

**FIRST CONGREGATIONAL CHURCH OF MANCHESTER, NH Safe
Church Policy - Approved by Church Council June 12, 2018**

Policy Statement

First Congregational Church of Manchester, NH (hereinafter referred to as the “Church”) recognizes that violence and physical abuse are realities in our society. This policy is intended to provide a responsible means of addressing this issue, and to reflect our commitment to work toward a safe community for all members, visitors, or guests of the Church (minors and adults), staff, contractors and volunteers visiting at the Church or participating in the programs and activities of the Church.

To achieve these goals we will:

- Conduct background checks (Criminal Offender Record Information (CORI) and Sexual Offender Record Information (SORI)) of Church staff and volunteers who work with children.
- Implement supporting policies regarding harassment, discrimination, and child abuse prevention (hereafter referred to as “Supporting Policies”).
- Provide a policy dealing with the possibility of a Registered Sex Offender with a prior history of offense seeking to worship in our community. Such circumstances require significant limitations on participation, and careful supervision for the protection of the congregation.
- Emphasize the importance of this Policy and Supporting Policies with Church leadership.
- Provide a specific process by which allegations of abuse are reported to the appropriate senior Church official or staff person for initial inquiry and, when abuse is suspected, reported to appropriate agencies pursuant to state law.
- Treat all persons with dignity and respect.
- Make the Church aware of this Policy and Supporting Policies by publication (on our web site), through Church leadership, and by inclusion in the Employee/Personnel Handbook.

While much of this Policy and the Supporting Policies is focused upon those directly working with children and youth, all members, staff, employees and volunteers are responsible to work toward a safe and caring community in which all individuals:

- > Are respected and their self-worth affirmed,
- > Are encouraged in their spiritual, social, and intellectual growth.

We will stress in our actions the care of all individuals, safety for our volunteers and staff, and the principles of fairness, kindness and forgiveness that have long been part of our tradition.

Policy Scope

1. Church-Related Activities and Programs

1.1 Location

This policy applies to all Church-related activities and programs either held at the Church or off site including virtual events on the internet.

1.2 Activities

This policy applies to the entire Church Community as defined in paragraph 2 in the course of performing Church-related activities.

2. Church Community

This policy applies to all constituency groups, including:

2.1 Members, Visitors and Guests

In this document, “members, visitors and guests” shall mean anyone visiting the Church, including but not limited to persons attending services or activities or participating in activities or functions of the Church, irrespective of formal membership in the Church.

2.2 Staff

In this document, “staff” shall mean anyone employed by the Church.

2.3 Volunteers

In this document, “volunteers” shall mean anyone then designated by the Church as a service volunteer.

2.4 Contractors/Vendors

In this document, “contractors” shall mean anyone then under-contract with the Church, or providing services to the Church, including consultants.

2.5 Minors

In this document, “minor” and “minors” shall mean anyone less than 18 years of age.

3. Protective Care of Minors

This policy considers the necessary precautions and procedures for the overall protective care of minors. It details policies under which the Church volunteers or staff shall have Access to Minors and all policies under which the Church volunteers or staff may Supervise Minors.

3.1 Access to Minors

Staff and volunteers who have access to privileged information or work with families or minors in the course of Church-related activities are considered to have Access to Minors. Except in cases where no screened individuals are available and adult access to minors is necessary, such access should be limited to individuals for whom background checks have been conducted according to the policies outlined below.

3.2 Supervision of Minors

For Church-related activities where parents or guardians are not present and it is explicitly understood that minors are in the care of volunteers or staff, said volunteers or staff are considered to be Supervising Minors. Except in cases where no screened individuals are available and access to minors is necessary, such a responsibility should be limited to individuals for whom background checks have been conducted according to the policies outlined below.

3.3 One-on-One Interactions

Staff and volunteers with Access to Minors or engaged in Supervising Minors shall not participate in one-on-one interactions with minors, unless approved in advance by appropriate supervisors.

4. Protective Care of Vulnerable Community Members

This policy considers the necessary precautions and procedures for the overall protective care of community members who are vulnerable by reason of mental or other disability. It addresses circumstances under which various parts of our constituencies may assist community members in need, including, but not limited to, elders requiring personal care attendants.

Policy Administration

This policy is in effect year round. Due to the potential disclosure of confidential information in connection with the administration of this Policy and Supporting Policies, responsibility for such administration must lie with a senior member of the Church's staff. This Policy and Supporting Policies presume and make reference to a Safe Church Compliance Administrator who will in the first instance be the Senior Pastor. Broadly, the Safe Church Compliance Administrator is responsible to manage and oversee the application of the Supporting Policies below and where noted perform specific tasks required by these policies.

Policy and Procedure Addressing Discrimination and Sexual and Other Unlawful Harassment

Note: This policy will be distributed and reviewed at both a meeting of the Church Council and a year-round staff meeting during the first quarter of each calendar year. Through the Employee/Personnel Handbook, it will be distributed to and reviewed with all new staff at the time of hire. It will be included in new Council briefing materials. It will also be publicized on our web site.

Preface: The Church shall at all times endeavor to maintain an environment in which all persons are free from sexual or other unlawful harassment. All persons associated with the Church, including, but not necessarily limited to, the employees, the administration, contractors, consultants, volunteer workers and members and attendees, are expected to conduct themselves at all times so as to provide an atmosphere free from discrimination and harassment. Discrimination

and sexual and other unlawful harassment will not be tolerated. Any person who engages in these behaviors while a participant in Church activities will be in violation of this policy. Further, retaliation against an individual for filing a complaint or assisting in an investigation pursuant to this policy is unlawful and will not be tolerated.

1. Harassment refers to unreasonable conduct or behavior, which is personally offensive or threatening, impairs morale, or interferes with the work effectiveness of employees and relates to *marital, social or economic status, race, disability, sexual orientation, ethnicity, gender, age, or previous religious affiliation*. Examples of harassment include conduct or comments that threaten physical violence; offensive, unsolicited remarks; unwelcome gestures or physical contact, display or circulation of written or electronically transmitted (email, social media, etc.) materials, items or pictures degrading to any members of the above-mentioned group; and/or verbal abuse or insults about or directed at any individual because of their relationship in any of the groups listed above which has the purpose or effect of unnecessarily interfering with an individual's employment or participation in worship, Church programs, educational, or other activities, or creating an intimidating, hostile, or offensive environment. Sexual harassment is defined as unwelcome sexual advances; requests for sexual favors, or other verbal or physical conduct of a sexual nature, where:
 - 1.1 Submission to such conduct is made either explicitly or implicitly a term or condition of a person's employment or participation in worship, Church programs, educational, or other activities sponsored or hosted by the Church;
 - 1.2 Submission to, or rejection of such conduct by an individual is used as the basis for decisions affecting employment or participation in worship, Church programs, educational, or other activities;
 - 1.3 Such conduct has the purpose or effect of unreasonably interfering with an individual's work or participation in Church activities or creating an intimidating, hostile or offensive working, worshipping, educational or proper Church environment;

- 1.4 The following unwelcome conduct may also constitute sexual harassment, whether intended or not;
- 1.5 Use of sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's own or another's sex life, comments on an individual's body, comments about an individual's sexual activity, deficiencies or prowess;
- 1.6 Displaying sexually suggestive objects, printed materials, pictures, or cartoons;
- 1.7 Unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
- 1.8 Inquiries into one's sexual experience; and,
- 1.9 Discussion of one's sexual activities.

2. The Safe Church Compliance Administrator

The Senior Pastor will annually designate him/herself or appoint another officer of the Church as the Safe Church Compliance Administrator who will be vested with the authority and responsibility of processing all discrimination and harassment complaints. Alternate Safe Church Compliance Administrator(s) may also be designated. In the event the complaint is against the Senior Pastor, the complaint will be heard by the Church Moderator.

- 2.1 Any member of the Church community, as evidenced by the constituency groups identified at paragraph 1.2, who believes that he or she has been subjected to discrimination or harassment should report the incident(s) to the Safe Church Compliance Administrator. A parent, guardian or any person who believes that a child has been subjected to harassment of any kind must file a complaint on behalf of the child. Anyone (employees, members, visitors, etc.) can raise concerns and make reports of discrimination or harassment without fear of reprisal.

Any employee who becomes aware of possible discrimination or harassment must promptly advise the Safe Church Compliance Administrator who will handle the matter in a timely and confidential manner, to the greatest extent possible.

- 2.2 When a complaint is made, the following process will be used to reach a disposition which balances the interests of all parties with the primary goal of protecting the safety of all while attending the Church or participating in Church activities, or doing the business of the Church. If the Safe Church Compliance Administrator believes the circumstances require investigation by an independent outside investigator, the Safe Church Compliance Administrator may delegate the responsibility for investigation to such an individual.

The Safe Church Compliance Administrator will investigate the matter through the following process:

- 2.2.1 When the aggrieved is a minor and there is an allegation of child abuse, the Safe Church Compliance Administrator will guide the reporting party through the process of making an oral report of the child abuse or the Safe Church Compliance Administrator will him/herself make such report to the Bureau of Children, Division for Children, Youth, and Families, Department of Health and Human Services in accordance with NHRSA 169-C:29 which states “any...person having reason to suspect that a child has been abused or neglected shall report the same...” and NHRSA 169-C:30 which states “An oral report shall be made immediately by telephone or otherwise, and followed within 48 hours by a report in writing, if so requested, to the bureau.”
- 2.2.2 When the aggrieved is an adult, the Safe Church Compliance Administrator will confer with the charging party in order to obtain a clear understanding of that party’s statement of the facts.

- 2.2.3 The Safe Church Compliance Administrator will then meet with the charged party in order to obtain his or her response to the complaint.
 - 2.2.4 The Safe Church Compliance Administrator will use his or her discretion in determining whether there are witnesses which should be interviewed and to conduct said interviews for the purpose of gathering facts and reaching a conclusion.
 - 2.2.5 Privacy and confidentiality: In the course of taking any action, the Safe Church Compliance Administrator shall maintain the highest degree of privacy and confidentiality as possible under the circumstances.
 - 2.2.6 The Safe Church Compliance Administrator will keep a written record of information gathered throughout the process of resolving the complaint, and shall complete a written record of his or her findings.
 - 2.2.7 The Safe Church Compliance Administrator shall provide a written record of findings to the Church Moderator.
- 2.3 After reviewing the record, the Safe Church Compliance Administrator will decide the next appropriate action. The Safe Church Compliance Administrator may gather additional information as deemed necessary to resolve the matter formally or informally. With the consent of the reporting party, the Safe Church Compliance Administrator may mediate a resolution between or among the parties.

Thereafter, the Safe Church Compliance Administrator shall impose any sanctions deemed appropriate. If a staff member is found to have violated this policy, the Safe Church Compliance Administrator may, without limitation, impose a warning, suspension or termination.

If a volunteer, member, or guest is found to have engaged in conduct or activities contrary to this policy, Safe Church Compliance Administrator may impose any sanctions deemed appropriate, including but not limited to, barring that person from further involvement with the Church and/or being present on Church premises, either permanently or for a period of time.

3. Retaliation

Retaliation is any form of intimidation, reprisal, or harassment directed against a person who reports discrimination or harassment or provides information during an investigation of such behavior, or witnesses or has reliable information about such behavior.

3.1 Retaliation against any person who has filed a complaint of discrimination or harassment or cooperated in an investigation regarding a complaint for discrimination or harassment is unlawful and will not be tolerated.

4. Policy Dissemination

In accordance with the law, this policy shall be given to all new staff upon appointment via the Employee/Personnel Handbook and shall be distributed annually to all staff.

4.1 Annual Review: This policy shall be reviewed annually by the Church Council.

4.2 Copies of this policy shall be referenced on our web site and promoted through Church leadership.

5. Background Investigations and Additional Procedures for Child and Youth Ministry

Criminal history and sex offender registry checks will be conducted for all employees or volunteers who work with minors. Written permission to conduct such background checks will be obtained from each such employee or volunteer prior to undertaking the check. Forms authorizing such background checks are attached to this policy as Ex. ____.

6. Registered Sex Offender Participation Policy

The Church recognizes that as a community of faith, promoting healing, redemption and fellowship, circumstances may arise when persons who have been adjudicated as sex offenders, may seek to worship in our fellowship. This policy seeks to identify the procedures and restrictions which will apply in such circumstances, seeking to establish rules for our ministry as to such sex offenders, while safeguarding the needs of the congregation to be protected from possible repeated offenses by the registered offender.

Any participation by a registered sex offender shall be subject to the guidelines established in this policy, and be subject to the discretion and determinations of the Safe Church Compliance Officer. Any registered sex offender seeking to participate in ministry with the Church shall communicate that desire to the Senior Pastor, as the Safe Church Compliance Officer. Since conviction and registration are matters of public record, there is no expectation of secrecy and the Safe Church Compliance Officer shall make it known to Church members and constituents of the participation by the registered offender in worship as appropriate. Under no circumstances will the registered offender participate in activities involving youth (Sunday School, Vacation Bible School, youth groups, seasonal camps, day care, etc.) or adults who are determined to be vulnerable due to conditions of mental or other disability. In addition, in the event prior actions of the registered offender involved victims who are members of the Church Community, the registered sex offender shall not be permitted to attend the Church or Church activities. The registered sex offender shall be instructed and agree to limitations of access and supervision during attendance at Church facilities. In general, such activities shall be limited to worship services, congregational meetings, adult education and adult fellowship events. In the event the registered sex offender does not honor or comply with the limitations on access described herein, or otherwise fails to abide by the directors or instructions of the Safe Church Compliance Officer, the registered sex offender shall be barred from Church activities and facilities.