

Safe Church Policies and Procedures

First Congregational Church in Winchester

Winchester, MA

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I. FCCW Purpose Statement

The First Congregational Church in Winchester, United Church of Christ (FCCW) is a Christ-centered, nurturing community, growing in faith, serving in love, and welcoming all with joy.

II. Safe Church Policy Statement, Location and Scope

A. *Safe Church Policy & Procedures Statement*

The church's goal in establishing these Safe Church Policies and Procedures is to ensure that all who participate in its church life, including children, seniors, and church workers, whether paid or volunteer, have a safe, secure, and nurturing environment in which to work and explore their relationship with God and each other.

FCCW is committed to creating and maintaining programs, facilities and a community in which members, friends, staff and volunteers can worship, learn and work together in an atmosphere free from all forms of abuse, discrimination, harassment, exploitation or intimidation.

As a Christian community, FCCW activities do at times require one-on-one counseling, time spent in community members' homes, and volunteer engagement in infrequent activities related to transportation, deliveries and health visits. To the greatest extent practical, diligence will be taken to strictly follow the policies and procedures outlined herein.

The Church will prohibit, prevent and correct behaviors that are contrary to our *Safe Church Policy and Procedures*.

The FCCW *Safe Church Policy & Procedures* will be approved by the Leadership Team, and reviewed at least once every three (3) years.

B. Location of *Safe Church Policy & Procedures Statement*

Hard copies of the *Safe Church Policies and Procedures*, and all forms referred to therein, will be made available and accessible at all times in the Church Front Office. Additional copies will be made available in the supervising ministers' offices, including: the Office of the Minister of Faith Formation (MFF), the Office of the Minister of Health and Wellness (MHW), and the Minister of Music and Worship Arts (MMWA).

A link to access an electronic copy will be made available on the FCCW website.

The Office Manager will be responsible for updating *Safe Church Policies and Procedures* documents, forms, and web pages, of any information relevant to these *Safe Church Policies and Procedures*.

A copy of the *Safe Church Policies and Procedures* will be provided to all employees and volunteer candidates prior to service. The three supervising ministers - MFF, MHW, and MMWA - are responsible for providing the *Safe Church Policies and Procedures* to their respective volunteers and employees.

C. *Scope of Safe Church Policy & Procedures Statement*

The policies and procedures included in this document apply to all activities which take place within the building and properties of the FCCW, as well as to programs, activities, and events scheduled as part of the ministry of the church which take place off-site. In addition, the policies and procedures outlined herein apply to any online meeting that is scheduled as part of the ministry of the church.

These First Congregational Church of Winchester (FCCW) *Safe Church Policies and Procedures* apply to all members, associate members, friends, volunteers, and employees of the church.

Nothing in this *Safe Church Policies and Procedures* supersedes the responsibilities of the employees, volunteers, and administration of the FCCW under Massachusetts General Laws. In addition the Minister of Health and Wellness (MHW) is responsible for functioning in accordance with the current scope and standards or Parish Nursing Practice as set forth by the American Nurses Association.

III. Policies and Procedures

A. Ministerial Conduct

Consistent with our understanding of the priesthood of all believers, all authorized Ministers¹, employees, elected and appointed lay leaders, and authorized volunteers are Ministers to the congregation. Every Minister² to the congregation should be adequately prepared and educated for the ministry in which they serve others, and to understand the ways in which their use or misuse of authority may impact others.

FCCW encourages its Ministers to nurture safety within Ministerial Relationships³ by being attentive to self-care, educating, maintaining appropriate boundaries, and referring those in need to supportive and helpful resources. Ministers should recognize the limits of their expertise and not try to perform/offer services for which they are not equipped or trained (for example, counseling or physical assistance).

Sexual exploitation, abuse or harassment of parishioners or others by anyone engaged in ministry on

¹ **Authorized Minister:** a person who holds ordained ministerial standing or has been commissioned or licensed by the Southern New England United Church of Christ (SNEUCC) or region of the Christian Church (Disciples of Christ). An authorized Minister is one type of minister within the meaning of this policy.

² **Minister to the congregation:** a person authorized by the church to carry out its ministry. Ministers include elected or appointed leaders of the church, employees, and volunteers, as well as Authorized Ministers.

³ **Ministerial Relationship:** the relationship between one who carries out the ministry of the church and the one being served by that ministry.

behalf of FCCW is unethical behavior and will not be tolerated within this congregation.

B. Screening and Hiring of FCCW Employees and Volunteers

A volunteer/employee spreadsheet will be managed and updated by the Office Manager and available for all supervising Ministers and Pastors. It will include as necessary the names and contact information of all approved employees/volunteers, the positions they are approved to fill, dates and names of workshops/training, dates and sign off by Lead Pastor on CORI checks and sex offender checks, and any other required paperwork titles, names, and signatures (i.e. drivers license, medical forms, registrations, etc.). This document will be protected for privacy purposes, and stored in the Office Manager's office.

1. Requirements for Screening and Hiring Employees

- A)** All employees will be personally interviewed to assess the suitability of their character and qualifications for the position they seek.
- B)** All applicants must submit an Criminal Background Check Authorization Form⁴
- C)** Before beginning their duties, all prospective employees will undergo a background check, including, but not necessarily limited to, inquiries of references and a criminal history verification by a third-party vendor (CORI).⁵
- D)** The Lead Pastor will ensure that a registered sex offender review⁶ is conducted for all employees. This registered sex offender review will be repeated at least once every three years for all employees.

2. Requirements for Screening and Recruiting Volunteers for FCCW Programs and Services

- A)** Volunteers who work with vulnerable persons⁷ will have been members of FCCW for at least six (6) months or, if not members, regularly and frequently associated with FCCW for at least one (1) year. ⁸
- B)** All volunteers, who may have direct and/or unmonitored contact with vulnerable persons will sign a Volunteer Participation Covenant,⁹
- C)** Before completing their duties, all volunteers, nineteen (19) and older, who may have direct and/or unmonitored contact with vulnerable persons will complete a Criminal Background Check Authorization Form
- d)** All volunteers, 19 and older, who may have direct and unmonitored contact with

⁴ Appendix, Exhibit A

⁵ See CORI Procedures, Section III, B, 3

⁶ Sex Offender search will be conducted on the Department of Justice website at www.nsopr.gov.

⁷ Vulnerable persons include children, the elderly, and those with mental or physical disabilities.

⁸ A volunteer of lesser association may work with minors if assisted by a member with at least six months of membership.

⁹ Appendix, Exhibit B

vulnerable persons will undergo a background check, including, but not necessarily limited to, inquiries of references and a criminal history verification by a third-party vendor (CORI).

- e) All drivers must be at least twenty five (25) years of age, unless transporting only siblings with parent permission.
- f) All drivers for youth programs specifically will undergo a background check, including, but not necessarily limited to, inquiries of references and a criminal history verification by a third-party vendor (CORI).¹⁰ Members who offer irregular rides to or from church for another member or deliver meals or flowers, do not need to undergo any background check or have their vehicle approved.
- g) All volunteers who may have direct and/or unmonitored contact with high school students must be at least twenty five (25) years of age. Volunteers who are not yet twenty-five (25) years of age may only have monitored contact with children at least five (5) or more years younger.
- h) The Lead Pastor, in collaboration with the appropriate supervising minister, will ensure a registered sex offender review¹¹ for all volunteers who may have direct and unmonitored contact with vulnerable persons. This registered sex offender review will be repeated at least once every three years and must be completed for all current volunteers within 6 months of approval of the *Safe Church Policies and Procedures*.

3. CORI Policies and Procedures

a) CORI Request Procedures¹²

In an effort to protect vulnerable persons from any predatory actions of adults, and in compliance with both state law and in adherence to a number of SNEUCC “safe church” mandates, FCCW, a “volunteer organization” as defined by the Massachusetts Criminal History Systems Board (CHSB), is required to elicit a CORI report on any employee, candidate for employment, or volunteer who may have direct and unmonitored contact with vulnerable persons in any church-sponsored program or service.

This requirement includes, but is not limited to, those intending to serve in the following positions: FCCW Sunday school teachers, nursery supervisors, confirmation class teachers and mentors, Forum Advisors, authorized teaching assistants, and chaperones; authorized drivers for MFF sponsored events; and all other youth group supervisors.

b) CORI Coordinator

¹⁰ The Lead Pastor is responsible for determining that public records available show that an individuals' driving license has not been revoked or suspended, and that they are therefore eligible to drive for FCCW activities.

¹¹ Sex Offender search will be conducted on the Department of Justice website at www.nsopr.gov.

¹² An overview of the CORI protocols and all necessary documents are available from the Office Manager upon request.

The Office Manager is the coordinator of all CORI requests performed for the persons listed above and shall be responsible, in collaboration with the respective supervising minister (MFF, MHW, MMWA), for distributing the CORI request paperwork and ensuring that the information received from those requests remains sealed, and is stored in appropriate locked files.

The appropriate supervising Minister (MFF, MHW, MMWA) is responsible for identifying and informing the Office Manager of all volunteers who are required to have a CORI request performed.

The Lead Pastor is responsible for identifying and informing the Office Manager of all employees who are required to have a CORI request performed or renewed.

c) CORI Officers

The FCCW's CORI Officers are the Lead Pastor and the Personnel Ministry Chair.

The Lead Pastor will review all CORI reports and determine if individuals pass a CORI check and thus are eligible to serve in an FCCW position, paid or voluntary. In making that determination, the Lead Pastor may, if deemed necessary, seek counsel from the FCCW's Personnel Ministry Chair.

In accordance with the laws of the Commonwealth of Massachusetts, all information contained within CORI reports will be held in confidence by the Lead Pastor and/or Personnel Ministry Chair. All CORI applicant reports will be kept in a locked file in the Lead Pastor's office and can only be accessed with at least one of either CORI Officers' permission.

If a positive CORI report is returned, it will then be reviewed only by FCCW's CORI Officers who will then determine whether that employment or volunteer application to the church may be accepted.

d) CORI Records Review Procedures

The Lead Pastor, and where necessary the other CORI Officer, will use the following criteria in its review of CORI records and determination if individuals are eligible or not, to serve in particular paid or volunteer positions:

- (1) Individuals whose CORI reports show that they have been convicted of committing child abuse, whether physical, emotional, or sexual, will not be considered, under any circumstances, for paid or volunteer positions in the FCCW which involve contact with children.

- (2) Individuals are ineligible to serve in any paid or volunteer FCCW positions if a CORI and /or other background report shows that they have been convicted of and/or plead guilty to or no contest to a crime involving physical abuse; domestic violence, child abuse, elder abuse; or if a judgment has been entered against them in a civil lawsuit charging any of the forgoing.
- (3) Individuals are ineligible to serve in any paid or volunteer FCCW positions which involve direct and unmonitored contact with vulnerable persons if their CORI reports demonstrate that they have been convicted of a crime, or plead guilty or no contest to a crime which involves the use of force or violence, rape, indecent assault, battery, or the crime of attempting any of the aforementioned offenses; possession and/or distribution of pornography including children; or if they have been charged with any felony listed above and are either awaiting trial or have been defaulted by the court.
- (4) Anyone who admits to any of the offenses listed above of this *Safe Church Policies and Procedures*, whether listed on their CORI report or not, will not be considered, under any circumstances, for a paid or volunteer position in the FCCW which involves contact with children and/or other vulnerable persons.

Although forgiveness is a core value of the FCCW, the Lead Pastor may also consider the following in making his/her determination of an individual's eligibility to hold a particular position in the FCCW:

- (5) Criminal offenses noted in that individual's CORI report or admitted by that individual, which are not named in these Safe Church Policies and Procedures including: sexual harassment or discrimination; financial fraud; or illegally manufacturing, distributing, or dispensing any controlled substances or the crime of possession with intent to manufacture, distribute or dispense a controlled substance.
- (6) Other factors which relate to that individual's ability to contribute to the FCCW's mission of maintaining "a safe, secure, and nurturing environment" in which children, adults and church workers can "work and explore their relationship with God and each other."

e) Policy for Response of Negative CORI Record

The following lists the required procedures the Lead Pastor should take if the CORI report reflects a criminal record:

- (1) Review the information with the applicant and inform him/her of the decision;
- (2) Provide to the applicant a copy of the CORI report and this *FCCW Safe Church Policies and Procedures*;

- (3) Inform the applicant which part of the criminal record appears to make him/her ineligible;
- (4) Provide the applicant with an opportunity to dispute the accuracy and relevance of the CORI upon receipt of additional documentation from the applicant and/or the Massachusetts Criminal History Systems Board (CHSB);
- (5) Provide a copy of the CHSB's information concerning the process for correcting a criminal record;
- (6) If appropriate, notify appropriate supervising minister of applicant's ineligibility for voluntary or employed position; and
- (7) Document all steps taken to comply with this section and secure documentation and related report or paperwork in appropriate secure location in Lead Pastor's office.

4. Other Screening Procedures

The Personnel Ministry will develop the necessary forms for all screening, recruiting and hiring contracts, and permission slips for both on-site and off-site events.

The Office Manager, in collaboration with the appropriate supervising Minister, will obtain all the signed forms and any accompanying documentation required of these *Safe Church Policies and Procedures* and maintain them in a secure location in the Lead Pastor's office, where they may not be accessed without the CORI Officer's permission.

The Lead Pastor will renew, as needed, its Certification on behalf of the FCCW, with the Commonwealth of Massachusetts' Criminal History Systems Board (CHSB).

In performing their duties the supervising ministers (MFF, MHW, MMWA), as well as other authorized Ministers, may, as they deem necessary, seek counsel from the FCCW Pastors and/or Personnel Ministry Chair.

C. Training¹³

The SNEUCC offers Safe Church training sessions regularly. All ministerial employees are required to attend this training by SNEUCC at least once every three (3) years or will attend at least one (1) workshop on this topic every three (3) years, whichever is more frequent.

The Exploitation and Harassment Response Team members must each take a Safe Church training workshop within 6 months of being elected/hired to serve in a position included in the response team's membership.

¹³ The Personnel Ministry, in collaboration with FCCW Lead and Associate Pastor and supervising ministers, is responsible for developing training guidelines for all employees and volunteers in accordance with this *Church Safe Policy and Procedures* and including them in any staff handbooks.

All Chairs or designated volunteers and employees who regularly work with vulnerable persons will receive appropriate training, as defined by the Personnel Ministry, and have an opportunity to receive and review the Safe Church Policies and Procedures.

The date and content of all training should be included in the volunteer/employee records spreadsheet coordinated by the Office Manager in collaboration with the supervising ministers.

The Lead Pastor is responsible for ensuring that all employees and volunteers are up to date on required trainings.

D. Program Specific Policies and Procedures

As a Christian community, FCCW activities do at times require one-on-one counseling, time spent in community members' homes, and volunteer engagement in infrequent activities related to transportation, meal/flower deliveries and health visits. To the greatest extent practical, diligence will be taken to strictly follow the policies and procedures outlined herein.

However, when such moments arise that procedures, such as the two-adult policy specifically, can not be followed, verbal notice will be made either before or as soon as practically possible after such an episode has occurred, to the supervising minister (MFF, MHW, MMWA) or staff supervisor (Lead or Associate Pastor).

This practice is to protect both the FCCW employee/volunteer and the recipient of such service or counseling.

1. Responsibilities for Implementation

Supervising Ministers (MFF, MHW, MMWA) are responsible for the implementation of these policies and procedures for their respective programs. The Faith Formation Ministry and the Health and Wellness Ministry are the advisory commissions established to assist the MFF and MHW in the management of their services and implementation of policies.

FCCW will provide adequate supervision and safeguards for all activities. To accomplish this the following policies and procedures must be abided:

2. Two Adults Rule

- a)** No eligible volunteer or employee, as screened and approved above, may be alone with a vulnerable person at any FCCW activity on or off FCCW premises, including online spaces.
- b)** Two adults, not married to each other, must be present with vulnerable persons at all times in the FCCW or at any FCCW activity on or off premises, including online spaces.

- c) If the two adults are a married couple, then a third adult (over 18) must also be present to satisfy this Two Adult Rule.
- d) If a vulnerable person, specifically a child, is being transported off site, there must be more than one child AND two (2) unrelated adults in any vehicle used for FCCW activities.
- e) All FCCW Day Field Trips must have at least two eligible adults present at all times.
- f) Any FCCW program or service which cannot meet this Two Adult Rule must be either canceled, or receive specific approval by the Lead or Associate Pastor. If cancelled, persons receiving services must be returned to their parent(s) or guardian(s) and the church can not be held responsible for any deposit fees which are lost as a result of that cancellation.
- g) Two Adults Rule Exceptions:**
 - (1) The adult is a parent, other relative, or legal guardian of the vulnerable person;
 - (2) The adult has received permission from both the parent(s) or legal guardian(s) of the vulnerable person and the supervising minister (MFF, MHW, MMWA) to be alone with them and has been vetted as an eligible adult ¹⁴;
 - (3) A child's behavior is disruptive in the church school, and one of the two adult teachers in the classroom needs to leave briefly to seek the MFF or the child's parent(s) or guardian(s) to come to the classroom. The MFF will be notified as soon as practically possible of this occurrence.
 - (4) One of the two adult teachers in the classroom needs to leave the classroom briefly in order to provide for the wellbeing of a child, for example, to assist a child who has become ill or who needs to go to use the restroom. The MFF will be notified as soon as practically possible of this occurrence.
 - (5) Volunteers are responsible for entering a home only for the purpose of delivering items.
 - (6) A member offers a one-time ride to or from church for another member. Although a Christian and neighborly act of kindness, this is not considered a service or activity of the church, and therefore the driver does not need to be CORI checked or have their vehicle approved. FCCW does recommend, however, that either the MHW or a Pastor be notified ahead of time of this occurrence if arrangements are made through the church.
 - (7) In situations where participants are readily visible to each other, a "Floater" may be present if only one adult is in the room. If this is the case, doors to the adjacent rooms must remain open at all times.

¹⁴ An Eligible Adult - Any employee or volunteer that has been screened and completed the vetting steps necessary under Section III, B, 3 above and is approved by CORI Officers for direct and/or unmonitored contact with vulnerable persons.

3. **Overnight Events - Three Adults Rule**

On FCCW Overnight Events regardless of on- or off-church property, there must be a minimum of three (3) adults, including at least one (1) male and one (1) female.

If the overnight program cannot meet this rule, the program must be canceled and the church can not be held responsible for any deposit fees which are lost as a result of that cancellation.

4. **Age Restrictions for Volunteer Involvement in Youth Programs**

Supervisors and Chaperones must be at least five (5) years older than the oldest participant in the FCCW class, group, or activity they supervise.

Youth five (5) or more years older than the youngest student present, may assist an unrelated adult in supervising children and youth activities; however, such assistance does not allow for unmonitored contact with any vulnerable persons.

5. **Authorized FCCW Youth Events**

Full information about programs should be made available beforehand to the parent(s) or guardian(s) of the youth who participate in them. Such information should include: the purpose and basic agenda of the scheduled event, trip, or overnight; dates and times; costs; and the method of transportation. When available the names of supervisors, chaperones, and drivers should also be made available to parent(s) or guardian(s). Such information will be provided by the MFF.

The MFF must ensure that all supervisors, chaperones, drivers, and adult guests who participate in FCCW youth activities, are eligible adults in accordance with the requirements of this *Safe Church Policies and Procedures*.

Parents or guardians must complete and return Event Participation Consent and Liability Waiver¹⁵ for all off-site or overnight events, before their child can participate in that trip or event.

a) Medication Release Forms

- (1) All youth participating in a day or overnight event must have a Medication Release Form¹⁶ on file with the FCCW before they can participate in the event.
- (2) Medication Release Forms must be taken to that trip destination or event by an FCCW authorized supervisor of that activity.
- (3) The MFF may keep all past signed Medication Release Forms on file in a secure location in their office.

b) Vehicle Rules

¹⁵ Appendix, Exhibit C

¹⁶ Appendix, Exhibit D

- (1) As noted above, there must be more than one (1) youth and two (2) unrelated adults in vehicles for any FCCW event.
- (2) Drivers for day or overnight youth events must be 25 years or older and present a current driver's license.
- (3) If using a personal vehicle, MFF should confirm that vehicles have up to date inspection and registration stickers prior to departure.
- (4) All occupants of vehicles used in FCCW youth activities must wear seat belts and follow the rules of the road, including not using digital devices while driving.
- (5) A youth (17 and older) may drive a younger sibling youth off campus with parental permission.

c) Behavior and Communications

Supervisors and Chaperones are expected to listen to the FCCW youth they are supervising, and clearly communicate expectations of appropriate behavior to them. Supervisors will maintain order in a manner consistent with the teaching of Christian responsibility, respect, and cooperation.

As noted in the *Two-Adult Policy* above, if a child's behavior is disruptive in the church school, one of the two adult teachers in the classroom may leave it briefly to seek the MFF or the child's parent(s) or guardian(s) to come to the classroom. No youth in any FCCW youth class, event, or trip will be disciplined by the use of any form of physical punishment.

E. Suspected Abuse

1. Reporters and Reporting

This process assures a legally mandated, prompt, and direct channel of information from the observer/reporter, through the Church ministry, to the state authorities who are charged with dealing with an act of abuse against any vulnerable person in a church building, on church grounds, or while participating in a church-sponsored activity or program off-site.

a) Reporters

- (1) All mandated reporters are required to report all reasonable suspicions of abuse to any vulnerable persons: The following are considered by FCCW as mandatory reporters:
 - (A) People who serve in the following employed or volunteer FCCW positions: a) Lead Pastor, Associate Pastor, MFF, MWH, and MMWA; b) Church Organist; c) Children's Choir Director; d) Deacons; and e) Building Manager.

(B) FCCW’s supervisors, drivers, and volunteers with direct and unmonitored contact with vulnerable persons.

(c) Church employees are also “mandated reporters” if their professional activities or counseling reveal to them that a child is being abused beyond the church, its buildings and grounds.

(2) Members of the FCCW church community, including FCCW volunteers working with youth, are not mandated reporters, but are morally obligated to report reasonable suspicions of any abuse to the Lead Pastor, the Associate Pastor, or the supervising Minister.

B) Reporting Procedures and Sequencing

(1) Ensure the individual’s safety. When a person suspects that a person has been abused, the very first priority is to be sure that the individual is as safe as possible, physically and emotionally. 911 should be called if there is injury or the situation seems to require immediate attention from medical, police, or fire fighting personnel.

(2) Once the safety of the vulnerable has been ensured, allegations of abuse must be immediately reported orally to the Lead Pastor¹⁷, or if not available the Lead Pastor or supervising minister (MFF, MHW, or MMWA).

(3) Any reporter may also submit an Individual DCF report¹⁸ or a similar report to DPPC or MEOEA.

(4) Once the Lead Pastor receives a report of suspected abuse, he/she or their designee will:

(a) Seek to inform the parent(s) or guardian(s) of the allegation of the abuse, unless the parent(s) or guardian(s) have been alleged to be the abuser(s).

(b) Remove employee or volunteer from all contact with vulnerables in FCCW sponsored programs, at least until state rulings on the legitimacy of the allegations have been made and on whether or not it is appropriate for that FCCW employee or volunteer to have contact with vulnerables.

¹⁷ **FCCW Oral Report:** A verbal report which is made immediately to the Lead Pastor when abuse is suspected. If the Lead Pastor is not available, the report is made to the supervising minister.

¹⁸ **Individual DCF Reports:** an individual not on the Ministerial Team may choose to contact DCF directly to submit their own DCF Oral Report and/or DCF Mandated Report regarding a particular allegation of child abuse. In such situations, the Lead Pastor will offer to help the individual fill out the DCF Mandated Report, but that individual must be identified on that Mandated Report as the reporter. Also, such individuals will be asked to fill out an FCCW Incident Report (Appendix, Exhibit E) and submit it to the Lead Pastor to maintain in the secure files.

- (c) Submit by telephone an Oral Report¹⁹ to the Massachusetts Department of Children and Families (DCF), Disabled Persons Protection Commission (DPPC), or the Massachusetts Executive Office of Elder Affairs (MEOEA)
 - (d) Notify the Exploitation, Abuse, and Harassment Response Team Member of the alleged abuse.²⁰
 - (e) Submit the Incident Report or similar DPPC/MEOEA report²¹ within 24 Hours
 - (f) Submit the DCF Mandated Report²² or similar DPPC/MEOEA report within 48 Hours
 - (g) Collaborate with the Response Team to develop any necessary public or member communications.
- (5) It is vital that the acts mentioned in this section be handled with as much discretion, fairness, and respect for all involved as possible, and with the recognition that DCF still needs to investigate and render its judgment on the allegation made. The following should be taken into consideration when reporting suspected abuse:
- (A) **Confidentiality** - Concern to maintain confidentiality should not keep anyone from making such a report to the FCCW and the DCF/DPPC/MEOEA, because the vulnerable have an overriding right to protection.
 - (B) **Respect and Dignity** - All allegations, reports, and DCF/DPPC/MEOEA rulings on abuse must be handled with respect for the dignity of everyone involved and with regard for their privacy as appropriate.

¹⁹ **DCF Oral Report:** a verbal report which is made by telephone to the Massachusetts Department of Child and Families as soon as a report of suspected child abuse is received. If the Lead Pastor is not available, the report is made by the MFF.

²⁰ The Lead Pastor and members of the Exploitation, Abuse and Harassment Response Team are responsible for obtaining any necessary reporting forms for the FCCW from the Massachusetts Department of Children and Families (DCF), Disabled Persons Protection Commission (DPPC), and the Massachusetts Executive Office of Elder Affairs (MEOEA).

²¹ **FCCW Incident Report (Appendix, Exhibit E):** A written report that must be submitted to the Lead Pastor within 24 hours after a DCF Oral Report of suspected child abuse was made. The Incident Report must contain all the information necessary to complete a DCF Mandated Report on that suspected abuse. The person who originally reported the suspected abuse will make out this Incident Report in conjunction with the Lead Pastor, or in conjunction with the FCCW MFF if the Lead Pastor is not available to help. The Lead Pastor will maintain this report in the secure files.

²² **DCF Mandated Report:** A written report that must be submitted to the Department of Children and Families within 48 hours after that suspected abuse was reported orally to DCF. The completion and submission of this Mandated Report will be overseen by the Lead Pastor or by the FCCW MFF if the Lead Pastor is not available. The Lead pastor will receive and maintain a copy of this report in its secure files

- (c) **Documentation** - All information obtained and all actions taken during the process of reporting allegations of abuse and making responses after those reports have been submitted must be documented.
- (d) **Privacy** - The Lead Pastor will obtain all such documents and maintain them in a secure location in the FCCW. Any individuals making reports may not be kept anonymous, but the Ministry Team will show discretion in who and how information is distributed to protect all parties' privacy.
- (e) **Cooperation** - All FCCW employees and volunteers will cooperate fully with DCF/DPPC/MEOEA, and police investigations of suspected abuse.

c) Accusations Against Lead or Associate Pastor

If the report of alleged abuse is made against an FCCW employee or volunteer whose ecclesiastical standing is held by SNEUCC, such as an FCCW Lead or Associate Pastor, Interim or Supply Minister, the Moderator will immediately consult with the Associate Conference Minister of the SNEUCC about any additional steps which may be taken by the FCCW and/or the UCC Association which holds the individual's ecclesiastical standing. The Moderator will then assume all reporting and decision making responsibilities previously held by the Pastor in question.²³

2. IN THE WIDER COMMUNITY

- a) Children** - Apart from any legal requirements, the FCCW will make a report to appropriate authorities, including but not limited to the Massachusetts Department of Children and Families (DCF), if at any time the church has reasonable cause to believe that a minor may be an abused or neglected child. Any Minister of the church who becomes aware of facts or circumstances that child abuse or neglect has occurred or that there exists a substantial risk that child abuse or neglect may occur in the reasonably foreseeable future shall immediately report the matter to the Lead Pastor, or if not available the Moderator, so that the church may take appropriate action in a timely manner. **The DCF Child Abuse Hotline currently is: 800-792-5200.**
- b) Disabled Persons and Elders** - Apart from any legal requirements, the FCCW will make a report to appropriate authorities, including but not limited to Disabled Persons Protection Commission (DPPC) or Massachusetts Executive Office of Elder Affairs (MEOEA) if at any time the church has reasonable cause to believe that an elder may be the victim of abuse, neglect, or self-neglect. Any Minister of the church who becomes aware of facts or circumstances that elder abuse or neglect has occurred or that there exists a substantial risk that elder abuse or neglect may occur in the foreseeable future shall immediately report the matter to the Lead Pastor, or if not available the Moderator, so that the church may take appropriate action in a timely manner. **The Elder Abuse Hotline currently is: 800.922.2275 (Voice/TTY) 800-792-5200. The National Domestic Violence hotline is: 1-800-799-7233**

²³ All actions taken in accordance with this section of the FCCW *Safe Church Policies and Procedures* must be documented and given to the Lead Pastor to maintain in secure files.

3. Procedures After Reporting Suspected Abuse

A) Responses After Reporting Suspected Abuse

- (1) All allegations, reports, and rulings on abuse must be handled with respect for the dignity of everyone involved and with regard for their privacy as appropriate.
- (2) All FCCW employees, and volunteers will cooperate fully with ruling bodies (DCF/DPPC/MEOEA) and police investigations of suspected abuse.
- (3) Pastoral support will be offered to all parties within the FCCW who are involved in a suspected abuse situation connected with the FCCW, including those who have made the complaint and/or abuse reports, the accused, the families of both, and the congregation. Decisions about how this support will be given will be made by the church's ministerial staff in consultation with the Ministry of Faith Formation and Ministry of Health and Wellness and the Trustees, as appropriate.

B) Rulings on Allegations Made Against FCCW Employees or Volunteers:

- (1) When the supervising Minister or Lead Pastor receives a ruling on an allegation of abuse made against an FCCW Employee or Volunteer, the Lead Pastor will immediately convey that ruling to the Leadership Team, or supervisor which oversees that employee or volunteer, so that appropriate steps can be taken with that individual in accordance with the ruling and the *Safe Church Policies and Procedures*.
- (2) In addition, when the supervising Minister or Lead Pastor receives a ruling on an allegation of abuse made against an FCCW employee or volunteer whose ecclesiastical standing is held by the SNEUCC, the Moderator will immediately inform the Chairperson of the Diaconate, who, in turn, will both convey that ruling to and consult with the SNEUCC which holds the individual's ecclesiastical standing and/or by the FCCW in accordance with its *Safe Church Policies and Procedures*.

c) Documentation

All information obtained and all actions taken during the process of reporting allegations of abuse, and making responses after those reports have been submitted, must be carefully documented and signed, including dates, times, and locations of all activities and meetings; the names of the persons present; any decisions or conclusions made; and any further action to be taken.

The Lead Pastor, or their designee, and the Exploitation, Abuse, and Harassment Response Team will obtain all such documents and maintain them in a secure location in the Lead Pastor's Office.

F. Sexual Harassment And Exploitation

It is the policy of FCCW that employees and volunteers are entitled to a comfortable working environment safe from unwanted sexual advances, exploitation or harassment.

1. **Sexual Harassment is defined as** repeated or coercive sexual advances toward another person contrary to his or her wishes. It includes behavior directed at another person with the intent of intimidating, humiliating, or embarrassing the other person, or subjecting the person to public discrimination. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:
 - a) Submission to such conduct is made either explicitly or implicitly a term or condition or circumstance of instruction, employment, appointment or participation in any church activity.
 - b) Submission to, or rejection of, such conduct by an individual is used as a basis for evaluation in making personnel or church-related decisions affecting an individual; or
 - c) Such conduct has the purpose or effect of unreasonably interfering with an individual's performance or participation in church activities or creating an intimidating, hostile, or offensive work or church environment.

Prohibited sexual harassment includes unsolicited and unwelcome contact that has sexual overtones, particularly:

- a) Written contact, such as sexually suggestive or obscene letters, notes, e-mails, or invitations;
- b) Verbal contact, such as sexually suggestive or obscene comments, threats, slurs, epithets, jokes about gender or sex-specific traits, sexual propositions;
- c) Physical contact, such as intentional touching, pinching, brushing against another's body, impeding or blocking movement, assault, coercing sexual intercourse; and
- d) Visual contact, such as leering or staring at another's body, gesturing, displaying sexually suggestive objects or pictures, cartoons, posters, or magazines.

Sexual harassment also includes continuing to express sexual interest after being informed directly that the interest is unwelcome and using sexual behavior to control, influence, or affect the career, salary, work, learning, or worship environment of another.

It is impermissible to suggest, threaten, or imply that failure to accept a request for a date or sexual intimacy will affect a person's job prospects, church leadership, or comfortable participation in the life of the church

It is forbidden either to imply or actually withhold support for an appointment, promotion, or

change of assignment, to suggest that a poor performance report will be given because a person has declined a personal proposition; or to hint that benefits, such as promotions, favorable performance evaluations, favorable assigned duties or shifts, recommendations or reclassifications, will be forthcoming in exchange for sexual favors.

2. **Sexual Exploitation** is defined as sexual activity or contact (not limited to sexual intercourse) in which a Minister engaged in a ministerial relationship with another takes advantage of the vulnerability of the person being served by causing or allowing that person to engage in sexual behavior with the Minister(s).

All allegations of behavior which call into question the fitness for ministry of any ordained Minister, including sexual exploitation or sexual harassment, will promptly be forwarded to the Committee on Ministry of the SNEUCC.²⁴

3. **Exploitation, Abuse and Harassment Team**

A subcommittee of the Moderator, Lead Pastor, Associate Pastor, Chair of Personnel Ministry, and appropriate supervising minister will be established each year in preparation for the possibility of hearing complaints under this policy.

The subcommittee, hereinafter referred to as "The Response Team," will be familiar with the terms of this policy, as well as the established procedures of the church for dealing with a complaint. Response Team members should take SNEUCC's Safe Church training when joining the Response Team, and subsequently at least every three (3) years, or when recommended by the SNEUCC Conference when training is updated.

4. **Response Protocols**

There is no state mandate regarding the reporting of suspected harassment, however, it is the moral obligation for all FCCW to respond immediately to any behavior that hinders an individual's ability to contribute to the FCCW's mission of maintaining "a safe, secure, and nurturing environment" in which children, adults and church workers can "work and explore their relationship with God and each other."

The complainant can report the incident to a minister, in an effort to resolve the matter informally. In this situation the Lead Pastor or their designee should be contacted as soon as reasonably possible to participate in an informal resolution. If the Lead or Associate Pastor are the subject of accusations, the Moderator will be responsible for all reports and responses.

However, if an informal resolution of the complaint does not seem wise, appropriate, possible, or does not succeed, the complainant may request that the full Response Team institute formal proceedings which shall include the following steps:

- a) The Response Team shall gather statements or other information from the individuals involved in the alleged exploitation or harassment and from others who may have pertinent information, such as qualified professional consultants, and present such information and recommendations to the Moderator, Personnel Ministry Chair and

²⁴ SNEUCC may be contacted at: 508-875-5233, 508-875-5485 (fax) and/or SNEUCC@SNEUCC.org

Leadership Team, or an appropriate subcommittee thereof.

- b)** The Response Team and/or Leadership Team may seek the advice of legal counsel or others to advise it in performing its functions.
- c)** The Leadership Team, or an appropriate subcommittee thereof, shall make determinations and take actions appropriate to resolve the matter. These may include:
 - (1) Finding that sexual exploitation or harassment has occurred, and that the appropriate body of the church is called upon to take action accordingly; such action may include one or more of the following:
 - (a) a formal reprimand, with defined expectations for changed behavior;
 - (b) recommending or requiring psychological or psychiatric assessment, counseling and/or treatment;
 - (c) probationary standing, with the terms of the probation clearly defined;
 - (d) dismissal from employment or authorized volunteer position by, affiliation with, or membership in, the church.
 - (2) Finding that sexual exploitation or harassment did not occur.

5. Procedures

- a)** All statements, recommendations and determinations will be documented and maintained in a locked location in the Lead Pastor's Office.
- b)** The person(s) toward whom the inappropriate behavior is directed need not be the complainant. Moreover, neither consent nor acquiescence will excuse or exonerate inappropriate behavior. At any time the church may initiate or proceed with the formal complaint process.
- c)** In determining whether alleged conduct constitutes sexual harassment or exploitation, consideration shall be given to the record of the alleged incident(s) as a whole and to the totality of the circumstances, including the context in which the alleged incident(s) occurred.
- d)** Any person bringing a sexual harassment or exploitation complaint or assisting in investigating such a complaint will not be adversely affected in terms and conditions of employment or church membership or affiliation, or otherwise discriminated against or discharged.
- e)** If the complainant or respondent is not satisfied with the disposition of the matter, he or she has the right to appeal to the Moderator. If the Moderator is the subject of the complaint, they shall refer the matter to the full Leadership Team. The subject of any such appeal to the full Leadership Team shall be limited solely to whether the procedures of this policy were followed. The matter will not be reconsidered on the merits and the

decision of the Leadership Team, or designated subcommittee thereof, will be the final resolution of the matter. If the full Leadership Team determines that the procedures of this policy were not followed, it will refer the matter back to the Response Team to complete the processing of the complaint in accordance with these procedures.

VII. **Rental and External Organization Use Policy**

All outside groups that rent FCCW facilities or use them without charge will be required to sign a Use of Facilities by Outside Organizations -- Statement of Compliance.²⁵

This agreement assures that procedures have been put in place by renting organizations to ensure the safety and security of all who benefit from the use of FCCW facilities. The FCCW reserves the right to cancel a rental agreement with any organization that does not make reasonable attempts to ensure the safety and security of vulnerable persons in their care. FCCW will not be responsible for lost deposits or fees if an event or organization is cancelled.

VIII. **Building Access Code/Chip Policy**

In order to receive a building access code/chip, the individual must complete a Building Access Code/Chip Form²⁶ which states that the signer will not share the code/chip with anyone else and that he/she will file an Incident Report if he/she reasonably believes that abuse and/or neglect of a vulnerable person has occurred in the church building or outside areas.

The Office Manager will maintain documentation of individuals who hold building access code/chips.

²⁵ Appendix, Exhibit F

²⁶ Appendix, Exhibit G

FCCW Organization

Moderator	Sarah Gallop
Lead Pastor	Will Burhans
Associate Pastor	Judith Arnold
Supervising Ministers	
Minister of Health and Wellness (MHW)	Kathleen Zagata
Interim Director Faith Formation Children & Youth (DFF)	Jake Greenberg
Minister of Music and Worship Arts (MWA)	Jane Ring Frank
Office Manager	Sarah Marino
Building Manager	Ed Banzy
Building Superintendent	Bill Lewis
Nursery Supervisor	Bri Connelly
Bookkeeper	Jose Foronda
Organist	Jeffrey Mead
Soloist/Section Leader	Susan Navien, Peter Owens
Cleaner	Christine Atkins

Sustaining Ministries

Exploitation, Abuse and Harassment Response Team (or Response Team)

Lead Pastor, Associate Pastor, Moderator, Personnel Ministry Chair, and the appropriate supervising minister (MFF, MHW, MMWA)

Personnel Ministry

Faith Formation Ministry, Children and Youth

Health and Wellness Ministry

Music and Worship Arts Ministry

Leadership Team

Adult Faith Exploration Ministry

Diaconate

Facilities Ministry

Financial Resource Ministry

Outreach Ministry

Glossary

Adult:

Persons age 19 and older.

Agreement of Non-Disclosure (AOND)

A signed form, submitted by an individual who seeks to have access to CORI reports, in which the individual agrees to abide by certain terms of confidentiality.

Authorization for a CORI Check:

A form signed by an individual which gives the FCCW permission to obtain that individual's CORI report from the Criminal History Systems Board (CHSB) of the Commonwealth of Massachusetts.

Authorized Adult Guest (AAG):

An adult who has been authorized by the MFF to attend an authorized FCCW Event as a guest, but who does not serve in any authorized supervisory capacity on such trips.

Authorized Driver (AD):

An adult 25 years old or older who has been authorized by the MFF to transport individuals on an authorized FCCW Event, but who does not serve in any authorized supervisory capacity on those trips, unless the driver has also been authorized to do so.

Authorized Volunteer/Adult:

Any person, 19 or older, who has been vetted to have direct and unmonitored contact with vulnerable persons. This may include church school teachers, Confirmation class teachers and mentors, youth group leaders, drivers for church-sponsored youth events, or ordained clergy serving as Supply Ministers of the FCCW.

Certification:

A process by which the Commonwealth of Massachusetts grants an organization legal access to CORI records after a review of the application submitted by that organization to the Commonwealth's Criminal History Systems Board.

Chaperone:

A volunteer who assists Supervisors in supervising youth in a special FCCW activity, such as a youth fellowship event, day field trip, or overnight event. To be an authorized Chaperone, an individual must have passed a CORI check, and be at least 21 years old and a minimum of five years older than the oldest youth participating in the activity.

Children or Youth:

Persons 18 years of age or younger, as defined by the Commonwealth of Massachusetts.

CHSB

Criminal History Systems Board (Commonwealth of Massachusetts)

Church Staff or Paid Employee

Any individual hired or called and compensated by the FCCW to hold a position in the Church on a part-time, full-time, temporary, or permanent basis.

Event Participation Consent and Liability Waiver

A form signed by the parent or guardian of a child which gives permission for that child to participate in an authorized FCCW off-site or overnight event and waiver of liability and agreement to hold harmless.

Criminal Offender Record Information (CORI):

Information regulated by the Criminal History Systems Board (CHSB) and maintained by the Board of Probation regarding criminal convictions of persons within the Massachusetts Court System. The term CORI will be understood to include a LexisNexis National Background Check.

Event Participation Consent and Liability Waiver

A form signed by the parent or guardian of a child which gives permission for that child to participate in an approved FCCW event.

FCCW or the Church:

The First Congregational Church of Winchester, Massachusetts of the United Church of Christ.

FCCW Key holder Acknowledgment Form:

A form signed by a person who has been assigned and has accepted a door key to the FCCW. This form contains the individual's signed statement that he/she has read and signed the church's Covenant Agreement.

Medication Release Form:

A form signed by the parent or guardian of a youth that authorizes the youth to self-administer his/her medication.

Overnight Event:

A youth event which is authorized by the MFF and scheduled to take place overnight either in the FCCW or offsite. The only adults allowed to participate in FCCW Overnight Events are those who have already passed a CORI check and who have been authorized to participate in those events as Supervisors, Chaperones, Drivers, or Adult Guests.

Pass a CORI Check

After reviewing an individual's CORI report, the Lead Pastor determines that the individual passes a CORI check and thus is eligible to serve in an FCCW position, paid or volunteer, which may involve direct and unmonitored contact with vulnerable persons.

Use of Facilities by Outside Organizations -- Statement of Compliance:

A form signed by the designated representative of an outside group which has been authorized to rent FCCW facilities or use them without charge. The form contains the designated representative's signed statement that he/she has read *the Safe Church Policies and Procedures* and that his/her group will comply with them.

Supervisor:

A volunteer or paid FCCW worker, including Church Staff members, who have passed a CORI check and have direct supervisory responsibility for the care of youth, in an FCCW position such as a church school teacher, Confirmation class teacher, youth group leader, or youth choir director. Chaperones assist Supervisors in supervising youth in a special FCCW activity, such as a youth fellowship event, day field trip, or overnight event.

Teaching Assistant

An adult or youth volunteer who functions in a non-supervisory role in the church's youth activities, such as in the church school or youth group.

Appendix

Exhibit A – Criminal Background Check Authorization Form

Exhibit B – Volunteer Participation Covenant

Exhibit C – Event Participation Consent and Liability Waiver

Exhibit D – Medication Release Form

Exhibit E – Incident Report

Exhibit F – Use of Facilities by Outside Organizations -- Statement of Compliance

Exhibit G – Building Access Code/Chip Form