

## Penn West Conference Safe Conduct Policy

*Modeled on SafeConduct™ Policy & Procedure Template ©Insurance Board, June 2017 edition*

### **I. Statement of Policy**

As a community of Christian faith, Penn West Conference 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. Penn West Conference supports principles of SafeConduct, which include individual responsibility to fulfill the highest standards of personal conduct toward others and to lead and guide the Conference in fulfillment of the standards set by our Christian faith. Penn West Conference strongly opposes and prohibits sexual exploitation, sexual harassment, or any form of exploitation or abuse of others regardless of age, sex, sexual orientation, sexual identification or mental capacity. It is the intention of our Conference to 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 Conference, whether Authorized Minister, leader, lay staff, volunteer or parent, is responsible to ensure that these policies are followed. Our Conference shall nurture good conduct as demonstrated by personal behaviors that are consistent with our Christian values.

### **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 under certain circumstances between two youths. This includes any activity which 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 law to report suspected abuse to police or child welfare agencies.

8. Authorized Ministers include any person who is admitted to ministry by the UCC and who holds standing with one of the Conference's Associations.

### **III. Code of Conduct with Youth and Vulnerable Adults**

The following Code of Conduct is intended to assist Authorized Ministers, 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 your supervisor.

Penn West Conference 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. All reports of suspicious or inappropriate behavior with youth and vulnerable adults or allegation of abuse will be taken seriously. Penn West Conference 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 Authorized Ministers, 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, sexual orientation, gender identity, age, disability, or religion.
3. Authorized Ministers, employees, and volunteers will adhere to uniform standards of displaying affection as outlined by Penn West Conference.
4. Authorized Ministers, employees, and volunteers will avoid affection with youth and vulnerable adults that cannot be observed by others.
5. Authorized Ministers, employees, and volunteers will adhere to uniform standards of appropriate and inappropriate verbal interactions as outlined by Penn West Conference.
6. Authorized Ministers, employees, and volunteers will not stare at or comment on youth and vulnerable adults' bodies.
7. Authorized Ministers, employees, and volunteers will not date or become romantically involved with youth and vulnerable adults.
8. Authorized Ministers, 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. Authorized Ministers, employees, and volunteers will not have sexually oriented materials, including printed or online pornography, on Penn West Conference's property.
10. Authorized Ministers, employees, and volunteers will not have secrets with youth and vulnerable adults and will only give gifts with prior permission.
11. Authorized Ministers, employees, and volunteers will comply with Penn West Conference's policies regarding interactions with youth and vulnerable adults outside of our programs.
12. Authorized Ministers, employees, and volunteers will not engage in inappropriate electronic communication with youth and vulnerable adults.
13. Authorized Ministers, employees, and volunteers are prohibited from working one-on-one with youth and vulnerable adults in any setting. Clergy, employees, and volunteers will use common areas when working with individual youth and vulnerable adults and keep a two adult rule with children at all times.
14. Authorized Ministers, employees, 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; and  
*Neglect:* withholding food, water, shelter
15. Penn West Conference will not tolerate the mistreatment or abuse of one youth or vulnerable adult by another youth or vulnerable adult. In addition, Penn West Conference 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, Authorized Ministers, employees, and volunteers.

16. All Authorized Ministers, 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. Authorized Ministers, employees, and volunteers will report concerns or complaints about other employees, volunteers, adults, or youth to Penn West Conference’s supervisor.
18. Penn West Conference cooperates fully with the authorities to investigate all cases of alleged abuse. Any Authorized Minister, 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. Authorized Ministers, 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**

Policies define 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**

Penn West Conference's physical contact policy promotes a positive, nurturing environment while protecting youths, Authorized Ministers, employees, and volunteers. Penn West Conference encourages appropriate physical contact with youths and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by Authorized Ministers, employees, and volunteers towards youths in the organization's programs will result in disciplinary action, up to and including termination of employment/volunteerism.

Penn West Conference's examples of appropriate and inappropriate physical interactions are:

##### **Appropriate Physical Interactions**

- 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)

##### **Inappropriate Physical Interactions**

- 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

## **B. Verbal Interactions**

Authorized Ministers, 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. Authorized Ministers, employees, and volunteers must not initiate sexually oriented conversations with youths. Authorized Ministers, employees, and volunteers are not permitted to discuss their own sexual activities with youths.

Penn West Conference's examples of appropriate and inappropriate verbal interactions are:

### **Appropriate Verbal Interactions**

- Positive reinforcement
- Appropriate jokes
- Encouragement
- Praise

### **Inappropriate Verbal Interactions**

- Name-calling
- Discussing sexual encounters or in any way involving youths in the personal problems or issues of Authorized Ministers, 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. Penn West Conference aims to eliminate or reduce these situations and prohibits private one-on-one interactions unless approved in advance by the organization administration.

In those situations where one-on-one interactions are approved, Authorized Ministers, employees, and volunteers should observe the following additional guidelines to manage the risk of abuse or false allegations of abuse:

- 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 Authorized Ministers, 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 Penn West Conference at increased risk.

Penn West Conference strongly recommends that staff do not have outside contact with youths from the organization. However, if off-site contacts are unavoidable (such as during mentoring programs), Penn West Conference has determined that the following forms of outside contact are appropriate and inappropriate:

#### **Appropriate Outside Contact**

- Taking groups of youths on an outing
- Attending sporting activities with groups of youths
- Attending functions at a youth's home, with parents present

#### **Inappropriate Outside Contact**

- Taking one youth on an outing without the parents' written permission
- 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, when outside contact is unavoidable, ensure that the following steps are followed:

1. Supervisors should identify for Authorized Ministers, 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 electronic communication between staff and youths, including the use of social networking websites – should be used with discretion and transparency.

The following are examples of inappropriate electronic communication:

- Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating comments
- Sexually oriented conversations
- Posting pictures of organization participants on social media sites without consent
- Posting inappropriate comments on pictures

In addition, leaders should provide this information to the participants' parents so that they know what is inappropriate from the staff.

#### **i. Cell Phone Use:**

While assigned to work with youths, electronic communications should be used with discretion and transparency.

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

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 organization issued or personal electronic communication devices include:

- a. Field Trips;
- b. Off-site Programs; and
- c. Emergencies.

## **F. Gift Giving**

Authorized Ministers, employees, and volunteers should use appropriate discretion in giving any gifts to groups of youths.

## **V. Screening and Selection**

The process of screening and selecting employees and volunteers is an essential element of management due diligence. There are several elements required which serve a number of purposes. Criminal background checking by itself is inadequate simply because very few predators, or people who would become predators, have been through the penal system. A would-be predator requires three things: Access, Privacy & Control.

**Standing of Authorized Ministers:** Employment of clergy who do not fulfill denominational requirements may have an impact on insurance programs.

The following screening and selection procedures are strongly recommended for all Authorized Ministers, employees, and volunteers.

*Note: Each board member, employee or volunteer now serving and regardless of length of service must be willing to set an example for all others who follow in their ministry. Therefore, at the time this policy is first adopted, all incumbent board members, employees and all incumbent volunteers who work with children shall execute the following procedures.*

### **A. Application**

All applicants for employment should be expected to complete an application prior to working at Penn West Conference. The Conference will hire or call employees in accordance with the Conference's personnel policies. Offers should not be made until an application is 100% complete. Applications should be kept in the personnel file.

Volunteer applicants must be active members of Local Churches in the Penn West Conference for a minimum of six months before being permitted to work in Penn

West Conference youth-oriented programs. There should be **no exceptions** to this policy, even when volunteer candidates come from another church or denomination with similar programs.

## **B. Interviews**

All applicants for employment should be interviewed during the selection process and prior to employment. The purpose of the interview is to determine whether the applicant possesses the skills needed to perform the job requirements and whether the applicant demonstrates characteristics of a potentially abusive person. The interview should also provide the applicant with information about job responsibilities and expectations. Interviews for employment with the Penn West Conference should consider the applicants' fitness for working with youth or children regardless of whether their position description involves such work.

Volunteer applicants should be interviewed by the Associate for Youth Ministry and/or other designated Conference staff.

## **C. Reference Checks**

Reference checks for employees should be conducted for all applicants prior to employment. A minimum of three references is recommended, including two professional and one personal reference. References should be conducted by telephone. The person responsible for the screening should inform the referent that the applicant is applying for a position with the organization and will explain that the applicant will have access to a vulnerable population. Responses to reference questions should be recorded and evaluated for risk. Offers of employment should not be made until the required number of references is contacted. Completed reference documents for employees should be kept in the applicant's personnel file.

Reference checks for volunteers should be conducted by the Associate for Youth Ministry and/or other designated Conference staff. The resources for references for employees may be used for volunteers, as well.

## **D. Background Checks**

Criminal history and sexual offender registry checks should be conducted for all applicants for employment. 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, Penn West Conference could have the applicant start the position and remain in the position until the criminal

background results are obtained and reviewed. New employees and should not be left unsupervised with youths until the criminal history results are returned.

Criminal history and sexual offender registry checks should also be conducted for all volunteers. Volunteers should not be left unsupervised with youths until the criminal history results are returned.

The background checks for employees or volunteers should include the following:

- Pennsylvania State Police certification;
- Pennsylvania Childline (Department of Public Welfare) certification; and
- FBI Fingerprint certification

Permission to conduct a background check shall be obtained from each applicant, either employee or volunteer, prior to executing it.

### **E. Employment Decisions**

The hiring committee shall review each background check and agree that the applicant is eligible for employment. The Associate for Youth Ministry and/or other designated Conference staff shall review the background checks for volunteers and agree that the applicant is eligible for service as a volunteer.

Before the Conference makes an offer of employment, those involved in the screening process should review all information obtained. The employment process should last a sufficient length of time to allow Penn West Conference to carefully collect and evaluate information about applicants and to allow the applicant time to self-select out of the process if they have concerns about the position.

Where a criminal record exists for either employees or volunteers, consideration shall be given to:

- Seriousness of the crime;
- Statutes that may legally disqualify the person from working with minors;
- Length of time since the last offense;
- Pattern of criminal activity; and
- Activities the applicant has been involved in since the offense(s) occurred.
- Specific responsibilities for the role being applied for.

Conviction for the following crimes shall be considered barriers to employment or volunteer work with children:

- Violent crimes;
- Sexual assault;
- Sexual abuse or neglect of a child; and

Arrest data are not grounds for disqualification, only convictions. The status or relevance of other crimes will be considered individually.

## **VI. Training**

Volunteers who are working with youth will receive this policy and will receive appropriate training for the event at which they are scheduled to volunteer.

## **VII. Monitoring and Supervision**

When Authorized Ministers, 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. General Supervision**

General supervision procedures:

- 1. Administrative and Supervisory Visits to Youth Programs-** Youth supervisors and administrators 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 related 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. Refer to local licensing requirements and general best practice guidelines for establishing adult-to-youth ratios.
- 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. Authorized Ministers, employees, and volunteers must be aware that close line of sight supervision is required when monitoring programs that mix age groups.

### **B. Monitoring Youth in Facilities**

Effective monitoring is expected and emphasized at all Penn West Conference sponsored youth events.

### **C. Monitoring High Risk Activities**

Certain activities in youth events are considered to be higher risk and require more intentional, careful supervision. These activities include bathroom and shower activities, transition times and free times, transportation activities, and off-site and overnight activities. Training of volunteers will highlight best practices on these activities.

## **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 an Authorized Minister, 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 Suspected Abuse by an Adult**

#### **i. Employee or Volunteer Response to Abuse:**

As required by mandated reporting laws, Authorized Ministers, 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, Authorized Ministers, 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 Penn West Conference Associate for Youth Ministry and Conference Minister.

**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 it 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.

**Supervisors and Administrators Response to Abuse:**

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

- 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.

## **B. Responding to Suspicious or Inappropriate Behaviors or Policy Violations**

Because Penn West Conference is dedicated to maintaining zero tolerance for abuse, it is imperative that everyone actively participates in the protection of youths. In the event that an Authorized Minister, 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 Penn West Conference, 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
- Buying gifts for individual youths
- Making suggestive comments to youths
- Picking favorites

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:

- 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.

#### **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:

- 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 or volunteer who has been reported.
- Review the file of the employee or volunteer 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.
- c. If more information is needed, interview and/or survey other Authorized Ministers, employees, and volunteers or youths.

#### **Organizational Response:**

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

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

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. Penn West Conference recognizes that the following interactions are high risk and should be prohibited:

- Hazing
- Bullying
- Derogatory name-calling



- Targeting youth based on race, sex, sexual orientation, gender identity, age, disability, or religion.
- 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:

- 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 your supervisor.
- Complete the necessary paperwork including what you observed and how you responded.
- Follow your supervisor's instructions regarding notifying the authorities and informing the parents of the 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.

**Supervisors and Administrators Response:**

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

- Meet with the staff 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.

#### **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:

- 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 Penn West Conference 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.

An incident of alleged abuse that requires medical or psychological care for a victim or family shall be reported to the Insurance Board by the Conference Minister and President. The latter shall discuss with the Insurance Board Claims Department whether the circumstances warrant initiation of Crisis Management services which may include psychological counseling. Upon approval, counseling services may be offered to a perceived victim(s), which may include family members.

## 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 Conference Minister 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 and Penn West Conference. Without intending ever to evade the media, contacts with media must be managed and conducted only by a person specifically designated by the Board of Directors to represent the church. No other person(s) may speak on behalf of the Conference. Unless designated differently by the Board in a particular circumstance, the exclusive spokesperson for the Penn West Conference shall be the Conference Minister and President.

Prior to speaking to media, the Conference Minister and President shall contact and consult with UCC Legal Counsel, to obtain an understanding of appropriate statements or admissions and issues of privacy that may apply to the situation.

The Conference Minister and President shall give immediate consideration to securing Insurance Board media relations and crisis management resources. Considering the speed of news cycles, a prompt determination is required, erring on the side of seeking help.

## **IX. Wider 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 Penn West Conference website, [www.pennwest.org](http://www.pennwest.org).

At the time children or vulnerable adults are enrolled in Penn West Conference programs, parents or legal guardians shall be provided a copy of this policy.

## **X. Acknowledgment of SafeConduct Policy and Procedure**

For Penn West Conference Staff and Volunteers:

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

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Signature of Employee or Volunteer

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Date