

FAITH BIBLE CHURCH CHILD PROTECTION POLICY

Approved by Elders: November 2020

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I. Introduction

1) PURPOSE

Faith Bible Church's main objective in implementing this Child Protection Policy is to reduce the risk of child abuse in our ministries. We also desire to protect our workers and the testimony of our church as a whole. We will do this by providing:

- An environment that fosters healthy relationships and spiritual learning and growth.
- A safer and more secure environment for all children who are entrusted to our care.
- Clear and shared guides to appropriate behavior by Staff and by volunteers.

2) DEFINITIONS

Within this document, the following definitions will apply.

- **ABUSED CHILD** – A child who is the victim of sexual activity, is endangered or neglected, or suffers physical injury, mental injury, or death other than by accident. Child abuse may be physical, sexual, emotional or mental, and may be the result of actions or a failure or refusal to act.
- **ACTIVITY LEADER** – The Worker who is in charge of a given ministry activity.

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- APPROVED WORKER – A Worker who has completed satisfactorily the initial screening process and all subsequent screening requirements (or the equivalent) as determined by the Child Protection Administrator.
- ASSISTANT (a.k.a. HELPER) – A person who is present to assist a Worker or Workers in an FBC ministry or activity. This person may be a Staff member or a volunteer (adult or minor).
- CHILD – Any person who participates as a child or student in an FBC activity in the ministry range from Nursery to Senior High, or any Special Needs person who is entrusted to an FBC ministry by a Parent or legal guardian.
- CPAT – FBC’s Child Protection Advisory Team.
- FELLOWSHIP – FBC Family and Regular Attenders.
- MINISTRY HEAD – The FBC volunteer(s) or Staff who is responsible to provide leadership to their overall ministry department (Ex: Nursery, VBS, Sunday School, etc.).
- PARENT – The custodial Parent or legal guardian of a child (or any adult surrogate whom the custodial Parent or legal guardian approves and designates to the Child Protection Administrator, FBC pastors or elders, Ministry Heads, or Activity Leaders). This EXCLUDES all adults who are not a custodial parent, guardian or designee of such person.
- STAFF – A paid FBC employee.
- WORKER – An adult with primary responsibility for providing care and/or oversight of a child or children in an FBC ministry or activity. A Worker may be a Staff member or a volunteer.

3) LEADERSHIP

Ultimate responsibility for the establishment of policies relating to child protection at FBC rests with the Board of Elders, who has approved this current policy and may change its provisions at any time.

This policy will be implemented through the cooperation, participation and diligence of FBC Staff, Ministry Heads, and Activity Leaders. FBC “approved” Staff, Ministry Heads, Activity Leaders, Workers and Assistants are responsible to monitor and guide the conduct of others, including Assistants, to ensure that this policy is followed.

A. The Child Protection Administrator.

The Board of Elders will appoint a pastor or other Staff person to administer child protection at FBC. This person may have one or more Staff Assistants approved by the Board of Elders. The Administrator’s responsibilities will include proactively assisting Ministry Heads and other Activity Leaders to ensure that this policy is followed; receiving, distributing and securely filing paperwork associated with the approval process; performing background checks; updating the approval summary records (including the “Child Protection Pipeline”); coordinating with the CPAT on policy training, consulting, research and review; managing a Child Protection line item in the annual budget; writing a Child Protection article for the Annual Report; and reminding the Board of Elders when a review of this policy is due.

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B. The Child Protection Advisory Team.

On behalf of the Board of Elders, and in coordination with the Child Protection Administrator, the Child Protection Advisory Team (CPAT) will provide coaching and training in child protection; policy implementation consulting; and policy research and/or review. This team will consist of individuals appointed by, and serving at the pleasure of, the Board of Elders. When possible the CPAT will include at least one pastor, one elder, and representatives from the ministries or departments affected.

CPAT members will appoint one of the team to serve as chair. This appointment may change at the pleasure of the CPAT. The chair will coordinate team activities and will serve as primary contact with those outside the team.

C. The Role of Others in FBC.

Other people with special interests or expertise to offer may work with or advise the CPAT.

We encourage all people concerned about child protection to:

1. Ask themselves, “What can I do or recommend to reduce the risk of abuse or harm in this situation?”
2. Convey observations and/or suggestions to the elders, Staff, CPAT members, Ministry Heads, Activity Leaders, and/or Workers.

4) ADMINISTRATION

- A. The names, titles, and contact numbers of the Child Protection Administrator and current members of the CPAT will be readily available on the FBC premises, and may be posted elsewhere as appropriate.
- B. Information files on operational activities, and screening and training records for paid and volunteer Workers, are managed by the Child Protection Administrator and are considered confidential. A Worker may have access to his or her records upon request; otherwise, only the Child Protection Administrator, approved FBC Staff Assistants, CPAT members, and active elders will have access to these records for FBC purposes. The Board of Elders will ensure that the Child Protection files are audited annually to verify compliance with the provisions of this policy.
- C. If a Worker requests to review his or her records, the review will occur at the church. The original records will remain in church custody. Upon written request by the Worker, a copy of his or her records may be made for the Worker by the church.
- D. In all cases, the Worker will not be permitted to view or get a copy of information from a reference when the person declined to share the reference information with the Worker.
- E. The Child Protection Administrator and the CPAT will review this policy, and revise it if needed, at least every two years. For each edition of this policy to be effective, it must be approved by the Board of Elders.

II. SCOPE

This policy recognizes four types of situations with varying degrees of responsibility:

1. **CONTROLLED.** These are ministries or activities which are organized and supervised by FBC Workers and where those FBC Workers have primary control of children's location and activities, whether on FBC premises or off-site. In a CONTROLLED situation this policy and relevant ministry policies apply in full.
2. **DISCLAIMED.** These are FBC ministries or activities which are organized by individuals in the FBC fellowship, whether on FBC premises or off-site, where Parents or their designees have primary or substantial control of children's location and activities. In a DISCLAIMED situation the FBC Ministry Head or Activity Leader is expected to provide a disclaimer of FBC responsibility either verbally or in writing. Sample disclaimer: "Families and individuals participating in this activity assume responsibility for the supervision and protection of the children they bring to the activity."
3. **PRIVATE.** These are activities conducted on FBC premises with FBC permission but organized and supervised by organizations or groups not formally associated with FBC. In a PRIVATE situation, an authorized representative of the organization or group must sign a Liability Release covering the ministry or activity. A copy of the Liability Release should be provided to the Child Protection Administrator. FBC, under no circumstances, assumes responsibility for supervision, control, or protection of the children who may be involved in these PRIVATE activities. Such responsibility shall be the responsibility of the Parents and of the organization hosting such PRIVATE activities.
4. **CASUAL.** These are scenarios wherein children are present on the FBC premises informally and in the company of Parents or others, where those Parents or others have primary or substantial control of children's location and activities. FBC, under no circumstances, assumes responsibility for the supervision, control, or protection of the children who may be involved in these CASUAL scenarios. Such responsibility shall be the responsibility of the Parents of the children.

BIG PICTURE

There are four operational dimensions of this policy, each of which requires diligent execution and record-keeping:

1. Screening of staff and volunteers.
2. Supervision of ministry activities.
3. Education and training of staff, volunteers, and others in the FBC Fellowship.
4. Response and reporting for alleged or actual incidents or policy violations.

III. SCREENING

Screening helps to ensure that only approved people of good reputation have primary supervision responsibility for children in our care during a ministry activity.

1) ELIGIBILITY REQUIREMENTS

A. Eligibility requirements for Workers and Assistants obtained from outside FBC.

1. Workers and Assistants obtained from outside the FBC Fellowship, whether compensated or not, must have approval by the Child Protection Administrator prior to service to FBC.
2. For such a Worker or Assistant, the Child Protection Administrator will obtain confirmation of qualifications equivalent to the FBC screening process (defined below) from the proposed person, the person's employer(s), and/or others as appropriate.

B. Eligibility requirements for Workers and Assistants from the FBC Fellowship.

1. Ordinarily, Workers and Assistants must be Family or Regular Attenders of FBC with significant participation for at least six months before they can work with children.
2. On a case-by-case basis the Child Protection Administrator, along with consultation with others as needed, may grant an exception to the six-month participation policy and will document the exception and its rationale in the child protection file for that person.
3. To become approved, all Workers must complete a formal screening process (defined below). All Workers must complete their screening process within one year of beginning the process.
4. Assistants may become approved via the screening process (defined below), and are encouraged to do so.

C. Age eligibility requirements for ALL Workers and Assistants.

1. Workers must be age 18 or older.
2. Minors (less than age 18) may serve as Assistants as appropriate. All Assistants, whether minors or adults, must be assessed by the Ministry Head or Activity Leader to be sufficiently mature for the permitted duty.

D. Other eligibility requirements for ALL Workers and Assistants.

1. FBC reserves the right, at any time, to repeat one or more screening steps, to conduct fingerprinting, and/or to conduct in-depth investigation of any applicant, Worker, or Assistant.
2. FBC reserves the right to disqualify any individual who does not satisfactorily complete the initial or ongoing screening process.

2) SCREENING PROCESS

A. The screening process for FBC Workers (and encouraged also for FBC adult Assistants).

1. The applicant must complete a formal screening process, which includes at least the following elements:
 - a. Completed and signed FBC application form.
 - b. Completed and signed FBC background check consent form.
 - c. Completed reading the FBC Child Protection Policy and completed and signed an agreement to the FBC Child Protection Policy.
 - d. Personal interview by the relevant FBC Ministry Head or designee.
 - e. Completed reference checks.
 - f. Completed background check(s).
 - g. Completed motor vehicle check (applies only to Workers and Assistants likely to drive with children as passengers to or from “controlled” activities).
 - h. Completed an introductory FBC Child Protection training session.

At its discretion the Child Protection Administrator may use an expedited screening process defined by the CPAT for (1) FBC Staff and (2) any current Elder, Deacon, or Trustee in light of their recent screening process for their role in that ministry area. A signed and dated memo will be kept on file with their other screening paperwork noting the approval for that expedited process. A signed Policy Agreement Form, completed Background Check, and completed training would still be required.

References must include all organizations who serve children and with which the applicant worked or volunteered within the past five years, and at least one person who has been part of the FBC Fellowship for at least one year.

2. For each applicant, the Child Protection Administrator (personally or through the appropriate Ministry Head) will:
 - a. Verify that all requested elements are provided by the applicant.
 - b. Check all data in the application, looking for gaps and inconsistencies.
 - c. Contact all references and record the results, noting especially any information requested but not verified or obtained.
 - d. Conduct the appropriate background check(s) and record the results.
 - e. Verify the applicant’s attendance and age eligibility and introductory training.
 - f. Conduct an in-person interview, record explanations of gaps or inconsistencies, and explain any recommended exceptions to our expectations. If possible, the personal interview will be conducted in the presence of more than one person, so that input and opinions can be compared.
 - g. Determine and record the applicant’s eligibility.
 - h. Notify the applicant about the outcome of the process.

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B. The screening process for FBC older minors (Grade Seven or above, but less than age 18).

An older minor who wishes to serve as an Assistant is required to complete a preliminary screening process, including at least:

1. Completed reading the FBC Child Protection Policy and completed and signed an agreement to the FBC Child Protection Policy.
2. Completed an introductory FBC Child Protection training session.

Upon attaining age 18, a person who wishes to be approved as a Worker or adult Assistant must complete all previously omitted steps of the formal screening process for adults.

IV. SUPERVISION

Supervision helps to ensure that risky situations are mitigated in ministry.

1. FBC approved Ministry Heads, Activity Leaders, Workers and Assistants are responsible to monitor and guide the conduct of others, including Assistants, to ensure that this policy is followed wherever and whenever it applies.
2. More specific supervision guidelines, to supplement this policy, may be created by the various ministries for their situations.

Basic Principle: Assess the Risk and Respond to the Risk

In situations with children, there are always three abuse risk factors to be aware of:

1. Isolation. Risk increases when isolation increases.
2. Accountability. Risk increases when accountability decreases.
3. Power and Control. Risk increases when there is an imbalance of power, authority, influence, and control between a potential abuser and a potential victim.

FBC Workers and participants should continually evaluate these risk factors in their situation, and when possible, increase supervision when risk increases. **THIS PRINCIPLE UNDERLIES ALL SUPERVISION GUIDELINES.**

1) Coverage

- A. Each activity will have a clearly designated Worker in charge: the “Activity Leader.”
- B. There should be at least one Approved Worker and one additional Worker or Assistant present at an activity covered by this policy. It is recommended that each ministry decide on appropriate Worker/Assistant-to-children ratios to provide adequate supervision.

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- C. Having only one Approved Worker with a group (2 or more) is permitted with junior and senior high students as long as they avoid a 1:1 ratio so that they can maintain “two-person integrity”.
- D. Except in an emergency, there must not be a Worker or Assistant alone with one child at an activity covered by this policy.
- E. Workers should arrive for the activity prior to the arrival of the first child and remain until after the departure of the last child.
- F. Parents are encouraged to observe or assist in an activity with the explicit knowledge of the Activity Leader.
- G. In a situation where additional help is warranted, and an adult (age 18 or older) or minor volunteers to assist, they may do so at the discretion of the Activity Leader.

2) Custody and Identity of Children of Kindergarten Age or Younger

- A. It is recommended that children in Nursery use a security tag system. In this system, no child will be released unless the corresponding tag has been received by the Activity Leader or designee.
- B. It is recommended that each child in Nursery through Kindergarten wears a name tag to allow easy identification.
- C. Workers and Assistants shall strive to ensure that the children do not leave an activity unattended.

3) Custody of Children Older Than Kindergarten Age

- A. Children in Grades One or Two should be released to the custody of a Parent or designee, and the child’s departure should be noted. The Parent or designee becomes responsible for the child.
- B. Children in Grade Three or above may be dismissed from the activity to meet their Parents, family members, or other designated person(s), unless Parents have indicated otherwise. The child’s departure should be noted. The Parents, family members, or designee(s) become responsible for the child.

4) Attendance Records

- A. For ministries to children in Grade Six and under, and for Special Needs ministry, Workers should complete an attendance record, to include at least the activity name, date and location; names of all of those present (including Workers, other adults, and minors); and (when possible) a contact number for Parents of participating children (if the Parents are not on the premises or in the activity area).
- B. It is recommended that, for each child of Kindergarten age and younger, the record will also show the location of the Parent (or other person responsible for the child) on the premises or in the activity area (if that is so).

5) Visibility

- A. When possible, all activity in a given space must be readily visible to outside observers. Any exception must be documented and this record must be given to the Ministry Head, with a copy to the Child Protection Administrator.
- B. At least one door in each activity room or area must be unlocked to permit inspection. An exception would be the Nursery where there is a large open window area providing visibility.
- C. One-on-one counseling must be conducted where all participants remain visible, and preferably when other people are nearby.
- D. Pastors and elders, and persons approved by the screening process, have the right to visit and observe any activity, classroom, or church-sponsored program at any time, unannounced.

6) Discipline

- A. Discipline should encourage character and behavior that honors the Lord and should emulate His firm, patient, loving care for us.
- B. Respect for and by children is expected, and discipline is expected to be appropriate for the child's age. Children under the care of FBC Workers will not be spanked or experience any form of physical discipline.
- C. Communication or behavior that could be interpreted as humiliating, degrading, or threatening is inappropriate and unacceptable.

7) Bathroom Visits

For children in Grade Six or younger:

- A. Workers should never be alone with a child in a bathroom with the door closed and never be in a closed bathroom stall with a child.
- B. The most frequently used bathrooms are chosen. On FBC premises, this includes the main bathrooms, the gymnasium bathrooms, and Nursery bathroom.
- C. Children should visit the bathroom in same-sex pairs/groups who stay together.
- D. In Grade 3 or younger, at least one approved adult Worker (of the same gender as the children) accompanies or supervises children.
- E. The bathroom's door remains open while children are using the bathroom.
- F. If a child needs assistance in a stall, the stall door must remain open. The Worker should use verbal assistance only or contact the child's parent to assist their child in the restroom.

8) Communication and Physical Contact

- A. All contact with children should be above reproach, build trust and confidence instead of suspicion or discomfort, and convey God's love and holiness.
- B. Staff, Workers and Assistants will have no romantic involvement with a child.
- C. Children receiving individual counseling should be told that they are free to discuss any aspects of the counseling process with a Parent or other adult, especially if they are uncomfortable about anything that occurs in counseling.
- D. Special documented arrangements may be made between the Ministry Head, Workers, and Parents for the care of a Special Needs individual.
- E. Anyone working with children should exercise caution when communicating one-on-one with a child or when engaging in one-on-one digital activities (such as games, social media, and networking) with a child. Staff, Workers and Assistants are encouraged to save copies of conversations whenever possible, especially those that concern personal sharing by a child. Since digital communication (Texting, Social Media, etc.) is most common and effective with teens, parents will be notified annually that youth group leaders use these methods of communication with their children. Parents can choose to monitor this communication or ask FBC youth workers to not communicate directly with their children in this way.

9) Gifts to children

No FBC Staff, Workers, or Assistants are to give gifts to individual children. Because gift giving can be a form of buying loyalty or silence, it is recommended that gift giving be done on a group basis. Gifts should be modest and appropriate to the occasion.

10) Physical Safety

- A. Each ministry should observe the guidelines and procedures provided by the Safety Team.
- B. Special Issues with Overnight or Off-Site Activities
 1. For any overnight or offsite activity, and any activity requiring transportation, the Activity Leader must have from each participant a Permission Form signed by the child's Parent within the most recent twelve months.
 2. It is recommended that FBC Workers at an off-site activity be age 21 or older. At the explicit discretion of the Activity Leader, Workers of age 18 to 20 may be employed, and younger persons may serve as Assistants with close supervision by Workers.
 3. The Activity Leader will provide an adequate number and mix of Workers and Assistants to supervise the activity. See "Coverage" above. For any co-ed overnight activity, there must be both male and female Workers.

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4. In arranging housing/sleeping for children, males and females must be separated. An exception may be made for a family to be housed together.
5. The Activity Leader will ensure that “unapproved” adults (age 18 or older) (other than a child’s Parent) are not left with children in a situation where no approved Workers can observe closely and continually.

C. Drivers for off-site activities must:

1. Be age 21 or older EXCEPT when:
 - 1) transporting only their siblings or relatives with Parental permission OR
 - 2) a person of age 18 or older, but less than age 21, has the explicit consent of the Activity Leader to be a driver for that specific activity, and has the explicit consent of the Parent(s) of the children to be transported.
2. Possess a valid driver’s license appropriate to the vehicle being driven.
3. Possess current proof of insurance for the vehicle.
4. Ensure that all vehicle occupants use seat belts properly in transit.

A Worker should not drive alone with a person of the opposite gender who is not an immediate family member. Adult Workers are permitted to drive alone with teens of the same gender when necessary for 20 minutes or less with parents’ permission.

V. EDUCATION AND TRAINING

Education and training aim to ensure that:

- FBC leaders fully and continually support our Child Protection Policy.
- FBC inquirers and visitors understand that we take child protection seriously.
- FBC Fellowship understands the rationale and scope of our policy.
- FBC Staff, volunteers, and Workers obtained from outside our fellowship are familiar with our policy and abide by its provisions.

1) The Fellowship

- A. This Child Protection Policy will be posted on the FBC website and featured in the Introduction to FBC classes. Copies will be available in the church office.
- B. To help improve ministry flexibility, to increase policy understanding and support, and to enhance the overall level of child protection at FBC, the CPAT will encourage Parents to undergo the screening process and policy training.

2) Staff and Workers

- A. The CPAT will offer introductory training in the policy to all elders, Staff, and Ministry Heads, so that they know the content and can enforce its provisions.
- B. For new Workers and Assistants, it is recommended that the CPAT (or designee) offers introductory training in child protection to groups at least twice a year, and to individuals opportunistically as appropriate.
- C. For veteran Workers and Assistants, it is recommended that the CPAT (or designee) offers refresher training in child protection supervision and response/reporting.
- D. The Child Protection Administrator will maintain records of training attendance.

VI. RESPONSE AND REPORTING

Response and reporting help to ensure that FBC acts in appropriate ways for the benefit of all concerned.

1) Response to actual or perceived violations of policy.

- A. Individuals are encouraged to report (verbally or in writing) actual or perceived violations of this policy or ministry policies “up the chain” to the Activity Leader, to the Ministry Head, to a pastor or to an elder. This should be done in the spirit of constructive criticism.
- B. The Activity Leader or Ministry Head will use the report as a teaching moment with those involved. To document improvement possibilities and/or to document repeated admonitions to an individual, it is recommended that the Activity Leader, Ministry Head, pastor or elder complete a Child Protection Incident Report. The original completed report should be filed by the Child Protection Administrator.
- C. At the discretion of the Board of Elders, Workers who fail to respond substantially to correction or advice may have their child protection approval revoked.

2) Response to an incident or observation.

The Board of Elders expects aggressive, immediate, discreet, good-faith handling of alleged or suspected incidents or evidences of child abuse. All laws will be followed. The Child Protection Administrator and/or available CPAT members will consult as needed on response and reporting.

It is important to know that:

- Ohio law provides that anyone reporting suspected child abuse or participating in a judicial proceeding resulting from such reports, is immune from any civil or criminal liability that otherwise might be imposed as a result of such actions when taken in good faith. (ORC Section 2151.421(G))

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- A person who knowingly makes or causes another person to make a false report that alleges that any person has committed an act or omission that resulted in a child being an abused or neglected child is guilty of a violation of the law. (ORC Sections 2151.421(H)(3) and 2921.14)
- A. A Worker who observes, or receives information about, an abuse incident or suspicious circumstances (including possible indicators of abuse) will:
1. Confront the situation promptly, firmly, respectfully, and discreetly.
 2. If appropriate and possible, move the affected child(ren) to a safe place.
 3. Quickly report verbally “up the chain.”
 4. Promptly initiate a Child Protection Incident Report.

It is recommended that other Workers or Assistants who observe or receive information about an incident or suspicious circumstances participate in completing the incident report.

It is recommended that all meetings or conversations held in the course of responding to an incident have one or more witnesses present.

- B. The responding Activity Leader, Ministry Head, pastor or elder is responsible for these immediate next steps:
1. If appropriate, summon medical and/or police assistance (e.g., a 911 call).
 2. If appropriate, notify the Parent(s) of the child.
 3. Continue to complete and evaluate the Child Protection Incident Report.
 4. Decide whether to initiate abuse response action.
- C. If NO abuse response action is warranted, the responding Activity Leader, Ministry Head, **pastor or elder will:**
1. If appropriate, notify the FBC pastors and elders.
 2. Give the original completed incident report to the Child Protection Administrator.
- D. If abuse response action is warranted:
1. The responding Activity Leader, Ministry Head, pastor or elder will notify the FBC pastors and elders, in confidence.
 2. The Board of Elders (or designee) may consult with an attorney on further fact-gathering, reporting, or other recommended actions.
 3. The Board of Elders will appoint a media spokesperson. This may be an attorney.
 4. The Board of Elders (or designee), acting as Reporter, will notify the appropriate county’s child protective agency. Regardless of whether the agency advises FBC to file a report with them, the Reporter will record the agency representative’s name and other particulars of the call.

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5. The Board of Elders (or designee) will notify FBC's liability insurance company.
6. If the alleged or suspected abuse appears to implicate an FBC person, the Board of Elders will suspend that person from duties involving children, pending the outcome of related investigations.
7. Give the original completed incident report to the Child Protection Administrator.

3) Other follow-up to an incident.

- A. If formal abuse actions were pursued, it is recommended that pastoral and elder resources be made available as appropriate to the immediate parties involved and to their families.
- B. It is recommended that the Board of Elders consult with FBC's liability insurance company attorney or designated representative, and/or an attorney secured by FBC, on other formal follow-up actions, including (but not limited to):
 1. Informing the FBC Fellowship.
 2. Deciding whether to take action or further action on an FBC person.
- C. It is recommended that the Child Protection Administrator and/or CPAT review the Child Protection Incident Reports on file to look for ways to improve this policy, its implementation, and related training.