

First Lutheran Church and Little Lambs Preschool

Child Protection Policy

March 2015

Revisions Page

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Revised 10.13.14 CPP Committee

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Approved 10.21.14 FLC BOD

Edited 3.18.15 – p.8 (added Committee to last line of #7) and updated forms (Appendix A, A1, & E)

Edited by CPP Committee 10.17.15 (struck line under 'Permission Slips' and added 'Overnight Stays' plus definition)

Edited/Approved by FLC Board of Directors 11.22.15 (section on Overnight Stays and Defining Male & Female)

First Lutheran Church (FLC) and Little Lambs Preschool (LLPS) seeks to provide a safe and secure environment for the children who participate in our programs and activities. By implementing the following practices, our goal is to protect the children of First Lutheran Church from incidents of misconduct or inappropriate behavior while also protecting our staff and workers from false accusations.

Applicability

This policy and these protective procedures are limited in scope and serve to protect our children and youth only when participating in programs such as LLPS, nursery, Sunday School, Confirmation Class, Youth Group, Vacation Bible School, retreats, or any program where parent(s) or guardian(s) are releasing their children/youth into our care with an Approved Worker supervising. This does not apply to congregation gatherings such as church services, picnics, and other activities where the responsibility of monitoring children's whereabouts and safety falls to the parent(s) or guardian(s). Implementing and following the various protective policies is only incumbent upon the CPP Committee and the Approved Workers and only during such time that they are serving in this capacity.

Definitions

For purposes of this policy, the terms "child" or "children" include all persons under the age of eighteen (18) years. The term "Approved Worker" includes both paid and volunteer persons who work with children.

Selection of Workers

All persons who desire to work with the children participating in our programs and activities will be screened. This screening includes the following:

a) **Six-Month Rule**

No volunteer applicant will be considered for any position involving contact with minors until s/he has been involved with FLC for a minimum of six (6) months or reference checking indicates the applicant has been in good standing for at least six (6) months in a previous Christian congregation. This time of interaction between our leadership and the applicant allows for better evaluation and suitability of the applicant for working with children.

b) **Written Application**

All persons seeking to work with children must complete and sign an Adult Volunteer Application Form (Appendix A) or an Employment Application (Appendix A1.) The application will request basic information from the applicant and will inquire into previous experience with children, previous church affiliation, reference and employment information, as well as disclosure of any previous criminal convictions. Also, if applicable, an inquiry will be made regarding the applicant's driving record and automobile insurance coverage. The Application Form will be maintained in confidence on file at First Lutheran Church. Youth applicants will complete an abbreviated form (Appendix B).

c) **Personal Interview**

Upon completion of the application, a personal interview will be scheduled with the applicant. (Appendix C.)

d) Reference Checks

Before an applicant is permitted to work with children, a designee of the CPP Committee will check at least two of the applicant's references, documenting such on a Reference Check Form (Appendix D) that will be maintained in confidence on file at FLC. These references should be of a non-family nature, preferably from organizations where the applicant has worked with children in the past.

e) Criminal Background Check

A criminal background check is required for all employees, regardless of position. LLPS employees/volunteers as well as church employees working directly with LLPS will be screened in accordance with the Maryland State Office of Child Care regulations. Other church employees as well as the following volunteers will be screened in accordance with the church insurance company's guidelines:

- Those who will be involved in our Nursery, Sunday & Confirmation School and Youth Group.
- Those who will be involved in overnight activities with children;
- Those counseling children;
- Those involved in one-on-one mentorship of children

Applicants will be asked to complete and sign a Background Check Authorization Form (Appendix E or Appendix F), allowing First Lutheran Church (FLC) to investigate the background of prospective workers. If an individual declines to fill out the Background Check Authorization Form or fails to submit it s/he will be unable to work with children or continue in his/her position of employment with FLC. Those workers screened in accordance with our insurance policy guidelines agree to allow for subsequent background investigations at periodic intervals while continuing as a First Lutheran employee or volunteer working with children. If a worker rescinds this authorization then s/he will be unable to work with children or continue in his/her position of employment with FLC. Notification to rescind must be provided in writing to a member of the CPP Committee. Because background checks done in accordance with the MD State Dept. of Education Office of Child Care provide for on-going notifications of concern, subsequent checks are unnecessary for these workers.

What constitutes a disqualifying offense will be determined by the CPP Committee of FLC on a case-by-case basis in light of all the surrounding circumstances. Generally, convictions for an offense involving children and/or for offenses involving violence, dishonesty, illegal substances, indecency and any conduct contrary to our mission will result in the need for the CPP Committee to more closely evaluate an applicant's eligibility to work with children. Failure to disclose a criminal conviction on the application form will also be a disqualifying event. Applicants will be given opportunity to review findings from an investigation, and anyone found to have a disqualifying event would be able to address it with the CPP Committee. The background check authorization form and results will be maintained in confidence on file at FLC.

f) Exception for One-Time Volunteers

In the case of one-time volunteer helpers/assistants such as during Vacation Bible School, the six-month rule, application and background check MAY be waived for both members and non-members in accordance with insurance company guidelines.

However, a personal interview will be conducted and documented. This category of volunteer will be paired with an Approved Adult Worker.

The CPP Committee will maintain and make available as requested a list of Approved Workers.

Two Person Rule

It is our goal that a minimum of two unrelated adult workers will be in attendance at all times when children are being supervised during our programs and activities. Some ministries such as the church nursery and youth-group babysitting will be overseen by an approved adult and additional approved youth worker(s.) Some Sunday School classes may have only one Approved Adult in attendance during the class session. In the event that a class has only one adult supervising on any given day, attempts will be made to first secure another adult helper and if unavailable, a roving monitor will be assigned and/or classroom or dividing doors will be kept open. One on one counseling situations must be scheduled during times when another Approved Adult is available to monitor through an open door or interior window into the counseling session room or take place in a public place (ie. coffee shop etc.)

Permission Slips

Children and youth not accompanied by a parent or guardian must have permission to participate in any overnight activity or any activity that takes place away from church grounds. That permission must be in writing, signed by a parent or guardian. It must identify the activity in which the child and youth will be participating. Permission forms may be created by the ministry leader for each specific event or a generic form (Appendix G) may be used.

Each youth participant of an off-site or overnight activity will also complete the Medical Information/ Release Form. (Appendix H)

Transportation of Children

When children and youth are transported for church activities they shall be transported in groups with at least one Approved Adult Worker. Adult drivers must be over 21, have a valid driver's license, registration, and automobile insurance. Applicants seeking to work or serve in this capacity will have his/her driving history investigated as part of the background investigation. What constitutes a disqualifying motor vehicle moving violation will be determined by the CPP Committee on a case-by-case basis in light of all the surrounding circumstances.

Overnights Stays

When approved workers are chaperoning an overnight event, male and female chaperones will be assigned the overnight oversight of male and female youth accordingly. In the event that overnight accommodations offer only double beds, only a parent and his/her child of the same sex may share a bed. Two youth of the same sex may share a bed in this situation. If the chaperone does not have a child of the same sex attending the event, that chaperone will have his/her own bed.

Defining Male and Female for the purpose of overnight, bathroom and showering accommodations:

For the purpose of pairing students and chaperones in sleeping accommodations as well as for the use of bathrooms and shower facilities, male and female are defined as the biological sexual identity as given by God and determined at birth. In the event that a student is navigating gender dysphoria when participating in a First Lutheran activity or event, the student shall follow this guideline for sleeping, bathroom and showering activities. When available, a private bathroom will be offered (ie. in the FLC main building there is a staff bathroom in our LLPS hallway that would accommodate either male or female students or workers.)

Sponsored Youth Organizations

Organizations such as the American Heritage Girls that are sponsored by First Lutheran Church but are governed by an outside organization must have an approved charter agreement with First Lutheran Church. In addition, at least one of the organization's adult leaders must be an Approved Adult Worker with FLC. The CPP Committee will determine whether the organization's CPP and procedures satisfy FLC's Child Protection Policy requirements with the exception that not every leader needs to be a church member. Such procedures and all forms related to those procedures will be incorporated into the Appendix of the CPP of First Lutheran Church. Copies of all applications/background checks/personal interview forms must be retained by FLC per this CPP.

Responding to Allegations of Child Abuse

For purposes of this policy, "child abuse" is any action (or lack of action) that endangers or harms a child's physical, psychological or emotional health and development. Child abuse occurs in different ways and includes the following:

- **Physical abuse** – any physical injury to a child that is not accidental, such as beating, shaking, burns, and biting.
- **Emotional abuse** – emotional injury when the child is not nurtured or provided with love and security, such as an environment of constant criticism, belittling and persistent teasing.
- **Sexual abuse** – any sexual activity between a child and an adult or between a child and another child at least four years older than the victim, including activities such as fondling, exhibitionism, intercourse, incest, and pornography.
- **Neglect** – depriving a child of his or her essential needs, such as adequate food, water, shelter, and medical care.

Childcare workers may have the opportunity to become aware of abuse or neglect of the children under our care. In the event that an approved worker at First Lutheran Church has reason to believe that a child has been abused or neglected either in the church/preschool or outside the facility, the worker shall report that belief directly to the protective services unit of the local department (abuse/neglect) or to the local law enforcement agency (abuse.) (Appendix I and J)

In the event that an incident of abuse or neglect is alleged to have occurred at First Lutheran Church or during our sponsored programs or activities, the following procedure shall be followed:

1. The worker who becomes aware of the alleged abuse will immediately notify the pastor, DCE and the chairman of the church Board of Directors (BOD.) If the incident occurs in Little Lambs Preschool, the Program Director of the preschool will also be notified. If the Chairman of the BOD is unavailable, the Vice-Chairman will be notified.
2. The pastor or the DCE will immediately notify the parent or guardian of the child and notification will be documented. If the parent(s) or the guardian(s) are the alleged abusers, the civil authorities will be notified first and in lieu of the parent or guardian.
3. The pastor or the DCE will immediately notify civil authorities and FLC will comply with the state's requirements regarding mandatory reporting of abuse as the law then exists. (Appendix J.) FLC, in conjunction with the worker, will fully cooperate with the investigation of the incident by civil authorities.
4. If a worker is alleged to be the perpetrator of the abuse or misconduct s/he will immediately be notified by the Chairman of the BOD that s/he is suspended from his/her position pending an investigation.
5. The BOD Chairperson will notify our insurance company by phone and in writing. The reporting worker, in cooperation with the ministry leader, will complete an incident report (Appendix K) which will be submitted to the BOD. Any documents received relating to the incident and/or allegations will immediately be forwarded to the insurance company and copies will be maintained in confidence on file at FLC.
6. In the event there is no investigation of the incident by state or local authorities, the CPP Committee will investigate the circumstances of the incident and determine an appropriate course of action.
7. Any worker who is not found innocent of the alleged abuse or misconduct will be removed from his/her position working with children or youth.
8. The BOD will designate a spokesperson to the media concerning incidents of abuse or neglect. All other workers should refrain from speaking to the media. The advice of legal counsel will be sought before responding to media inquiries or releasing information to the congregation. All other representatives of the church should refrain from speaking to the media.
9. All actions taken in response to the alleged abuse will be documented and submitted by the pastor or BOD Chairperson to the BOD.
10. A pastoral visit will be arranged for those who desire it.

Open Door Policy

Classroom doors should remain open unless there is a window in the door or a side window beside it. Doors should never be locked while persons are inside the room except for security reasons and in accordance with fire safety regulations.

Teenage Workers

We recognize that there may be times when it is necessary or desirable for babysitters (paid or volunteer) who are themselves under age 18 to assist in caring for children during programs or activities. Youth assigned responsibility for assisting Approved Adults supervising younger children will become Approved Youth Workers upon completion of the Application and having a Personal Interview. Teenage workers must be at least 13 (with the exception of first-year confirmation students assisting in the church nursery) and under the supervision of an Approved Adult Worker.

Check-In/Check-Out Procedures

It is the Sunday School policy of FLC to dismiss children 2nd grade or older to find their parents after Sunday School. Elementary students meeting in annex buildings will be escorted back to the main building by their teachers. Children under the age of 2nd grade are asked to wait in their classrooms or with their teachers for their parent or an older sibling to pick them up. Parents who want to make other arrangements are asked to speak personally with their student's Sunday School teacher. The church nursery has a sign in/out procedure. Vacation Bible School has a procedure for personally dropping off/picking up children with designated small group leaders. Little Lambs Preschool students follow LLPS's procedure for picking up/dropping off.

Sick Child Policy

It is our desire to provide a healthy and safe environment for all of the children at First Lutheran Church and Little Lambs Preschool. Parents are encouraged to be considerate of other children when deciding whether to place a child under our care. In general, children with the following symptoms should NOT be dropped off:

- Fever, diarrhea, or vomiting within the last 24 hours
- Symptoms of communicable or infectious disease

Children who are observed by our workers to be ill will be separated from other children and the parent or guardian will be contacted to request that the child be picked up for the day.

Medication/Severe Allergy Policy

It is the policy of First Lutheran Church not to administer either prescription or non-prescription medications to the children under our care. Exceptions to the medication policy may be granted to parents of children with potentially life-threatening conditions (such as asthma or severe allergic reactions) or when students are participating in all-day, off-site or overnight activities and are under the care of an Approved Worker. It is preferable that the parent(s) of such children should address their situation with the ministry leader prior to the event. Little Lambs Preschool's medication policies apply to children enrolled in LLPS.

Discipline Policy

It is the policy of First Lutheran Church and Little Lambs Preschool not to administer corporal punishment. Acceptable discipline techniques include:

- Redirecting the child to another activity
- Verbal corrections
- Planning ahead to prevent problems
- Encouraging appropriate behavior
- Having consistent, clear rules that are developed in conjunction with the children
- Separation if necessary

Workers should consult with the ministry leader if assistance is needed with disciplinary issues. Parents will be informed of any necessary disciplinary action taken.

Restroom Guidelines

During organized church-sponsored activities when children are under the care of approved adults the following are guidelines for bathroom use. Children five years of age and younger should utilize a classroom bathroom, if one is available. If a classroom bathroom is not available, workers should escort a group of children to the hallway bathroom, never taking a child to the bathroom alone. The worker should then remain at the open bathroom door and escort the children back to the classroom. If a child requires assistance, the worker may assist the child, encouraging the child to be as independent as possible, contacting the parent if necessary. Elementary age children are asked to go to the bathroom with a buddy and return together.

For the protection of all, workers/volunteers should never be alone with a child in their care as an Approved Worker in a bathroom with the door closed and never be in a closed bathroom stall with a child. Parents are strongly encouraged to have their children visit the bathroom prior to each class.

Accidental Injuries

In the event a child is injured while under our care, the following steps should be followed:

1. For minor injuries, scrapes, and bruises, workers will provide First Aid (Band-Aids, etc.) as appropriate and will notify the child's parent or guardian of the injury at the time the child is picked up from our care.
2. For injuries requiring medical treatment beyond simple First Aid, the parent and/or guardian will immediately be summoned in addition to the worker's supervisor. If warranted by circumstances, an ambulance will be called. An Incident Report (Appendix K) will be completed, the parent will sign the report and will be given a copy.

Training

First Lutheran Church will provide training on this child protection policy to all new childcare workers and will strive to provide opportunities for additional training classes or events on an annual basis. All workers will be asked to sign documentation indicating they have received both training and a copy of the Child Protection Policy.

Implementation

First Lutheran Church will implement this Child Protection Policy in the following way:

1. The Child Protection Policy Committee, consisting of 5 members has been established to manage the various aspects of this policy. The committee consists of the FLC pastor, Director of Christian Education (DCE), Preschool Program Director, church Administration Chairperson and the church Vice-Chairman of the Board of Directors (BOD.) The CPP Committee will elect a chair from among its membership.
2. The CPP Committee will:
 - a. Maintain a list of approved youth workers and a list of approved adult workers.
 - b. Meet to discuss and make recommendations to the church BOD regarding proposed revisions to the Child Protection Policy.
 - c. Delegate to the Director of Christian Education (for church staff and volunteer positions that involve working with children), the Preschool Program Director (for preschool staff and volunteers) and the Administration Chair (for other church staff positions not involving working with children) the responsibility for reviewing applications, conducting reference checks, submitting for background clearances, and maintaining private and confidential information in personnel files
 - d. Assure that training in the church/preschool Child Protection Policy and reporting procedures is provided to all workers at least annually and documented.
 - e. Determine appropriate disciplinary action or disqualification in response to violations of the Child Protection Policy.
 - f. Retain copies of all Accident/Incident forms.
3. Those interested in either employment or volunteering with First Lutheran Church or Little Lambs Preschool will be required to fill out an Application Form (Appendix A, A1 or B) and a Background Check Authorization Form (Appendix E or F.) Applications will be reviewed and references checked by the appropriate leader as delegated by the CPP (see above.)
4. The appropriate leader as delegated by the CPP Committee will conduct and document a personal interview of each applicant, including a review of the CPP and completion of the Personal Interview Form (Appendix C.) This form will be provided to the CPP Committee and will be maintained by the committee along with the lists of approved Youth and Adult Workers. Generally these forms and lists will be maintained by the DCE.
5. The appropriate leader as delegated by the CPP (see above) will request a background check for each adult applicant. (A background check will not be conducted for youth applicants.) LLPS will follow State of Maryland Office of Child Care guidelines in securing background checks with fingerprinting and releases of information. SingleSource Services (part of the church insurance company's Check & Protect Program) will conduct background checks on church volunteers and church staff not working directly with LLPS at the request of the Director of Christian Education or the Administration Chair as delegated above.
6. Employees and volunteers who have satisfied the screening process of this policy will be added to the list of Approved Workers by majority vote of the CPP Committee.

7. All current adults/youth working with children at FLC will receive 'Temporary Approved Worker' status during a 4-month CPP implementation process. Applicants will be given three weeks to provide a completed Application (Appendix A, A1 or B) and Background Authorization Form (Appendix E or F.) If an individual declines to fill out or neglects to submit either form within this time frame, s/he will be unable to work with children or continue in his/her position of employment with FLC until the required forms are received. Unless disqualifying information is obtained from either the Application or Background Check, and with CPP Committee approval, temporarily approved workers will convert to Approved Worker status.
8. For each approved worker, records shall be maintained for a minimum of 25 years. All records, hard copies and those on savable media shall be kept in locked storage. No information should be retained on computers. Hard copies of incident reports shall be retained indefinitely and be backed up on cd or flash drive.

Retained worker documentation shall include:

- a. Application
- b. Reference Check Form
- c. Personal Interview Form
- d. Background Check Authorization and Results
- e. Training Records

Appendices:

A - Adult Volunteer Application

A1 – Employment Application

B – Youth Childcare Helper Application

C – Personal Interview Form

D – Reference Check Documentation Form

E – FLC Background Check Authorization Form (from SingleSource)

F – LLPS Emergency Information Form & Office of Childcare Background Authorization

G – Permission Slip (Generic)

H – FLC Youth Group Medical Information & Release Form

I – Dept. of Social Services Abuse & Neglect Pamphlet

J – State of Maryland Child Protection Laws

K – Incident/Accident Report

L – American Heritage Girls Child Abuse Prevention Policy

M – American Heritage Girls Ministry Agreement