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Child Protection Policy

1. Foundations

What we believe & what we are committed to.

Containing:

- Introduction
- Scriptural Precedent
- Key Commitments & Ongoing Support

Introduction

God speaks boldly throughout his Word to highlight the dignity of children as well as the responsibility his people carry to steward his children in wisdom. As Northwest Presbyterian Church (NPC) lays the foundation for healthy practices within our congregation, we want to not only identify what is inappropriate, but also to state positively what we are pursuant of for the children in our congregation, ministries, and communities.¹

- We believe in promoting healthy relationships between adults and children.
- We believe protecting children is every adult's responsibility.
- We believe in preventing abuse with training and accountability.
- We believe in responding to abuse with boldness, compassion, and courage.

Scriptural Precedent

Our God is a God of light. He is glorious and beautiful in his love and moral purity. God calls us to walk in his ways as his children of light.

- *John 12:35-36, "So Jesus said to them, 'The light is among you for a little while longer. Walk while you have the light, lest darkness overtake you. The one who walks in the darkness does not know where he is going. While you have the light, believe in the light, that you may become sons of light.'"*
- *Ephesians 5:8-9, "For at one time you were darkness, but now you are light in the Lord. Walk as children of light (for the fruit of light is found in all that is good and right and true)."*

Children are special in God's sight, made in his own image. Jesus rebuked his disciples in righteous anger when they tried to prevent children from coming to him. Jesus welcomes children and gives them a central place in his kingdom.

- *Genesis 1:27, "So God created man in his own image, in the image of God he created him; male and female he created them."*
- *Mark 10:13-14, "And they were bringing children to him that he might touch them, and the disciples rebuked them. But when Jesus saw it, he was indignant and said to them, 'Let the children come to me; do not hinder them, for to such belongs the kingdom of God.'"*

God hears the prayers of children who are abused. Jesus said that to receive a child is to receive him, while some of his harshest words were reserved for those who would cause a child to stumble.

¹ NPC highly values the role that loving, godly adults have in discipling and nurturing children, as well as how children bless adults in the church. Our congregation vows, at a covenant child's baptism, to "undertake the responsibility of assisting the parents in the Christian nurture of this child." (*Book of Church Order*, Presbyterian Church in America, 56-5.)

- *Psalm 10:17-18, "O Lord, you hear the desire of the afflicted; you will strengthen their heart; you will incline your ear to do justice to the fatherless and the oppressed, so that man who is of the earth may strike terror no more."*
- *Matthew 18:5-6, "Whoever receives one such child in my name receives me, but whoever causes one of these little ones who believe in me to sin, it would be better for him to have a great millstone fastened around his neck and to be drowned in the depth of the sea."*

Children are valued by God, but also vulnerable spiritually, physically, mentally, emotionally, and morally. God hates the oppression of the vulnerable. God recognizes the temptation for the powerful to use their power for the exploitation of the weak. God condemns anyone who would thus abuse their power.

- *Isaiah 11:4, "but with righteousness he shall judge the poor, and decide with equity for the meek of the earth; and he shall strike the earth with the rod of his mouth, and with the breath of his lips he shall kill the wicked."*
- *Luke 4:18-19, "The Spirit of the Lord is upon me, because he has anointed me to proclaim good news to the poor. He has sent me to proclaim liberty to the captives and recovering of sight to the blind, to set at liberty those who are oppressed, to proclaim the year of the Lord's favor."*

As his redeemed image-bearers, his children of light, God calls us to speak up and use our power for the protection of the vulnerable. When we intervene on behalf of the vulnerable we are reflecting the moral beauty of our God. When we remain silent or abuse power by harming the vulnerable, we are denying the glorious moral purity of God.

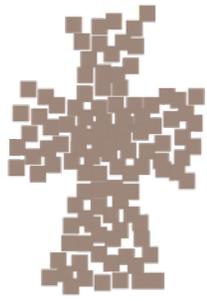
- *Ecclesiastes 4:1, "Again I saw all the oppressions that are done under the sun. And behold, the tears of the oppressed, and they had no one to comfort them! On the side of their oppressors there was power, and there was no one to comfort them."*
- *James 1:27 "Religion that is pure and undefiled before God, the Father, is this: to visit orphans and widows in their affliction, and to keep oneself unstained from the world."*

KEY COMMITMENTS & ONGOING SUPPORT

In pursuit of the above, NPC is committed to the following standards:

- We have a zero-tolerance policy for child abuse.
- We report child sexual abuse to the civil authorities per Ohio law.
- All employees and volunteers will be screened according to the Child Protection Procedures of NPC.
- We do not employ anyone who has been convicted of or confessed to sexually abusing a child.
- We do not allow anyone to volunteer with children who has been convicted of or confessed to sexually abusing a child.
- Any employee or volunteer who does not abide by or help guard our Child Protection Procedures and our Code of Conduct will not be allowed to work with children or youth.

- Any employee or volunteer accused of sexually abusing a child will be immediately suspended from serving children and we will do our best to ensure they have no access to children in our church or community until we have clarity on the situation.
- A member of the church's leadership in consultation with the child safeguarding committee will seek to support a child victim and the child's family in any way we can with great compassion, including but not limited to being present during hearings, interviews, court dates, etc., and assisting in finding qualified mental health practitioners with expertise in treating victims of abuse and their family members.



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Child Protection Policy

2. Code of Conduct

The standards, expectations, and proper practices
for employees & volunteers at NPC.

Containing:

- Introduction
- Definitions
- Safe Behaviors
 - Adult–Child Interactions
 - Bathrooms
 - Diapering
 - Check-In
- Violations
- Making a Report

INTRODUCTION

We are committed to promoting a safe environment for all children at Northwest Presbyterian Church (NPC). Working toward this goal, we believe in promoting healthy relationships between adults and children. We will not tolerate any form of abusive behavior—verbal, emotional, physical, or sexual. As adults, it is our task to work together to ensure that children are safe by abiding by the following Code of Conduct. All adults and youth, whether employees, volunteers, and student volunteers are subject to this Code of Conduct.

DEFINITIONS

- Child—Any person under the age of 18 or any person whose mental capacity is that of a minor.¹
- Adult—Any person at least 18 years of age.
- Student Volunteer—Any person, under the age of 18, who supervises children at a church-sponsored activity or program.
 - If a student is in fifth grade, he or she may serve in PreK Children’s Worship or Sunday School with an adult leader.
 - Middle school students may serve in the Nursery and Children’s Worship with their own parent or an adult who has agreed in writing to be responsible for the student while they are working together. The student’s parent must also agree to this in writing.
 - High School students may volunteer in the nursery, children’s worship or Sunday school with any qualified adult leader.
 - Middle and High School students may serve in age-appropriate areas during Vacation Bible School, according to the discretion of the Children’s Ministries Director.
 - Students 16 years and older may be hired to provide childcare at NPC events where paid childcare workers are hired. Such students shall be paired with an adult.
 - Students 16 years and older may volunteer to supervise children at a church-sponsored activity or program with an advanced role of responsibility, even occasionally functioning as an adult. Such a student must be: (1) properly screened, (2) thoroughly trained in the Child Protection Policy, (3) given written permission by a parent to perform the various responsibilities particular to the role in which they are volunteering.
- Child Abuse—Any willful act, omission, or threatened act that results in any physical, mental or sexual injury or harm.²

¹ Legally, and for the purposes for our Child Protection Policy, a child is anyone under the age of 18, or a mentally or developmentally disabled person or a physically impaired person under the age of 21. However, the general principles of protecting the vulnerable should be applied by all to any vulnerable person at any age.

² For a more explicit definition, see *Ohio Revised Code* § 2151.031.

- Child Sexual Abuse—Any sexual act between an adult and a child, or between two children, when one exerts power over the other; forcing, coercing or persuading a child to engage in any type of sexual act; sexual abuse also includes non-contact acts such as exhibitionism, exposure to pornography, voyeurism, and communicating in a sexual manner by phone or internet.³
- Child Physical Abuse— non-accidental physical injury (ranging from minor bruises to severe fractures or death) as a result of 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, caregiver, or other person who has responsibility for the child. Such injury is considered abuse regardless of whether the caregiver intended to hurt the child. Physical discipline, such as spanking or paddling, is not considered abuse as long as it is reasonable and causes no bodily injury to the child.
- Child Emotional Abuse—When a child is not nurtured or provided with love and security, but instead endures an environment of constant criticism, belittling, threatening, or bullying.
- Spiritual Abuse—Abuse administered under the guise of religion. Including but not limited to:
 - Use of religious ideology, precepts, tradition, or sacred texts to harm a child.
 - Compelling a child to engage in religious acts against his or her will.
 - Abuse that occurs in a religious context (e.g., church).
 - Abuse perpetuated by a religious leader (e.g., pastor).
 - Invocation of divine authority to manipulate a child into meeting the needs of the abuser.
- Mandated Reporter—Any person who is required to by law to report⁴ when the person knows or reasonably suspects that a child has suffered or faces a threat of suffering any physical or mental wound, injury, disability, or condition of a nature that reasonably indicates abuse or neglect of a child.⁵ However, in keeping with biblical principles, for the sake of vulnerable children who cannot protect themselves, all adults who know of abuse or

³ "Victim of sexual activity offense constituting abuse or exhibits evidence of physical or mental injury inflicted other than by accidental means, or threats or harm to child's health and welfare, or is an endangered child under 2919.22." *Ohio Revised Code* § 2151.011, et seq.; 2921.14; 2151.421

⁴ Per *Ohio Revised Code* § 2151.421 (A)(1)(b).

⁵ The Ohio statute states that the reporter shall report when the person "knows or has reasonable cause to suspect based on facts that would cause a reasonable person in a similar position to suspect, that a child under eighteen years of age, or a person, under twenty-one years of age with a developmental disability or physical impairment, has suffered or faces a threat of suffering any physical or mental wound, injury, disability, or condition of a nature that reasonably indicates abuse or neglect of the child." (*Ohio Revised Code* § 2151.421).

who have a reasonable suspicion to believe there has been abuse are morally obligated to report abuse.⁶

Adult-Child Interaction Standards

ACCOUNTABILITY:

We honor the Lord when we hold each other accountable for the purpose of protecting children made in his image. Adults, volunteers, student volunteers, and upperclassman student volunteers, shall monitor each other and older children in the area of physical contact, helping each other follow these guidelines, pointing out anything that could be misinterpreted, and holding one another accountable for any violations of these boundaries.

Whenever children are present, two unrelated adults must be present to ensure accountability. Every ministry activity ought to be open and interruptible.

VISIBILITY:

Ministry with children and students shall occur only in highly visible areas. Observability is a key factor in minimizing the risk of abuse. This means utilizing open and highly visible spaces as well as avoiding isolated areas.

ONE ADULT – ONE CHILD SITUATIONS:

Most abuse happens in one adult-one child situations. We strive to avoid any one adult-one child situations because they are such high risk. This does not mean there cannot be any private conversation between an adult and a child. However, these conversations need to take place in an open and observable area. For the purposes of appropriate supervision, Students volunteers 16 years and older may in rare circumstances count as an adult, but any such student volunteers and/or adults who are related shall count as only one adult. All activities involving children must have at least two unrelated adults supervising at all times.

- Private meetings and/or counseling sessions may be scheduled only with the child's parents' permission, and in a public place or in the NPC offices where others are present in the immediate area. Such meetings may include private discussions that are out of the hearing of others, but under no circumstances may a private conference occur where no others are able to view the meeting from a nearby position.
- No child may be transported alone in a vehicle by an adult leader, student volunteer, upperclassman student volunteer, or staff member without first having received written permission from the child's parent. Upon receiving written permission, the driver shall

⁶ See Scriptural Precedent in the *Foundations* portion of the Child Protection Policy.

then alert by phone call or text the child's parent as well as a third party upon (1) their departure and (2) their arrival.

These standards will not be compromised. If an event is lacking sufficient supervision (i.e. only one adult⁷ is available in a nursery room, Sunday school class room, youth group event, etc.), then the event shall be either delayed until the appropriate number of leaders are present to safely receive children (as outlined here), or the event will be canceled altogether.

TOUCH:

By God's design, appropriate touch is an important way for us to understand that we are loved. Appropriate touch is always observable and interruptible by other adults. A hug in the context of a group is very different from a hug in an isolated situation. Any touch should be welcomed by the child. Any resistance by the child should be immediately respected. Because healthy, caring touch is valuable to children, but unhealthy touch is abusive, the following guidelines apply to all children:

- Touch should be observable and interruptible rather than secretive.
- Touch should show care for the child rather than meet a need in the adult.
- Touch should be age and developmentally appropriate.
- Touch should always communicate respect for the child by honoring appropriate boundaries.
- Touch should immediately cease if the child is in any way uncomfortable.
- Adults and other youth or children should not hit, slap, pinch, push, hold against their will, or otherwise assault children.

The following signs of affection are generally appropriate within the guidelines above:

- Verbal praise
- Side hugs and shoulder to shoulder hugs
- High fives and fist bumps
- Pats on the shoulder, back, or head (when culturally appropriate)

For smaller children, the following are generally appropriate with other adults around and within the guidelines above:

- Touching hands, shoulders, and arms
- Hugs
- Holding them when others are present

The following behaviors between adults and children are inappropriate. They are also inappropriate between student volunteers, older children, and younger children. Please refrain from:

- Touching buttocks, chests, genital areas, or thighs

⁷ or the equivalent of related adults

- Full body hugs
- Kissing
- Tickling
- Showing affection in isolated areas or when alone with a child
- Sleeping in bed with a child
- Flirtatious or seductive looks
- Playing sexually suggestive games
- Any form of affection, touch, or other interaction that is unwanted by the child
- Any behavior that is, or could be interpreted as, sexual in nature

SPEECH:

Words are a powerful way to build one another up or tear one another down. There shall be no verbal interaction involving shaming, belittling, name calling, cursing, using harsh language that may frighten, threaten or humiliate a child, or making inappropriate or derogatory remarks about a child, their physique, body development, or dress. Inappropriate verbal interaction also includes telling sexual or other inappropriate jokes, making sexually suggestive comments, telling inappropriate secrets, or discussing sexual encounters or desires with children. Adults shall refrain from showing preferential treatment to a particular child or student, especially in the form of promises or gifts.

If the church staff or volunteers want to give a lecture or organize a program to help youth understand age-appropriate questions about their body or sexuality, the event must be planned in advance and parents notified beforehand. When children or teens raise questions about their body or sexuality, NPC volunteers and staff will answer the question at hand in an age-appropriate way and inform the teen's parent as well as a supervisor.

TECHNOLOGY:

Any employee or volunteer working with children or students is responsible to ensure that any technology is used appropriately. Use of phones, the internet, TV, and movies when children are in our care must be monitored. Technology can quickly be turned from a proper use into something that is used for exploitation. All pornography and any other sexually explicit or suggestive content is strictly prohibited.

Adults should refrain from developing a relationship with a child or student primarily over electronic media (text, IM, etc.), since this is not open and observable. All aspects of this Code of Conduct are equally applicable to all interactions, communications, and descriptions over electronic media, and will be held accountable as such.

Any sexual documentation of or interaction with a child by means of electronic media is abusive and strictly forbidden. Explicitly prohibited are photos of children who are

unclothed, toileting, changing clothes, or (outside the context of a water oriented event) are in swimwear or are wet.

BUILDING SECURITY & SUPERVISION:

Caring for children, NPC has considered the building's physical structure. Design of the physical space and supervision play key roles and keeping children safe. Unoccupied, the space will be secured and inaccessible, including closets, empty classrooms, and office space. All children and youth areas have proper lighting and doors with windows, and classrooms are regularly reviewed for safety standards.

Regular supervision helps reduce risk. Every activity involving children is observable and interruptible and we are all accountable to one another. Program supervisors shall frequently and randomly stop in to observe the nursery and other areas where children and adults are together.

PARENTAL INVOLVEMENT:

In order to maintain proper standards of safety and care, we encourage parents to drop by, even unannounced, to observe any activity or meeting in the area in which their child is participating (while respecting the flow and goals of the activity). Parents are also encouraged to view the kid's area, nursery, and student ministry rooms through the doors/windows in the hallway. Along with other adults, parents have a key role to play in keeping their children safe. The involvement of watchful parents, who make unannounced visits, leads to a safer environment for all children. Parents are encouraged to be educated in our Procedures and Code of Conduct and help with their enforcement.

That said, Parents are also responsible for knowing where their children are at all times, and a child may not be dropped off or left anywhere unattended before a program has officially begun or before the appropriate number of leaders are in place as detailed in this Code of Conduct.

BATHROOM USE

No adult or student volunteer should take or send a child to the bathroom alone. Elementary age children should be sent to the bathroom in similar age and same gender groups of at least two or three. One adult should straddle the door to the hallway to remain visible to others in the hall while ensuring the children are safe as they go to and from the restroom. When we separate, the younger class (age 4-Kindergarten) will go as a whole class during Children's Worship. The class will line up in the hallway and children will be sent in after the teachers have made sure the bathrooms are clear of other adults or youth. If a child is potty training and/or needs assistance, we will involve the child's parent. If a child in the younger class needs to use the restroom after the class has gone, we will follow the same procedure as

with the older children: two or three similar age, same gender children will go together while one adult straddles the door to the hallway so they are observable and the adult may observe the children. See below for bathroom procedures in the nursery.

As our nurseries have a bathroom attached to the room, if a child is able to use the toilet they should do so alone. Nursery staff will check to see if the bathroom is empty and only after it is clear will the child be allowed in. No adult shall be alone with the child in the restroom. Line-of-sound instead of line-of-sight supervision will be maintained while children are using the facilities. Whenever possible, when children are using the bathroom, instruction should be offered without any touch. If the child asks for a parent or has had an accident, we will involve the child's parent.

DIAPERING

Children in diapers are already vulnerable, and when a diaper needs changing a child is especially vulnerable. We want to be sensitive to parents if they would prefer to change their own child's diaper in the nursery. Parents who desire to come out of the service and change the diaper should indicate how they prefer to be contacted at registration. A changing table with supplies is provided in the nursery for the use of parents and staff. If a diaper is being changed by nursery staff, the worker will notify the other workers present, and then change the diaper quickly, with a door open, and with respect for the child.

CHECK-IN PROCEDURES

Every parent will be required to register any child who attends NPC activities or programs, recording who may safely pick-up the child from an event, any allergies, medical needs, or special concerns the church should know about, as well as providing contact information in the event they are needed for the care for their child.

Weekly, every child must be checked in for nursery and Children's Worship, and attendance shall be taken at all middle school and high school events. For security purposes we only allow parents or other responsible adults to check-in or check-out children. We do not release children to older siblings or other adults. For nursery children, each parent should have a matching receipt to hand back in to the volunteer in order to check-out their child. The worker shall check the number on the child's name tag to ensure it matches the receipt. If the receipt has been lost, we will require a photo ID to release the child. All volunteers shall work toward learning the names of guests to ensure as high a level of security as possible.

Children in fourth grade (with parental permission) or older can be released without weekly parental sign out.

VIOLATIONS

For the safety of every child in our care, we are all responsible to help ensure the boundaries set forth in this Code of Conduct are followed. NPC takes any violations of our Child Protection Policy very seriously. Abusers are rarely caught in the act of abusing a child, but are more often seen breaking the rules and crossing boundaries. We must all be prepared to both give and to receive correction if a boundary is being crossed for whatever reason.

Now, every incident of boundary and rule violation does not necessarily signal that child abuse has occurred. However, every incidence of a boundary violation requires responsible action to safeguard children. Our expectation is that you will intervene when a boundary is crossed. Those who are unwilling to guard proper boundaries cannot work with our children.

When a boundary is crossed, kindly but firmly remind the person of the boundary, make sure the situation is safe, and fill out an Child Safety Incident Report form and submit it to a member of the church staff in a sealed envelope. All reports will be kept confidential. Cases where it would be appropriate to fill out a Child Safety Incident Report would include but not be limited to:

- If there is any boundary violation, or repeat violations.
- If an adult or student volunteer raises their voice at a child.
- If an adult or student volunteer wants to give a child a hug and the child seems uncomfortable (even in a visible area).
- If an adult or student volunteer makes a remark or tells a joke with sexual content.
- If there is an attitude of resistance to boundaries.
- If an adult or student volunteer is all alone with a child in an isolated area (an especially dangerous boundary violation).

Please note that any abuse should be immediately stopped and then reported to the authorities. The above only apply to Code of Conduct violations.

MAKING A REPORT

- 1. Within 24 hours, call Franklin County Children Service (614-229-7000), or local police.**
2. Contact a pastor who is uninvolved.
3. Fill out a Child Safety Incident Report Form and submit it to the pastor.
4. The pastor will inform church leadership, legal representation, and insurance.
5. Media inquiries (if any) should be directed to the senior pastor.

After all the necessary reports have been made, NPC leadership will consult with the Child Safeguarding Committee about how to best communicate with the congregation, including but not limited to suspending the accused from activities with children and informing parents

at NPC. Everyone involved in the incident is encouraged to use biblical wisdom when speaking about it. While NPC does not require a strict confidentiality about such a public threat to our children, we would ask anyone who has knowledge to use their knowledge for a godly purpose, speaking only of the incident in times and places that will help further protect children, aid investigators, or give comfort.

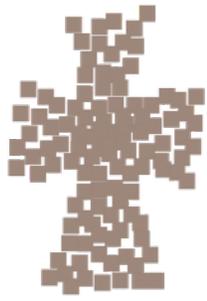
WHO SHOULD REPORT:

When anyone has reason to suspect or has knowledge of child abuse, he or she is morally and, in the case of pastors, medical professionals, teachers, attorneys, therapists, childcare workers, and others,⁸ legally obligated to immediately report it to the civil authorities. *If you fail to report the suspected abuse immediately or fail to report the suspected abuse before you inform a pastor, you have violated the law and you can be prosecuted*⁹. If a pastor is involved in the incident, after you have fulfilled your mandated reporter requirements, report to another pastor or elder. You will then need to fill out a Child Safety Incident Report Form and submit it to a pastor who is uninvolved in a sealed envelope.

Reports should be made within 24 hours, and can be made at any time by phone to Franklin County Children Service (614-229-7000) or local police.

⁸ Ohio Revised Code § 2151.421(A)(1)(a), (b).

⁹ Ohio Revised Code § 2151.99; 2151.421(B), (C).



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3. Procedures

How we execute our code of conduct.

Containing:

- Introduction
- Definitions
- Screening
- Policy Training & Implementation
- Abuse Detection
- Abuse Disclosure
- Making a Report
- Investigations
- Independent Assessment

INTRODUCTION

We are committed to promoting a safe environment for all children at Northwest Presbyterian Church (NPC). Working toward this goal, we believe in promoting healthy relationships between adults and children. We will not tolerate any form of abusive behavior—verbal, emotional, physical, or sexual. The responsibility for promoting a safe environment for the protection of children rests on all adults at NPC. We have committed to the following procedures as we seek to prevent and respond to abuse with sound training and appropriate accountability.

DEFINITIONS

- Child—Any person under the age of 18 or any person whose mental capacity is that of a minor.¹

- Adult—Any person at least 18 years of age.

- Student Volunteer—Any person, under the age of 18, who supervises children at a church-sponsored activity or program.
 - If a student is in fifth grade, he or she may serve in PreK Children’s Worship or Sunday School with an adult leader.
 - Middle school students may serve in the Nursery and Children’s Worship with their own parent or an adult who has agreed in writing to be responsible for the student while they are working together. The student’s parent must also agree to this in writing.
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 - Students 16 years and older may be hired to provide childcare at NPC events where paid childcare workers are hired. Such students shall be paired with an adult.
 - Students 16 years and older may volunteer to supervise children at a church-sponsored activity or program with an advanced role of responsibility, even occasionally functioning as an adult. Such a student must be: (1) properly screened, (2) thoroughly trained in the Child Protection Policy, (3) given written permission by a parent to perform the various responsibilities particular to the role in which they are volunteering.

¹ Legally, and for the purposes for our Child Protection Procedures, a child is anyone under the age of 18, or a mentally or developmentally disabled person or a physically impaired person under the age of 21. However, the general principles of protecting the vulnerable should be applied by all to any vulnerable person at any age.

- Child Abuse—Any willful act, omission, or threatened act that results in any physical, mental or sexual injury or harm.²
- Child Sexual Abuse—Any sexual act between an adult and a child, or between two children, when one exerts power over the other; forcing, coercing or persuading a child to engage in any type of sexual act; sexual abuse also includes non-contact acts such as exhibitionism, exposure to pornography, voyeurism, and communicating in a sexual manner by phone or internet.³
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- Child Emotional Abuse—When a child is not nurtured or provided with love and security, but instead endures an environment of constant criticism, belittling, threatening, or bullying.
- Spiritual Abuse—Abuse administered under the guise of religion. Including but not limited to:
 - Use of religious ideology, precepts, tradition, or sacred texts to harm a child.
 - Compelling a child to engage in religious acts against his or her will.
 - Abuse that occurs in a religious context (e.g., church).
 - Abuse perpetuated by a religious leader (e.g., pastor).
 - Invocation of divine authority to manipulate a child into meeting the needs of the abuser.
- Mandated Reporter—Any person who is required to by law to report⁴ when the person knows or reasonably suspects that a child has suffered or faces a threat of suffering any physical or mental wound, injury, disability, or condition of a nature that reasonably

² For a more explicit definition, see *Ohio Revised Code* § 2151.031.

³ "Victim of sexual activity offense constituting abuse or exhibits evidence of physical or mental injury inflicted other than by accidental means, or threats or harm to child's health and welfare, or is an endangered child under 2919.22." *Ohio Revised Code* § 2151.011, et seq.; 2921.14; 2151.421

⁴ Per *Ohio Revised Code* § 2151.421 (A)(1)(b).

indicates abuse or neglect of a child.⁵ However, in keeping with biblical principles, for the sake of vulnerable children who cannot protect themselves, all adults who know of abuse or who have a reasonable suspicion to believe there has been abuse are morally obligated to report abuse.⁶

SCREENING

1. All adults who work with children will submit the necessary information for a national criminal background check before being allowed access to children. Any adult who has been convicted of child abuse or other violent crimes will not be eligible for employment at NPC or be allowed to serve as a volunteer within the nursery, children's ministry, and student ministry.
2. All adults and student volunteers 16 years old or older who work with children will provide a written application, along with three non-related, personal references who can answer questions about how the applicant interacts with children. The appropriate ministry leader shall check all references before they serve, and additional screening may be required at the discretion of the ministry leader.
3. All adults and student volunteers 16 years old or older who work with children will have their social media accounts examined and names searched online by the appropriate ministry leader.
4. All adults and student volunteers 16 years old or older who work with children will be provided a copy of the Child Protection Policy,⁷ will be required to sign, acknowledging they received it, and will be informed that the ministry leader will discuss the policy with them.
5. All adults and student volunteers 16 years old or older who work with children will interview with the appropriate ministry leader, exploring the candidate's written application, references, and social media examination, and introducing the Child Protection Policy,⁸ before they serve.
6. All adults and student volunteers who work with children must be members or regular attenders of NPC for six months prior to service.

⁵ The Ohio statute states that the reporter shall report when the person "knows or has reasonable cause to suspect based on facts that would cause a reasonable person in a similar position to suspect, that a child under eighteen years of age, or a person, under twenty-one years of age with a developmental disability or physical impairment, has suffered or faces a threat of suffering any physical or mental wound, injury, disability, or condition of a nature that reasonably indicates abuse or neglect of the child." (*Ohio Revised Code* § 2151.421).

⁶ See Scriptural Precedent in the *Foundations* portion of the Child Protection Policy.

⁷ All 3 sections for adults, but only (1) Foundations and (2) Code of Conduct for students.

⁸ All 3 sections for adults, but only (1) Foundations and (2) Code of Conduct, with age appropriate descriptions of abuse detection for students.

7. All paid church employees, clergy, and adult volunteers who work with or have access to children shall be screened for any criminal convictions no less often than once every four years.

Policy Training & Implementation

TRAINING:

- Before supervising children in any capacity, adults and student volunteers must read and agree to follow the Child Protection Policy.⁹
- Before supervising children on a regular basis, all adults must receive training on child abuse awareness, prevention, and reporting. Nursery team leaders will receive additional training on abuse detection.
- NPC's Child Safeguarding Committee, church staff and church leadership will complete GRACE certification training requirements, which include all the above, plus training in response to abuse and supporting survivors.
- Ongoing training opportunities will be provided at regular intervals, and volunteers must repeat training every two years. Training opportunities may be provided in person, online, and through video or written formats.

DISSEMINATION:

This policy shall be disseminated widely to the church community through publications, public discussions, educational opportunities, sermons and training programs to raise awareness and create an environment of awareness for our children and families. Specifically, the most recent version of our current policy shall be:

- Posted on our church website.
- Readily available in our church office, lobby, Youth Ministry room, and Children's Ministry check in points.
- Communicated to every member semi-annually via email.
- Incorporated into Sunday morning sermon(s) and/or highlighted during worship.

REVISING & UPDATING THE POLICY:

NPC's Child Safety Committee will meet quarterly to evaluate the practice and implementation of the policy and yearly to review and update the Child Protection Plan as needed. The Committee will solicit policy feedback, and recommended updates will be presented to the appropriate leadership for review and implementation.

⁹ All 3 sections for adults, but only (1) Foundations and (2) Code of Conduct for students.

Abuse Detection

Because “the majority of children who are sexually abused will be moderately to severely symptomatic at some point in their life,”¹⁰ NPC is familiar with and attentive to potential indicators of child sexual abuse.

Detection of indicators is no doubt the most difficult aspect of undisclosed abuse, and so we must work together to make sure we are doing all we can to keep children safe and follow the law. When anyone has reason to suspect or has knowledge of child abuse, he or she is morally and, in the case of pastors, medical professionals, teachers, attorneys, therapists, childcare workers, and others, legally obligated to immediately report it to the civil authorities¹¹ in the following circumstances:

- 1. Witness** – you witness or discover an act of abuse. In this situation you must demonstrate courage. You must intervene and move the child (and perhaps other children) to a safe place and call the authorities immediately. Then, contact a pastor and complete our “Child Safety Incident Report” form. The pastor will then ensure the perpetrator has no further access to children at the church and initiate appropriate pastoral response and care for all parties.
- 2. Disclosure** – a child tells you of abuse they experienced. In this situation, remain calm and keep the child talking with open-ended questions rather than leading questions (for example, “What happened next? Can you tell me more?”) as long as the child feels comfortable. As appropriate during and after the disclosure, tell the child you believe them, telling you was the right thing to do, it is not their fault, and you are going to help them and make sure they are safe. After the initial disclosure, do not conduct a lengthy interview, but as soon as is practical, while being sensitive to the child and ensuring the child’s and other children’s safety, call the authorities. Then, contact a pastor and complete our “Child Safety Incident Report” form. See the following “Abuse Disclosure” section for further direction.

- *Special Note 1:* Contrary to a common opinion, research has established that rates of false accusations are surprisingly low. Studies generally put false accusations between 1 and 2.5 percent. Of these false reports, most are made by adults rather than children, and most commonly by adults in the context of child custody battles. The actual common occurrence is for a child to suffer in silence. For a child to disclose is an

¹⁰ S. R. Dube, R. F. Anda, C. L. Whitfield, D. W. Brown, V. J. Felitti, M. Dong, and W. H. Giles, “Child Sexual Abuse: Consequences and Implications,” *Journal of Pediatric Health Care* 24 (2005): 358-364. Retrieved from: www.medscape.com/viewarticle/731970_1; See also, S. R. Dube, et. al., “Long-Term Consequences of Childhood Sexual Abuse by Gender of Victim,” *American Journal of Preventive Medicine*, 28 (2005): 430-438. Retrieved from [www.ajpmonline.org/article/S0749-3797\(05\)00078-4/fulltext](http://www.ajpmonline.org/article/S0749-3797(05)00078-4/fulltext).

¹¹ *Ohio Revised Code* § 2151.421(A)(1)(a), (b).

incredible act of courage and when it does happen it is almost always genuine. Sadly, for many children who disclose, a common pattern is they are not believed or the adult does not follow through and report. Research reveals that only about 5 percent of child abuse is reported. Both false accusations and underreporting are terrible, but underreporting is by far the most common problem in our time.

- *Special Note 2:* When there is a disclosure of abuse, no one, not even the parents or the pastor ought to conduct another interview of the child or conduct an internal investigation. The authorities or Franklin County Children Services will have someone who is trained to conduct a child forensic interview. The more interviews the child has, the harder it is on the child and on those tasked with investigating and potentially prosecuting the crime.

3. Reasonable Suspicion – One or more signs of child abuse are present, or after being warned about crossing safe boundaries with children, a person continues to do so. Reasonable suspicion does not mean proof. After reporting the reasonable suspicion, then contact a pastor and complete our “Child Safety Incident Report” form.

SIGNS 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.¹² Sometimes there are no visible signs of child sexual abuse, but common signs include:

- Bleeding, bruising, pain or other signs of trauma around the genitalia (please note when changing a diaper this is very different from a diaper rash)
- Difficulty sitting and/or walking without pain
- Sexually transmitted disease in a child
- Sexual language and/or behavior that are not age-appropriate
- Sexually promiscuous behavior
- Addictions
- Self-harm
- Repeated boundary violations by an adult or student volunteer (e.g. you find an adult or student volunteer isolated with a child or pushing the limits of inappropriate touch and/or relationship, even after being warned not to do so)
- Emotional and behavioral signs such as withdrawal, fear, depression, anger, compulsive behavior, or swings in behavior and mood.

¹² Centers for Disease Control and Prevention, “Adverse Childhood Experiences Study: Major Findings,” (2016), retrieved from: www.cdc.gov/violenceprevention/acestudy/about.html., Child Welfare Information Gateway, *Long-Term Consequences of Child Abuse and Neglect* (Washington, DC: US Department of Health and Human Services, Children’s Bureau, 2013), retrieved from https://www.childwelfare.gov/pubpdfs/long_term_consequences.pdf.

While some sex play between children of similar ages is often the result of a healthy, age-appropriate curiosity,¹³ other sex play is atypical for children and may be indicative of abuse.

Typical Sexual Behaviors:

- Showing others their genitals (e.g., “I’ll show you mine if you show me yours”)
- Playing house or doctor
- Showing interest in bathroom functions
- Using dirty language for bathroom functions
- Touching their genitals or masturbating

Atypical Sexual Behaviors:

- Placing mouth on sex part
- Imitating intercourse or sexual positions with others or dolls
- Making sexual sounds
- Asking others to engage in sexual acts
- Undressing others, especially forcefully
- Inserting an object into vagina or anus

ABUSE DISCLOSURES

Because children and adult survivors are reluctant to disclose abuse, NPC acknowledges that when survivors choose to do so, they need our community’s utmost support.

When children disclose, they almost always do so by accident, and may later recant even when there is proof that the abuse occurred. If questioned directly, many child victims may deny the abuse. When children disclose intentionally, children may first test the adult’s reaction by pretending that the abuse happened to a friend or by supplying only a small bit of information. If a child discloses abuse to you, the following are helpful tips on how to respond in the moment:

- Stay calm.
- Believe the child.
- Protect the child immediately from the suspected offender.
- Show love and respect for the child.

¹³ W. N. Friedrich, J. Fisher, D. Broughton, M. Houston, C. R. Shafran, “Normative Sexual Behavior in Children: A Contemporary Sample,” *Pediatrics* 101 (1998): 9. Retrieved from: <http://pediatrics.aappublications.org/content/101/4/e9.full>. See Tables 3 and 4 for normative sexual behavior categorized by gender. The American Academy of Pediatrics and the Prince Edwards Island government have also released helpful guides for differentiating between normal and concerning sexual behaviors. See N. D. Kellogg, “Clinical Report—The Evaluation of Sexual Behaviors in Children,” *American Academy of Pediatrics* 124 (2009): 992-998, retrieved from <http://pediatrics.aappublications.org/content/pediatrics/124/3/992.full.pdf> and The Provincial Child Sexual Abuse Advisory Committee, *Children’s Sexual Behaviours: A Parent’s Guide* (Prince Edward Island, Canada, 2013), retrieved from: www.gov.pe.ca/photos/original/CSS_CSBPGEEn.pdf.

- Let the child know what to expect next, and incorporate their input where possible.
- Report the abuse to authorities and your supervisors/church leaders.
- Document the disclosure and your report.
- Protect the child's right to privacy and avoid the urge to turn indiscriminately to colleagues, friends, or family for advice. Instead turn to professionals experienced in handling cases of child sexual abuse and to carefully selected individuals who can provide assistance and support to the child and you.

MAKING A REPORT

- 1. Within 24 hours, call Franklin County Children Service (614-229-7000), or local police.**
2. Contact a pastor who is uninvolved.
3. Fill out a Child Safety Incident Report Form and submit it to the pastor.
4. The pastor will inform church leadership, legal representation, and insurance.
5. Media inquiries (if any) should be directed to the senior pastor.

After all the necessary reports have been made, NPC leadership will consult with the Child Safeguarding Committee about how to best communicate with the congregation, including but not limited to suspending the accused from activities with children and informing parents at NPC. Everyone involved in the incident is encouraged to use biblical wisdom when speaking about it. While NPC does not require a strict confidentiality about such a public threat to our children, we would ask anyone who has knowledge to use their knowledge for a godly purpose, speaking only of the incident in times and places that will help further protect children, aid investigators, or give comfort.

WHO SHOULD REPORT:

When anyone has reason to suspect or has knowledge of child abuse, he or she is morally and, in the case of pastors, medical professionals, teachers, attorneys, therapists, childcare workers, and others,¹⁴ legally obligated to immediately report it to the civil authorities. *If you fail to report the suspected abuse immediately or fail to report the suspected abuse before you inform a pastor, you have violated the law and you can be prosecuted*¹⁵. If a pastor is involved in the incident, after you have fulfilled your mandated reporter requirements, report to another pastor or elder. You will then need to fill out a Child Safety Incident Report Form and submit it to a pastor who is uninvolved in a sealed envelope.

Reports should be made within 24 hours, and can be made at any time by phone to Franklin County Children Service (614-229-7000) or local police.

¹⁴ Ohio Revised Code § 2151.421(A)(1)(a), (b).

¹⁵ Ohio Revised Code § 2151.99; 2151.421(B), (C).

INVESTIGATIONS & INTERNAL REVIEW

NPC will comply in every way with the appropriate civil authorities' investigations.

When abuse is reported to the civil authorities and the incident occurred on NPC's property or ministry event, the Child Protection Committee will perform an internal review of the incident. Without interfering with or delaying the civil authorities' investigation, the child safeguarding committee's review will seek to discover the following:

1. Did staff, volunteers, and other adults act in accord with the philosophy of NPC's Child Protection Policy? If not, what steps must be taken to correct this?
2. Did staff, volunteers, and other adults follow our Child Protection Procedures and Code of Conduct? If not, is there any particular reasons why not? What steps must be taken to correct this?
3. Is there an area of our Child Protection Policies or Code of Conduct that should be altered so that such an incident will be less likely in the future?

If a report of child sexual abuse has been made, and the civil authorities do not issue charges, the Child Safeguarding Committee shall conduct its own review in cooperation with church leadership to determine whether the person(s) involved shall be allowed to continue working with children. Even if civil authorities do not have enough evidence to pursue charges, this does not mean the person is exonerated or is well-suited to work with children. Any powers of church discipline shall remain with the leadership; however, information and recommendations from the Child Safeguarding Committee will be given full weight by the leadership.

If there is any serious or noteworthy incident during the time children are in the care of NPC staff and volunteers, that staff or volunteer as well as one other who was also present during the incident shall fill out a Child Safety Incident Report Form independently. This will ensure that we can document any pertinent information for future reference, for the sake of all involved. Incidents shall include but not be limited to injury, illness, a behavior issue that could potentially harm the child or other children, or property damage.

INDEPENDENT ASSESSMENT

Under the following circumstances, NPC will consult with GRACE to determine if an independent review should be pursued:

1. When a suspicion of child maltreatment is reported to the civil authorities and they decline to investigate or prosecute the alleged abuses.
2. 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 assessment is deemed necessary, NPC will consult with GRACE to retain an organization that meets the following criteria:

1. Completely independent of NPC
2. Experienced in proper investigation techniques
3. Up-to-date on child maltreatment research