

Child Protection Policy

- A. **Purpose:** The bible clearly defines the innate value of children and God's heart for protecting the vulnerable. Believing that children are image bearers of God and our sacred trust, The First Baptist Church of Orlando, Inc. ("FBCO") intends to provide a nurturing and dynamic Christian environment that will foster a child's Christian faith. To that end, the purpose of this policy is to establish procedures that (1) protect the physical and emotional well-being of children; (2) comply with applicable laws; and (3) protect employees and volunteers who report abuse; and (4) clearly outline the procedures for appropriately responding to reports of abuse or neglect.
- B. **Definitions:**
1. **Volunteer:** A volunteer is any person who works with children and students at FBCO who is not employed as a staff member and does not receive pay, including persons under the age of 18 referred to herein as "student volunteers."
 2. **Staff/Employees:** Staff or employees refer to persons directly employed by FBCO.
 3. **Ministry Worker:** A ministry worker is anyone who works in FBCO children's or student ministries and encompasses both volunteers and staff.
 4. **Child/Children:** Florida Statute Section 39.01(11): "Child" or "youth" means any unmarried person under the age of 18 years who has not been emancipated by orders of the court.
 - a. **Kids:** For the purpose of this policy, the term "Kids" refers to the children's ministry at FBCO for babies, preschool age toddlers and children through grade five (5).
 - b. **Student:** For the purpose of this policy, the term "Student" refers to a child or youth attending grades six-twelve (6-12).
 - c. **Highschool:** Refers to Students in grades 9-12.
 5. **Guardian:** Refers to a child's legal guardian(s), including parents, foster parents and legally appointed guardians.
 6. **Abandoned:** Florida Statute Section 39.01(1): "Abandoned" or "abandonment" means a situation in which the parent or legal custodian of a child or, in the absence of a parent or legal custodian, the caregiver, while being able, has made no significant contribution to the child's care and maintenance or has failed to establish or maintain a substantial and positive relationship with the child, or both. For purposes of this subsection, "establish or maintain a substantial and positive relationship" includes, but is not limited to, frequent and regular contact with the child through frequent and regular visitation or frequent and regular communication to or with the child, and the exercise of parental rights and responsibilities. Marginal efforts and incidental or token visits or communications are not sufficient to establish or maintain a substantial and positive relationship with a child. A man's acknowledgment of paternity of the child does not limit the period of time considered in determining whether the child was abandoned. The term does not include a surrendered newborn infant as described in s. 383.50, a "child in need of services" as defined in chapter 984, or a "family in need of services" as defined in chapter 984. The absence of a parent, legal custodian, or caregiver responsible for a child's welfare, who is a servicemember, by reason of deployment or anticipated deployment as defined in 50 U.S.C. s. 3938(e), may not be considered or

used as a factor in determining abandonment. The term does not include a surrendered or a “family in need of services” as defined in chapter 984. The incarceration, repeated incarceration, or extended incarceration of a parent, legal custodian, or caregiver responsible for a child’s welfare may support a finding of abandonment.

7. **Abuse:** Florida Statute Section 39.01(2): “Abuse” means any willful act or threatened act that results in any physical, mental, or sexual abuse, injury, or harm that causes or is likely to cause the child’s physical, mental, or emotional health to be significantly impaired. A man’s acknowledgment of paternity of the child does not limit the period of time considered in determining whether the child was abandoned. The term does not include a surrendered newborn infant as described in s. 383.50, a “child in need of services” as defined in chapter 984, or a “family in need of services” as defined in chapter 984. The absence of a parent, legal custodian, or caregiver responsible for a child’s welfare, who is a servicemember, by reason of deployment or anticipated deployment as defined in 50 U.S.C. s. 3938(e), may not be considered or used as a factor in determining abandonment. Abuse of a child includes acts or omissions. Corporal discipline of a child by a parent or legal custodian for disciplinary purposes does not in itself constitute abuse when it does not result in harm to the child.
8. **Juvenile Sexual Abuse:** Florida Statute Section 39.01(38): Child-on-child sexual abuse is any sexual behavior by a child (17 years and under), to another child, which occurs without consent, without equality, or as a result of coercion. For the purpose of this subsection, the following definitions apply:
 - i. “Coercion” means the exploitation of authority or the use of bribes, threats of force, or intimidation to gain cooperation or compliance.
 - ii. “Equality” means two participants operating with the same level of power in a relationship, neither being controlled nor coerced by the other.
 - iii. “Consent” means an agreement, including all of the following:
 - a) Understanding what is proposed based on age, maturity, developmental level, functioning, and experience.
 - b) Knowledge of societal standards for what is being proposed.
 - c) Awareness of potential consequences and alternatives.
 - d) Assumption that agreement or disagreement will be accepted equally.
 - e) Voluntary decision.
 - f) Mental competence.
9. **Neglect:** Florida Statute Section 30.01(50): “Neglect” occurs when a child is deprived of, or is allowed to be deprived of, necessary food, clothing, shelter, or medical treatment or a child is permitted to live in an environment when such deprivation or environment causes the child’s physical, mental, or emotional health to be significantly impaired or to be in danger of being significantly impaired. The foregoing circumstances shall not be considered neglect if caused primarily by financial inability unless actual services for relief have been offered to and rejected by such a person. A parent or legal custodian legitimately practicing religious beliefs in accordance with a recognized church or religious organization who thereby does not provide specific medical treatment for a child may not, for that reason alone, be considered a negligent parent or legal

custodian; however, such an exception does not preclude a court from ordering the following services to be provided, when the health of the child so requires:

- a. Medical services from a licensed physician, dentist, optometrist, podiatric physician, or other qualified health care provider; or
- b. Treatment by a duly accredited practitioner who relies solely on spiritual means for healing in accordance with the tenets and practices of a well-recognized church or religious organization.
- c. Neglect of a child includes acts or omissions.

C. Applicable Florida Statutes:

1. Pertinent Provisions regarding the Mandatory reports of child abuse, abandonment, or neglect. Florida Statute Section 39.201: A person is required to report immediately to the central abuse hotline established in s. 39.101, in writing, through a call to the toll-free telephone number, or through electronic reporting, if he or she knows, or has reasonable cause to suspect, that any of the following has occurred
 - a. Child abuse, abandonment, or neglect by a parent or caregiver, which includes, but is not limited to, when a child is abused, abandoned, or neglected by a parent, legal custodian, caregiver, or other person responsible for the child's welfare or when a child is in need of supervision and care and has no parent, legal custodian, or responsible adult relative immediately known and available to provide such supervision and care.
 - b. Child abuse by an adult other than a parent, legal custodian, caregiver, or other person responsible for the child's welfare. The central abuse hotline must immediately electronically transfer such reports to the appropriate county sheriff's office.
 - c. Any person who knows, or has reasonable cause to suspect, that a child is the victim of sexual abuse or juvenile sexual abuse shall report such knowledge or suspicion to the central abuse hotline, including if the alleged incident involves a child who is in the custody of or under the protective supervision of the department.
2. Pursuant to Florida Statute Section 39.201.(b)2. the following "A person making a report to the central abuse hotline whose occupation is in any of the following categories is required to provide his or her name to the central abuse hotline counselors:"
 - a. Physician, osteopathic physician, medical examiner, chiropractic physician, nurse, or hospital personnel engaged in the admission, examination, care, or treatment of persons;
 - b. Health or mental health professional other than one listed in subparagraph 1.;
 - c. Practitioner who relies solely on spiritual means for healing;
 - d. School teacher or other school official or personnel;
 - e. Social worker, day care center worker, or other professional child care, foster care, residential, or institutional worker;
 - f. Law enforcement officer; or
 - g. Judge.
 - h. The names of reporters shall be entered into the record of the report, but shall be held confidential and exempt as provided in s. 39.202.

3. Florida Statute Section 39.204 reads as follows: The privileged quality of communication between husband and wife and between any professional person and his or her patient or client, and any other privileged communication except that between attorney and client or the privilege provided in s. 90.505 (clergy privilege), as such communication relates both to the competency of the witness and to the exclusion of confidential communications, shall not apply to any communication involving the perpetrator or alleged perpetrator in any situation involving known or suspected child abuse, abandonment, or neglect and shall not constitute grounds for failure to report as required by s. 39.201 regardless of the source of the information requiring the report, failure to cooperate with law enforcement or the department in its activities pursuant to this chapter, or failure to give evidence in any judicial proceeding relating to child abuse, abandonment, or neglect.

Privileged Communication: In cases involving child abuse or neglect, 39.204 abolishes the privileges between husband and wife and between any professional and his/her patient/client except the lawyer-client privilege and the clergy privilege (90.505). For members of the clergy, if a perpetrator confesses confidentially to a member of the clergy for the purpose of seeking spiritual counsel and advice, the communication remains confidential and there is no duty to report to DCF.

4. Immunity from liability in cases of child abuse, abandonment or neglect: Florida Statute Section 39.203: (1)(a) Any person, official, or institution participating in good faith in any act authorized or required by this chapter, or reporting in a good faith any instance of child abuse, abandonment, or neglect to the department or any law enforcement agency, shall be immune from any civil or criminal liability which might otherwise result by reason of such action.

a. Applicable Portion of Florida Statutes to FBCO:

- i. Duty to report: All FBCO employees and volunteers must report incidents of abuse, abandonment or neglect of a child to the Department of Children and Family Services Hotline. The phone number for the hotline is 1-800-96-ABUSE.
- ii. Failure to report: A person who is required to report incidents of abuse, abandonment or neglect of a child and fails to do so, or prevents another person from doing so, is guilty of a third-degree felony. Florida Statute Section 39.205(1).
- iii. Immunity from liability: Any person who in good faith reports an instance of child abuse, abandonment or neglect to the Department of Children and Family or any law enforcement agency is immune from any civil or criminal liability that may result from such action. Florida Statute Section 39.203(1)(a).
- iv. Clergy privilege: The Florida Rules of Evidence provide that communication between clergy and an individual consulting with him for the purpose of seeking spiritual advice in the clergy's professional capacity are privileged.

- D. **Policy:** It is the policy of FBCO that extensive precaution and safeguards are to be implemented and observed to prevent child abuse of all types at FBCO, and to swiftly address and resolve all suspicions and allegations of abuse as outlined in this policy. FBCO maintains a **zero-tolerance**

policy for child abuse and will strive to protect children and workers with reasonable safeguards, and to respond appropriately to allegations of child abuse or neglect.

E. Governance:

1. The Board of Trustees and FBCO executive leadership shall create and implement policies and procedures for preventing, reporting and addressing child abuse. The Chairman of the Board of Trustees shall be notified of inquiries and investigations taking place, as well as the Chairman of the Personnel Team if involving a staff member, as outlined in FBCO's Misconduct Investigation Policy.
2. Church executive leadership shall enforce and provide oversight of policies and procedures, while the Child Safety Coordinator and Child Safety Team at each FBCO campus will ensure implementation of, and adherence to, policies and procedures.
3. FBCO officers, leaders, staff and volunteers will review child protection policies and procedures, and attest to such review in writing, annually.
4. All child protection policies, procedures and compliance will be reviewed annually by the Child Safety Team and will report such review to the Board of Trustees to be filed in the subsequent minutes.

F. Screening and Training:

1. Enlistment:
 - a. Volunteers considered for a ministry position (those working in a "shepherding" capacity with ongoing and direct contact with children) in the preschool, children and student areas of ministry must regularly attend, or have been associated with First Baptist Church Orlando, for a minimum of three (3) months and are encouraged to complete FBO's new attendee class ("Connect") before serving in these areas. A prospective ministry worker may, however, temporarily serve on the Guest Services Serve Team located in open, public areas with adequate supervision after having completed Connect if still waiting on the screening process to be completed. The three (3) month minimum attendance requirement may be waved with a recommendation of at least two (2) fellow attendees and approval from a ministry Director.
 - b. All prospective ministry workers with preschool, children and students will complete the established screening process which will include, at a minimum:
 - i. A completed application, which will include personal references. At least two of these references will be checked utilizing a standard set of reference check questions.
 - ii. A background check by a reputable public data screening firm. Students (17 and younger) serving in Kids or Students ministry will be required to go through the same application process as adults. However, since background checks cannot be run on minors, student volunteers will be required to provide two (2) adult references – one must be a guardian and one must be a non-relative. These references will be checked before the student is approved to serve. Additionally, a social media screening will be reviewed.
 - iii. Understanding of and commitment to the Code of Conduct, including a commitment to FBCO's standard of transparency.

- a) Standard of Transparency: FBCO reserves the right to request transparency regarding all communication between ministry staff and students, including requests to view text messages and other forms of electronic communication upon request. FBCO may perform random safety checks without prior notice at any time by requesting to view text conversations or social media engagement with specific students. Adult ministry workers will agree to comply with FBCO's standard of transparency prior to serving with students, which includes the duty to disclose private sensitive conversations with Students to leadership. FBCO's standard of transparency extends to conversations, phone calls and all forms of communication with students.
 - b) In addition to the Code of Conduct, employed FBCO staff will also complete the Affidavit of Good Moral Character.
 - iv. An interview utilizing a standard set of interview questions intended to identify and explore any areas of concern. The interview may be waived with approval from a ministry Director if the applicant is personally known to a FBCO staff member, is extensively involved at FBCO and has attended for an extended amount of time. The rationale for waiving the interview will be documented as part of the applicants screening process.
 - v. Training on standards, policies and procedures applicable to the area in which they will serve.
- c. The steps listed above will be completed prior to the person serving in the preschool, children or student areas of ministry, with the exception of those serving temporarily on the Guest Services Serve Team as outlined above.
- d. Guardian chaperones must complete the same screening process as a volunteer before supervising an event sponsored by FBCO, even if the event is located off Church premises.
- e. Individuals who have been arrested for, charged with, under probation for, convicted of, or has admitted to either sexual or physical abuse offenses cannot volunteer, nor will they be employed for any FBCO sponsored activity or program for preschool, children or students. These individuals may not serve in these areas. Automatic disqualifiers include child abuse (sexual or otherwise), abduction, murder/manslaughter, incest, sexual assault, and any offense listed as disqualifying in the legal jurisdiction. Lesser offenses will be evaluated based on relevance, surrounding circumstances, age of conviction or unlawful act, length of time since the activity occurred, indicators of ongoing pattern of behavior, evidence of repentance and rehabilitation, evaluation of current spiritual fitness, and any other mitigating circumstances.
 - i. Known convicted child sex offenders are prohibited from having contact with children of whom they are not legal guardians at any time while on FBCO property or at FBCO events, including Small Groups. If a sex offender is suspected of being on property or participating in any ministry of FBCO, a ministry director or pastor will work with the head

of security to ascertain if the person is listed on the national Public Sex Offender Registry to verify the nature of the individual's offense. Once a convicted child sex offender is identified and confirmed on the national registry, a FBCO ministry director or pastor, in collaboration with the head of security as appropriate, will make contact with the offender to explain FBCO's sex offender policy and review the Registered Offender Conduct Agreement.

- ii. Known convicted child sex offenders who attend FBCO programming will be required to:
 - a) Review, agree to and sign the Registered Offender Conduct Agreement, with an understanding that if they violate the standards outlined, they will not be welcome back.
 - b) The Offender must agree to never be alone with any child (of whom he/she is not a guardian) at FBCO at any time, including use of restrooms.
 - c) The Offender must agree to not enter Kids and Student areas without a chaperone. If the offender has children, alternate plans will be agreed upon in advance as to the most appropriate way to have the children delivered to the Kids and Student spaces. Otherwise, the offender must agree to not enter the Kids and Student spaces.
 - d) The Offender will be asked to adhere to the guidance and oversight of FBCO leadership, including placement in an appropriate Small Group or Celebrate Recovery program, as applicable.
 - e) The Offender will be asked to provide a copy of their driver's license or identification, which will be kept on file.
 - f) The Offender will be made aware that other pastors and key leaders will be made aware of his/her presence on campus as appropriate (with accompanying photo).
 - g) The Offender will be asked to provide the contact information for their probation officer.
 - h) The offender will be asked to check in with the head of security, campus director, or a pre-determined point of contact upon arriving on FBCO property and provide an outline of all plans for participation for that visit, including the locations on property the offender plans to be, and then check out when leaving.
- iii. Exceptions to the requirements for child sex offenders with lesser, non-predatory offenses may only be approved by the Senior Associate Pastor or the Pastor of Ministries and Administration. Offenses will be evaluated based on relevance, surrounding circumstances, age of conviction or unlawful act, length of time since the activity occurred, indicators of ongoing pattern of behavior, evidence of repentance and rehabilitation, evaluation of current spiritual fitness, and any other mitigating circumstances.

- f. Updated background checks will be performed annually for all FBCO staff and volunteers. Staff and volunteers are required to notify FBCO of any changes throughout the year that may affect their qualifications to work with children. The annual screening will also include review of policies and procedures with attestation in writing.
- 2. Training:
 - a. Training of ministry workers will be provided by an approved and knowledgeable trainer. Approved trainers include FBCO Student and Kids staff serving as Coordinators, Directors, Managing Directors, and Pastors. These team members will be knowledgeable on all FBCO policies, completed training to include Sexual Abuse Awareness and Screening Workers, and will have previous ministry related experience.
 - b. Training for ministry workers will include a review of state laws requiring the reporting of child abuse and neglect, including definitions and procedures. Training will also include at a minimum spiritual standards and biblical ethics, childcare safety protocols, security protocols, check-in and out procedures, child to adult ratios, proper hygiene and health procedures, appropriate touch and interaction, and emergency protocols.
 - c. Student volunteers are excluded from the requirement of watching abuse awareness and prevention videos and will receive other forms of age-appropriate training.
 - d. FBCO will provide periodic reoccurring training in the prevention and recognition of the sexual abuse of children, which will be documented. Staff and volunteer workers in the preschool, children and student areas of ministry are required to participate in these sessions.
 - e. Ministry Workers will be trained to understand they have no right to privacy or confidentiality regarding their own violations of FBCO's child safety protocols when such violations have been investigated and found to be true. FBCO may report to members, donors, other employers, or other organizations where the violator may serve.

G. Operations:

- 1. Buildings and Spaces:
 - a. When possible, children's ministry areas should be equipped with video surveillance equipment. Ministry workers should be informed of, and acknowledge the presence and use of, surveillance for safety and security purposes. Confined spaces not equipped with video surveillance will be subject to regular, unannounced visits from the Child Safety Coordinator or his/her designee.
 - b. Ministry areas and spaces should be well lit and in safe working condition. Spaces should have limited and securable access points. When possible, the added visibility of glass windows into main meeting spaces is preferable.
 - c. Spaces will have age-appropriate access control with established check-in/check-out procedures and attendance documentation.

- d. Spaces, toys and equipment in all Student and Kids areas should be cleaned regularly. In the event of an illness outbreak, classrooms, toys and equipment should receive additional cleaning.
 - e. Emergency situations and evacuation standards and guidelines shall be maintained and reviewed annually which shall include, at a minimum, responses to fire, hurricane, and active shooter scenarios. Ministry workers will receive training on how to handle emergency situations and evacuations.
2. Supervision:
- a. Rule of two: A minimum of two ministry workers will be present at all times in teaching and social situations sponsored by FBCO. Specifically:
 - i. A ministry worker should never be alone with a child. It is important that all interactions with children be observable by others for the safety and accountability of all.
 - ii. One ministry worker may not take a group of preschoolers, children or student out socially. Two ministry workers must always be present.
 - iii. One ministry worker may not provide transportation for a child to or from a FBCO event. Two ministry workers must be present.
 - iv. If an unplanned situation occurs resulting in only one ministry worker being present with children, immediately inform the area's leader or supervisor to locate a second ministry worker as quickly as possible. If safe to do so, children should be moved to a more public and visible location (open door, unobstructed window) until a second ministry worker arrives.
 - b. The Child Safety Coordinator (Next Gen Pastor), leader or overseer in each area will personally supervise ongoing programs and make unannounced visits into each classroom regularly.
 - c. Special events requiring childcare, such as vacation bible school, will follow all standards outlined in this policy. Special events for the whole family which do not require childcare, such as fall festivals and the like, will be designed with child safety in mind but guardians will retain full responsibility for their children.
3. Documentation:
- a. Guardians will be notified of offsite events in writing (such as email) prior to the event, including any identified risks, precautions, sleeping arrangements, transportation, supervision, and other relevant information.
 - b. Guardians must sign a waiver and release of liability as part of the permissions form, including medical information/permission as needed.
 - i. Overnight events only: Prescription medication and over-the-counter drugs must be approved by the guardian and disclosed to the FBCO staff member supervising the student, including clear instructions and parameters for administration.
 - ii. Overnight events only: Children or Students may not have possession of any medications unless they are 18+ years old, except for medications necessary for emergency use (inhalers, Epipens...etc.). All prescription and non-prescription drugs must be distributed by a registered nurse.
 - c. Relevant forms must be accessible to those supervising offsite trips.

- d. Documents, waivers and attendance records related to preschool, Kids and Students are to be securely kept on file for a minimum of ten (10) years in accordance with FBCO's record retention policy.
 - e. All personnel and volunteer records should be stored securely. All allegations, inquiries, investigations (including findings), or incident reports should be documented and permanently filed securely and confidentially. Records should be retained for at least 10 years.
 - f. FBCO will make every effort to only use images of FBCO children with written guardian consent/waiver. The use of picture and video images of children at FBCO will not be used if a guardian expressly requests such (preferably in writing).
4. Transportation and FBCO Sponsored Offsite Events:
- a. Volunteers and staff who transport children not related to them on behalf of FBCO to and from church related functions will be pre-approved by leadership and should be screened and trained in accordance with this policy. The only exception to the Rule of Two in transportation situations is when leadership and guardians have approved and there is more than one child in a vehicle.
 - b. Drivers should be in good standing as evidenced by a driver history check.
 - c. FBCO obtains a copy of a valid driver's license and current vehicle insurance and retains on file for each driver.
 - d. Offsite Student and Kids activities and events sponsored by FBCO, as well as overnight accommodations, must be pre-approved by the leader of the corresponding department and be in adherence to the safety standards and precautions outlined in this policy.
 - e. Overnight Rooming: Overnight FBCO sponsored events require gender appropriate supervision in accordance with the Rule of Two. Sleeping areas must be separated appropriately by age and gender. Students/children are not permitted to leave overnight events without authorization from FBCO leadership or prior authorization from the guardian(s).
 - i. Adult leaders should never sleep in the same room or bed with a student. In instances that require extra care for a student (Disability, etc.) an adult may be required to stay in the room with written guardian request or permission.
 - ii. Adult leaders should never be in a room alone with a student.
 - iii. In rooming situations where an outside protective door is present, inside rooming doors should always remain open.
 - iv. Do not change clothes in front of students.
 - v. Do not allow students to change clothes in front of you.
 - vi. Do not counsel students alone or behind closed doors.
 - vii. Every person present at overnight functions over 18 must be screened in accordance with this policy and pass a background check (including family members if staying in a home).
 - f. Child safety standards outlined in this policy apply only to pre-approved FBCO ministry-sponsored events and activities.
 - i. Guardians retain responsibility for their own child safety and protection measures when engaging in activities not expressly authorized by FBCO, or

when attending an event designed to be supervised by the guardians themselves, such as festivals, family events and the like.

- ii. Off-campus In-home Small Groups: Small groups must be approved by FBCO, and hosts/leaders will be screened with a background check. In order to satisfy the Rule of Two, either two screened and trained childcare workers will be retained or one will supervise while the other monitors periodically throughout the event. Special attention should be given regarding safe interaction between older and younger children. Parents must be notified of activities that children will participate in, including games or any media that will be viewed. Parents will be notified that they retain responsibility for the care and supervision of their own child/children. Attendance must be recorded and retained on file in accordance with FBCO's record retention policy.
- iii. Student Led Events: Offsite bible studies and gatherings designed to be led by Student Leaders must follow the Rule of Two with at least one FBCO screened and trained adult present. The Student Leader must also be screened and trained in accordance with this policy.
- g. Guardians must be notified of all offsite Student and Kids events, including games, activities, or media, that will be viewed.
- h. Transportation guidelines should be strictly observed, which include:
 - i. Guardians are encouraged to drop off/pick up to/from events themselves.
 - ii. Students/children should be transported directly to their destination. Unauthorized stops to non-public places should be avoided.
 - iii. Transporting only one non-related student or child alone is prohibited.
 - iv. Students/children should never be left alone in a vehicle.
 - v. Absent an emergency, cell phones may not be used by drivers while transporting minors, other than navigation applications. Extra caution and attention to safety should be observed.
 - vi. No drivers under age 25 may drive FBCO owned or rented vehicles.
 - vii. Ministry workers should never instruct a student to drive another student or child to/from a ministry event.
 - viii. Transportation of students and children should only be for the number of seatbelts in a vehicle. Individual seatbelts should be worn at all times while in the vehicle (no double-buckling).
- 5. Outside Organization Events (Non-FBCO Sanctioned Activity):
 - a. FBCO requires all outside organizations and special event hosts who provide children's ministry or childcare on FBCO campuses to maintain FBCO safety standards for outside parties, and to sign the appropriate agreements and waivers prior to use of FBCO facilities. Failure to adhere to FBCO's child safety standards for outside parties will result in corrective action, including but not limited to, termination of childcare privileges either immediate and/or future. FBCO will request outside parties to hire and utilize FBCO trained and screened workers to provide oversight and care for children, when possible. FBCO will provide training

materials and resources on child safety to outside organizations prior to use of FBCO facilities.

H. **Reporting and Responding:**

1. **Reporting:**

- a. All FBCO employees must report any incidents of abuse, abandonment, or neglect of a child to the Department of Children and Family Services Hotline. The phone number for the hotline is 1-800-96-ABUSE. All allegations will be taken seriously in accordance with FBCO's Policy on Reporting Abuse. Following the reporting of the incident to the Department of Children and Family Services Hotline, the employee or volunteer shall immediately notify a FBCO pastor.
- b. A preschool, Kids or Students ministry worker who suspects child abuse, abandonment, or neglect has occurred should report the incident or suspicions to his/her supervising pastor and the Child Safety Coordinator immediately. If a report to the Department of Children and Family Services has not yet been made, the supervising pastor or Child Safety Coordinator will assist the worker or victim in reporting the incident. The supervising pastor or Child Safety Coordinator will immediately inform the Director of Human Resources, the Senior Associate Pastor, and the Pastor of Ministries and Administration of the incident in accordance with FBCO's Misconduct Investigation Policy. Legal counsel should be engaged to assist with the reporting process as advisable. Regardless of who makes the report, the Child Safety Coordinator must be informed of all claims and reports, and provide assistance, council and support as needed.
- c. In instances where the accused offender is another minor, the same process as outlined in sub paragraph b immediately above should be followed, with special attention to act in the best interest of the minors involved, protect the identity of the minors involved and to notify guardians as appropriate. If the reported incident occurred on FBCO property or at an FBCO sanctioned event, the guardians should be notified immediately unless instructed by law enforcement to the contrary. When in doubt, consult with legal counsel.
- d. If in doubt regarding whether a report should be made or not, FBCO will err on the side of caution and will call the Department of Children and Family Services (DCF) to discuss the situation with an investigator to determine if a report should be made. The staff member, or legal counsel, assisting with the report shall make a written record of the name and title of the investigator or agent representing the DCF and include the recommendations made by the investigator/agent. A copy of this documentation should then be submitted to the Child Safety Coordinator, concurrent with all applicable documentation and reporting policies of FBCO.
- e. Inappropriate behavior with a child, even though it may not be considered true abuse, should also be reported in accordance with this Policy. If a childcare worker is deemed to be in violation to FBCO's child safety standards but does not rise to a level of being immoral or illegal, such as allowing a 4th grade child to sit on one's knee or being found alone with a child, the situation should be reported to the supervising pastor and the Child Care Coordinator to determine the appropriate corrective response. Based on the severity, the first offense may require an

accountability conversation and a reminder of the standards and expectations with admonishment to abide by the safety standards. A second offense may require removal from any duties allowing immediate access to children to a non-child access serving opportunity while the worker completes review of all training videos and attests to compliance afresh in writing by signing the Code of Conduct. A third offense should result in permanent termination of childcare service. These steps should be adapted to best fit the severity of the situation and any step may be skipped entirely to immediately remove a worker from service if warranted as determined by the supervising pastor and Child Care Coordinator.

- f. Ministry workers will receive training on how to receive a report from a child, which will include the following instructions:
 - i. Stay calm
 - ii. Listen carefully and intentionally but do not interrogate
 - iii. Be careful to not make the child feel ashamed
 - iv. Keep everything reported confidential, reporting only to authorities and church leadership as outlined in this policy
 - v. Do not promise the child you will keep the report a secret
 - vi. Assure the child they did the right thing by telling you and that it is not their fault
 - g. An FBCO incident form should be completed and filed in accordance with FBCO's record retention.
 - h. Claims of historic abuse by an alleged victim who is now an adult should be reported to law enforcement by the adult claimant, except in special circumstances. FBCO may assist the alleged victim in making the report but should not subvert the claimant's wishes if the claimant does not want to proceed with reporting. In either case, the allegation and outcomes must be documented in accordance with this policy, including the claimant's refusal to report if that is the case. The claimant's refusal to report, however, will not preclude FBCO from conducting its own investigation into the matter if the accused is still actively involved at FBCO.
 - i. Guardians will receive information on how to communicate general complaints and feedback as well as reports or allegations.
2. Responding:
- a. In collaboration with FBCO's legal counsel, FBCO will cooperate fully with civil authorities and will defer when necessary to law enforcement or DCF, whose investigations take higher priority over internal investigations.
 - b. If there is just cause to believe child abuse has occurred at an FBCO sanctioned event, the incident will be promptly investigated according to FBCO's Misconduct Investigation Policy, concurrently and not hindering in any way investigations that may also be underway by local authorities. The goal of internal investigations will be the following:
 - i. Follow facts objectively and avoid bias
 - ii. Create no further emotional harm
 - iii. Protect possible victims
 - iv. Provide justice and due process for possible offenders

- v. Avoid legal liability for FBCO
 - vi. Make findings to a preponderance of the evidence
 - vii. Engage the assistance of experts, such as professional investigators, victim assistance experts, child forensic interviewers or forensic psychologists as warranted.
- c. The FBCO Human Resources Director, or designee, will contact the church's insurance agent and/or carrier regarding abuse allegations, legal claims, or threats of litigation. All reports to FBCO's insurance agent or carrier should be documented regardless of the outcome and filed securely for at least 10 years.
- d. Contact FBCO's legal counsel.
- e. If an accused person confesses to the abuse, in addition to the steps outlined in this policy, obtain a signed statement from the accused regarding the incident if possible.
- f. A written summary of inquiries or investigations shall be prepared by the investigator(s) in accordance with FBCO's Misconduct Investigation Policy.
- g. If the accused person is a FBCO employee or volunteer, the accused should be suspended from performance of duties involving children until the official inquiry or investigation has been completed. This removal of duty from children's ministry should, if possible, occur in such a way that an innocent person is not immediately presumed by others to be guilty.
- h. If the incident occurred on FBCO property or during a FBCO sanctioned event, or the accused person is a FBCO employee or volunteer, with the guidance of legal counsel, the appropriate FBCO pastor will compassionately inform the victim and/or the victim's guardians (In cases involving custody sensitive situations, the appropriate guardian) of the known facts of the incident, details of the allegation, steps that are being taken, and subsequently continue to keep them informed of the status of the investigation. The pastor should express the church's concern and offer the services of the church, including counseling services for the alleged victim. Exceptions to guardian notification are any scenarios in which the guardians may be party to the allegation, in which case FBCO defers to the appropriate authorities/DCFS to handle.
- i. All reports of child abuse, abandonment, or neglect shall be handled with the appropriate level confidentiality. No person shall communicate any information concerning the alleged incident to others except as necessary to cooperate with any official investigation or as set forth in this policy. FBCO staff, in consultation with the official(s) conducting the investigation, may authorize limited additional disclosure as necessary to protect other children from harm, particularly when the person responsible for the abuse cannot be identified, but in no case shall the identity of the victim(s) or the accused person be otherwise disclosed except as required by law.
- j. No form of abuse will be tolerated. Confirmed abuse of any kind will result in immediate dismissal from children's ministry duties. FBCO will immediately terminate any staff member or volunteer who is a child sexual abuse offender who has admitted to, had a finding of, or been convicted of child sexual abuse.

- k. Liaison with media and the Community: If the child abuse occurred on FBCO property or if an FBCO employee or volunteer is the accused perpetrator, then the senior pastor or his designee shall serve as FBCO's sole access to the media and to FBCO congregants, as appropriate. FBCO should emphasize to the public its position on child abuse, its concern for the victim, and the extensive steps being taken to address the safety of all children.
- 3. Post investigation:
 - a. After local authority's and FBCO have concluded any inquiries or investigations, FBCO will inform the involved parties, as appropriate, of the outcome and next steps.
 - a. FBCO will administer appropriate discipline, suspension or termination of church members, volunteers or staff found to be guilty of allegations or charges in accordance with FBCO's Bylaws and the Misconduct Investigation Policy.
 - b. FBCO's Crisis Response Team will be engaged to respond to victims and their families as appropriate, address media concerns and related matters if applicable, and make adjustments to FBCO practices and policies if necessary, based on lessons learned from the incident. FBCO will offer ongoing counseling to victims as appropriate. The Crisis Response Team may at times act as a Misconduct Investigation Task Force as applicable.

References:

- 1. *Code of Conduct*
- 2. *Misconduct Investigation Policy*
- 3. *Record Retention Policy*

Exhibit A
Child Protection Teams Chart

