



FBCK Protective Environment for Adults, Children, and Youth (PEACHY) Policy and Operating Procedures



FBCK is committed to providing a safe and secure church environment for children, youth, and vulnerable adults. To this end, it has established the FBCK Protective Environment for Adults, Children, and Youth (PEACHY) program. The PEACHY program not only maximizes safety and minimizes the risk of child abuse or neglect in the church community, it also guides and protects volunteers and employees from unwarranted allegations. This document establishes the policies that guide PEACHY and outlines the operating procedures that will be used to implement PEACHY in FBCK ministries and activities.

1.1 SCOPE AND AUTHORITY

This policy covers all FBCK ministries and activities involving infants/toddlers, children, youth, and vulnerable adults, as defined below. It is designed to provide a protective environment for FBCK members and guests free from physical threats, verbal or sexual abuse, exploitation, and neglect. It is not intended to cover all aspects of safety and security at FBCK, but will be coordinated with any other FBCK safety and security policies and procedures.

The FBCK trustees have responsibility and oversight of PEACHY, with the guidance of the FBCK Senior Pastor. The trustees will review and update the PEACHY policy at least annually. A trustee will act as PEACHY Director with responsibility for implementing the PEACHY program within FBCK. The PEACHY Director will maintain and update PEACHY operational procedures as necessary.

This policy also applies to any church plants and missions efforts that are under the sponsorship of FBCK. As each church operates in different circumstances, these church plants and missions efforts may develop different operating procedures to meet their needs. These operating procedures will be documented as addendums to this document. FBCK trustees will review and advise on these procedures, as appropriate, and assist in their implementation if needed. The FBCK PEACHY policy does not apply to church plant and missions efforts supported by FBCK for which FBCK is not the primary sponsor.

2 DEFINITIONS

For the purpose of the PEACHY policy and procedures, the following definitions apply:

Infants/early toddlers – Those up to about three years old (and typically still in diapers) who primarily participate in nursery activities.

Children – Those from about three years old (and typically out of diapers) through sixth grade, or about twelve years old.

Youth – Those from seventh grade, or about thirteen years old, through the completion of high school, or achieving age eighteen.

Vulnerable adults – Those who have achieved adulthood (age eighteen and above) but are vulnerable to abuse, exploitation, or neglect due to limited physical, mental, or social abilities.

PEACHY Director – A person nominated by the trustees (with the guidance of the Senior Pastor) and approved by the church body with the responsibility to implement and manage the PEACHY program. The PEACHY Director must be a trustee of the church.

Pastoral staff – The Senior Pastor of FBCK, as well as any paid or volunteer staff working under him in roles such as Associate Pastor, Youth Pastor, Assistant to the Pastor, or summer interns. It does not include any church employee, such as a secretary/administrative assistant or janitorial staff, that does not have a pastoral function. Pastoral staff must be members of FBCK, except those filling temporary positions such as summer interns.

Ministry director – A person responsible for organizing and executing a ministry of the church. Ministry directors will work with the PEACHY Director to ensure that PEACHY requirements are met in every activity. Ministry directors must be members of FBCK.

Teacher/leader – A person responsible for teaching a class or leading an activity within a ministry. Teachers/leaders will work under the supervision of the ministry director to ensure that PEACHY requirements are met. Teachers/leaders must be members of FBCK.

Ministry assistant – A person who assists or supports ministry activities under the direction of a ministry director or a teacher/leader. Ministry assistants need not be members of FBCK, but must be willing to support the objectives and doctrines of the church.

Worker – A person (whether volunteer or FBCK paid staff) directly involved in a church ministry. This includes ministry directors, teachers/leaders, and ministry assistants, as well as all pastoral staff.

Qualified worker – A worker (whether volunteer or FBCK paid staff) who has met the requirements to serve in a ministry under the PEACHY program, as specified in section 3.1 of this policy.

3 PEACHY PERSONNEL

3.1 Certification

To be qualified to work in ministries under the PEACHY program, individuals must be screened (section 3.2) and trained (section 3.3). In addition, they must agree to abide by the PEACHY code of personal conduct (section 3.4).

Individuals must wait six months after their initial contact with FBCK before entering the screening process. The PEACHY Director may waive this six-month rule for individuals that have been vetted by other organizations, if that vetting is more stringent than that required under the PEACHY program.

The PEACHY Director has responsibility for qualifying workers, including conducting screening and training. Once a candidate worker has met the qualifications, the PEACHY Director will certify that they are qualified to work in PEACHY ministries. The PEACHY Director will maintain a list of certified workers, and will distribute the list to other ministry directors and church leadership as needed.

3.2 Worker Screening

FBCK will screen all workers in ministries under the PEACHY program. Typically, screening will be done during the summer months, although screening can be done at other times as necessary. The screening process will consist of:

- (a) Completion of an application by the worker (including a signed statement attesting whether they have ever been accused, charged, or convicted of abuse or sexual misconduct),
- (b) A background check, including criminal records,
- (c) A check of sex offender registries of all states the applicant has lived in for the last ten years,
- (d) A check of two (unrelated) references provided by the applicant, and

(e) An interview.

For workers under the age of eighteen, parts (b) and (c) are not required. However, a parent or guardian must provide written affirmation and consent for the minor's participation in the PEACHY program. Youth will only be considered if they have a record of demonstrated maturity and good judgment.

Workers must be re-screened each year, starting with the completion of a renewal application. For workers previously screened by FBCK, parts (b) through (e) of the screening process may be waived at the discretion of the PEACHY Director. However, parts (b) and (c) must be done at least once every three years for each individual.

3.3 Worker Training

All workers in ministries under the PEACHY program must annually complete training on the prevention and detection of abuse or neglect. This training will include:

- Definitions and types of abuse and neglect,
- Impact of abuse and neglect on individuals and on families and churches,
- Identifying abuse or neglect,
- Criminal and civil consequences of misconduct,
- FBCK PEACHY policies and procedures, including the screening process (and the rationale behind it), supervision requirements, and the use of electronic communications and social media,
- Risk reduction techniques,
- Expected code of personal conduct under the PEACHY program, and
- Reporting procedures for observed or suspected misconduct.

The PEACHY Director will conduct an annual training session each year (typically in August) and will make training available at other times for those that can not make the annual session. Upon completion of the training, workers will submit a form verifying their participation in the training.

In addition to the annual training session, focused training sessions may be conducted for special events (e.g., camp and Vacation Bible School) as needed.

3.4 Code of Personal Conduct

All workers in ministries under the PEACHY program must annually review the code of personal conduct, and submit a form verifying their willingness to abide by the PEACHY policies/procedures and code of personal conduct. The code of personal conduct is attached at the end of this document.

3.5 Revocation

The PEACHY Director, with the advice of the FBCK pastoral staff and other church leaders, may revoke the certification of any worker due to (1) separation from FBCK; (2) failure to meet annual screening and/or training requirements; (3) egregious or repeated minor violations of FBCK PEACHY policies and procedures and/or code of conduct; or (4) discovery of disqualifying past conduct.

3.6 Worker Name Tags

Certified workers will wear an identifying name tag any time they are serving in a ministry under the PEACHY program. The name tag will include a "peach" symbol to indicate that the worker is certified.

4 SUPERVISION

4.1 Check-In/Check-Out

All infants/toddlers, children, and youth must be checked in (using the foyer kiosks) by a parent/guardian upon entering the building. They will receive a name tag to be worn during services; the parent/guardian will receive a corresponding security tag.

At the conclusion of a service or ministry activity, parents/guardians must show the valid security tag before children and youth will be released to them. If a security tag is not available, children and youth may be released to the adult who performed the check-in upon proof of identification; children will not be released to another adult unless preauthorized. Release may be delayed while authorization is verified.

For church services or activities with no separate children or youth ministries, or other situations in which children will not be away from their parents, check-in/check-out is not required.

4.2 Two-Adult Rule

All PEACHY ministries within FBCK will use a two-adult rule, when possible. This rule requires that two certified and unrelated adult workers be present at every function and within every classroom. This rule creates accountability and deters misconduct. It also reduces the ability for anyone to make a false accusation.

If two certified workers are not available, then a single certified worker is sufficient *if the activity is being conducted in an open area or in a classroom with an observation window and a floating premises monitor (section 4.4) is available to provide accountability.* The floating monitor will check the classroom periodically as part of their duties. In this case, the classroom must remain unlocked, the observation window must remain unblocked, the lights in the classroom must remain on, and the worker must remain within the view from the observation window.

4.3 Rule of Three

If the two-adult rule cannot be supported and no floating monitor is available, then the rule of three will be employed. The rule of three requires at least three unrelated individuals to be present, with at least one being a certified adult worker, and the other two being at least age 8. While less desirable than the two-adult or adult-plus-monitor approach, the rule of three provides some accountability. The age and capacity of the children being supervised should be considered when using this rule. The Rule of Three is not met if any of the three are below age 8, or are related to each other, as this provides insufficient accountability.

4.4 Premises Monitors

One or more floating “premises monitors” will provide additional supervision where necessary. Duties will include: ensuring that workers and minors have identification badges, routinely checking restrooms and off-limits areas, assisting with restroom breaks, monitoring occupied classrooms via the observation windows, assisting with the check-in/check-out process, and maintaining awareness of any non-certified adults in the children’s and youth areas.

4.5 Counseling

All counseling involving minors, whether spiritual or disciplinary, will be conducted in a manner that maintains accountability and transparency. Counselors will follow the supervision guidelines of sections 4.2 and 4.3. If the nature of counseling is such that it must be done one-on-one, the counseling must be done within the direct line of sight of another unrelated certified worker.

4.6 Noah's Room

FBCK's Noah Room ministry provides childcare for infants/early toddlers during regular services and special events. The Nursery Director (working with the PEACHY Director) is responsible for ensuring that the ministry meets PEACHY requirements. Noah's Room workers will follow the supervision guidelines of sections 4.2 and 4.3. Of special note:

- The room has a large observation window that permits monitoring from the sanctuary, significantly decreasing the risk of an incident. This serves the same purpose as premise monitoring, when the sanctuary is in use.
- The room has an area that can be blocked from public view by drapes, to allow privacy for nursing mothers and their babies. These drapes will be open when the nursing area is not in use. When the drapes are closed, certified workers in the room shall maintain awareness to ensure that the area is being used only as intended.
- Noah's Room is sometimes staffed with youth workers (that is, teenage girls). These youth workers must be PEACHY certified (section 3), and the two-adult rule or rule of three must still be followed.

4.7 Transportation

Transportation conducted under the authorization of FBCK will be conducted using the above guidelines for the two-adult rule and the rule of three. Situations include:

- Transportation between the church property (or other designated loading/unloading area) and an event site. This includes the use of charter buses, leased/rented vehicles, personal vehicles, and church-owned vehicles. Examples include a charter bus to/from church camp and a rental van to/from a youth rally.
- Transportation between homes and the church property (or other area), as part of an organized church ministry such as a "bus ministry". This includes the use of personal vehicles and church-owned vehicles.

At times, a worker may have opportunity to provide transportation for minors between a home and the church property using their personal vehicles outside of an organized church ministry. Examples include (a) bringing the child of a neighbor to participate in a church ministry, and (b) giving a ride home to a minor when the parent is unable to pick them up. In these cases, the worker is not considered to be acting as an agent of the church. However, in such situations:

- A certified worker should be used, if possible,
- The parent/guardian of the minor must be informed of and agree to the arrangement, and
- The worker must notify an (unrelated) worker of the arrangement, to provide accountability and transparency.

4.8 Special Events

For special events or activities taking place off the church property, Ministry Directors (in coordination with the PEACHY Director) will develop and clearly communicate supervision procedures appropriate for the location and activity. These procedures will meet the two-adult rule or employ appropriate risk-mitigation measures to establish the necessary supervision and accountability.

5 RESTROOMS

Restrooms present a higher risk and therefore warrant special procedures.

- The two upstairs restrooms (off the foyer) are designated, one for males and one for females. The greeters (stationed in the foyer) will monitor the flow of people to/from the restrooms.
- The two downstairs single restrooms (off the fellowship hall) are unisex; that is, each can be used by either sex. However, at no time should males and females share a restroom at the same time. The floating monitor (stationed in the fellowship hall) will monitor the flow of people to/from the restrooms.
- Per FBCK's standing motions, restroom usage and participation in other activities must be consistent with a person's biological sex.
- A certified worker may provide assistance to a younger child if necessary. A non-certified adult or teen is never allowed in a restroom alone with a child, unless they are directly related to the child.
- Teachers/leaders will not let children and youth go unaccompanied from a classroom to the restroom area, unless a floating monitor is available to provide supervision. If a floating monitor is not available, the teacher/leader should find a certified worker to escort or take the entire class to the restroom area.

6 OFF-LIMITS AREAS

Off-limits areas include:

- closets,
- the mechanical room,
- private offices,
- classrooms (when not in use),
- the kitchen and fellowship hall (when not in use),
- the baptistery and other areas behind the sanctuary platform,
- stairwells (except when directly transitioning between upstairs and downstairs), and
- all outdoor areas around the church building except the parking lot.

Children, youth, and non-certified adults are not allowed in off-limits areas unless under the direct supervision of certified workers. Certified workers should avoid off-limits areas unless necessary in the performance of their duties. In such cases, workers should limit their time in the area and secure the area when done (e.g., relock doors). To maintain accountability, a certified worker and a minor are not to be alone together in an off-limits area for an extended period of time, unless others are notified in advance.

For activities taking place off the church property, Ministry Directors will clearly define and communicate off-limits areas appropriate for the location and activity.

7 USE OF ELECTRONIC COMMUNICATIONS AND SOCIAL MEDIA

Email, Short Message Service (SMS), social media platforms (such as Facebook and Twitter), and direct file transfers have become important communications tools in today's society, including in church ministries. However, they also present challenges in creating a protective environment for children, youth, and vulnerable adults. Workers must ensure that electronic communications are appropriate, transparent, and traceable. The following policies guide the use of electronic communications and social media within PEACHY ministries.

- Workers will not electronically communicate directly with a child, youth, or vulnerable adult one-to-one. Generally, communications (such as SMS or email) should be sent to the entire ministry group. If the situation requires a one-to-one conversation, the leader or teacher will include a parent/guardian in the distribution. In the rare case that it would not be appropriate to include a parent/guardian, a member of the pastoral staff or the PEACHY Director **must** be included in the distribution.
- Workers will not communicate with children, youth, or vulnerable adults using ephemeral messaging apps (which feature messages that “self-destruct” after being read or after a period of time) or apps that employ non-standard user-level encryption. Forbidden apps include (but are not limited to) Snapchat, Confide, Telegram, Wickr, Bleep, CoverMe, Whatsapp, and Signal.
- If a worker receives a one-to-one communication from a child, youth, or vulnerable adult:
 - (a) If the content is routine and would not be considered private, the worker may respond, but will include a parent/guardian in response distribution to ensure transparency.
 - (b) If the content is not appropriate (e.g., request for a private meeting; romantic advances; images or videos of a revealing or sexual nature), the worker will take the following steps:
 - a. Do not immediately respond to the communication.
 - b. Do not delete the communication. Prematurely deleting the communication may create the impression that the teacher/leader has something to hide.
 - c. If feasible, disconnect the device from any networks to prevent further dissemination.
 - d. Immediately notify the PEACHY Director or Senior Pastor, who will help develop an appropriate response. If the communication may contain material that could be considered sexually explicit or child pornography, the worker must notify law enforcement.
- If appropriate, workers may use the email function within Planning Center Groups to provide an extra layer of transparency and traceability.
- Any communications channel (for example, an SMS mass text group) or social media presence (for example, a Facebook page for a teen group) established for a ministry must be coordinated with the FBCK Communications/Outreach Committee to ensure that branding, content, and access guidelines are followed.
- Ministry directors will regularly make ministry participants and their parents/guardians aware of the FBCK electronic communications and social media guidelines and how electronic communications will be used within the ministry.

8 CONTINUAL RISK ANALYSIS

No set of procedures can be developed that fit every situation. Therefore, FBCK will continually monitor and evaluate its programs and activities to assess the risks they present. This assessment process will include an examination of three interrelated risk factors:

- **Isolation.** Most (but not all) abuse occurs in isolated settings. As a general rule, risk increases as isolation increases. Factors that affect isolation include: (1) the number of people present, (2) the time of the activity, (3) the location of the activity, and (4) the physical arrangements.
- **Accountability.** Abuse can only happen in settings when there is a lack of proper accountability. In general, risk decreases as the degree of accountability increases. Factors that affect accountability include: (1) personal character and integrity, (2) number of people present, and (3) openness and approval associated with the activity.
- **Power and control.** In general, risk increases when there is an imbalance of power, authority, influence, and control between a potential abuser and a potential victim. Example situations in which imbalances might occur include: (1) children or youth with significant age differences that are paired together, (2) pairing together children or youth with significantly different physical strength or ability, or (3) an adult exerting power or control over a minor without corresponding oversight by another adult.

Once risks have been assessed, measures can be taken to reduce any risks that are too high. Typically, two methods can be employed, alone or in combination.

- **Increased supervision.** This could be done in a variety of ways, including (a) increasing the number of adults participating, (b) increasing the number of qualified workers participating, or (c) moving from general supervision (in which the focus is on the group at large) to specific supervision (which focuses more on specific individuals and actions). Increased supervision could also mean an increased degree of accountability, such as alerting church leaders about the activity and providing details in advance about what is planned.
- **Restructure the activity.** Often, activities can be restructured to reduce risk without substantially changing the focus of the activity. Possible areas to consider include: (a) changing meeting times or locations, (b) making alternate transportation plans, or (c) changing the age groups used within the activity.

This on-going process of risk assessment and reduction will be an inherent part of the planning of each activity.

9 REPORTING SUSPECTED INCIDENTS OF ABUSE/NEGLECT

9.1 Mandated Reporter Responsibility

“Mandated Reporters” are those persons that are required by law to report any incidences of suspected abuse or neglect to state or local agencies. In Virginia, mandated reporters are defined under Virginia Code § 63.2-1509, which says in part:

“The following persons who, in their professional or official capacity, have reason to suspect that a child is an abused or neglected child, shall report the matter immediately... any person 18 years of age or older associated with or employed by any public or private organization responsible for the care, custody or control of children...”

Under this statute, church teachers and youth workers might or might not be considered mandated reporters. It is FBCK policy that FBCK church workers report any suspected incidences of child abuse or neglect within the guidelines of the mandated reporter law, whether or not they would legally be considered mandated reporters. Under Virginia’s mandated reporter law:

- A report must be made if there is reason to suspect that a child has been abused or neglected.
- The report must be made to the local department of the city or county in which the child resides or in which the suspected abuse occurred, or alternatively to the Virginia Department of Social Services Mandated Reporter Portal.
- The report must be made with 24 hours of the first suspicion of child abuse or neglect.
- A reporter is immune from any civil or criminal liability on account of the report, unless they acted in bad faith or with malicious purpose.

Mandated reporter responsibility holds whether or not the suspected incident happened during FBCK activities or in FBCK facilities. Responsibilities are not mitigated by familial relationships or mutual agreement between involved parties.

9.2 Line of Reporting

Any incidences of suspected child abuse or neglect involving FBCK will be reported to the PEACHY Director (or if appropriate, to a member of the pastoral staff or a deacon). The Director (or proxy) will help gather facts, advise as to whether there is credible evidence, assist with making the initial report, and notify church leadership.

9.3 Reporting Hotline

The following can be used for reporting a suspected incident of abuse or neglect:

VDSS Mandated Reporter Portal: <https://vacps.dss.virginia.gov/VACPSWeb/>

Fairfax County DFS 24/7 Child Protective Services Hotline: 703-324-7400

Virginia Child Protective Services Hotline: 800-552-7096

Virginia Adult Protective Services Hotline: 888-832-3858

You should call 911 if you believe a child or vulnerable adult is in immediate danger.

9.4 Privileged Communications

Under certain circumstances, Virginia Code § 63.2-1509.19 does provide a limited exception to the mandated reporter requirement for “any minister, priest, rabbi, imam, or duly accredited practitioner of any religious organization or denomination usually referred to as a church.” Information given in a confidential manner by someone seeking spiritual counsel and advice may be considered privileged communications under Virginia Code § 8.01-400 and § 19.2-271.3, and therefore be exempt from mandated reporting requirements.

It is FBCK policy that *only ordained members of its pastoral staff and ordained deacons are considered “accredited practitioners”* for the purposes of Virginia Code § 63.2-1509.19, 8.01-400, or 19.2-271.3. Should an ordained member of the pastoral staff or ordained deacon learn of a potential child abuse/neglect situation through privileged communications, he will take whatever actions he can to secure the safety and welfare of the child involved, to the extent possible without breaking the sanctity of the privileged communications.

Information not meeting the above criteria is not considered privileged. Examples include:

- Information given or obtained as part of the screening or certification process,

- Reports or confessions of potential abuse or neglect made to church workers other than accredited practitioners,
- Reports or confessions of potential abuse or neglect made to accredited practitioners, but made outside the context of seeking confidential spiritual counsel and advice, and
- Reports of suspected abuse or neglect made through the reporting chain.

While not considered privileged communications, such information will still be treated with appropriate confidentiality.

Workers (except for accredited practitioners) should be aware that any information about abuse or neglect obtained during a counselling session is not legally protected as privileged communications, even if the person being counselled requests it.

10 RESPONSE PROCEDURES FOR AN ALLEGED INCIDENT

A successfully executed PEACHY program greatly reduces the risk that an incident of abuse or neglect should occur within the church. Realistically, no practical prevention strategy is 100 percent effective. The response procedures in this section will be followed should an allegation of misconduct be made against an FBCK church worker.

10.1 Underlying Principles

Several underlying principles will be used to guide the church's response:

- All allegations will be taken seriously.
- Situations will be handled forthrightly with due respect for people's privacy and confidentiality.
- Full cooperation will be given to civil authorities under the guidance of the church's attorney.
- Adequate care will be shown for the well-being of victims and their families.

10.2 Response Steps

The following steps will be taken in response to an allegation of misconduct. The PEACHY Director will oversee the church's response, in consultation with the Senior Pastor and other church leaders.

Provide a caring response to the initial allegation. This will focus on three simple points: (1) that the complaint is being taken seriously; (2) that procedures exist for such complaints and that those procedures will be followed; and (3) that the church desires to extend care and support in whatever way possible to the victim and the victim's family.

Document the allegation. The church will collect and record basic information about the complaint to verify that there is sufficient substance to make a report and to assist investigators. The church's role is not to investigate the allegation.

Seek assistance from professionals. The church will contact its insurance representative and its lawyers for assistance, as necessary.

Provide support to the victim.

Fulfill state reporting requirements, as outlined in section 9.

Decide on options regarding the alleged perpetrator. Most likely, the alleged perpetrator will be temporarily relieved of any duties involving contact with minors and restricted from any activities

involving contact with minors while the case is being investigated. The alleged perpetrator may also be subject to church disciplinary measures in accordance with the church constitution.

Respond to congregational concerns. Information will be shared with the congregation as deemed necessary, while placing a high priority on the rights to privacy of both the victim and the accused. Any meetings for this purpose will be restricted to church members only.

Respond to the media. As necessary, the church will respond to the media. A single spokesperson will be appointed, and all requests for information will be coordinated through the spokesperson.

11 SEX OFFENDER ATTENDANCE POLICY

While creating a safe and protective environment for its members, guests, and staff is a key priority for FBCK, the church also recognizes that it has an important role in helping individuals previously convicted of a sex offense return to society, overcome dangerous behaviors, and deepen their own faith commitments. Furthermore, the church recognizes that not all offenses are of equal seriousness. For example, an individual convicted of crimes with numerous non-consensual minor victims over a period of years before his conviction presents a much different risk profile than a pair of high school sweethearts whose consensual sexual relationship becomes criminal when one of them turns 18. While both of these situations could result in the individual being added to a sexual offender registry, the appropriate response from the church (and the community) should be different. The decision to allow an individual convicted of a sex offense to attend FBCK or participate in its ministries, and what restrictions will be placed on that participation, must be made on a case-by-case basis.

FBCK reserves the right to research all public information databases, including but not limited to court records, sexual offender registries, department of corrections records, and any other repositories of public information regarding any ministry member, guest, staff member, volunteer, or other participant in FBCK services and activities.

Should church leadership become aware that any person attending (or wanting to attend) FBCK services or activities is registered as a sex offender, or is under legal proceedings that may result in their becoming registered as a sex offender, the following guidelines will be followed.

11.1 Care Response Team

The Senior Pastor shall establish a Care Response Team (CRT) to investigate and respond to information that an individual registered as a sex offender attends (or wants to attend) FBCK. This team will convene as needed to perform this function. The CRT will consist of at least three members, including a trustee and a member of the pastoral staff. The CRT will be familiar with FBCK's constitution and policies, as well as any guidance on risk assessment provided by Virginia Child Protective Services, law enforcement, and the church's insurance provider. The PEACHY Director need not be part of the CRT, but will advise and assist the CRT as necessary. CRT members must be screened adults. If necessary, multiple CRTs may be established to handle different situations.

Upon having an individual referred to them, the CRT will investigate the situation to allow for a fact-based decision. Suggested investigative actions include:

- Check public records, including federal and state sex offender registries, to confirm facts and fully understand the referred person's background;
- Contact local law enforcement regarding the situation;

- Conduct a formal criminal background check; and
- Interview the referred person.

Upon completion of its investigation, the CRT will recommend a course of action. There are three potential conclusions for most referrals:

- The CRT may conclude that the referral is unfounded and there is no reason to believe that the referred person poses any unusual threat to others. In this case, the CRT should communicate this conclusion to church leadership, which should deem the issue resolved.
- The CRT may conclude that the referred individual was convicted, but the nature of the offense(s) and the individual's current spiritual and psychological conditions are such that their attendance would not reasonably pose a threat if mitigation measures are in place. These mitigation measures include a Conditions of Participation agreement (section 11.3) and a plan for a designated chaperone (section 11.4). In this case, the CRT should communicate this conclusion to church leadership, who should ensure that the plans are implemented and followed and that key church ministries are notified as necessary.
- The CRT may conclude that the referred individual was convicted and that the nature of the offense(s) and the individual's current spiritual and psychological conditions are such that their attendance would pose a threat to the FBCK community, workers, and staff, despite mitigation measures. In this case, the CRT should communicate this conclusion to church leadership, who should take the actions necessary to prevent attendance (for example, inform the security team and guest services staff).

The CRT may reassess its conclusions and change its recommendations as new information becomes available.

11.2 Cooperation with Law Enforcement

One of the first steps that the CRT should take is contacting law enforcement and probation departments. Many previous offenders have restrictions on where they may go as conditions of their parole or probation. In addition, the court assigns psychologists or counselors to many previous offenders. In such cases, these professionals should be contacted to determine whether the assigned professional considers them ready to participate in church activities. (Due to privacy issues, such contact may require permission from the offender.)

FBCK will always work with law enforcement officials to ensure that individuals are complying with the conditions of their parole or probation, and no FBCK action will be taken that contravenes legal mandates.

11.3 Conditions of Participation Agreement

Should the CRT recommend that an individual previously convicted of a sex crime be permitted to attend FBCK activities, the CRT and the individual (in cooperation with law enforcement and others, as needed), will agree to set of conditions under which that participation will take place. The agreement will be documented in a written Conditions of Participation Agreement (CPA). At a minimum, the CPA will include:

- A summary of the current legal status of the individual, including any relevant parole or probation restrictions.

- An assessment of the individual's spiritual status, including any testimony of salvation and evidence of spiritual growth.
- Any relevant recommendations made by psychologists/counselors pertaining to the individual.
- A statement of what the individual desires out of their attendance at FBCK.
- Any identified triggers or situational factors that could contribute to recidivism, and any actions that FBCK might take to mitigate those triggers or situational factors.
- Possible behaviors, whether inside or outside of the church setting, that might indicate a path towards recidivism.
- Any limitations on what activities the individual will be permitted to attend. For example, they may be permitted to attend worship services but no other events. Limitations may also include time or location restrictions. For example, they may be permitted on the upper level (sanctuary) but not the lower level (fellowship hall and classrooms).
- Any requirements for a designated chaperone (section 11.4).
- Any spiritual counselling that the individual will receive as part of their association with FBCK, or any other individualized support that FBCK will provide to them.

The CPA will be signed and dated by a church trustee and by the offender. It may be modified or updated by mutual agreement. It may be revoked by either party for any reason, including failure to follow the terms of the agreement. If the CPA is revoked, the individual may not attend FBCK services or activities until a new CPA is in place. The CRT is responsible for managing the CPA.

11.4 Designated Chaperone

Perhaps the most effective risk management technique is the use of chaperones in church activities. People are much less likely to engage in misconduct when there is someone watching them.

The CRT may assign a specific person (or persons) the responsibility of monitoring an individual during FBCK services and activities. In accordance with their CPA, the offender may not participate in services or activities without the chaperone.

Church leadership will identify and train a pool from which to draw designated chaperones. This pool should consist of screened adult volunteers who are familiar with FBCK's constitution and policies, as well as any reference material on which FBCK's sex offender attendance policy is based.

11.5 Prohibition of Online Interactions

An individual under a CPA is prohibited from interacting online with FBCK children and youth. As part of the CPA, the individual will receive education regarding this prohibition, and violation of the prohibition will trigger a reevaluation of the CPA by the CRT.

11.6 Confidentiality

The need for confidentiality is an important consideration when dealing with individuals who have been convicted of sexual crimes. Improper handling of information, including disclosing personal information to those without a need to know, could undermine progress being made by the individual, lead to rumors among the congregation, and even result in a defamation lawsuit. Church leaders should minimize the sharing of information to CRT members, chaperones, and key ministry leaders except where necessary.

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Should it become necessary to share information to a wider audience about an individual who has been convicted, church leadership will only share information that is publicly available (either through court records or on a sex offender registry). They may also reveal the existence of a CPA. The contents of a CPA will not be revealed without the explicit written permission of the individual.

FBCK PEACHY CODE OF PERSONAL CONDUCT

1. I will adhere to the FBCK PEACHY guidelines in all my interactions with infants/toddlers, children, youth, and vulnerable adults.
2. I will respect the right of those under my supervision and care to not to be touched in ways that make them feel uncomfortable or that disregard their right to say no.
3. I will not discipline those under my supervision and care by use of physical punishment or by failing to provide the necessities of care.
4. I will not slap, hit, yell at, shame, or belittle those under my supervision and care.
5. I will not use physical restraint except in situations where it is necessary to protect the child, other children, or other workers from harm.
6. I will know where those under my supervision and care are at all times.
7. I will use approved check-in/check-out procedures and otherwise ensure that participants remain continually under positive control of FBCK workers until being released to parents/guardians.
8. I will be consistently alert to the physical and emotional state of those under my supervision and care, and immediately report any signs of injury or possible abuse or neglect.
9. I will not consume, use, possess, or be under the influence of alcohol or illegal drugs, or be impaired by legally prescribed drugs, while working with those under my supervision and care.
10. I will not smoke or use tobacco in the presence of those under my supervision and care.
11. I will not use inappropriate language in the presence of those under my supervision and care.
12. I will use portable electronic devices wisely, being mindful that they do not distract me from my duties.
13. I will only use electronic communications or social media within the constraints of policy.
14. I will wear appropriate clothes, keeping both safety and modesty in mind.
15. I will wear my FBCK identification at all times while performing duties.