

Child Safeguarding Policy
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1. Policy Foundations

1.1 Purpose

The purpose of this policy is to:

- 1. Affirm the commitment of Grace DC to the safeguarding of children and vulnerable adults and to the prevention of all forms of abuse
- 2. Establish common values and principles for safeguarding children and vulnerable adults and provide protection guidance and best practices
- 3. Determine procedures that govern all interactions with children or vulnerable adults in any official Grace DC ministry
- 4. Ensure that all members and regular attenders of Grace DC know their responsibilities in safeguarding children and vulnerable adults
- 5. Equip children and vulnerable adults to recognize and advocate for appropriate relational boundaries both within and outside the Grace DC community.

1.2 Scope

This policy provides guidance and procedures that must be followed by all members and regular attenders of Grace DC when interacting with children in any official church ministry context. Youth under 18 who volunteer with children are also accountable to this policy. This policy covers children and vulnerable adults.

1.3 General Policy Principle

Grace DC is committed to the prohibition, prevention, disruption, and reporting of all forms of child abuse in our church ministries. This policy document intends to bring this commitment to life by outlining the steps we will take to build—and maintain—a safe and secure environment for our children.

1.4 Responsibility

The Elders of Grace DC are organizationally responsible for upholding this policy. The Children's Ministry Coordinator is responsible for enforcing and periodically reviewing and updating this policy. The Members and regular attenders of Grace DC are responsible for following and upholding this policy.

All members, staff and volunteers are required to read, assent to and uphold this policy. They will be asked annually to reaffirm their commitment to this policy.

Each congregation in the Grace DC network will create and sustain a Child Safeguarding Committee (CSC) to oversee congregational education on, implementation and enforcement of the policy. Email childsafe@gracedc.net, childsafe@gracemosaic.org to contact the committee in your congregation.

1.5 Definitions

Official Grace DC ministry context or events: includes events taking place in facilities secured with church funds or in the name of Grace DC. Private events initiated by Elders, staff, members, or attendees of Grace DC and held in private homes or public spaces (such as parks, restaurants, etc.) are not considered church events if they are not explicitly organized or sponsored by a ministry of Grace DC. Grace DC does not have responsibility over childcare at individual Community Groups, which typically meet in people's homes. Weddings are not church events, even if Grace DC staff are officiating. The care and protection of children in such settings (i.e., community groups and weddings) is the responsibility of the caretaker of each child.

Grace DC: Grace DC is one church made up of multiple congregations. In this document, Grace DC refers to both the legal entity/organization and its congregation, which includes members, regular non-member attendees, and visitors. Grace DC subsets include:

Grace Downtown
Grace Meridian Hill
Grace Mosaic
Institute for Cross-Cultural Mission

Staff: A paid employee of the organization whether administrative or pastoral staff. For the purpose of the document, staff also includes paid contracted workers whether paid directly by Grace DC or through a third party provider, who cares for and serves the children of the church.

Member: An individual who has gone through the membership process which includes a background check, assent to the Child Safeguarding Policy and a vow to submit to the government and discipline of the church.

Elder: Teaching and Ruling Elders are leaders who have spiritual oversight of the church.

Volunteers: Any member or non-member who offers to care for and serve the children of the church.

Caretaker: We use this term to identify both parents and those expressly given consent to provide direct care and oversight of a child. Examples could be a grandparent, relative, mentor, adult over 18 assuming responsibility for the safety and well-being of the child while at a Grace DC event.

Child: Grace DC considers any person under 18 years of age to be a child. For the purposes of this policy, the term child includes vulnerable adults.

Vulnerable Adult: The broad definition of a 'vulnerable adult' is someone aged 18 years or over who is unable to take care of him or herself, or unable to protect themselves against significant harm or exploitation.

For the purposes of this policy, Grace DC uses the legal definition of abuse found in the appropriate legal jurisdiction.¹ In general, abuse includes the following:

Physical Abuse: non-accidental physical contact as a result of including but not limited to the following: punching, beating, kicking, biting, shaking, throwing, stabbing, choking, hitting (with a hand, stick, strap, or other object), burning, or otherwise harming a child, that is inflicted by a parent, caretaker, or other person who has responsibility for the child. Intentional and judicious physical discipline is not considered physical abuse.

Emotional Abuse: acts toward a child, primarily verbal behavior, that terrorize, intimidate, humiliate, demonstrate a pattern of discrimination, scapegoat, or demean a child and/or deprive them of normal contact with other persons. Such acts cause or have a substantial likelihood of causing harm to the child's physical, psychological, social, spiritual, or moral development.

Sexual Abuse: non-consensual physical contact with a sexual or intimate part of the body, or other forms of sexual activity engaged in for the purpose of sexual gratification or to degrade or abuse.

Physical contact includes, but is not limited to:

- Touching, grabbing, patting, slapping, pinching, rubbing, fondling, groping, poking, or other forms of contact, whether over or under clothing
- Rubbing one's genital area up against another person or touching another person with one's genitals, whether over or under clothing. This includes instances when an individual acts as though the rubbing was inadvertent but in fact it was intentional.
- Sexual intercourse of any kind

Sexual or intimate body parts include, but are not limited to:

- Breasts
- Buttocks
- Genitals
- Groin area
- Upper thighs

Other forms of sexual activity include, but are not limited to:

- Photographing, videotaping, or making any other visual, descriptive, or auditory recording of sexual activity or the sexual or intimate parts of a person's body
- Displaying to another any writings, photograph, videotape, or other visual or auditory recording of sexual activity or the sexual or intimate parts of a person's body

Lack of consent includes, but is not limited to:

- If one individual is an adult and one individual is a child. Children can not legally give
 consent to sexual activity with an adult. All sexual activity by an adult with a child is by
 definition non-consensual.
- Explicit indication of lack of consent
- Physical/verbal force or intimidation, whether express or implicit
- Circumstances making it obvious that consent has not been granted, such as:

¹ For complete definitions on abuse, see the Code of the District of Columbia: https://code.dccouncil.us/dc/council/code/sections/16- 2301.html#(23)

- Being too intoxicated to say "no"
- Being asleep
- Lack of knowledge of the activity's occurrence
- Otherwise not having the physical or mental capacity to consent.

Neglect: the failure of parents or caretakers to meet a child's physical and emotional needs when they have the means, knowledge and access to do so; or the failure to protect a child from exposure to danger. By itself, lack of financial means to provide for a child is not neglect.

- Physical: failure to provide necessary food or shelter, or lack of appropriate supervision
- Medical: failure to provide necessary medical or mental health treatment
- Educational: failure to educate a child or attend to special education needs
- Emotional: inattention to a child's emotional needs, failure to provide psychological care, or permitting the child to use alcohol or other drugs

Spiritual Abuse: Physical, emotional, or sexual abuse administered under the guise of religion. Including but not limited to:

- Use of religious ideology, precepts, tradition, or sacred texts to physically, emotionally, or sexually abuse a child
- Physical, emotional, or sexual abuse that occurs in a religious context (e.g., church, small group, church retreat)
- Physical, emotional, or sexual abuse perpetrated by a religious leader (e.g., pastor, youth leader)
- Invocation of divine authority to manipulate a child into meeting the needs of the abuser

Other important issues and definitions to be aware of include:

Polyvictimization: We are aware of the research on polyvictimization, which tells us that children who are maltreated in one way are at significantly increased risk of being maltreated in multiple ways. Therefore, as our church becomes aware of an indicator or report of a child being maltreated in one way, we will be alert to the possibility that this child might also be maltreated in another way, and will take steps to protect the child from known risks and be extra attentive to and supportive of the child.

Indicators of Abuse: Because "the majority of children who are sexually abused will be moderately to severely symptomatic at some point in their life," Grace DC is familiar with and attentive to potential indicators of child abuse. As the church's front-line for children's and youth programming and pastoral counseling, church staff and volunteers have regular opportunities to observe children's behavior, family dynamics, and caregiving styles. They are often privy to the intimate details of congregants' lives. Church staff have ongoing contact with the entire family unit and its acquaintances, and as such may be in the unique position to detect child sexual abuse and other forms of child maltreatment.

Impact of Abuse: Though a child's injuries may be hidden from the untrained eye, child sexual abuse and other forms of child maltreatment can result in immediate and/or lasting impact in all realms of the person's well-being. Understanding how child sexual abuse can traumatize the child and have lasting impact in the life of a surviving adult is a critical first step in preventing abuse and responding compassionately. Not every child will display the impact of their

maltreatment and not every adult will experience the long-term consequences of their traumatic childhood experiences, but all are at increased risk.

Perpetrators of child maltreatment: People who sexually abuse children utilize authority, trust, or physical force/threats to gain access to and control over children so they can perpetrate the abuse. Anyone is capable of abusing a child, from a stranger to a family member. Over 90% of abuse occurs by someone known by the victim. Abusers in the church settings will groom both the victim and their family. Jesus taught about wolves in sheep's clothing. We must be vigilant in upholding policies universally even with those most trusted members within our community to protect the most vulnerable.

2. Interactive Guidelines and Routine Protective Measures

2.1 Registration and Release

All children participating in official Grace DC church events will be registered and released in a way that is conducive to the protection of children. Registration and release includes the steps below (or others determined to be equivalent by the Children's Ministry Coordinator):

Responsibility

Once children's attendance is recorded for an event, it is the church's responsibility to supervise those children from the time they are dropped off until the time they are picked up by their caretaker. Children in sixth grade and older can be released without caretaker sign-out.

Registration for Members

At the beginning of each ministry year, Grace DC registers any child who attends church activities. The registration will record who may pick-up a child from an event, any allergies the child has, medical concerns the church needs to know about, and doctor to contact in case of an emergency. This registration record will facilitate the drop-off of the member's child to church activities.

Registration for Non-Members/Regular Attenders

Visiting caretakers are required to fill out their name, child's name, cell phone, and allergy information prior to checking child into the church activity. A visiting caretaker may authorize in writing another adult to pick up the child at the end of the church activity. In this case, the designated adult must accompany the caretaker to sign in the child and receive the nametag at that time.

Pick up/Sign out

Grace DC will not release the child to anyone apart from the caretaker or previously authorized adult (as outlined above).

Emergency Exception

In the event of an emergency (e.g. building evacuation) that prevents the caretaker or authorized adult to pick up the child, the child will be released for temporary safekeeping to the care of two unrelated members who have been pre-screened and approved for childcare.

2.2 Communicating with Caretakers

All caretakers must keep their cell phones on and remain available to be reached (via text message, call, or in-person) for the duration of the church activity.

Emotional Distress

Unless otherwise noted by caretaker, caretaker will be contacted to pick up their child if the child appears to be in distress or has been crying uninterrupted for ten minutes.

Late Pick Up

If a child is not picked up within 15 minutes of the pre-determined pick up window, staff will either text or call the caretakers or ask the Children's Ministry Coordinator to locate the caretakers. If caretaker can not be located, the child will be entrusted to two unrelated adults

approved for childcare until the caretaker is found. If caretakers can not be found within 30 minutes from the end of pre-determined pick up window or it is suspected the child has been abandoned, Child Services will be called.

Sickness

If a child develops any symptoms of illness while in the nursery, the child will be separated from other children and the caretaker will be asked to immediately pick up the child.

Harmful Behavior

If the child's behavior poses a risk to self, others, or disrupts the general provision of care, the caretaker will be asked to immediately pick up the child.

2.3 Access To Childcare Areas

The only people permitted in the designated childcare areas during designated childcare times are the children, their caretakers, on-duty staff, assigned volunteers, and the Children's Ministry Coordinator. When pass-through areas are used for childcare, anyone other than the above mentioned people must not pause or linger in the childcare space.

Caretaker's Presence

Caretakers who are not assigned volunteers may be permitted to stay with their child temporarily; however, their care must be limited to their own child.

When Caretaker is registered sex offender

If the caretaker or guardian of a child is a registered sex offender [known to Grace DC], they must coordinate with the Children's Ministry Coordinator times to drop-off and pick-up their child. The Children's Ministry Coordinator or their designated agent will be present during these times. In the case that a member or regular attender of the church is a registered sex offender, [Grace DC] will appoint certain point-persons (i.e., Elders) for interacting with such individuals on a weekly basis. An agreement/covenant containing terms and conditions for the member/attender's behavior (e.g., not permitted in certain areas of the church during services, permitted in certain areas only in the company of an appointed point-person) will be drafted, gone over, and signed.

2.4 Open and Observable Interactions

Grace DC requires two, unrelated adults to be present during the supervision of all church ministry childcare events. No adult is permitted to be alone with a child for any period (apart from where a caretaker relationship exists.) Most child abuse happens in isolated situations and most adults seeking to harm a child prefer to do so in private. The more an interaction is observable and interruptible, the better. Because abuse can be perpetrated by older children against younger children, groups of children will be supervised by at least two unrelated adults during church activities. Children are not permitted to be alone with other children without adult supervision.

Adult-to-Child Ratios

Infants: 1:2

Crawlers/Walkers (under 2): 1:3

Young Preschoolers: 1:4 Older Preschoolers: 1:5

Elementary ages: 2 adults per class

Ancillary Church Ministry Events

Absent a caretaker's written consent and a Children's Ministry Coordinator's knowledge, Grace DC prohibits its members, volunteers, and staff from spending time alone with children at ancillary church activities such as bible studies, tutoring, mentoring, and partner ministry activities. This includes activities that take place in a private home or other isolated settings including cars. In cases of taxis/ubers, the 2 adult ratio should be upheld whenever possible. If not possible, older children will be sent in groups of 2 or more with one adult and a driver.

Favoritism/Gift-giving

Staff and volunteers are prohibited from displaying favoritism towards a child or group of children within the context of official church ministry events. Caregivers are permitted to be more familiar with their own children if such attention does not detract from their duty. Staff and volunteers are prohibited from giving gifts to individual children, unless the gifts are both:

- Able to be given to other children at other times for similar reasons (e.g., gifts to graduating seniors; a new Bible for students entering middle school; end of the year thank you gifts to volunteer)
- Paid for and signed from the church rather than the individual staff member

Beneficial Extra Attention

In cases where staff believe that a child would benefit from different attention such as spending time with a child or children from church (for mentoring, Bible study, tutoring):

- Staff should be able to articulate a clear reason for providing extra attention to a child that focuses on the child's needs.
- Staff must receive authorization from Children's Ministry Coordinator before providing extra attention to a child.
- When possible, supervisors might organize a rotation of staff and volunteers so that extra attention is not provided solely by one individual.
- In keeping with the policy, the staff and Children's Ministry Coordinator will be consulted regarding appropriate locations (e.g. public place with high visibility), transportation options, selecting the unrelated adult to be present and approve of the plan.
- Staff providing extra attention must always abide by the policy (e.g., meet in observable and interruptible spaces) and appropriate touch boundaries.
- If special attention is considered, the staff and Children's Ministry Coordinator will make an effort to find ways that a caretaker could participate and welcome caretaker participation and input.
- Children's Ministry Coordinator should occasionally drop by unexpectedly during outings or meetings.
- Staff should periodically reevaluate the situation to determine if extra attention is still necessary.

2.5 Touching and Personal Boundaries

Grace DC requires that all physical touch between an adult and a child is observable by another adult. Pressuring a child for a hug or physical affection either verbally or non-verbally ("Aww, come on!" or "That makes me sad/hurts my feelings" or making a pouty face in response to a child resisting a hug or other touch) is prohibited.

Prohibited Touch

Grace DC prohibited forms of touch includes but is not limited to:

- Sexually or physically abusive touch
- Corporal Punishment
- Any touch that is unwanted by a child or the child's caretaker indicates it is unwanted

The following are forms of touch that are prohibited by anyone other than caretakers or legal guardians of the child:

- Touching a child's thighs, stomach, or back
- Lap sitting* for children who are three and older; if a child three and older attempts to climb in one's lap, one should redirect them to sit next to you
- Tickling*
- Playing with hair
- Full frontal hugs
 - *Tickling and lap sitting are common grooming techniques and ways for abuse to occur.

Examples of Permissible Touch

Grace DC desires to show healthy affection to its children through the following:

- Displays of affection that are observable and interruptible except as listed above in prohibited touch
- High-fives/Fist Bumps
- Pats on the shoulder
- Side-hugs
- Holding/carrying of children three and younger (Note that appropriate exceptions will be made, documented and communicated for children with special needs/injuries.)

2.6 Media and Communication Boundaries

Photography and Video

Volunteers are not permitted to take photos or videos of children during church activities. Staff are permitted to take photos or videos of children only if the following criteria is met:

- The photographs or videos are in support of official church communications and marketing activities (e.g. to be posted on church website or included in church publications)
- Caretakers consent to have photos or videos taken of their children; staff will consult
 with caretakers before photos or videos are used or disseminated. As a part of
 registration caretakers can indicate whether they consent to having photographs or
 video taken of their children and whether such pictures can be disseminated (social
 media or church website, or church communication). Staff and Volunteers must consult
 with Children's Ministry Coordinator before disseminating/posting pictures of children
 taken during church activities.

Open and Observable Communication

Staff and volunteers are prohibited from communicating (including but not limited to phone, text, email, social media, or other online platforms) to a child without the awareness and approval of the caretaker. All communication to a child should be copied to a caretaker or unrelated staff or volunteer.

Older Children Seeking Advice or Information

Grace DC acknowledges that there will be times when older children (such as teenagers with independent phone access) will reach out to staff or volunteers via phone for advice or prayer, when such happens, the volunteer or staff should address the concern as appropriate to address immediate concern and direct more conversation to an open meeting with another un-related adult present. Any staff or volunteer who has been contacted should report the communication with the Children's Ministry Coordinator.

Sexual Content in Communication or Media

Grace DC prohibits the use of sexual language with children. Sexual language in any mode of communication in person, phone, text, email, social media (Instagram, snapchat, Facebook, etc.) or activity that involves:

- Sexually suggestive language, racy jokes, sexual innuendo, descriptions of sexual experiences/habits
- Uploading, downloading, or viewing of pornography
- Music, videos games, and movies with sexual themes
- Messages that humiliate, threaten, ridicule, degrade, frighten

2.7 Diapering and Toileting

Caretakers are required to ensure their children have a fresh diaper and/or have recently used the bathroom prior to drop-off. Only female staff or volunteers appointed by the Children's Ministry Coordinator in the absence of female staff are permitted to change diapers. The standard consent form signed by all caretakers will ask caretakers to authorize female staff and appointed female volunteers to change diapers as needed or indicate if they prefer to change the diaper directly.

Open and Observable Diaper Changing

Children must be kept in full view of other adults while diapers are being changed.

No Assistance with Toileting

Grace DC staff and volunteers are not permitted to provide bathroom assistance for any child who is toilet trained; further, they are not permitted to be inside the bathroom with the children. If a child requires assistance in any way inside a bathroom (e.g. pulling up or down pants, wiping, etc.), the caretaker will be called.

Taking Children to the Bathroom

While under the care of the church, children within the same class (age group) will be taken to the bathroom in groups of three or more (e.g., one staff member and two children or two staff members and one child); the adult nearest the bathroom must be within the line of sight of another unrelated adult. Children should use the bathroom one at a time.

When taking children to the bathroom, staff and volunteers must ensure the bathroom is completely vacant before letting children inside. Once the children are inside the bathroom, no adults are permitted to enter the bathroom space.

Urgent Safety Concern in Bathroom

If there is ever a medical or safety emergency in the bathroom, (e.g. child falls off toilet or slips and falls in bathroom) that requires an adult to enter the bathroom, the bathroom door will be kept open and the caretaker immediately contacted. All doors should be left open and another adult must always be within sight.

2.8 Discipline and Safety

Discipline Approach and Philosophy:

Discipline means working to bring children under God's way of living. This process takes time, patience and prayer. Grace DC's approach to discipline is to demonstrate by modeling the behavior (teaching by example), gently correct a child, and to redirect a child to appropriate behavior related to the activity and lesson. We don't shout, shame, belittle, etc.

Restraint to Prevent Harm

In occasions where children must be briefly physically restrained from hurting themselves or others, caretakers will be contacted as soon as possible. When necessary, children will be restrained in a manner that is least restrictive, for example, standing in front of or blocking a child from lunging at another, picking up a small child who has climbed on a table.

2.9 Health and Wellness

Sickness

Children with acute signs or symptoms of serious sickness are not permitted to participate in children's ministry events. Caretakers should use the following guidelines on prohibited signs or symptoms to assess whether their child is fit to participate:

- Temperature over 100.5° taken orally in the last 24 hours
- Diarrhea or vomiting within the last 24 hours
- Runny nose, that is yellow or green discharge
- Any unexplained rash that has appeared within the last 24 hours
- Persistent, productive cough
- Pink eye or other eye infection
- Exposure to sickness

Exposure to Sickness During Children's Ministry Events

If it is known that children have been exposed to a contagious illness during a children's ministry event, the Children's Ministry Coordinator will notify caretakers and teachers during or following the event.

Prohibition of Administering Medicine

Staff and volunteers are prohibited from administering any medicine, including Tylenol and Ibuprofen/Motrin. If a child requires medicine during the nursery session, caretakers must return to the nursery to administer it. Time-sensitive life saving measures such as epi-pens may be administered with the express written permission of the caretaker.

Vaccinations

GraceDC recommends that parents who are members or regular attenders ensure that their children are up to date on their immunizations, based on the CDC's age-based recommendations for children. All children are able to use the nursery and participate in Children's Ministry events independent of their vaccination history. In the event public health authorities declare an outbreak of vaccine preventable disease in the Washington, D.C. region, Grace DC will consult with health professionals to assess our practices. GraceDC may adopt additional protocols and practices in response to such an outbreak to maximize protection for the children in our congregation.

2.10 Church Education and Training

This policy will be disseminated widely to the church community through publications, public discussion, educational opportunities, sermons, training programs and other appropriate means of communication that will raise awareness and create a safe environment for our children. Specifically, the most current version of our policy will be:

- Posted on the church's website
- Printed policies will be available in the church's lobby, main office, and children's wing
- Annual email to members and volunteers
- A copy of the policy will be distributed to potential members as part of the new member process

Acknowledgement of Policy Training

Grace DC requires all staff and volunteers working with children and caretakers to sign an annual affirmation indicating that they have read and agree to abide by the terms of this policy, as a precondition to engagement with the church or receiving access to children. Affirmations will be stored by the church office.

Mandatory Education

All staff and volunteers working with children will attend regular, at least one annual training on what child maltreatment is and how to prevent and respond to it.

3. Selection of Workers

3.1 Suitability Screening

All persons who desire to work with the children participating in church events will be screened, including both staff and volunteers. The screening of both staff and volunteers is the responsibility of each congregation's Children's Ministry Coordinator. All information collected during the screening process is to be kept confidential and shared only with those persons responsible for determining the eligibility of an applicant for service in Children's Ministries. This screening includes the following:

Six Month Rule

No person will be considered for any volunteer position involving contact with minors until s/he has been involved with Grace DC for a minimum of six (6) months. This time of interaction between our leadership and the applicant allows for better evaluation and suitability of the applicant for working with children. This period can be waived only by decision of the Children's Ministry Coordinator, in consultation with a church Elder responsible for oversight of Children's Ministries.

Written Application

All persons seeking to work with children must complete and sign a written application in a form to be supplied by us. The application will request basic information from the applicant and will inquire into previous experience with children, previous church affiliation, reference and employment information, as well as disclosure of any previous criminal convictions. The application form will be maintained in confidence on file at the church.

Personal Interview

Upon completion of the application, depending upon how well the applicant is known to the Children's Ministry Coordinator, a face-to-face interview may be scheduled with the applicant to discuss his/her suitability for the position, at the discretion of the Children's Ministry Coordinator. The results of the interview, especially when sensitive subjects are discussed, will be kept confidential and only disclosed to those persons requiring the information in order to determine whether the applicant should be permitted to work with children at Grace DC.

Reference Checks

Before an applicant is permitted to work with children, at least two of the applicants' references will be checked. For staff these references should be for paid positions in addition to personal references, preferably from organizations where the applicant has worked with children in the past. Documentation of the reference checks will be maintained in confidence on file at the church.

Criminal Background Check

A national criminal background check is required for all staff and volunteers. This should be done for each childcare worker every two years. Checking the National Sex Offender Public Website is also required as part of this criminal background check.

Social Media Checks

Social Media accounts of all staff and volunteers may be checked periodically for inappropriate content or tendencies (i.e. commenting and liking comments and photos fixated on young children)

Signed Policy

All applicants must certify that they have read, understood, and accepted Grace DC's Child Safeguarding Policy before working with children. The signed acknowledgment form is to be kept on file by the church.

Evidence of all of these items must be maintained in perpetuity by Grace DC. Before a background check is run, prospective staff and volunteers will be asked to authorize Grace to run the check. If an individual declines to authorize a background check, s/he will be unable to work with children.

3.2 Suitability Determination

A disqualifying offense that will keep an individual from working with children will be determined by the Children's Ministry Coordinator and the Elders on a case-by-case basis in light of all the surrounding circumstances. Generally, convictions for an offense involving children and/or for offenses involving violence, illegal substances, indecency and any conduct contrary to our mission will preclude someone from being permitted to work with children. Failure to disclose a criminal conviction on the application form may also be a disqualifying event. Under no circumstances will any employee or volunteer who has been convicted or pleaded guilty (or no contest) to child physical or sexual abuse be permitted to serve in children's ministries at Grace DC, even if a spiritual conversion has occurred after the events took place. The background check results are stored indefinitely.

3.3 Training

Training is an important deterrent to child abuse. Grace DC provides opportunities at least once a year for general training for volunteers who work with children. In this training, the Children's Ministry Coordinator provides an overview of Grace DC's Child Safeguarding Policy. Grace DC staff and volunteers who interact with children will also complete any other required training.

G.R.A.C.E. TRAINING REQUIREMENTS

All staff, church members, and volunteers at Grace are required to listen to recorded G.R.A.C.E. training.

CPR TRAINING

Grace requires staff who work regularly with children to be certified in child CPR and will reimburse for the cost of CPR training upon request. We will have at least one CPR trained worker on site for any event where childcare is officially being provided.

3.4 Youth Workers

We recognize that there may be times when it is necessary or desirable for volunteer babysitters who are themselves under age 18 to assist in caring for children during programs or activities. The following guidelines apply to underage workers:

- Must be at least age 10
- Must be interviewed/screened by Children's Ministry Coordinator
- Must complete written application and reference checks
- Must be under the supervision of an adult and must never be left alone with children
- Must work with 2 adults present
- Must adhere to the policies laid out in this document.

4. Reporting and Responding to Abuse

4.1 Reporting Abuse

It is the moral responsibility of Grace DC to report suspected abuse or neglect of any child whenever it comes to our attention regardless of where that abuse takes place. We shall report all suspected abuse to stop suspected existing abuse and to prevent further abuse. To report abuse is to witness to the world the love and justice of God. Reporting abuse is a form of ministering to the needs of those crying out for help. If abuse occurs, it is our intention to act as an advocate for all affected persons, providing support, information, assistance and intervention.

All adults at Grace DC should immediately report witnessed abuse, children's abuse disclosures, consistent and egregious indicators of abuse, a perpetrator's disclosure, or rumors a child is being abused.² Reports can be made by calling DC's Child and Family Services Agency at 202.671 SAFE (202.671.7233). It is our obligation to report abuse, not investigate suspicions or allegations.

The closest child advocacy center to Grace DC is Safe Shores, The DC Children's Advocacy Center. If anyone has questions concerning a child's safety, Grace DC encourages that person to reach out to the child advocacy center at (202) 645-3200.

Please see Appendices A, B and C for additional resources on When to Alert the Safeguarding Committee, the Child Safeguarding Committee's Protocols and Signs of Abuse.

4.2 Responding to Reported Abuse

After a church member has reported abuse to the legal authorities, Grace DC requires the notification of the Children's Ministry Coordinator or the Child Safeguarding Committee of their congregation to initiate organizational protocols. If the Children's Ministry Coordinator or the Child Safeguarding Committee learns of abuse before it is reported to the legal authorities, then the Children's Ministry Coordinator or the Child Safeguarding Committee will serve as the agent(s) to report the abuse to the legal authorities.

4.3 Procedures for Responding to Incidents

In the event that an incident of abuse or neglect is alleged to have occurred at a church event, the following procedures shall be followed:

- 1. Any and all allegations must be taken seriously. The care and safety of the victim is the first priority.
- 2. If a child discloses abuse, the adult should not ask questions but offer supportive words such as "Thank you for telling me." and "It's my job to make sure you're safe." In the event that a report goes to be investigated, interviewing of children is best done by trained child forensic interviewers.
- 3. The caretaker of the child will be notified unless they are suspected of perpetrating the abuse. In such a case, the Child Safeguarding Committee will review and use wisdom and discernment to determine if it would impede an investigation to notify caretaker.

² For complete reporting requirements, see the Code of the District of Columbia: https://code.dccouncil.us/dc/council/code/titles/22/chapters/30/subchapters/II-A/

- 4. Those supervising children should take whatever steps are necessary to assure the safety of the child/youth until the caretaker(s) arrive (as applicable).
- 5. If the accused is serving in Children's Ministry, he or she will immediately, yet with dignity and respect for the sacred worth of the accused, be removed from further involvement with children and/or youth. The church will continue to minister to him/her and his/her family in a caring and Christ-like manner.
- 6. Once the proper authorities are contacted and the safety of the child or youth is secured, the Pastor or other designated person may tell the accused that a report has been made, to the extent it does not compromise an ongoing investigation. If the accused is a volunteer or staff member of the church, that person shall be relieved temporarily of his or her duties until the investigation is finished. If the accused is a staff person of the church, arrangements will be made to either maintain or suspend his or her income until the allegations are cleared or substantiated. He or she should be instructed to have no contact with the victim or with witnesses.
- 7. All allegations of abuse will be reported to the civil authorities, even if the caretaker(s) do not wish the incident to be reported. Grace DC will comply with the law's requirements regarding mandatory reporting of abuse. Grace DC will fully cooperate with the investigation of the incident by civil authorities.
- 8. After having reported the suspected abuse to the proper persons, the Pastor and his designees should discuss the incident with the Elders and make plans for a proper response. The Children's Ministry Coordinator will make sure that Grace DC informs our liability insurance company. A spokesperson who can speak to the media and the congregation should be designated. No other persons should release information about the incident.
- 9. The insurance company will be notified, and Grace DC will complete an incident report. Any documents received relating to the incident and/or allegations will immediately be forwarded to the insurance company.
- 10. In addition to an incident report for the insurance company, a written report of the basic information should be kept to ensure ongoing ministry and advocacy for the victims and others involved. The report should be brief and contain only factual information relevant to the situation. It will be filed in a secure place to ensure confidentiality. It should be written in ink or typed and printed out to prevent it from being changed.
- 11. Appropriate confidentiality of any allegations and of any resulting investigation should be maintained as much as possible. Maintaining appropriate confidentiality will protect the privacy and reputations of those actually or allegedly involved in the incident. Anyone with information about the incident should disclose it only to law enforcement or child protective services. When such information will affect the administration of children's ministries at Grace DC, it should also be shared with the Pastor and/or Children's Ministry Coordinator.
- 12. A pastoral visit will be arranged for those who desire it. This should be for the purpose of providing pastoral support during the time of crisis and not for the purpose of investigating the incident or influencing the investigation.
- 13. Any person who is found guilty of the alleged abuse or misconduct will be removed from their position working with children or youth upon consultation with the Elders.

4.4 Engagement of Outside Counsel

Under the following circumstances, Grace DC will receive outside counsel to determine if an independent review should be pursued:

- When a suspicion of child abuse is reported to the legal authorities and they decline to investigate or prosecute the alleged abuses.
- A district attorney has not pursued legal prosecution because no suspected criminal behavior is reported; however, the Child Safeguarding Committee believes the individual's behavior might still violate the church policy, be immoral, be inappropriate, or be unsafe.
- If an investigation is deemed necessary, Grace DC will retain an organization that meets the following criteria:
 - Completely independent of Grace DC
 - Experienced in proper investigation techniques
 - Up-to-date on child maltreatment research

4.5 Responding to Concerning Behavior, Suspicious Activity, and Policy Violations

All members of the Grace DC community—staff, volunteers, and caretakers—are required to report concerns about behavior, suspicious activity, or policy violations to the Child Safeguarding Committee (CSC), even if the behavior, activity, or violation does not meet the threshold of abuse. This is essential to creating a culture of vigilance at Grace DC. Please keep in mind the following about the CSC:

- A report to the CSC does not constitute an accusation of abuse or intent to harm a child
- The CSC is trained in handling the information they receive. They understand that the policy can be violated for many reasons, including ignorance or misunderstanding of the policy,
- The CSC must have all information to be able to see concerning patterns before abuse occurs. Even seemingly minor policy transgressions can raise to the level of a concern if they are repeated or if the person does not respond to correction. We do not want to wait until abuse occurs to intervene.
- Even if there is no wrongdoing, this person may not be the best fit to work with children. The CSC is in the best position to make that decision.

If you are uncertain whether to bring your concern to the CSC, please use the process flow in Appendix A to guide your decision. The CSC will follow the process flow in Appendix B when determining how to respond when concerns, suspicions or policy violations are reported.

4.6 Limited Access Agreements

Grace DC utilizes Limited Access Agreements to clarify safe behavior around children for community members who have violated the policy repeatedly, have offenses on their background check that are not related to children (e.g. stealing, drug use, DUI, etc.).

A Limited Access Agreement is a written and agreed-upon boundary between an individual and Grace DC wherein we outline specific concerns about an individual's behavior, detail appropriate behavior toward children, and plan ongoing accountability for the individual. Limited Access Agreements apply to members of a church community. They do not apply to known offenders or church staff members.

If a staff member violates the policy, they will be formally warned. Should they violate the policy again, it will be reviewed by the Elders to determine the appropriate course of action.

4.7 Additional Reporting Requirements

In addition to the reporting obligations discussed above, Grace DC staff, volunteers, and all members are required to promptly report to the Children's Ministry Coordinator or to the Child Safeguarding Committee whenever the staff, volunteer, or member:

- Is involved in or becomes aware of any sexually-oriented communications or relationship involving a child connected with Grace DC; or
- Is involved in or becomes aware of any inappropriate behavior involving a child by a pastor, elder, staff member, or volunteer; or
- Is arrested for, or convicted of any crime involving child abuse and/or neglect, is charged with child sexual abuse in a civil proceeding; commits an act of child abuse (whether the crime takes place within the church or outside); or (except as otherwise prohibited or limited by applicable law) is diagnosed with any paraphilic psychological condition as defined by the American Psychiatric Association including, but not limited to, pedophilia, voyeurism or exhibitionism; or
- Becomes aware that a member of his/her household has been arrested for, or convicted of any
 crime involving child abuse and/or neglect, is charged with child sexual abuse in a civil
 proceeding; commits an act of child abuse; or (except as otherwise prohibited or limited by
 applicable law) is diagnosed with any paraphilic psychological condition as defined by the
 American Psychiatric Association including, but not limited to, pedophilia, voyeurism or
 exhibitionism; or
- Becomes aware that a person who is attending the church has been arrested for, or convicted of
 any crime involving child abuse and/or neglect, is charged with child sexual abuse in a civil
 proceeding; commits an act of child abuse; or (except as otherwise prohibited or limited by
 applicable law) is diagnosed with any paraphilic psychological condition as defined by the
 American Psychiatric Association including, but not limited to, pedophilia, voyeurism or
 exhibitionism.

4.8 Church Ministry Interactions with Sex Offenders

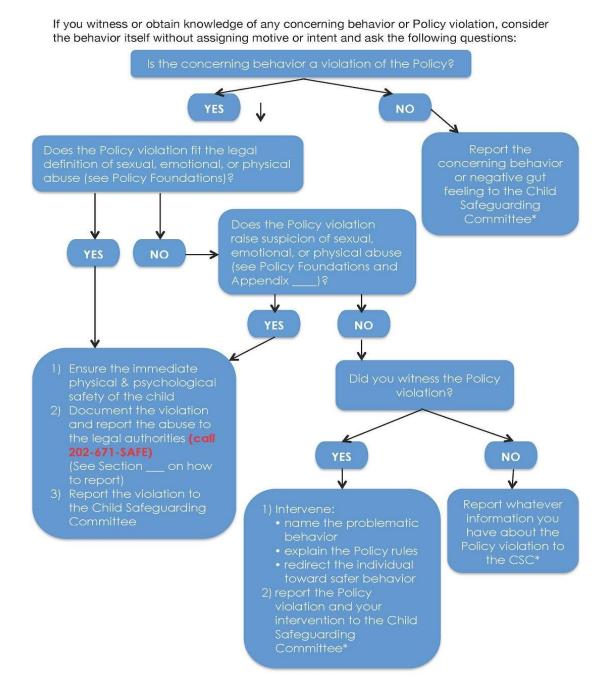
If a convicted offender wants to participate in Grace DC's community, we will contact an expert for the most up-to-date best practices on how to best interact with a known sex offender. Similarly, if an individual has been credibly accused of child sexual abuse or any form of child maltreatment but has not yet or was not convicted, we will contact experts on how to best proceed.

When Caretaker is Registered Sex Offender

If the caretaker or guardian of a child is a registered sex offender known to Grace DC, they must coordinate with the Children's Ministry Coordinator, or someone assigned by the Children's Ministry Director, to drop-off and pick-up their child. The Children's Ministry Coordinator—or their designated agent—will be present during these times.

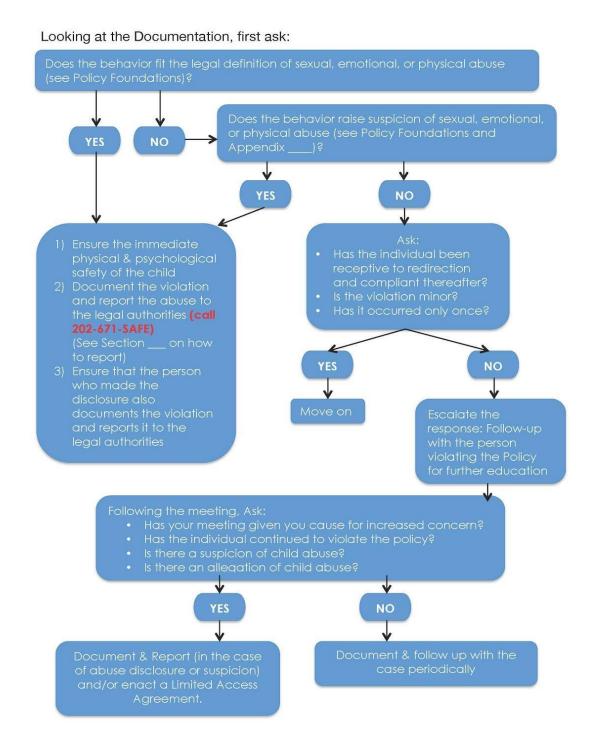
In the case that a member or regular attender of the church is a registered sex offender, Grace DC will appoint certain point-persons (i.e., Elders) for interacting with such individuals on a weekly basis. An agreement/covenant containing terms and conditions for the member/attender's behavior (e.g., not permitted in certain areas of the church during services, permitted in certain areas only in the company of an appointed point-person) will be drafted, gone over, and signed.

Appendix A: When to Alert the Child Safeguarding Committee



^{*}See Appendix B for the Child Safeguarding Committee's Protocol for Reporting

Appendix B: Child Safeguarding Committee's Protocol for Reporting



Appendix C: Signs of Abuse

It must be noted that poverty itself is not neglect. Grace DC will be mindful not to conflate poverty with neglect and not to conflate neglect with bad parenting. Research shows that there is a greater likelihood of racial/ethnic minority families who suffer with poverty being reported due to alleged neglect and have a greater likelihood of having children put into the foster care system when compared with white families with the same infractions/concerns. Grace DC will seek to prioritize child safety and development and actively work to identify racial bias as we evaluate signs of abuse.

Consider the possibility of sexual abuse if a child has:

- Any of the following physical signs:
 - o Torn, stained, or bloody underclothing
 - Unexplained difficulty, pain or blood in the genital area when walking, sitting, or using the bathroom
 - Discharge from the penis or vagina
 - o Injuries (e.g., bruises, tearing, bleeding), itching, or swelling in the genital, vaginal, or anal area
 - Sexually transmitted diseases
 - Pregnancy
- Any of the following behavioral signs:
 - o Precocious sexual knowledge or behavior such as:
 - Placing mouth on sex part
 - Asking others to engage in sexual acts
 - Trying to have intercourse or imitating intercourse
 - Undressing others, especially if done forcefully
 - o Imitating sexual positions with dolls
 - o Inserting an object into vagina or anus, especially if child continues to do so despite pain
 - Manually stimulating or having oral or genital contact with pets
 - Making sexual sounds
 - Inserting tongue in mouth when kissing
 - o Extreme moods or behaviors: hostile and aggressive or fearful and withdrawn
 - Self-mutilation
 - Substance abuse
 - Running away

Consider the possibility of physical abuse if you notice:

- Physical signs:
 - Frequent injuries of any kind (e.g., bruises, cuts, fractures, burns, welts, swelling, sprains, broken bones), especially if the child is unable to provide an adequate explanation of the cause of injury
 - These injuries may appear in distinctive patterns such as grab marks, human bite marks, cigarette burns, or impressions of other instruments
 - Pay particular attention to injuries that present on both sides of the head or body, as accidental injuries typically only affect one side of the body
- Behavioral signs:
 - Attempts to hide injuries
 - Difficulty sitting or walking
 - Wariness of physical contact with adults
 - o Reluctance to go home

- o Depression or self-mutilation
- Fear of parent(s) or caretaker(s)

Consider the possibility of neglect if a child:

- Is obviously malnourished, listless, or fatigued
- Begs, steals, or hoards food or complains frequently of hunger
- Chronic sleepiness
- Is consistently dirty or has severe body odor
- Lacks sufficient clothing for the weather or clothing does not fit
- Frequently complains of feeling unwell
- Untreated illness, injuries, health (e.g., unfilled cavities) or serious educational needs
- Obvious lack of necessary medical treatment or equipment
- Has an untreated need for glasses, dental care, or other medical attention
- Stays at school outside of school hours
- Frequently tardy or absent from school or has significant academic struggles
- Is inappropriately left unsupervised or with people unable to provide proper supervision
- Displays clinging behavior or equal comfort/attachment with strangers as with primary caretakers
- Abuses alcohol or other drugs