complete in the certain situations:

<i>Audience</i>	<i>Armatus® Modules</i>	<i>Timetable</i>
Employees unable to attend live training AND Employees hired after live training conducted	<input type="checkbox"/> Meet Sam <input type="checkbox"/> It Happened to Me <input type="checkbox"/> Organization Policies <input type="checkbox"/> Preventing Sexual Activity between Young Children	Within 30 days of live training or hire date
High Access Volunteers	<input type="checkbox"/> Organization Policies <input type="checkbox"/> Abuse Risk Management for Volunteers	Prior to access with youth or vulnerable adult
Employees who violate policies or exhibit questionable boundaries	<input type="checkbox"/> Organization Policies <input type="checkbox"/> Refresher Module	Within 5 days of administrator notification
Returning employees (who previously participated in live or Armatus® training)	<input type="checkbox"/> Refresher Module	At employment or volunteer anniversary date.

## V. Monitoring and Supervision

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

### A. Facility Monitoring

### B. General Supervision

General supervision procedures:

1. **Administrative and Supervisory Visits to Youth or vulnerable adult Programs-** youth or vulnerable adult supervisors and administrators will regularly visit all youth or vulnerable adult programs to ensure that all activities are well-managed and that youth or vulnerable adult policies are observed by all in attendance.
2. **Ratios-** Each program will follow the ratio requirements that are directly to the goals of the program and the design of the program area. The staff or volunteer-to-youth or vulnerable adult ratio should be adjusted for programs that serve youth and vulnerable adults with special needs.

Recommended adult to child ratios:

*0-5 years 1:5*

*5-10 years 1:6*

*10-14 years 1:8*

*14-18 years 1:10*

3. **Mixed Age Groups-** In most incidents involving one youth or vulnerable adult abusing another youth or vulnerable adult, the youth and vulnerable adults are from different age groups. Each program is responsible for establishing specific guidelines for additional monitoring and supervision of activities that involve youth and vulnerable adults from different age groups. Staff and volunteers must be aware that close line of sight supervision is required when monitoring programs that mix age groups.



## C. Monitoring Youth or vulnerable adult in Facilities

1. Require a parent or legal guardian to complete program registration form which includes identifying information, any special medical or behavioral circumstances, any legal indemnifications, the youth's date of birth, and emergency contact information. In addition, require all youth and vulnerable adults to sign-in AND to sign-out of the facilities so that the program has a record of the youth or vulnerable adult who are in the facility at all times.
2. Require youth and vulnerable adults 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 youth and vulnerable adults will be suspended or dismissed from the program for policy violations. Require parents/guardians of youth to sign this Code of Conduct as well, so that they are aware of the programs polices and progressive disciplinary procedures. If the youth or vulnerable adult is a guest of a program member, the visiting youth or vulnerable adult must sign the Code of Conduct.
3. While in the facility, youth and vulnerable adults 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, tutoring, 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. Youth and vulnerable adults 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.
4. All program staff should wear nametags or identifying clothing so that the youth or vulnerable adult can easily recognize them as staff or volunteer.
5. Train all staff:
  - a. To greet youth and vulnerable adults that enter the facility; to direct youth and vulnerable adults to the structured activities or authorized areas; and, to redirect youth and vulnerable adults 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). This staff should document the scheduled and periodic sweeps of high risk locations.

Ultimately, all youth and vulnerable adults 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

### 1. Bathroom Activities

When supervising restroom use, adult staff members should first quickly scan the bathroom before allowing youth and vulnerable adults to enter.

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

### 2. Child Care Procedures for Diapering and Toileting

For diapering

- a. Place the changing table in an open area where adult actions can be observed by others.
- b. Require written documentation of diaper changing.
- c. Inform parents/guardians if staff notices anything out of the ordinary or concerning while changing the diapers. Require staff to know and follow all licensing requirements having to do with diapering.

For toileting:

- d. Require staff to stand in the doorway with the door ajar while children use the restrooms.
- e. If staff must enter the restroom to assist a child, ensure that the door to the restroom remains open.
- f. When possible, send in only one child at a time.
- g. When not possible, send in only as many children as there are stalls.

### **3. Locker Room Activities**

The locker room procedures include:

- a. Require staff/volunteer to stand within earshot of the locker room when in use by youth and vulnerable adults.
- b. Require staff /volunteer to routinely check inside the locker room so users know the locker room is monitored.
- c. Discourage the use of locker rooms by youth and vulnerable adults of different ages at the same time.
- d. Prohibit the use of locker room horseplay such as towel snapping.

### **4. Shower Activities**

Staff and youth and vulnerable adults must shower at different times. Create shower schedules that will permit supervision of the youth and vulnerable adults while staff shower.

- a. While the youth and vulnerable adults shower, at least one staff member/volunteer should stand in the bathroom doorway or within earshot of the youth and vulnerable adults. Ensure that only one youth or vulnerable adult is in each shower (Consider utilizing shower curtains that do not go all the way to the floor, so that staff can easily see how many youth and vulnerable adults are in each shower stall).

### **5. Transition Times and Free Times**

Transition times and free-choice times (or free times) pose a high risk for incidents because during these times, staff and volunteers may not be assigned a particular group of youth and vulnerable adults to supervise. Require youth and vulnerable adults to remain in line-of-site of staff /volunteer(s) at all times.

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

## **6. Playground Activities**

The playground procedures require:

- a. youth and vulnerable adults to remain in line-of-site of staff at all times.
- b. Definition of specific and narrow geographic boundaries around the playground area.
- c. Specific instructions on how to monitor barriers of supervision (such as storage sheds, playhouses, tunnels, and shrubs).
- d. That all staff are assigned specific areas to supervise (“zone monitoring”).
- e. Specific bathroom procedures.
- f. Staff to conduct periodic roll calls for each age group.
- g. Supervisors to conduct periodic check-ins and assessments of the activity period and of the entire activity area.

## **7. Transportation Activities**

The transportation guidelines:

- a. Require written parent/guardian permission from all youth on the trip. Staff /volunteers must take these permission forms and medical releases with them on the trip.
- b. Require staff /volunteers to have a list of the youth and vulnerable adults on the trip. The staff/volunteers take roll when boarding the bus, when leaving the bus, periodically throughout the trip, and then again when boarding the bus.
- c. Specify staff-to-youth or vulnerable adult 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 youth and vulnerable adults are seated by themselves or with a staff member/volunteer
- f. Prohibit drivers from making unauthorized stops.
- g. Where applicable (such as in mentoring programs), require staff /volunteer to document the beginning and ending time of the trip and the mileage, names of the youth and vulnerable adults being transported, and the destination.
- h. Require documentation of any unusual occurrences.

When public transportation is used:

- a. In addition to the transportation procedures listed above, youth and vulnerable adults should remain in one area of the public transportation, if possible.
- b. Staff and volunteers that are assigned to a group should remain with that group on the transportation.
- c. Take a head count or call roll immediately after entering and leaving.

In situations where staff transport youth and vulnerable adults in personal vehicles:

- a. Staff must be notified of all transportation activities.
- b. Use the “rule of three” when transporting youth and vulnerable adults: At least two adults must transport a single youth or vulnerable adult, or at least two youth and vulnerable adults must be present if transported by a single adult *unless there is written permission from a parent/guardian.*
- c. Youth must never be transported without written permission from a parent/guardian.
- d. Youth and vulnerable adults must be transported directly to their destination. No unauthorized stops may be made.
- e. A staff member must document beginning and ending times and mileage, the names of youth and vulnerable adults, and other staff and volunteers who are involved in transportation, purpose of the transportation, and destination.
- f. Staff must avoid unnecessary physical contact with youth and vulnerable adults while in vehicles.
- g. When possible, staff should avoid engaging in sensitive conversations with youth and vulnerable adults.

## **8. Off-Site Activities**

The off-site procedures include:

- a. Require supervisor approval for all off-site activities.
- b. Require parent/guardian approval for minors.
- c. Specifying staff-to-youth or vulnerable adult ratios for the activity.
- d. Require at least one adult of the same sex
- e. Requiring staff and youth and vulnerable adults to be easily identifiable.
- f. Include specific bathroom and locker room procedures as applicable to outing.
- g. Include transportation procedures.
- h. Include instructions for a supervisor to observe the off-site activities at scheduled times and random intervals.

## 9. Overnight Activities

### Supervision Guidelines:

- a. All overnight activities must be documented and approved in writing by the Program Director.
- b. Staff is expected to regularly and randomly observe overnight activities on a scheduled and periodic basis.
- c. The Director should appoint a “lead” staff to supervise the overnight. A meeting with all staff 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 youth to attend the overnight.
- e. Determine the appropriate staff-to-youth or vulnerable adult ratios before the event and schedule staff accordingly. At least one same gender chaperone will be present for male or female youth.
- f. Meetings with the group should be hosted in open and observable areas; meetings should not be hosted in staff or youth or vulnerable adult rooms.

### Overnights at the Facility:

- a. Physical boundaries within the church must be clearly defined and explained to the youth and vulnerable adults.
- b. Assign each staff /volunteer to a specific group of youth and vulnerable adults to supervise. Each staff /volunteer should then maintain a role sheet that lists all the youth and vulnerable adults in his or her group. Head counts and roll checks should be conducted routinely throughout the evening.
- c. Assign staff /volunteers to high risk areas in Advent Lutheran Church, 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”.
- d. With regards to sleeping arrangements, separate the male and female youth and vulnerable adults into 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.
- e. When performing room checks, staff /volunteers should always go in pairs.

### Overnights Away from the Facility:

- a. Overnight stays at private homes are prohibited unless approved by staff.
- b. Physical boundaries at the off-site location must be clearly defined and explained to the youth and vulnerable adults.
- c. Assign each staff/volunteer to a specific group of youth and vulnerable adults to supervise. Each staff /volunteer should then maintain a role sheet that lists all of the youth and vulnerable adults in his or her group. Head counts and roll checks should be conducted routinely throughout the event.
- d. If in a cabin type setting, the staff /volunteer should be placed in bunks to maximize supervision around the cabin and in a way that decreases the chances of youth and vulnerable adults sneaking out (such as by the door).

- e. In hotel rooms, assign youth and vulnerable adults to rooms based on sex and age. Staff /volunteers should have their own rooms. If staff /volunteers must share rooms with youth and vulnerable adults, they must have their own beds and never change in front of youth and vulnerable adults.
- f. All staff/volunteer are to be on duty in the halls or cabins at night until an hour after lights out and all rooms are quiet.

## 10. Teen Leadership Program

Older youth and vulnerable adults who participate in teen leadership programs are still youth or vulnerable adult participants and not staff or volunteers. Therefore, even though they are often given more responsibility, teens in the leadership programs must be provided with guidelines regarding appropriate behavior, and then supervised accordingly. In addition, staff and volunteers must understand and recognize that these teens are still youth and vulnerable adults and not their peers. Therefore, the following guidelines are recommended for teen leadership programs:

- a. Train teen leaders in their role in programs and on program policies about appropriate and inappropriate interactions. This training should include the following information:
  - Appropriate and inappropriate physical and verbal interactions and the importance of maintaining behavioral boundaries between teen leaders and younger youth and vulnerable adults and between teen leaders and staff and volunteers.
  - Prohibit teen leaders from being one-on-one with youth and vulnerable adults.
  - Prohibit teen leaders from escorting youth and vulnerable adults to the bathrooms.
  - Prohibit teen leaders from assisting youth and vulnerable adults with changing their clothes.
- b. Create a system to monitor the teen leaders.
  - Designate a specific employee or volunteer in charge of the teen leadership program and its participants.
  - Require teen leaders to wear clothing or lanyards that identify them as leaders-in-training and differentiate them from both staff and volunteers and from younger youth and vulnerable adults.
  - Require a supervisor to conduct daily check-ins with teen leaders and their program supervisors.

## **E. Supervisors and Administrators Monitoring On-Site and Off-Site Programs**

**Keep a record.** Document your supervision visits. Include information like your arrival and departure times, which youth and vulnerable adults and parents/guardians were present, and a summary of the information collected. Provide staff with feedback about visits.

**Vary your observation times.** Do not develop a predictable pattern of observation. Drop in at different times each day. Occasionally leave and come back immediately.

**Arrive before staff/volunteers.** Check punctuality and the routine that staff follow to prepare for the youth and vulnerable adults to arrive.

**Survey the physical environment.** Is this a suitable location for the activity (e.g. size of area for number of youth and vulnerable adults, ability to supervise all areas used by youth and vulnerable adults, landscaping that may inhibit supervision)

**Watch activities.** Are they planned and organized? Are the staff actively involved? Ask to see the schedule of activities and compare with what is going on at a given time.

**Observe bathroom and locker room activities.** Observe bathroom and locker room activities to ensure that the staff/volunteers are complying with the established policies and procedures.



## VI. Responding

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

Because Advent Lutheran Church is dedicated to maintaining zero tolerance for abuse, it is imperative that every staff member and volunteer actively participate in the protection of youth and vulnerable adults. In the event staff /volunteers observe any suspicious or inappropriate behaviors and/or policy violations on the part of other staff or volunteers, it is their personal responsibility to immediately report their observations.

#### *Examples of Suspicious or Inappropriate Behaviors Between Staff/Volunteers and Youth or vulnerable*

- Violation of the abuse prevention policies described above
- Seeking private time or one-on-one time with youth and vulnerable adults
- Buying gifts for individual youth and vulnerable adults
- Making suggestive comments to youth and vulnerable adults
- Picking favorites

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

## 1. Staff and Volunteer Response:

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

### *Guidelines for Staff/Volunteers Response to Suspicious or Inappropriate Behaviors and/or Policy Violations*

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

## 2. Supervisor and Administrator Response:

In the event 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 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 staff or volunteer who has been reported.
- Review the file of the staff 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 staff, volunteer, or program.
- b. If policy violations with youth and vulnerable adults are confirmed, the staff 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.

If more information is needed, interview and/or survey other staff and volunteers or youth and vulnerable adults.

### **3. 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

### 1. Staff or Volunteer Response to Abuse:

As required by mandated reporting laws, staff and volunteers must report any suspected abuse or neglect of a youth or vulnerable adult—whether on or off Advent Lutheran Church property or whether perpetrated by staff, 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 if the report was made in good faith and without malice. *\*Refer to state specific mandated reporting requirements for definitions of abuse more specific reporting information.*

In addition to reporting to state authorities, staff and volunteers are required to report any suspected or known abuse of youth and vulnerable adults perpetrated by staff 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. Immediate supervisor
- b. Directors
- c. Administrators

#### *Additional Guidelines for Staff/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 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.

## 2. 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 or vulnerable adult 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 a staff member or volunteer, notify your crisis management team and follow your crisis management plan.
- Suspend the accused staff or volunteer until the investigation is completed.

## **C. Responding to Youth or vulnerable adult-to-Youth or vulnerable adult Sexual Abuse and Sexualized Behaviors**

### **1. Youth or vulnerable adult -to- Youth or vulnerable adult Interactions:**

Most serious incidents of youth or vulnerable adult -to- youth or vulnerable adult 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.

#### *Prohibited Youth or vulnerable adult -to-Youth or vulnerable*

- 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, all sexual activity between youth and vulnerable adults and sexualized behaviors of youth and vulnerable adults must be consistently documented.

## 2. Staff and Volunteer Response:

Youth or vulnerable adult -to- Youth or vulnerable adult 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 staff witness youth or vulnerable adult -to- youth or vulnerable adult sexual behaviors, they are instructed to follow these guidelines:

### *Guidelines for Staff and Volunteers Responding to Youth or vulnerable adult-to- Youth or vulnerable adult Sexual Activity*

- If you observe sexual activity between youth and vulnerable adults, you should immediately separate them.
- Calmly explain that such interactions are not permitted and separate the youth or vulnerable adult.
- 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/guardians of the youth or vulnerable adult involved.
- In some cases, if the problem is recurring discipline may be required including not allowing one or both youth and vulnerable adults to return to the program.

### 3. Supervisors and Administrators Response:

In the event a supervisor or administrator receives a report of a youth or vulnerable adult's sexualized behavior or youth or vulnerable adult -to- youth or vulnerable adult sexual activity, the supervisor should do the following:

#### *Guidelines for Supervisors and Administrators Responding to Youth or vulnerable adult-to-Youth or vulnerable*

- Meet with the staff or volunteer who reported the sexual activity to gather information.
- Confirm that the youth or vulnerable adult 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/guardians of the youth 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:

- c. Review the need for additional supervision
- d. Review the need for revised policies or procedures
- e. Review the need for additional training
- f. Alert staff



#### **4. Advent Lutheran Church Response:**

After the internal review of the sexualized behavior or youth or vulnerable adult -to- youth or vulnerable adult sexual activity, Advent Lutheran Church staff will determine what can be done to prevent a reoccurrence, such as:

##### *Guidelines for Response*

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

## **VII. Sample Critical Incident Management Plan**

### **Prior to Allegation/Incident**

- Determine who 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 a 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.

### **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.
  - 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.
  - Reassure them that you are taking this seriously.
  - 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 Advent Lutheran Church as well as those with past contact with the accused offender.
  - 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 staff, 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.
    - Communicate as much information as you can about the incident.
    - Provide information regarding the proactive steps leadership is taking in response to the incident.
    - Describe resources you are providing families, and give parents a chance to ask questions.
    - 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.
  - 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**

- 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 youth education program to all youths involved 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

**Acknowledgment of Abuse Prevention Manual**

I have read and agree to comply with Advent Lutheran Church Safe Sanctuary policies regarding abuse prevention.

\_\_\_\_\_  
Signature of Employee or Volunteer

\_\_\_\_\_  
Date