



9270 Cockerham Rd.
Denham Springs, LA 70726
Phone: (225) 369-2832

CHILD PROTECTION POLICY AND PROCEDURES

The Way Church of Denham Springs will neither permit nor tolerate the emotional abuse, physical abuse, maltreatment, neglect, sexual abuse, or spiritual abuse of any child to occur in its workplace or at any activity sponsored by or related to it or to be committed by or against any of its members or visitors. To make this “zero—tolerance” policy clear to all church leaders, staff members, volunteers, church partners, and visitors, we have adopted mandatory procedures that church leaders, staff members, volunteers, church partners, individuals and survivors/victims must follow when they learn of or witness any form of child abuse or neglect. Those reasonably suspected or believed to have abused or neglected a child or other forms of misconduct will be appropriately disciplined, up to and including termination of employment or partnership, as well as criminal prosecution. No church leader, staff member, volunteer, church partner, or other person, regardless of his or her title or position has the authority to commit or allow any form of child abuse, maltreatment, or neglect.

Any occurrence in which an adult engages a child in sexual activity is abusive. Sexual activity between an adult and child is abusive regardless of whether the adult or the child is the initiator, whether the activity is forced or not, or whether the child understands that the activity is sexual in nature. Sexual activity between children can also be abusive, particularly if there is a significant disparity in age, development, or size; if one child is in a position of responsibility, trust, or power over the other; if one child is unconscious; or if coercion is used.

Because “the majority of children who are sexually abused will be moderately to severely symptomatic at some point in their life,”¹ the Way Church is familiar with and attentive to potential indicators of child sexual abuse and other forms of abuse, maltreatment, or neglect. As the church’s front-line for children’s and youth programming and pastoral counseling, church leaders, staff members, and volunteers have regular opportunities to observe children’s behavior, family dynamics, and care-giving styles. They are often privy to the intimate details of church members’ lives. Unlike formal educators, church leaders, staff members, and volunteers have ongoing contact with the entire family unit and its acquaintances, and as such may be in the unique position to detect child abuse, maltreatment, and neglect.

¹ Centers for Disease Control and Prevention, “Adverse Childhood Experiences Study: Major Findings,” (2016), retrieved from www.cdc.gov/violenceprevention/acestudy/about.html.

Though a child's injuries may be hidden from the untrained eye, child sexual abuse and other forms of child abuse and maltreatment can result in immediate and/or lasting impact in all realms of the person's well-being. Understanding how child abuse, maltreatment, and neglect can traumatize the child and have lasting impact in the life of a surviving adult is a critical first step in preventing abuse, maltreatment, and neglect, 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.

The Way Church takes all indicators and suspicions of child abuse, maltreatment, or neglect seriously. 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 be maltreated in another way, and we will take steps to protect the child from known risks and be extra attentive to and supportive of the child.

The abuse of children is not only a sin, but it is also a serious crime. When adults report suspected child abuse to the legal authorities, their report could save a child's life. In contrast, silence about suspected abuse brings incredible harm to victims and emboldens offenders. The Way Church encourages its partners and leadership, both mandatory reporters and not, to contact the authorities immediately when a child discloses abuse or neglect, when they witness child abuse or neglect, or when they observe signs of child abuse or neglect. The Way Church will not tolerate apathy, malfeasance, or neglect by any member of church leadership or staff. This is a failure to faithfully shepherd the flock God has entrusted to us and maligns the integrity of the Gospel of Jesus Christ.

DEFINITIONS

“Abuse” is any one of the following acts, which seriously endangers the physical, mental, or emotional health and safety of a child:

- The infliction, attempted infliction, or, as a result of inadequate supervision, the allowance of the infliction or attempted infliction of physical or mental injury upon a child by a parent or any other person;
- The exploitation or overwork of a child by a parent or any other person, including but not limited to commercial sexual exploitation of the child;
- The use of force or violence upon the person of a child by a dating partner, family member, or household member;

- The involvement of a child in any sexual act with a parent or any other person, or the aiding or toleration by a parent, caretaker, or any other person of a child's involvement in any sexual act with any other person;
- The involvement of a child with a parent or any other person, or the aiding or toleration by a parent, caretaker, or any other person of a child's involvement in any pornographic displays, or any sexual activity constituting a crime under the laws of the State of Louisiana or the United States; or
- The involvement of a child in any coerced abortion or female genital mutilation as prohibited by Louisiana law.

“Child” means any person who has not attained eighteen (18) years of age.

“Church leader(s)” means any person who has been duly ordained, licensed, or recognized by the Way Church as an elder, pastor, minister, shepherd, or small group or house church leader/teacher.

“Church partner(s)” means any person who has signed a membership covenant with the Way Church and/or holds themselves out as a member of the Way Church.

“Child pornography” is the visual depiction of a child engaged in actual or simulated sexual intercourse, deviant sexual intercourse, sexual bestiality, masturbation, sadomasochistic abuse, or lewd exhibition of the genitals.

“Church staff” or “staff member” means any person who is employed by the Way Church as an elder, pastor, administrator, teacher, child care or nursery worker, Parents’ Day Out (PDO) employee, or custodian.

“Church volunteer(s)” means any person who volunteers or participates in any ministry of the Way Church or the church’s Parents’ Day Out program that places them in a supervisory, teaching, or caretaking role over children, or in direct unsupervised contact with children.

“Coerced abortion” means the use of force, intimidation, threat of force, threat of deprivation of food and shelter, or the deprivation of food and shelter by a parent or any other person in order to compel a female child to undergo an abortion against her will, whether or not the abortion procedure has been attempted or completed.

“Commercial sexual exploitation” is any form of child sexual abuse or exploitation in which a person(s), of any age, forces or entices a child into engaging in any sexual activity

or pornographic displays for the financial benefit of any person or in exchange for anything of value, including monetary and non-monetary benefits, given or received by any person.

“Dating partner” means any person who is involved or has been involved in a sexual or intimate relationship with the child characterized by the expectation of affectionate involvement independent of financial considerations, regardless of the length of time or duration of the relationship.

“Emotional abuse” is any act toward a child that causes or has a substantial likelihood of causing harm to the child’s physical, psychological, social, spiritual, or moral development. Emotional abuse includes, but is not limited to, patterns of:

- Restricting a child’s movement;
- Discrimination (e.g., serving snacks to all children in a group, except for one child or one group of children);
- Blaming;
- Belittling, denigrating, ridiculing, or humiliating;
- Threatening or scaring;
- Unrealistic expectations and demands; or
- Other non-physical forms of hostility or bullying

“Family member” means any parent, sibling, grandparent, aunt, uncle, or any other ascendants or descendants, who is related to the child either by blood, step, or adoption; or any foster parent of the child.

“Household member” means any person presently or formerly living in the same residence as the child, or any child presently or formerly living in the same residence with the child, including any foster children who are not related to the child either by blood, step, or adoption.

“In-home perpetrator” refers to any parent or caretaker of a child, or any person who maintains an interpersonal dating or engagement relationship with the parent or caretaker of the child, or any person living in the same residence with the parent or caretaker of the child as a spouse, whether married or not. The term “caretaker” should be given the broadest possible understanding.

“Neglect” is the refusal or unreasonable failure of a parent or caretaker to supply a child with necessary food, clothing, shelter, care, treatment, or counseling for any injury, illness, or condition of the child, as a result of which the child’s physical, mental, or emotional health and safety is substantially threatened or impaired. “Neglect” also includes prenatal

neglect by a mother during pregnancy, which includes the exposure to chronic or severe use of alcohol or the unlawful use of any controlled dangerous substance, or in a manner not lawfully.

“Out-of-home perpetrator” refers to any person other than a parent, caretaker, guardian, or live-in dating partner.

“Physical abuse” is any 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, or other part of the body, or any object or instrumentality), burning, or otherwise harming of 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.

“Sexual abuse” is any physical contact with a sexual or intimate part of the body, or other forms of sexual activity, conducted without consent, or engaged in for the purpose of sexual gratification or to degrade or abuse.

- Physical contact includes:
 - Anal, vaginal, or oral sexual intercourse;
 - Touching, grabbing, patting, slapping, pinching, rubbing, fondling, groping, poking, or other forms of contact, whether over or under clothing; or
 - 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 was in fact intentional.
- Sexual or intimate body parts include, but are not limited to:
 - Breasts;
 - Buttocks;
 - Genitals;
 - Groin area; and/or
 - Upper Thigh
- Other forms of sexual activity include:
 - 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; or
 - 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:

- Explicit indication of lack of consent;
- Physical/verbal force or intimidation, whether express or implicit;
- Circumstances in which one individual is an adult and one individual is a child, since children cannot legally consent to sexual activity with an adult;
- Circumstances in which one individual is too intoxicated to say “no” or to understand or appreciate the circumstances in which that individual finds himself/herself;
- Circumstances in which one individual is asleep;
- Circumstances in which one individual lacks knowledge of the activity’s occurrence; or
- Circumstances in which one individual does not have the physical or mental capacity to consent.

“Sex offender” or “sexual offender” refers to any individual convicted of a “sex offense” as defined by Louisiana or federal law, any individual who is on probation or parole for a “sex offense” as defined by Louisiana or federal law (or as recognized by the State of Louisiana if for a conviction from another state, territory, or jurisdiction), or any individual who is currently required to comply with state and/or federal Sex Offender Registration and Notification (SORNA) laws.

"Spiritual abuse" is the coercion, control, or abuse of a child by another in a spiritual context or under the guise of religion, whereby a child experiences spiritual abuse as a deeply emotional personal attack. This spiritual abuse includes, but is not limited to, any of the following:

- Use of religious ideology, precepts, tradition, or sacred texts to commit the emotional, financial, physical, or sexual abuse of a child or sexual misconduct (as defined in the *Sexual Misconduct Policy & Procedures*);
- Compelling a child to engage in religious acts against his or her will;
- Mistreatment of a child who is in need of help, support, or spiritual encouragement;
- Abuse that occurs in a religious context (e.g., church or youth group);
- Abuse perpetrated by a religious leader (e.g., pastor, youth minister, teacher); or
- Invocation of divine authority to manipulate or exploit a child into meeting the needs of the abuser.

PROTECTIVE PRACTICES

People who sexually abuse children utilize authority, trust, or physical force/threats to gain access and control over children so they can perpetrate the abuse and will seek out opportunities that gives them access to children. Therefore, the Way Church is committed to diligently providing a safe environment for children and their families.

Child Protection Director

The Way Church shall appoint or hire a Child Protection Director, or designate a current church leader or staff member, who shall be responsible for overseeing the child protection policies and training for the church and be a resource for the church on all issues related to maltreatment. The Child Protection Director should be a former child protection professional such as an investigator, prosecutor, forensic interviewer, social worker, victim's advocate, or medical/mental health professional with significant experiences and knowledge in working with victims and/or offenders and, ideally, who served as part of a multi-disciplinary team (MDT) response to cases of maltreatment. A professional who has served as part of an MDT will have been exposed to the full gamut of professional responses to child abuse. The Child Protection Director shall demonstrate a knowledge of the diverse professions and resources that may be necessary to sufficiently address maltreatment and assist the church in responding to the needs of families with excellence. The Child Protection Director shall be fluent in child abuse literature on preventing child abuse within institutions, specifically in faith communities, and in the role that religion is misused to justify maltreatment.

The Child Protection Director shall have the following responsibilities:

- Policies:
 - Oversee the development and enforcement of child protection policies and procedures for the church.
 - Make sure all child protection policies and procedures reflect the best practices and (if possible) are rooted in research.
 - Implement and enforce policies for (1) managing convicted sex offenders attending the Way Church or seeking membership in the congregation and (2) individuals not convicted of a sexual offense but for whom there is strong evidence of risk.
 - Review all new child/youth ministries or events to ensure there is an adequate safety plan for children.
 - Review and (if needed) update all policies annually.
- Training:
 - Implement a training program for all church leaders, staff, volunteers, and church members working with children/youth on recognizing and responding to any form of child abuse or neglect.
 - Educate the Way community about child protection policies and engage them in ensuring adherence to policies. Parents and family members should also receive education on how to speak with their children about this subject.
 - Implement personal safety training for all Way children/youth participating in children/youth activities.
- Child Abuse Ministries and Community Engagement

- Develop a proactive ministry for survivors of abuse as well as survivors in the community.
- Develop community collaborations with social services, law enforcement agencies, children's advocacy centers, mental health services, and other professionals and agencies responding to child abuse, and to work with these agencies in addressing the needs of maltreated children.
- Develop a fund that can be used to assist any survivor of abuse with medical and mental health care or other services they may need.
- Stay abreast of the latest research on addressing the physical, emotional, and spiritual needs of victims of child abuse and share this information with the Way community. This can be done, in part, by attending state and national conferences on child abuse and in developing collaborations with other ministries seeking to address this issue.

The Child Protection Director shall report to the Elder Board and shall have all other duties detailed in this *Child Protection Policy and Procedure*.

Screening of Leaders, Employees, and Volunteers

While it is not always possible for any organization to identify someone as a child abuser, a thorough screening can help offset this risk and help the church determine if an applicant is an appropriate fit for a position or role at the church. In keeping with our values of protecting the children in our care, as we raise up leaders, hire employees, or recruit volunteers, the Way Church will require all applicants to submit to a formal screening process, which shall include, but not be limited to, background checks, Internet and social media searches, reference checks, and formal interviews.

Any person who is being considered as a candidate for the following positions shall be screened by church leadership:

- Elder (and spouse);
- Pastor (and spouse);
- Shepherd (and spouse);
- Children's ministry team member or volunteer;
- Youth ministry team member or volunteer;
- Parent's Day Out (PDO) employee or volunteer; and/or
- Nursery worker or volunteer.

The Way Church requires the following screening procedures:

- The completion of a written application.

- All candidates either must provide a valid driver's license or state identification card or must consent to be photographed, with copies of their driver's license, identification card, or photographs to be kept in their personnel file.
- At least two references to be contacted. These references should include:
 - Previous employers;
 - At least one reference not supplied directly by the applicant; and
 - Personal references if the applicant is under eighteen.
- A background check that includes the following information:
 - Confirmation of education;
 - Local criminal records check;
 - State criminal records check;
 - FBI criminal records check;
 - State central child/dependent adult abuse registry check;
 - State sex offender registry check;
 - Motor vehicle records check;
 - Professional disciplinary board background check; and
 - An interview that explores a candidate's written application and introduces the *Child Protection Policy & Procedures* to the candidate.
- All candidates must acknowledge in writing that they have received a printed copy of this policy, that they understand them, and that they agree to abide by them.

If the screening process yields information that an individual abused, mistreated, or neglected a child in any way or has been convicted of a violent and/or sexual crime, that individual shall not work with children in any capacity and may be rejected from further consideration as a leader, employee, or volunteer at the Way Church. The Elder Board shall make the final determination in this regard.

The Way Church keeps confidential all information received in the applicant selection process. Such information will be stored with access afforded only to appropriate church staff and/or teams on a need-to-know basis. If the church learns of false, misleading, or amended information on an application that could cause potential danger to individuals or groups these policies endeavor to protect, or other liability to the church, that person will be terminated or have his/her application rejected.

All church staff (part time or full time) or volunteers in a supervisory, caretaking, or teaching position with direct relation to children under the age of eighteen (18) years must have been members of The Way Church for a minimum of six (6) months prior to being considered for the position and must submit to a criminal background check before being considered for the position. This rule does not apply to Parents' Day Out (PDO) employees or volunteers, though it is a requirement of the Parents' Day Out (PDO) Director. The six (6) month of partnership requirement may be waived by unanimous consent of the Elder Board.

No applicant or volunteer ever convicted of a sex offense is eligible for service in a position with direct relation to children and is permanently barred from ministry.

Any applicant or volunteer who is a survivor of child abuse or domestic violence in the past must notify the Elder Board prior to service in a position with direct relation to children or with domestic abuse survivors or offenders. This disclosure will be kept in the strictest of confidence by the Elders of the church and will be used exclusively for deciding whether the applicant is a good fit for the considered position and so that the elders may better serve the spiritual and emotional needs of the applicant or volunteer. Any violation of this confidentiality, without the expressed consent of the applicant or volunteer, by an elder shall be grounds for disciplinary action.

All church leaders and church staff shall report any arrest or conviction for any criminal offense, excluding traffic offenses, to the Elder Board within seventy-two (72) hours of arrest or conviction.

Nursery and Children Check-In and Check-Out Policy

The Way Church will have in place an identification system ensuring that only a child's parents or another person(s) authorized by a child's parents can drop off or pick up the child at any church event. Church leaders, staff members, or children's ministry team members in charge of each ministry area shall ensure the above system is in place.

Two Worker Rule

A minimum of two workers will be in attendance at all times when children are being supervised during a church activity, regardless of the number of participants, location or activity. At least one of these must be a church leader, staff member, or children's ministry team member. These two workers cannot be related to one another.

Exceptions:

- Some students (sixth-twelfth grades) may have only one primary worker in attendance in approved cases by the minister in charge. In these instances, doors to classrooms will remain open, or the meeting will take place in an open area with other students and/or adults.
- Workers related to one another may serve together in certain situations upon special approval by the Elder Board, in consultation with the minister in charge of said ministry area and the Child Protection Director.
- In cases where a church leader has a legitimate reason to be alone with a child (i.e., counseling, visitation), all workers should obtain the consent of the child's parent or guardian and an Way Elder prior to being alone with the child. In such cases, the church

leader should first attempt to have another adult present, with the child's consent, and only agree to meet with the child alone if there is not another adult available that the child trusts to be present. This will be strictly enforced.

In situations where two workers are scheduled but one of those does not arrive on time, or is absent for the entire event(s), the minister overseeing the event(s) must be notified and take whatever precautions are necessary to ensure the participant's safety and protection as best he/she can.

Observation of Children Activities

Church activities for children (infants – fifth grade) should be scheduled in areas visible from adjoining areas. Such visibility will be maintained by leaving curtains and blinds open and, whenever possible, by leaving the door to the room open. Reasonable exceptions to this rule may be made by the senior pastor where seclusion is necessary for rest, provided two approved workers are present in the room at all times. At no time will an adult meet alone with a child in any room where the door is closed or in an area where they cannot be seen.

Ratio of Workers to Children

It is required that a reasonable ratio of workers to children is maintained at all times involving the supervision of children. The church leader, staff member, or children's ministry team member responsible for the children's ministry shall be primarily responsible for setting and maintaining a reasonable ratio of workers to children giving due regard to all factors present, including the number and age of the participants, the nature of the activities and the location where the activities are taking place.

The ratio should provide enough staff to prevent or curtail most discipline problems. When dealing with a larger group of 20 or more students, an additional helper should be available who does not carry the responsibility for any child but remains free to help with equipment, supplies, and other things needed by those working with the children.

Physical Contact with Children

Individuals who abuse children often commence the abuse with inappropriate touch in order to test tolerance levels for their behavior. These interactions may begin with non-sexual, accidental, or overly physical touch—often in view of others. If bystanders do not notice or challenge the touching, the perpetrator may feel emboldened and push the boundaries further. The Way Church recognizes that certain kinds of touch may be appropriate in one setting, but inappropriate in another, especially depending upon the age of the child. In order for bystanders to intervene when they observe inappropriate touching, the Way Church establishes the following guidelines:

- Examples of unacceptable touching includes, but is not limited to:
 - Sexually or physically abusive touch
 - Touching a child's thighs, stomach, or back, unless medically necessary
 - Corporal punishment of another's child
 - Any touch that is unwanted by the child or makes the child feel uncomfortable
 - Any touch that makes the child's parent or caregiver uncomfortable or is expressly forbidden by the child's parent or caregiver
 - Any touch that is secret
 - Touch that sexually gratifies the adult in any way
 - Tapping a child's clothed bottom
- Examples of acceptable touching includes, but is not limited to:
 - Sitting side by side
 - High fives, fist bumps, special handshakes
 - Side hugs
 - Pats on the shoulder
 - Carrying a small child on your hip

Church leaders, staff members, or volunteers are expressly prohibited from engaging in any touching of a child that is secret. Any touch of a child must be observable and interruptible. Before a church leader, staff member, or volunteer touches a child, he or she should ask themselves the following questions: Am I comfortable telling a caregiver or supervisor about the touch? Does the child want the touch? If no, then that touch should be avoided. Lying about a touch to a caregiver or a supervisor is prohibited.

Disciplining of Children

The Way Church expects all children participating in any event, program, or ministry to ...

- Respect their leader(s);
- Respect their fellow children;
- Respect church property; and
- Have fun!

The following behavior by children are unacceptable and need to be addressed by a church leader or staff member immediately on an individual basis depending on severity and frequency:

- Disrespect for authority/abusive language
- Disruption of classroom
- Physical aggression
- Harassment of peers or bullying

- Lying
- Stealing
- Mistreatment of church property

Discipline is designed and carried out to help each child:

- Learn self-control
- Make good choices
- Identify feelings
- Develop a respect for the feelings of others

Staff and volunteers will:

- Acknowledge good behavior
- Listen carefully and openly to children
- Encourage two-way communication
- Treat all children fairly
- Develop a nurturing and trusting environment

In the event that a child fails to abide by these expectations and causes any disruption or situation calling for discipline, church leaders, staff members, or volunteers shall abide by the following disciplinary procedures:

1) Redirect

Get on the child's level and look them in the eye. Give a verbal warning, explaining why the behavior is not acceptable. Give a suggestion for the right way to act or behave and help them do it.

2) Remove

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If the child does not follow directions and redirecting the child is unsuccessful, it may be necessary to remove them from the situation or activity so that they calm down and prepare to rejoin the event or ministry activity. Use a calm tone of voice, not harsh or loud voice or sarcasm. Place them in an area away from the other children for not more than one minute per year of age.

3) Refer

If the child is still not obeying, refer the child to your ministry leader for assistance.

No church leader, staff member, or volunteer is permitted to threaten a child or demean a child in any way. Verbal abuse, threats, or derogatory remarks are expressly forbidden. Withholding or forcing of meals, snacks or naps is expressly forbidden. Punishment associated with potty training is expressly forbidden.

Corporal punishment of a child by a church leader, staff member, or volunteer is expressly forbidden. This does not preclude a church leader, staff member, or volunteer from

disciplining his or her own child, though such discipline is encouraged to be done outside the view of other children.

No church leader, staff member, or volunteer is permitted to touch or hold a child in an aggressive or assertive manner unless it is absolutely necessary to prevent harm to another person or to prevent a child from doing something dangerous.

In the event that a child has physically harmed or injured another child, the staff member or ministry leader responsible for the event or ministry activity shall immediately report the conduct to the child's parent or guardian and notify church leadership. In the event that a child has been physically harmed or injured, the staff member or ministry leader responsible for the event or ministry activity shall immediately report the harm or injury to the child's parent or guardian and notify church leadership. First aid shall be applied immediately if needed. If the injury is serious or life-threatening, emergency services shall be contacted immediately.

Extra Attention and Preferential Treatment

Some children will require extra attention—such as a child with a physical or learning disability, a child who has recently lost a caregiver, a new child who struggles to make friends, etc. However, it is precisely these children that are often the most vulnerable to abuse. Furthermore, favoritism is prohibited (James 2:1, 8-9). Church leaders, staff and volunteers are encouraged to meet the varying and individualized needs of the church's children.

Secret gifts or special treatment towards a child is expressly forbidden. Any extra attention displayed to a child must be observable and interruptible.

In order to guard against both displays of favoritism and grooming behaviors by would-be abusers, the following precautionary measures are hereby adopted:

- Church leaders, staff, or volunteers should be able to articulate a clear reason for providing gifts or special attention to a child.
- Church leaders, staff, or volunteers should alert church leadership or their ministry leader of their intention to provide extra attention to a child.
- When possible, church leadership or ministry leaders should organize a rotation of staff and volunteers so that extra attention is provided by multiple individuals.
- Church leaders, staff, or volunteers providing extra attention must always abide by the *Child Protection Policy & Procedures* at all times.
- Church leadership and ministry leaders should drop by unexpectedly during outings or meetings.

- Church leadership and ministry leaders should periodically reevaluate the situation to determine if extra attention is still necessary.
- Ministry leaders should make certain to alert the Child Protection Director or Church Elders about the need for continued oversight of instances of preferential treatment.

Ministerial and Staff Oversight

The Child Protection Director shall coordinate with the respective youth and children's ministry teams to ensure ongoing supervision of all workers. This should include regular unannounced visits into classes and other program sites.

Children's Pickup

Children (infants – fifth grade) are not permitted to leave the area of a church activity at the conclusion of the scheduled activity until released to an authorized adult. Parents must be notified of this rule and be supportive of it in order for a child to continue participating.

If a parent or guardian does not pick up a child on time, the child will be kept by their approved worker in an area where safe supervision can continue until the parent or guardian is located. Children whose parents are habitually late in picking up their child, after proper warning, will not be allowed to continue attending the event.

No child shall be taken from church property, either unattended or in a group without specific parental permission.

Due to the nature of child custody laws, staff members and volunteers must act diligently in making sure that the correct people are picking up their children. Please be aware that only parents or guardians with custody of the child, or an approved adult designated by said parent or guardian, may pick up the child. If there are any questions regarding this procedure, please notify a church leader or ministry leader for clarification.

Missing Child

In the event that a child is missing, church leadership should be notified immediately. Staff members and volunteers shall continue the search for the child, while the ministry leader notifies the child's parents and increases church awareness of the situation. All should remain calm and rational while moving in as timely manner as possible. In the event that ministry leader suspects that the child may no longer be on church property or has been abducted by another person, the ministry leader shall contact law enforcement immediately and notify church leadership.

Release of Claims

Prior to participating in an event defined below, a notarized medical release form must be executed by a parent or the legal guardian of a participant under the age of 18. The form will remain on file with the church and remain in force and effect unless and until revoked in writing by the parent or legal guardian and which revocation is actually delivered to the Way Church. Defined events mentioned above include only:

- Any event involving travel 25 miles or more from the church campus;
- Any event involving overnight stays away from the child's home; or
- Events on or off the church campus scheduled on consecutive days beyond the first day.

The church will provide opportunities before any of these events for parents or legal guardians to execute the required medical release before a notary public. Otherwise, parents and/or legal guardians will be responsible for any notary public fees.

While the church prefers that this form be on file for any and all church scheduled events involving children under the age of 18, reality dictates that it is sometimes impossible, at other times over burdensome and/or impractical. However, all such forms on file in the church's possession will apply to any and all events for that child.

IDENTIFYING AND REPORTING SUSPECTED ABUSE, MALTREATMENT, AND NEGLECT

Mandatory Reporters

All church leaders, staff members, volunteers, or any other person who holds a ministerial or administrative position at the Way Church of Denham Springs – regardless of whether paid or unpaid – shall report any form of child maltreatment or neglect to the appropriate authorities as set forth in this policy & procedure. This includes, but not limited to, the following leadership positions in the church:

- Elders;
- Pastors;
- Shepherds (house church leaders);
- Staff members;
- Members of the children's ministry team;
- Members of the youth ministry team;
- Parents' Day Out (PDO) employees and volunteers; or

- Any volunteers or church members who have a supervisory or caretaking role over children in any capacity on church property or at any activity sponsored by or related to a ministry of the Way Church.

Reporting Procedure

All mandatory reporters shall report immediately all suspected child abuse, neglect, or misconduct to a Way Elder and shall report immediately suspected child abuse, maltreatment, or neglect to the appropriate government authority as set forth below.

In-Home Perpetrators

- Mandatory reporters shall report suspected child abuse, maltreatment, or neglect to the Department of Children & Family Services (DCFS) through the designated reporting hotline telephone number: 855-4LA-KIDS (855-452-5437), or to the local DCFS office.
- Mandatory reporters shall also report suspected child abuse, maltreatment, or neglect to the appropriate local or state law enforcement agency.

Out-of-Home Perpetrators

- Mandatory reporters shall report suspected child abuse to the appropriate local or state law enforcement agency.

All mandatory reporters shall strive to include the following information in any report given to DCFS or law enforcement:

- The name, address, age, sex, and race of the child;
- The nature, extent, and cause of the child's injuries or endangered condition, including any previously known or suspected abuse or neglect of the child or the child's siblings;
- The names and addresses of the child's parents or other caretakers;
- The names and ages of all other members of the child's household;
- The name and address of the reporter;
- An account of how the child came to the reporter's attention;
- Any explanation of the cause of the child's injury or condition offered by the child, the caretaker, or any other person (using the same language used by the child, caretaker, or other person as best as possible);
- The number of times the reporter has filed a report on the child or the child's siblings;
- Whether there are any weapons or dangerous substances in the child's home; and

- Any other information which the reporter believes to be relevant and important.

If any of this information is unknown to the reporter, then reporter shall attempt to obtain information from the records of the Way Church or from the child, caretaker, or other person who has made the disclosure of abuse or neglect to the report. After this, if any of the above information remains unknown to the reporter, then reporter shall notify DCFS and/or law enforcement of this when making the report.

It is the policy of the Way Church not to attempt to investigate or assess the validity or credibility of an allegation of sexual or physical abuse as a condition before reporting the allegation to the appropriate law enforcement agency or DCFS.

The Way Elders shall also be responsible for ensuring that any mandated reports are made to the appropriate governing authority and shall take all such necessary steps to ensure the safety of any child who is suspected of being the victim of abuse or neglect.

Investigation & Follow Up

The Way Church and its leadership will take all allegations of sexual abuse or misconduct seriously. In the event that the allegations involve a member of the church staff or leadership, then the Elder Board shall promptly, thoroughly, and equitably investigate whether misconduct has taken place. The Elder Board may utilize an outside third party to conduct an investigation of misconduct or assist in the investigation. The Elder Board will take every reasonable measure to ensure that those named in any complaint of misconduct or are too closely associated with those involved in the complaint will not be part of the investigative team.

The Way Church will cooperate fully with any investigation conducted by law enforcement and/or DCFS and church leadership shall take all necessary steps to ensure the safety and well-being of the child and the child's family.

To the fullest extent possible, but consistent with our legal obligation to report suspected abuse to appropriate authorities, we will endeavor to keep the identities of the alleged victims and investigation subject confidential.

If the investigation by the church or by the government substantiates the allegation(s), the perpetrator shall be subject to discipline by the Elder Board, including termination of employment or termination of membership with the Way Church and exclusion from all church properties.

In the event that the allegations involves a person who is not a member of church leadership (such as a church member, volunteer, visitor, or any other person), then the Elder Board shall take all necessary actions to ensure the safety of the child and his/her

family and their cooperation with any investigation being conducted by law enforcement or DCFS. If the allegations are such that they do not constitute abuse or neglect, but would be misconduct as defined by Scripture, then the Elder Board shall proceed with disciplinary proceedings as set forth in Scripture and the *Constitution & By-Laws*.

Suspension of Church Related Duties

A person accused of abuse or neglect will be suspended immediately following an accusation of abuse or neglect from all church related duties involving individuals or groups these policies endeavor to protect. This would include all childcare, teaching, transportation or sponsorship duties.

If the person is a paid staff member of church, then the person accused should be suspended on “paid leave” until the Elder Board has made a final determination on whether disciplinary action is warranted and what discipline shall be imposed. If the Elder Board determines that termination of membership, leadership, or employment is warranted, and said termination requires a vote of affirmation by the church membership, then the person shall remain suspended on “unpaid leave” until the matter is brought before the church membership in general or special business meeting and a final decision has been made.

Limited Access Agreements

The Way Church recognizes that abuse thrives on secrecy and that transparency and accountability help to counteract secrecy, prevent abuse, and promote safety. One way that we can pursue transparency and accountability is through *Limited Access Agreements* for individuals who engage in concerning or risky behavior around children.

A *Limited Access Agreement* is a written and agreed-upon boundary between an individual and The Way Church wherein we outline its 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 the church community. They do not apply to known offenders, church leadership or staff members.

At the discretion of the Elder Board, The Way Church may utilize *Limited Access Agreements* with any individuals who have:

- Engaged in repeated, minor violations of the policies of The Way Church concerning the protection of children or church members;
- Engaged in concerning or risky behavior that could put children at risk (e.g., any form of abuse defined by this policy); or
- Engaged in any offense(s) that are not related to children (e.g., driving under the influence, drug use, etc.).

If a convicted offender wants to join The Way Church community, the Elder Board will consult with the Child Protection Director (and/or any equivalent child protection expert they deem appropriate) on how to best interact with a known sex offender, including the use of a *Limited Access Agreement* as a condition of membership. 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, the Elder Board will consult with the Child Protection Director (and/or any equivalent child protection expert) on how to best proceed.

Retaliation and False Accusations Prohibited

The Way Church strictly prohibits any retaliation against anyone, including any church leader, staff member, volunteer, church member, student, or individual, who in good faith reports suspected child abuse, maltreatment, or neglect, alleges that it is being committed, or participates/assists in any investigation prompted by their good faith reporting of suspected child abuse or neglect. Anyone who improperly retaliates against someone who has made a good faith allegation of child abuse, maltreatment, or neglect will be subject to discipline, up to and including termination.

Intentionally false or malicious accusations of child abuse, maltreatment, or neglect are prohibited. Anyone who intentionally provides false information or makes malicious accusations of child abuse, maltreatment, or neglect, will be subject to discipline, up to and including termination.

Confidentiality and Preservation of Records

All reports of abuse, maltreatment, or neglect shall be held in absolute confidence. No church leaders, staff member, volunteer, or church member shall communicate any information concerning the alleged event or disclosure to any person, except as necessary to cooperate with any official investigation. Any breach of this confidentiality shall be cause for church discipline, up to and including termination. The Elder Board, in consultation with the official conducting the investigation may authorize limited additional disclosure if necessary to protect other children from harm, particularly where the person responsible for the abuse cannot be identified. But in no case shall the identity of the victim or the accused person be disclosed, except as required by law or as permitted in this policy.

The senior pastor, or such other person as the Elder Board may direct, shall be responsible to ensure that all allegations of abuse are thoroughly documented and that all documents are preserved for a period of ten (10) years from the date of the disclosure or allegation, or until all criminal or civil investigations and actions have been completed, whichever occurs last.

Ministerial Care

Church leadership and staff shall encourage and assist abused or neglected individuals and their families to secure appropriate trauma-informed counseling, care, and support. In the event the abuse or neglect involve a church leader, staff member, or church member, or other person who regularly attends the Way Church, then church leadership and staff shall encourage and assist the the abused or neglected individual in securing appropriate pastoral care and support, including third party counseling, being mindful of the potential for a conflict of interest. All persons shall act towards the abused or neglected individual and their families, and the accused, in accordance with the principles set forth in Scripture at all times. An abused or neglect individuals shall not be further victimized by the spiritual abuse by any church leader, staff member, or church member.

Liaison with the Community

The senior pastor, the church's legal counsel, or such other person as the Elder Board may direct, will serve as the church's sole access to the media. The church should emphasize to the public its position on child abuse and neglect, its concern for the victim and the extensive steps being taken to address the safety of all who attend the church.

ATTENDANCE OR MEMBERSHIP OF INDIVIDUALS CONVICTED OF A SEX OFFENSE

Consistent with the teachings of Scripture, The Way Church firmly believes that there is no sin(s) beyond the grace and forgiveness of Jesus Christ. We also affirm, as did Martin Luther in his 95 theses, that all of life is repentance. We therefore strive to maintain a culture of redemption and repentance for all who attend any of the services or ministry events offered by The Way Church. We believe that spiritual health is attainable for all individuals and our hope and prayer is that we will all *"grow in the grace and knowledge of our Lord and Savior Jesus Christ"* (2 Pet. 3:18, ESV). As long as a person with a history of one or more sexual offenses remains honest and committed to God and to others, the local church should encourage him or her to move toward treatment and recovery and should commit its support as they continue.

The Way Church is also committed to providing a safe environment for children and victims/survivors of child sexual abuse or maltreatment. The Way Church must therefore balance the following three priorities: (1) the safety of children; (2) the peace of mind of parents and family members; and (3) opportunities to worship and fellowship for everyone, including those who have been convicted or accused of a sex offense.

In the event that someone the sex offender has harmed or their family also attends The Way Church and chooses to remain, the church leadership will work with other churches in the community to find a place for the offender to find a place to worship and have accountability. The offender shall not be permitted to attend any service or event where someone he or she harmed or their family is present.

When the Senior Pastor, an Elder, or any member of church leadership or staff, is informed that a sex offender is attending or wishes to attend the church, the Elder Board shall take the following steps:

- Obtain a record of the sex offender's prior criminal convictions by conducting a national, state, and local criminal records check in order for church leadership to be fully informed regarding the sex offender's criminal background.
- If the sex offender is on probation or parole, the Child Protection Director shall identify the offender's probation/parole officer and ascertain the conditions that have been imposed. The Way Church will comply with and enforce any conditions of probation or parole as required by Louisiana law. In some cases, sex offenders may be prohibited from attending church, being in the presence of children, or having unsupervised access to children. If the probation/parole officer indicates that the offender is permitted to attend church, then the Child Protection Director shall ask the officer if he or she would recommend that the offender be allowed to attend church, and if so, under what conditions. The Child Protection Director shall obtain this information in writing, or, if that is not possible, make a detailed written account of the officer's response. These records shall be maintained and preserved by The Way Church.
- Condition the sex offender's right to attend church services and activities on his or her signing a *Limited Access Agreement* (see above) that imposes no less than the following conditions:
 - The sex offender will not work with minors in any capacity in the church.
 - The sex offender is not qualified to hold any leadership position within the church.
 - The sex offender will not be present on church property while children are present for Parents' Day Out activities. In the event that the sex offender's child(ren) participate in the Parents' Day Out ministry, the sex offender is permitted to drop off and pick up his/her child(ren) (unless otherwise prohibited by law or court order), but is otherwise prohibited from remaining on the premises.
 - The sex offender will not attend any youth or children's functions while on church property, except for those involving his or her own child or children, and only if in the presence of a chaperone (see below).
 - The sex offender will always be in the presence of a designated chaperone while on church property. This includes religious services, educational classes, activities, and restroom breaks. The chaperone shall monitor the sex offender the entire time that the sex offender is on church property or is attending a church-sponsored event.

- The sex offender will continue to comply with any of the conditions of his probation/parole, sex offender registration and notification requirements, and any sex offender treatment or counseling requirements imposed by law or court order.
 - The sex offender will sign a written agreement allowing church leadership to speak with his or her probation/parole officer and/or sex offender therapist/counselor so that the church may provide accountability to the offender and coordinate with his treatment in any way.
 - The sex offender waives any clergy-penitent privilege with any communications with church pastors, elders, or shepherds. (This does not affect any privileges recognized by Louisiana law between the offender and any person within the church who is providing mental health or counseling therapy to the offender.)
 - A single violation of these conditions will result in an immediate termination of the sex offender's privilege to attend church.
 - A violation of any conditions of the sex offender's probation or parole that is brought to the attention of church leadership shall be immediately communicated to the offender's probation/parole officer.
 - The Limited Access Agreement option will not be available unless the church's insurer is informed and confirms that coverage will not be affected.
- In certain cases, exclusion of the sex offender from the church is the only viable option and shall be implemented by the Elder Board if (1) for any reason the limited access option is not feasible or enforceable; or (2) if the offender's crimes are so frequent or heinous that exclusion is the only appropriate option; or (3) one or more of the offender's victims attends the church.

The Elder Board, in consultation with the Child Protection Director and any other child protection experts they may deem appropriate) may utilize these protections and procedures for any individual who were accused or charged with a sex offense, but were not convicted of a sex offense (e.g., were found not guilty at trial, were convicted a lesser offense, or where the District Attorney elected to reject or dismiss the charges) if there is compelling evidence that the individual committed a sex offense and they deem it necessary and prudent to implement these protections and procedures.