

## **Safe Haven Designation Statement Shepherd of the Hills Lutheran Church**

A single incident of child abuse or molestation can devastate a church. Parents question whether their own children have been victimized, the viability of the church's youth and children's programs is jeopardized, and church leaders are often considered responsible for allowing the incident to happen. There is also the enormous potential for legal liability for the church, its officers and leaders, and its governing body. Most tragic of all is the emotional trauma to the victim and the victim's family.

Unfortunately, incidents of child molestation can and do occur in the church with increasing frequency. Part of the reason is that churches have been all too willing, without any screening process whatsoever, to welcome anyone expressing an interest in working in a volunteer capacity. By their very nature churches are trusting, forgiving, and unsuspecting institutions. These very qualities have made churches targets of child molesters. Churches and institutions must openly recognize that abuse does occur and discuss the importance of protecting children, young people, the elderly and disadvantaged adults from such abuse. The church can be proactive in its response to this concern by being educated on these issues, developing and become aware of church policy for preventing abuse, and adopting guidelines to prevent abuse. We will utilize several abuse prevention measures in an effort to create the safest possible environment within our church. These measures include screening of staff and volunteers, supervision of church activities and workers, provisions for regular training on abuse issues, use of team teaching and chaperoning standards for appropriate classroom order, and classroom safety and accessibility. Each volunteer working with minors, the elderly and the disadvantaged adults will be asked to sign a statement indicating that he/she has never been convicted of or pleaded guilty or no contest to physical or sexual abuse of those groups we have identified.

Anyone who has had an abuse conviction or a conviction that has been expunged, as well as anyone refusing to sign the statement, will not be permitted to work with children.

Although this policy may unfairly exclude someone who could safely work with children, we believe it is best to err on the side of safety.

In addition, before beginning such service, all volunteers serving in high risk ministries must have signed a statement indicating they have read and understand the policies and practices for prevention of abuse.

**Policy Statement**

Because God embraces all people with His love, we believe that everyone should be safe from all forms of abuse and neglect especially within His church. We, the members of Shepherd of the Hills Evangelical Lutheran Church, will be advocates for all who participate in our ministries, and we will establish clearly defined safeguards, policies and procedures for their protection.

**Goals**

- To assure that our church is a safe place for all, especially for children, seniors, and the developmentally disabled.
- To protect the staff and volunteers of our church from potential false allegations of abuse.
- To lower our church's legal risk by establishing a program that meets the test of reasonable care.
- To design a program that meets the above goals while maintaining the integrity of church programs and staffing needs.
- Community group leaders of children or youth who use the church facilities will be required to read the policy statement and sign an acknowledgment form.

**SAFE HAVEN PROCEDURES  
SHEPHERD OF THE HILLS EVANGELICAL LUTHERAN CHURCH  
CANON CITY CO**

In order to protect our members, our staff, and our church, and to promote the prevention of abuse, Shepherd of the Hill Lutheran Church, hereafter known as SOTH, has instituted the following procedures in compliance with our Safe Haven Policy.

**Definitions**

**The following definitions will be used in these procedures.**

- Workers: A worker is considered to be anyone who performs services under the supervision of SOTH whether this individual is in a paid position or a volunteer.
  - Staff -- all rostered and non rostered paid employees of SOTH.
  - High Risk Volunteer (HR) -- those individuals who work on a regular basis in ministries designated as High Risk as defined below.
  - Low Risk Volunteer (LR) -- those individuals who work in ministries designated as Low Risk as defined below. (ie office receptionist, ushers, etc.).
  - Youth Volunteers -- those individuals aged 12 – 17 years, who work exclusively with children and always in conjunction with a second HR Volunteer.
  - Nonmember Volunteers -- those individuals who have are not identified as members in the congregation.
  - Program Coordinator -- always a paid staff member under whose authority a specific ministry program work is conducted.
  
- Ministries
  - High Risk (HR) Ministries are those ministry programs which involve but are not limited to:
    - One-on-one contact with minors, the elderly or the disadvantaged adults, i.e., counseling
    - Off-site activities
    - Overnight activities
    - Transportation in church and/or personal vehicles
  - Low Risk (LR) Ministries are those ministry programs which have minimal involvement with children, the elderly or disadvantaged adults
  
- Children are those persons from infancy through 5<sup>th</sup> grade.
  
- Youth are those persons who are in 6<sup>th</sup> grade through 12<sup>th</sup> grade.
  
- Membership, an individual who is a member of the congregation as defined in Chapter 8 of the Constitution and Bylaws of SOTH.

## **Worker Screening Procedures**

In order to insure equality for all individuals covered by this policy the following screening procedures will be used. All individuals who work in our High Risk ministries, as defined on page 3, shall be subject to the following screening. Those who have been convicted of or have pleaded guilty or no contest to physical or sexual abuse will not be allowed to work in a High Risk Ministry.

### **High Risk Staff -**

- complete an employment application and a screening form;
- provide references which shall be verified by either phone or letter;
- read the Safe Haven policies and procedures during the hiring interview;
- be subject to the satisfactory completion of a background check;
- be reviewed and trained in SOTH Policy on Sexual Misconduct, shall sign an agreement to indicating they understand and will adhere to said policies; and
- sign a statement indicating that he/she has never been convicted of or pleaded guilty or no contest to physical or sexual abuse.

### **Volunteer –**

- demonstrate a commitment to SOTH and its mission statement;
- fill out appropriate forms for position;
- provide references appropriate to the volunteer position which will be verified;
- be subject to a satisfactory completion of a background check;
- be reviewed and trained in SOTH Policy on Sexual Misconduct, shall sign an agreement to indicating they understand and will adhere to said policies; and
- sign a statement indicating that he/she has never been convicted of or pleaded guilty or no contest to physical or sexual abuse.

### **Youth Volunteers (12 – 17 years)-**

- demonstrate a commitment to SOTH and its mission statement;
- fill out appropriate forms for position;
- provide references from a member(s) of SOTH congregation;
- participate in training and orientation appropriate for a person in contact with children;
- be reviewed and trained in SOTH Policy on Sexual Misconduct, shall sign an agreement to indicating they understand and will adhere to said policies; and
- sign a statement indicating that he/she has never been convicted of or pleaded guilty or no contest to physical or sexual abuse.

### **Nonmember Volunteers-**

- demonstrate a commitment to SOTH and its mission statement;
- fill out appropriate forms for position;
- provide a copy of a state drivers license or other photographic identification to be kept on file.
- provide references appropriate to volunteer position which will be verified;

- be subject to a satisfactory completion of a background check;
- be reviewed and trained in SOTH Policy on Sexual Misconduct, shall sign an agreement to indicating they understand and will adhere to said policies; and
- sign a statement indicating that he/she has never been convicted of or pleaded guilty or no contest to physical or sexual abuse.

***Note: Nonmember Volunteers must be made aware that SOTH insurance policies will not protect them in the case of legal litigation.***

**Volunteer – Low Risk -**

- demonstrate a commitment to SOTH and its mission statement;
- fill out appropriate forms for position;
- provide references from a member(s) of SOTH congregation

**Managing Confidential Written Information**

All confidential information maintained by SOTH shall be marked with a Warning Label which will read as follows:

*Warning --- Confidential Information. This document contains confidential information that may be reviewed only by those individuals authorized by Church Council. No other persons are authorized to review this document. Any person or persons who reviews, duplicates, distributes or discloses any portion of this document without authorization may face one or more of the following consequences:*

- *Termination of employment*
- *Dismissal from any volunteer position within the church*
- *Possible criminal liability*
- *Possible civil liability*

All the screening documents shall be kept in a locked file. The keys to the secured file shall be in the possession of the Pastor and/or his designee. Church staff shall be advised that any unauthorized access to the confidential information including employment screening documents will be grounds for immediate dismissal. In order to properly dispose of any documents and to maintain their confidentiality the following guidelines should be followed:

- *For individuals who are hired.* All employment documents pertaining to the applicant who is hired should be retained permanently by the church in a confidential file. Once the person is no longer in the employment of the church, all confidential forms and documents should be placed in a sealed envelope and retained in a locked file.
- *For individuals who apply but are not hired.* All employment applications shall be kept for a period of three years. These documents serve as evidence if an allegation of discrimination occurs. Following that period, these materials should be shredded and disposed of by the staff liaison to the SAFE Committee.
- Forms will be kept on file for 3 years for volunteers and 5 years for staff.

## Evaluating Risk

Whenever a new employee or volunteer is hired, it is necessary for SOTH to evaluate that individual for both their ability to do the job and what, if any, risk they bring to the organization. In an effort to maintain the confidentiality of all volunteers and applicants for employment it has been determined that a limited number of people should have access to confidential, written information. However, to achieve our goal to protect people and reduce legal risk, prudence dictates that we have all the counsel necessary to make informed decisions. The following individuals have been authorized to evaluate the information collected:

- Pastor
- Church Council President
- Mutual Ministry Team

Access to information will be limited to Pastor and Church Council president for paid personnel and volunteers

In order to maintain the integrity of the organization there are standard procedures that are to be followed when evaluating our risk involving suspected misconduct. If a church receives any information from an applicant or a reference suggesting that the applicant may pose a risk of harm to others, then the church must proceed with caution. The following guidelines should be followed:

- a) evaluate all of the evidence using the criteria listed below and
- b) seek professional counsel.

The goal in this process is to make an informed judgment about the suitability of this applicant for service in a given area. In evaluating any of the evidence the following should be considered:

- Type of misconduct – Does the type of misconduct relate to the position that the applicant wants to fill?
- Chronic behavior – Has there been a repeat of the behavior over a period of time? Repeated behavior should be given careful consideration as there is potential for repeated offenses. Chronic behavior may be determined by the duration of a person's misconduct, the number of incidents, and/or the number of victims.
- When the prior incident occurred – How long ago did the prior incident occur? The length of time that has passed since the misconduct occurred should be taken into account, **except** in the cases of sexual misconduct.
- Relationship of trust – Has there been misconduct that involves a violation of trust in a prior relationship? Misconduct occurring in the context of a relationship of trust should be viewed more seriously.
- Arrest without conviction – Churches should only ask applicants about criminal convictions and not arrests. If, however, a criminal case that is pending is known to the church it is an area that needs further screening.

If a decision to accept or reject an applicant is determined the identity of the applicant in question will be protected and the circumstances of risk will be the topic considered.

*NOTE: In cases of sexual misconduct a perpetrator should never be allowed to work with minors or other vulnerable persons.*

## **Worker Supervision**

SOTH will use reasonable care in selecting its workers, but there is still the possibility of liability for emotional and physical damage sustained by an individual during church activities. In order to put in place as many safe guards as possible SOTH has adopted the following supervisory policies and procedures for all ministry involving minors, the elderly or the developmentally disadvantaged to create and maintain a safe environment. These procedures are to be followed by every volunteer and employee serving in ministries working with children, youth, seniors or developmentally disadvantaged at SOTH.

*Guidelines for a Safe Environment- Christian ministry by its very nature is a ministry that often involves physical touch and emotional closeness. Those who work with people know the value of an affirming hug and the need for people to have other people with whom they can share confidences, especially when they are hurting. The Christian community affirms that touching one another and sharing emotional burdens are important means of communicating God's love. Shepherd of the Hills encourages appropriate touch; however, at the same time it prohibits inappropriate touch or other means of sexual exploitation.*

### Appropriate Touch

- Use of touch must be gentle and passive, not aggressive.
- Use of touch should be conscious and not haphazard. The touch should be one that gently reminds a child in correction, quiets a child in pain, or affirms a child in a positive manner.
- Use of touch should be limited to placing a hand on a child's shoulders, hands, arms, head, or upper back.
- Appropriate touch is done in group settings. Touching one another by hugging, holding hands, (with children), or putting an arm around the shoulders are reassuring gestures that show you care.
- One way to keep touch from being misinterpreted by a single youth is to show the same genuine affection to many youth.

### Inappropriate Touch

- Use of touch must be non-demanding. This means that hugs and kisses should not be asked for by workers, and they should not be forced upon a person.
- Avoid touch in situations that could be misinterpreted as sexual advances. For example, touching while in the water is inappropriate because it is hidden.
- Sexual touch, defined as contact with penis, vagina, buttocks, breast or chest area, whether under or over clothing, and kissing, is never allowed.

Leaders should not elicit inappropriate sexually explicit conversation with anyone. Showing sexually explicit material to youth is not allowed, i.e. videos or photographs. No discussion of the leaders own sexual experience is allowed.

It is the responsibility of the adult in charge to stop any touching that is repetitive or seems inappropriate or could be interpreted as sexual harassment, i.e. jokes, sexually oriented comments,

innuendo, gestures, drawings, and notes. If necessary, seek the help of staff or other adult workers.

The help of another responsible adult should be requested if a young person is behaving (touching or speaking) in a way that is making the adult leader uncomfortable and they are unsure as to how to handle the situation.

Adults holding older children on the lap or carrying younger children on the shoulders is not appropriate.

A child must never be struck for the purpose of discipline or for any other reason.

### Two Adult Rule\*\*

- Two adults must be present during all church activities involving minors (infant – 12<sup>th</sup> grade).
- One adult must be a staff person or an “HR Volunteer”.
- Two adult leaders must be present for overnight stays. For groups including both sexes one leader must be a male and one a female.
- For all mission trips a staff person is required to participate.
- Two Youth Volunteers may be used but only in conjunction with adult supervision and only in activities involving children defined as infant through fifth grade.

*\*\*While the Two Adult Rule is in place there may be times when a child may unavoidably be alone with a leader for a short time. (i.e. if one of the leaders is unable to be there at the last minute.)*

### Discipline

- Positive verbal directives telling the child what you want them to do should be used by leaders or those in charge.
- Time-out and notifying parents are acceptable methods of control.
- Spanking, ridicule, handling roughly, striking, kicking, shaming, withholding food or restroom privileges, and verbal or emotional abuse are not acceptable.

### Classrooms

- Unimpeded visibility into a classroom is a must. It can be accomplished through:
  - use of classroom doors with windows of shatterproof glass, or
  - classroom doors which are left open when the classroom is occupied.
- Random visits will be made to all classrooms by the Program Coordinator.
- Parents of the children served, the clergy, or administrative and professional staff of the church have the right to visit any program at any time unannounced.

### Parental Permission

Written parental or custodial permission with a medical release form is mandatory under the following conditions:

- in those rare occasions when there is a legitimate reason to depart from the “Two Adult Rule”. Prior to such an occasion the Program Coordinator must be notified and he/she must first obtain the consent of the child’s parent or guardian.
- for all counseling sessions with a minor including Youth Peer Ministry,

- for all occasions requiring transportation in church or private vehicles,
- for all off-site programs and events,
- for all overnight events and
- for all mission trips

#### Adequate Personnel

- The preferred ratio of children and youth to adult leaders is 5 to 1.
- The preferred ratio for nursery age children to adult leaders is 4 to 1.

#### Bathroom Breaks

Adult leaders shall:

- Schedule breaks to avoid spontaneous interruptions to class time.
- Keep spontaneous breaks to a minimum; however, allowances may be necessary.
- Send a co-leader with the child who is requesting the break.
- If supervision is not needed, stand in the bathroom doorway with the door open.
- If supervision is needed prop the bathroom door open. Do not close the bathroom stall door.
- Avoid touching the child's genital area.
- Ask another adult in the area to be in visual contact if possible.

#### Overnights and Day Trips

- Written parental or custodial permission with a medical release form is mandatory.
- All adult leaders must be screened to work in high risk ministry.
- Two adult leaders are required for all events away from church premises.
- Adults and minors must never be together in a one-on-one situation in isolation without parental permission.
- The buddy system should be implemented whenever possible.
- When possible, one male and one female leader should accompany mixed groups.

The following rules also apply to overnight trips:

- Mixed groups on an overnight trip require one male and one female leader.
- Adults must respect every youth's right to privacy and personal boundaries while showering and changing.
- Adults must not share a bed with a minor.
- Adults should avoid being in a bedroom alone with a minor.

#### Security

- Adult leaders are responsible for the safety and security of those in their program while either at the church or away from the church.
- All leaders should be aware of other scheduled activities taking place in the area at the same time. All leaders should be alert for strangers in the vicinity and should ask them

who they are and what they want. Any suspicious individuals found to be in the area of a church activity should be reported to the appropriate authorities.

- Supervision of minors will be maintained before and after events until all involved are in the custody of a parent or legal guardian.
- All activities and play must be supervised.

#### Counseling/Youth Peer Ministry

- Counseling shall be provided only by qualified SOTH staff.
- Scheduled, regular counseling with minors requires written parental or custodial permission including a medical release form.
- Counseling with minors should be conducted in an environment that provides visibility to those passing by, such as in a public place (a restaurant or even a hallway) or in a room with a window in the door.
- Meetings held with a young person alone in his or her home requires the permission and presence of a parent or guardian. It is never appropriate to be in a minor's bedroom.
- Adequate training shall be provided to all peer counselors. Training will be provided by the Youth Program Coordinator.

#### Nursery

In order to make sure a child is returned to the proper parent or guardian there must be a procedure developed to clearly identify the child and the child's parent or guardian. In all cases the child can only be released to the authorized individual.

**ANY VIOLATION OF THESE GUIDELINES MUST BE REPORTED TO THE APPROPRIATE PROGRAM COORDINATOR IMMEDIATELY AND IT WILL BE INVESTIGATED**

#### **The Program Coordinator's Supervisory Responsibilities**

- To adequately supervise all leaders to ensure that SOTH *Guidelines for a Safe Environment* are implemented.
- To make periodic random classroom visits and inspect all areas where adults and children are together for periods of time, remaining aware of areas where abuse might occur.
- To take appropriate action on all complaints and accusations immediately whether presented by staff, adult leaders, parents, or minors and to notify the reporting person of the conclusion.
- To document all complaints and subsequent disciplinary action in writing.

#### **The Safe Haven Coordinator's Responsibilities**

- To ensure that all adult leaders, staff and volunteers are trained on SOTH Safe Haven Policies and Procedures.
- To ensure that the Policies and Procedures are being followed.
- To ensure that all forms are completed and on file for volunteer positions.

## What is Sexual Abuse?

*Sexual abuse is defined as “Any sexual activity with a child – whether in the home by a caretaker, in a day care situation, a foster/residential setting, or in any other setting, including on the street by a person unknown to the child. The abuser may be an adult, and adolescent, or another child.....”*

(National Resource Center on Child Sexual Abuse, 1992)

All sexual abuse is an exploitation of a person’s vulnerability and powerlessness in which the abuser is fully responsible for the actions. Sexual abuse is criminal behavior. Since touch can be misconstrued, all workers must know the difference between appropriate and inappropriate touch. Inappropriate contact includes non-touching and touching aspects. They may include but are not limited to:

### **Non-touching**

Verbal Comments i.e. jokes innuendoes

Exposure to pornography

Obscene phone calls

Allowing children to witness sexual activity

### **Touching**

Oral, genital/anal penetration

Intercourse

Fondling

Forcible rape

## **REPORTING OBLIGATIONS**

Because it is mandated in Scriptures for the church to protect and care for those who cannot protect and care for themselves, SOTH has determined that our staff and volunteers must report **any** known or reasonably suspected incident of child abuse. Whether there is an incident or an alleged offense that takes place on or off SOTH premises, it will be considered ministry related because of the minor who is involved with SOTH program(s).

### When to Report

- When a child alleges abuse and there is no apparent reason to believe the child is being untruthful.
- When an employee or volunteer has reason to believe abuse has occurred.
- When a perpetrator confesses physical or sexual abuse.

### Where to Report

In cases where the abuse is **Third party sexual abuse**, which means it is sexual abuse that is committed by someone unrelated to the victim. Third party sexual abuse and those cases where the suspected perpetrator is 10 years of age or older should be reported to the law enforcement agency in whose jurisdiction the offense is believed to have occurred. For SOTH the appropriate agency is Canon City Police Department-719 275-5600

If the abuse is **Interfamilial sexual abuse**, which is sexual abuse to a child that is committed by a family member or person living in the child’s household in a position of trust. Interfamilial sexual abuse and those cases where the suspected perpetrator is under the age of 10 should be reported to the Sexual Abuse Team based in Fremont County Department of Human Services office. The agency can be reached at 275-2318 and they will page the appropriate personnel.

## Who should Report

There are two ways in which legal obligation exists that requires reporting of suspected abuse.

**Mandatory reporters**-The Colorado Children's Code 19-3-304 lists those professionals who are required by law to report child abuse.

**Permissive reporters**-All other persons are permitted by law to report suspected abuse but are not required to do so. Permissive reporters will not be penalized by the state for not reporting instances of child abuse, but they can be sued by any victim for failure to report if they do not report reasonable suspicions. Shepherd of the Hills church has determined that our staff and volunteers will act as mandatory reporters in any known or reasonably suspected case of child abuse.

## Immunity from Liability

Any report is confidential and the person making the report is immune from liability for making such a report. *Persons making good faith reports of suspected abuse or neglect are immune from any liability, both civil and criminal unless a court determines that such person's behavior was willful, wanton, and malicious.* (C.R.S. 19-3-309 of the Colorado Children's Code)

## Confidentiality of Information

- Initially all reports are confidential; however if criminal charges are filed in a child abuse case, the reporter's anonymity cannot be guaranteed due to the necessity of court testimony and/or material witness.
- All SOTH staff and volunteers must be sensitive to the need for confidentiality in the handling of this information and, therefore, should only discuss the incident with the persons directly evaluating the situation.

## Determination to Report

- The adult leader working with a suspected victim of sexual abuse must immediately notify the Program Coordinator for the program in which the minor is participating. It is advisable to write down the specifics of the situation as soon as possible.
- The Program Coordinator will report the allegation to the Pastor.
- The Pastor, after discussion with the adult leader, hereafter known as the Reporting Person, will contact Fremont County Department of Human Services for their assessment of whether or not the facts in the case warrant an official report.
- If the answer is "no", there is no need to file a report – then the Pastor must record in writing details of the contact with Fremont County Department of Human Services including the supervisor's name, date and time, and a summary of the conversation.
- If a consensus of opinion is not reached – then the Pastor will inform the Reporting Person that he or she may report unilaterally to the authorities if they still believe reasonable suspicion exists.
- If the answer is "yes", there is sufficient reason to believe that abuse has taken place – then the Pastor will assist the Reporting Person in making an official report.

## **How to Report**

- Initial reporting will be accepted orally (i.e. telephone call). The Reporting Person will stay with the facts and avoid making judgments, diagnosis, or accusations.
- The agency or officer may request a written report. \* The attached form *Report of Suspected Child Abuse* should be used when a written report is requested. A copy must be made for the church's confidential files.

## **RESPONSE TO ALLEGATIONS OF ABUSE**

Realistically no practical prevention strategy is 100 percent effective. An accusation of child sexual abuse may occur in any church. Wrong reactions can multiply the pain and liability inherent in an abuse case. In light of this reality, SOTH has developed a thorough response plan. In the unfortunate case of an allegation of sexual abuse SOTH has determined that our first priority must be the care and safety of the victim. The Program Coordinator or other appropriate staff person will take the following prompt and immediate action.

### **The Victim and Family**

- Respond to and acknowledge the victim's pain and that of his or her family.
- Promptly notify the child's parent/guardian in accordance with the directions of the relevant state or local agency.
- Assure the child is in a safe environment before the accused is confronted.
- Work with the child, his or her family and the Reporting Person when follow-up is needed.
- Do not admit liability, arrange counseling, or seek to negotiate a settlement. This may void insurance coverage and might be seen as an attempt to hinder prosecution.

### **The Church**

- Notify the Pastor and Church Council President.
- Notify the bishop of the Rocky Mountain Synod.
- Notify the liability insurance company. Let it be noted that written and verbal reports to insurers are generally non-privileged. They may be divulged in subsequent criminal prosecutions or civil suits.
- Designate one spokesperson from Shepherd of the Hills to speak with the media and the congregation in a discrete, informed and diplomatic manner. A clear position statement on child sexual abuse, including the policies and established safeguards of the church, should be presented. What follows is a suggested media release:

#### **Sample Release to Media**

*It is with great regret that we acknowledge an accusation of sexual misconduct against one of our volunteers/employees. The accused person has been relieved of his/her duties pending an investigation. We are cooperating to the utmost with the investigating authorities. Shepherd of the Hills Lutheran Church has been aggressive in an effort to prevent just such an incident. In 2001 a comprehensive Policy on Sexual Misconduct was implemented. That an incident of sexual abuse may have happened in spite of our best*

*efforts greatly saddens us. Our concern and prayers are first and foremost with the victim and family.*

### **RESPONSE GUIDELINES**

- Do not prejudge the situation. Always take the allegation seriously.
- Do not attempt an in-depth investigation. Leave this to professionals.
- Do not deny the incident occurred, in the face of clear evidence to the contrary.
- Do not minimize the incident i.e. “it only happened once”.
- Do not present the accused as a repentant sinner who has been rehabilitated.
- Do not blame the victim or the victim’s family.
- Do not admit liability.
- Do not provide in-house counseling.
- Do not spell out details of accusations in public interviews.
- Do not surrender to those who will criticize and condemn the church. This is not the time for “No comment”. Do influence public opinion positively by emphasizing the precautions that were taken and the policies that were implemented.

#### **The Governmental Authorities**

- Cooperate to the extent of the law with any legal reporting requirement.
- Cooperate with state and local authorities in the investigation and possible prosecution of such allegations with the presence and guidance of the church attorney.

#### **The Accused**

- An accused volunteer or paid staff person will immediately be relieved of all his or her duties until the investigation is finished.
- Reinstatement of the accused will occur only after all allegations have been cleared to the satisfaction of all persons involved.
- The church will treat the accused with dignity and support.