



## Children's Ministry Policies

*Proposed April 7, 2024*

Dear Children's Volunteer or Staff Member,

Welcome to First Baptist Icard!

At First Baptist Icard, we take our responsibility to care for children very seriously.

These guidelines are intended to facilitate a safe and nurturing environment in which children can grow in relationship with Jesus.

The pages of this handbook provide a general overview of procedures and guidelines for First Baptist Icard volunteers and staff members. Our policies are intended to create a safe environment for children. The following procedures have been adopted and will be strictly enforced.

After you have carefully read this policy manual, please sign and return the agreement form located on the last page.

Sincerely,

***First Baptist Icard Elders***

# First Baptist Icard Policies & Procedures for Children’s Ministries

*will be finalized after approval*

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## **Overview of the First Baptist Icard Safety System**

Because we love children and desire to protect them, First Baptist Icard requires all staff members and volunteers working with children or students (and other vulnerable populations) to complete **FOUR SAFETY STEPS** before ministry work or volunteer placements begin.

### **STEP ONE: Sexual Abuse Awareness Training**

First Baptist Icard policies and procedures require that staff members and volunteers avoid abusive behavior of any kind. Staff members and volunteers are required to report any policy violations to a supervisor or a member of the First Baptist Icard Safety Committee. Staff members and volunteers should have a basic understanding of the characteristics of sexual abusers and their behaviors in 'grooming' a child for sexual abuse. Grooming is the process used by an abuser to select a child, win the child's trust (and the trust of the child's parent or 'gatekeeper'), manipulate the child into sexual activity and keep the child from disclosing the abuse.

To equip First Baptist Icard staff members and volunteers with information necessary to recognize abuser characteristics and grooming behavior, First Baptist Icard requires all staff members and volunteers to complete MinistrySafe's Sexual Abuse Awareness Training (live or online at [www.MinistrySafe.com](http://www.MinistrySafe.com)). This training will be renewed every two years.

### **STEP TWO: Screening Process**

Staff members and volunteers are required to complete the First Baptist Icard Screening Process, which requires a staff member or volunteer to:

- complete an Employment Application (employees only)
  - complete the Safety Application (employees and volunteers)
  - complete a face-to-face interview (employees and volunteers)
  - provide references to be checked (employees and volunteers)
- \*a volunteer must attend First Baptist Icard for six months before being eligible to serve in volunteer positions providing access to children, students or vulnerable populations.

### **STEP THREE: Policies & Procedures**

Staff members and volunteers are required to review the policies contained in this manual and sign the last page indicating that he or she has read and understood the material, and agrees to comply with policy requirements.

### **STEP FOUR: Criminal Background Check**

First Baptist Icard requires that all staff members and volunteers working or volunteering in children's or student activities or programming undergo a criminal background check. Depending upon position, differing levels or intensity of background check may be required. Individuals who have committed sexually-oriented or sex-related crimes may

not serve in any area providing services to children or minors. In addition, certain other past criminal acts *may* preclude an applicant from serving minors.

## **Child Safety Policy**

### **ABUSE TOLERANCE**

First Baptist Icard has a **zero tolerance for abuse** in ministry programs and ministry activities. It is the responsibility of every staff member and volunteer at First Baptist Icard to act in the best interest of all children in every program.

In the event that staff or volunteers observe any inappropriate behaviors (i.e. policy violations, neglectful supervision, poor role-modeling, etc.) or suspected abuse (physical, emotional, or sexual) it is their responsibility to immediately report their observations to one of the Elders

### **REPORTING SUSPICIOUS OR INAPPROPRIATE BEHAVIORS**

First Baptist Icard is committed to providing a safe, secure environment for children and their families. To this end, any report of inappropriate behaviors or suspicions of abuse will be taken seriously and will be reported, in accordance with this policy and state law, to the First Baptist Icard Safety Committee Chair and the Police Department, Child Protective Services, or other appropriate agency.

An element of the safe environment referenced above includes the fostering of a culture of reporting relevant information to a supervisor or a member of the First Baptist Icard Safety Committee. Because sexual abusers 'groom' children for abuse, it is possible a staff member or volunteer may witness behavior intended to 'groom' a child for sexual abuse. Staff members and volunteers are asked to report 'grooming' behavior, any policy violations, or any suspicious behaviors to a supervisor or a member of the First Baptist Icard Safety Committee.

### **ENFORCEMENT OF POLICIES**

First Baptist Icard staff members and volunteers who supervise other staff members or volunteers are charged with the diligent enforcement of all First Baptist Icard policies. Violations of these policies are grounds for immediate dismissal, disciplinary action, or reassignment from a position in Children's Ministries – for both volunteers and staff members. Final decisions related to policy violations will be the responsibility of the Board of Elders.

## **Reporting Abuse or Suspicions of Abuse**

### **REPORTING VIOLATION OF POLICY**

In order to maintain a safe environment for our children, First Baptist Icard staff members and volunteers must be aware of their individual responsibility to report any questionable circumstance, observation, act, omission, or situation that is a violation of these policies. All questions or concerns related to inappropriate, suspicious, or suspected grooming behavior should be directed to an Elder

### **CONSEQUENCES OF VIOLATION**

Any person accused of committing a prohibited act or any act considered by the church to be harmful to a child will be immediately suspended from participation in First Baptist Icard Children's Ministries. This suspension will continue during any investigation by law enforcement or Child Protective agencies.

Any person found to have committed a prohibited act should be prohibited from future participation as a staff member or volunteer in all activities and programming that involves children, students or vulnerable populations at First Baptist Icard. If the person is a staff member or employee, such conduct may also result in termination of employment from First Baptist Icard.

Failure to report a prohibited act to the designated person is a violation of this policy and grounds for termination (employee) or removal (volunteer). Volunteers who fail to report a prohibited act may be restricted from participation in any activities involving children, students or vulnerable populations at First Baptist Icard.

### **REPORTING ABUSE OR SUSPICIONS OF ABUSE**

First Baptist Icard is committed to providing a safe, secure environment for children and their families. To this end, any report of inappropriate behavior or suspicions of abuse or neglect will be taken seriously and will be reported, in accordance with this policy and state law, to Child Protective Services or criminal law enforcement.

Because sexual abusers 'groom' children for abuse, it is possible that a staff member or volunteer may witness behavior intended to groom a child for sexual abuse. Please report 'grooming' behavior, policy violations, or any suspicious behaviors to an immediate supervisor, such that the church may take appropriate action to safeguard children in the program.



*REPORTING ALLEGATIONS OR SUSPICIONS OF ABUSE TO LAW ENFORCEMENT*

**We report all suspected or alleged abuse or neglect of children to the Burke County DSS**

**Abuse Hotline: 828-764-9600**

Because many adults are unfamiliar with North Carolina reporting requirements and may be fearful of the process, First Baptist Icard utilizes a 'tandem or dual report' model, where permitted. A 'dual report' occurs when a First Baptist Icard supervisor reports the suspicion or allegation *together* with the individual who saw, heard or received information causing him or her to suspect abuse or neglect.

THIS PRACTICE IS NOT REQUIRED, OR INTENDED TO INHIBIT ANY STAFF MEMBER OR VOLUNTEER FROM REPORTING TO LAW ENFORCEMENT, CPS OR THE ABUSE HOTLINE *DIRECTLY*. Instead, it is meant to facilitate reporting, protect children and support individuals who may not feel able or willing to report alone.

*NO PERMISSION IS NEEDED from First Baptist Icard before reporting to law enforcement personnel or the Child Abuse Hotline.*

While not required by state law, please report all suspicions of child abuse or neglect (or any inappropriate or 'grooming' behaviors of a colleague or coworker) to an immediate supervisor or a member of the First Baptist Icard Safety Committee. This request is intended to assist the church in properly protecting children involved in First Baptist Icard programs.

***When in doubt, report.***

**PEER TO PEER ABUSE**

Peer-to-peer sexual abuse is children molesting or abusing other children. Those who work with students in our youth ministry must be vigilant to watch for this type of abuse. Please take time to read the attached article on Peer-to-Peer abuse that is an appendix to this policy before signing the final page of the policy. **ALL ACTS AND/OR SUSPICIONS OF PEER-TO-PEER ABUSE MUST BE REPORTED IMMEDIATELY TO AN ELDER AND ALL STATE LAWS FOR REPORTING ABUSE MUST BE FOLLOWED.**

## **Safety Committee**

### **SAFETY COMMITTEE**

Recognizing the importance of providing and maintaining a safe environment for children, First Baptist Icard will appoint and maintain a Safety Committee, which will meet once each quarter.

The purpose of the Safety Committee is to enable First Baptist Icard Children's Ministries to carry out appropriate ministry activities while safeguarding program participants against emotional, physical or sexual abuse.

### **COMPOSITION**

The Safety Committee will be comprised of the following members:

- the Lead Pastor
- the Associate Pastor of Students
- All children's Sunday school teachers
- One representative from FBI kids Wednesday night program.

### **RESPONSIBILITIES**

The Safety Committee will be charged with the following duties:

1. Applying existing First Baptist Icard policies and procedures related to children's safety and risk management issues.
2. Monitoring all Children's Ministries programs for ongoing compliance with safety policies.
3. Making recommendations to the First Baptist Icard Board of Elders regarding safety issues.

## **Children's Ministry Staff Monitoring Plan**

### **BUILDING SAFETY**

Every children's volunteer is responsible for ensuring that the ministry program area is monitored during programming serving children. This includes unobserved monitoring of staff members, volunteers and children. No child will ever be left unattended in a ministry area or on a playground during regular programming, classes or activities.

### **SUPERVISION**



Only parents (dropping off children), screened ministry volunteers, church staff members, and children are allowed in areas where ministry to children is occurring. If questions or concerns arise related to any person in the area, a staff members should be notified immediately.

**Two trained, screened adults should supervise children at all times.**

Avoid being alone with an individual child in any room or during any ministry program. If one supervising adult must leave a group of children, another volunteer or employee must be notified so that the *Two Adult Rule* can be followed.

If two individuals serving in a room are related to one another, a third unrelated volunteer or staff member must be present.

If an unusual circumstance occurs and you find yourself alone with a single child, take the child to a room or building occupied by others, or to a location easily observed by others. (Example: if a child is the last in a class to be picked up by a parent, move to an adjoining room where other staff members or volunteers are present.)

If you need to talk with a child alone, do it in the hallway or a highly visible area, or have another leader with you.

After every ministry event, ensure that every room, area and restroom is checked prior to leaving.

**PLAYGROUNDS**

On the playground, remember to circulate, watching children during play periods, giving particular attention to areas not easily seen from all viewpoints. (Example: under slides, in corners, behind structures).

Any two children together in an unseen or less easily viewed area should be redirected to another (more open) area of the playground.

**Child Safety Measures**

**WORKER TO CHILD RATIOS**

First Baptist Icard is committed to providing adequate supervision in all Children's Ministries programs. Accordingly, the following worker to child ratios will be observed:

<b>Program</b>	<b>Workers</b>	<b>Children</b>
Nursery	2	8
Preschool, 2 & 3 years old	2	12
Preschool, 4 & 5 years old	2	18
Elementary	2	20
VBS	2	20

If a worker is 'out of ratio' it is his or her responsibility to immediately notify a First Baptist Icard staff member. Supervisors will make diligent efforts to find substitute workers to immediately bring worker to children ratios into compliance with Church policy.

## **RELEASE OF CHILDREN**

At any time that a child has been entrusted to First Baptist Icard staff members or volunteers, the Church incurs responsibility for the safety and well-being of the child. Staff members and volunteers must act to ensure the appropriate supervision and safety of children in their charge.

Children's Ministries volunteers are responsible for releasing children in their care only to parents, legal guardians, or other persons designated by parents or legal guardians at the close of services or activities.

It is presumed a person who drops off a child or student has authority to pick up the child.

In the event that staff members or volunteers are uncertain of the propriety of releasing a child, they should immediately locate or contact a staff member before releasing the child.

## **Disciplinary Policies**

### **DISCIPLINE**

It is First Baptist Icard's policy that staff members and volunteers are prohibited from using physical discipline in any manner for behavioral management of children. **No form of physical discipline is acceptable.** This prohibition includes spanking, slapping, pinching, hitting, or any other physical force as retaliation or correction for inappropriate behaviors by children. When a child is misbehaving, follow these steps:

1. Go to the child and calmly ask him or her to stop the behavior. (Most children respond immediately and correct the behavior.) Give a warning and remind the child of class expectations, and redirect to a positive behavior. Do this individually when possible, try not to single out a specific child in a large group setting. \*When working with younger children, some physical redirection may be necessary: for example, removing a toy from the hands of a child who is hitting another.
2. If the child repeats the action, guide them to a quiet place – separate from the other children – for a short but designated period of time. Stay within sight of others, and avoid being alone (or unseen) with the child.

Provide the child with a simple, understandable reason for the separation, and a clear explanation of your expectations.

("Terry, you didn't stop hitting Kelly when I asked you to, so it was necessary for me to separate you from the group.")

3. After a 3rd time, refer to a staff member. A staff member may inform a parent or guardian, who may be asked to become involved in redirecting misbehavior.

Uncontrollable or unusual behavior should be reported to ministry supervisor.

NEVER...

- Never yell at a child.
- Never grab a child.
- Never threaten a child. Always follow through with your word.
- Never hit a child.
- Never confront a parent in front of others.
- Never openly humiliate a child in front of the class.

## **BULLYING**

Verbal, physical or emotional bullying is not acceptable in First Baptist Icard ministry programs. At the first sign of bullying in any form, act decisively, and inform your ministry supervisor. There is no "harmless put-down" where bullying is concerned.

1. *First Offense:* Issue a warning to the child and a general reminder to the group that this kind of interaction is wrong. Try not to embarrass or chastise.
2. *Second Offense:* Pull the offending child(ren) from the group (in a seen or supervised location) and discuss the inappropriate interaction or behavior. Set clear parameters and behavioral goals. Let the child know that the next step is communication with a pastor and the child's parents. Notify an immediate supervisor of ANY signs of bullying or verbal abuse.

Privately, but with another adult present, confirm that a child who was the target of the bullying behaviors is not in danger of continued harassment and is physically and emotionally stable. **DO NOT SINGLE A CHILD OUT IN FRONT OF THE GROUP ... be discreet.**

3. *Third Offense:* Send the child to a pastor or ministry supervisor for a phone call (or communication onsite) with his or her parent(s) and possible removal from the activity or event.

## **Restroom Policies**

DO NOT USE OR OCCUPY a bathroom in use by children. Adults should use a restroom separate and apart from restrooms used by children during weekend services or when there are children present. No volunteer OF ANY AGE should enter or occupy a bathroom while children are using it. When no child is present, adults (and young volunteers) are allowed in a bathroom (one at a time) so long as there is another adult at the doorway keeping any child from entering. Only adult females may change diapers and must do so on diaper changer stations within plain view of other volunteers.

### *NURSERY CHILDREN*

Because nursery children may require complete assistance with their bathroom activities, all staff members and volunteers will observe the following policies:

#### **Diapering**

- Only female nursery workers or the child's parent or legal guardian will undertake the diapering of children of either sex.
- Changing of diapers should be done in plain sight of other nursery workers.
- Children will never be left unattended on changing tables.
- Any special instructions given by parents leaving children in nursery will be recorded on the registration cards ("Seth Adams has a medicine in the bag for rash.")
- Children should be re-diapered and re-clothed immediately upon the completion of changing their soiled diaper.
- Children should be changed on changing stations only.

#### **Toilet training**

- No child will be forced to toilet train.
- Only female nursery workers or the child's parent or legal guardian will participate in toilet training efforts with children of either sex.
- When children are taken into bathrooms the door will be left partially open.
- Young children will never be left unattended in bathrooms.
- Parents should be consulted on each child's progress in the toilet training process before leaving the child with volunteers or staff members. Any special instructions given by parents leaving children in the nursery will be recorded on the registration card ("Georgia can use the toilet, but she needs to be reminded – ask her if she needs to go.").
- Children should be assisted in straightening their clothing before returning to the room with other children.
- "Accidents" should be handled by reassuring the child and completing the changing of diapers or underwear and clothing. Extra clothing and diapers are available from First Baptist Icard in the children's area, if the parent has not furnished a clothing change.

### *GRADES 1-6*

If you must go into the restroom to check on an individual child, seek out another worker to accompany you. If another worker is not available, go to the exterior bathroom door, knock, and ask if the child needs assistance. Do not enter the restroom.

If a child requires immediate assistance, leave the exterior bathroom door open when entering the bathroom area and try to verbally assist the child in completing his or her toileting activities, while the child remains behind the door of the bathroom stall. Any assistance with the straightening or fastening of garments should be done in the presence of another staff member or volunteer.

If restroom use is required:

- Only *adult* female workers will assist children in the restroom, unless a parent is assisting their own child.
- Only one child in the restroom at a time, in a single toilet facility.
- When a worker is assisting a child, the door must not be locked, and must remain ajar. In general, children should receive the minimum amount of assistance needed based upon their individual capabilities. Encourage children to do all they can for themselves.
- All students in grades 1-3 must be accompanied to the restroom by a female leader. 4th and 5th grade students may go to KIDS ONLY restrooms alone with a bathroom pass from their room.
- Be aware if a student repeatedly asks to use the restroom and stays there for unusual periods of time. Report this behavior to a supervisor if it occurs.
- A single staff member or volunteer should never take a lone child to the restroom.

### *SPECIAL NEEDS*

Parents will offer instruction to staff members or volunteers to change the diapers of individuals with special needs. After the age of 4, parents or legal guardians will change the diapers of all individuals with special needs. If someone with special needs requires assistance using the restroom, a special needs volunteer may assist them in the restroom.

## **Medication**

Do not administer medication of any kind to any child while serving in ministry programs, including 'over the counter' drugs.

## **Transportation**

Staff members and volunteers may from time to time be in a position to provide transportation for children. The following guidelines should be strictly observed when workers are involved in the transportation of children:

- Children should be transported directly to their destination. Unauthorized stops to a non-public place should be avoided. Staff members and volunteers should avoid transportation circumstances that leave only one child in transport.
- Staff members and volunteers should avoid physical contact with children while in vehicles.
- No cell phones may be utilized by the driver while driving First Baptist Icard vans, or vehicles owned or rented by First Baptist Icard, unless in an emergency.
- No drivers under age 25 may drive First Baptist Icard owned or rented vehicles.

## **Verbal Interactions with Children**

Verbal interactions between staff members or volunteers and children should be positive and uplifting. First Baptist Icard staff members and volunteers should strive to keep verbal interactions encouraging, constructive, and mindful of their mission of aiding parents in the spiritual growth and development of children.

To this end, staff members and volunteers should not talk to children in a way that is or could be construed by any reasonable observer as harsh, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. In addition, staff members and volunteers are expected to refrain from swearing in the presence of children.

## **One-to-One Interactions with Children**

Staff members and volunteers should never conduct one-to-one, unobserved meetings or interaction with children while participating in First Baptist Icard Children's Ministry program. Another adult who has completed the First Baptist Icard application and screening process should always be present.

## **Physical Contact**

First Baptist Icard is committed to protecting children in its care. To this end, First Baptist Icard has implemented a 'physical contact policy' which promotes a positive, nurturing environment for our Children's Ministries while protecting children. The following guidelines are to be carefully followed by anyone working in Children's Ministries programs:

- Hugging, pats on the back and other forms of appropriate physical affection between staff members or volunteers and children are important for children's development, and are generally suitable in the church setting.



- Inappropriate touching and inappropriate displays of affection are forbidden. Any inappropriate physical contact, touching or displays of affection should be immediately reported to an Elder.
- Physical contact should be for the benefit of the child, and never be based upon the emotional needs of a staff member or volunteer.
- Physical contact and affection should be given only in observable places or when in the presence of other children or children's staff members and volunteers. It is much less likely that touch will be inappropriate or misinterpreted when physical contact is open to observation.
- Physical contact in any form should not give even the appearance of wrongdoing. The personal behavior of staff members or volunteers in Children's Ministries must foster trust at all times. Personal conduct must be above reproach.
- Do not force physical contact, touch or affection on a reluctant child. A child's preference not to be touched must be respected.
- Children's staff members and volunteers are responsible for protecting children under their supervision from inappropriate or unwanted touch by others.
- Any inappropriate behavior or suspected abuse by a staff member or volunteer must be reported immediately to an Elder.

## **Intoxicants**

Staff members and volunteers are prohibited from the use, possession, or being under the influence of alcohol or any illegal drugs while in any First Baptist Icard facility, while traveling with children, or while working with or supervising children.

## **Tobacco Use**

First Baptist Icard requires staff members and volunteers to abstain from the use or possession of tobacco products in church facilities, while in the presence of children or their parents, or during First Baptist Icard activities or programs. First Baptist Icard is a tobacco-free facility.

## **Sexually Oriented Conversations**

Staff members and volunteers are prohibited from engaging in any sexually oriented conversations with children, and are not permitted to discuss any inappropriate or explicit information about their own personal relationships, dating or sexual activities with any child in the program.

## **Sexually Oriented Material**

Staff members and volunteers in Children's Ministries at First Baptist Icard are prohibited from possessing any sexually oriented materials (magazines, cards, images, videos, films, etc.) on church property or in the presence of children.

## **Nudity**

Staff members and volunteers in First Baptist Icard's Children's Ministries should never be nude in the presence of children in their care. In the event there is a situation that may call for or contemplate the possibility of nudity (i.e. changing clothes during a pool party, weekend or overnight retreat, etc.), staff member/volunteer will submit a plan to the Elders concerning arrangements for showering or changing clothes.

## **Parental Involvement**

### **PARENTAL CONTACT**

Parents who leave a child in the care of First Baptist Icard staff members and volunteers during church services or activities will be contacted if their child becomes ill, injured, or has a severe disciplinary problem while participating in Children's Ministries programs.

### **PARENTAL INVOLVEMENT**

Parents are encouraged to visit any and all services and programs in which their child is involved at First Baptist Icard. Parents have an open invitation to observe all programs and activities in which their child is involved. However, parents who desire to participate in or have continuous, ongoing contact with their children's programs at First Baptist Icard will be required to complete the First Baptist Icard volunteer application and screening process.

## **Policies and Procedures Statement of Acknowledgement and Agreement**

This page is to be signed, detached, and delivered to the Ministry Supervisor.

I have received and read a copy of First Baptist Icard's Children's Ministries Policies and Procedures and understand the importance of the material in the manual. I agree to abide by these guidelines while serving or working at First Baptist Icard.

I understand the manual may be modified, and that any guideline may be amended, revised, or eliminated by First Baptist Icard.

I have reviewed the duties listed in my ministry position description, and I agree to fulfill these duties. I understand I may choose to end my employment or voluntary service at First Baptist Icard at any time (If possible, I will provide two weeks' notice to my supervisor).

I acknowledge and understand that the materials and guidelines contained in this handbook in no way express or imply a contractual employment relationship between me and First Baptist Icard. If applying as a volunteer, I acknowledge and agree that I will receive no monetary compensation for hours worked.

I understand it is my responsibility to review new guidelines which may be created and distributed.

I acknowledge receipt of First Baptist Icard policies and procedures manual.

\_\_\_\_\_  
Staff Member or Volunteer's name (please print)

\_\_\_\_\_  
Staff Member or Volunteer's signature

Date: \_\_\_\_\_

## **Policy for the Safe Use of Images of Children**

### **1. Introduction**

Churches enjoy and welcome publicity. Photographs and video add color, vibrancy, life and interest to articles promoting church activities, events and initiatives. Making use of photographs for publicity materials and to promote the church in the press can encourage and attract engagement with the church and celebrate the church's achievements. Images must however be used in a responsible way. As a church we need to respect the right to privacy for children, young people, and parents and to be aware of potential safeguarding issues.

FBI will take every reasonable effort to minimize risk by following the guidelines detailed in this document and by securing appropriate consent for the use of images.

This policy applies to the use of photographs and video in church publicity materials, on its website, social media and in the press. Its implementation is the responsibility of all church officers, activity leaders and volunteers. Parents and visitors will be made aware of this policy.

### **2. Safeguarding**

There may be a risk when specific children can be identified in photographs or video, or connected to regular attendance at a particular location. For that reason, FBI has developed this policy to make every effort to minimize risk. In the event of the inappropriate use of children's photographs the will follow the appropriate safeguarding procedures.

### **3. Children's Online Privacy Protection Act**

Photographs and video images of people are classed as personal data under the terms of the Children's Online Privacy Protection Act. Therefore, using such images for church publicity purposes requires the consent of either the adult or young person concerned or, in the case of children, their legal guardians. Young people aged 13-17 are able to give consent themselves under the Children's Online Privacy Protection Act.

FBI will not display images of children or young people online, in publications or in a public place without such consent. The definition of a public place includes areas where visitors to the church have access.

#### **4. Photographing and Filming Church Events and Activities**

Where photographs are taken at an event attended by large crowds, this is regarded as a public area so it is not necessary to get permission of everyone in a crowd shot, but individuals should not then be identified in accompanying text from such an image without consent. Signage will be displayed to make people aware that photography or filming is taking place so that they can take appropriate actions to avoid being in any images or so they can advise an appropriate church officer as to their position on use of their image in publicity.

The Children's Online Privacy Protection Act does not apply to photographs or films taken for personal use by family, but FBI requests that parents do not take photographs of any children but their own at church events or activities to safeguard other children. First Baptist Icard will have designated photographers at church events and activities who will be aware of which children or young people may not be photographed, so we ask all other adults to refrain from photography beyond family shots.

FBI ask that parents and other adults and young people do not film church events or activities as they will not have full awareness of which children may or may not be filmed, and there could be risks to the safety of children or families if such video appeared online without appropriate checks in place. People must not try to film, even discreetly, as while they may feel that they are filming only their own child, other parents cannot tell what they are filming, and it could cause significant distress and disruption of an event. First Baptist Icard will endeavor to have designated film makers at church events and activities who will be aware of which children or young people may not be filmed. Please support us as a church to follow this guidance to enable us to sensibly protect the families in our care.

On occasions, commissioned photographs or video may be captured of children on outings, activities or events, or performing in church productions. The church will inform parents where arrangements have been made for a commercial photographer/film maker to capture such an event. Where a commercial photographer is used, the church will:

- provide a clear brief about what is considered appropriate in terms of content and behavior, and secure storage and retention;
- issue the photographer with identification which must be worn at all times;
- make the photographer aware of any restrictions on who can be photographed;
- not allow unsupervised access to children or one-to-one photo sessions at home.

If children or parents have any concerns about inappropriate or intrusive photography, they should report them to the Elders who will handle them in the same manner as any other safeguarding concern.

## **5. Appropriate Use of Images in Church Publicity Materials**

FBI will:

- ensure that images are stored securely and used only by those authorized to do so;
- ensure that electronic images are stored on a secure computer or device to which members of the public have no access;
- not use an image of any child who is subject to known child protection arrangements;
- secure parental consent for the use of children's photographs, or consent from the young person if aged 13 or over; and,
- ensure that children are appropriately dressed in any used images.

## **6. Church Website**

The advice for using photographs on a website is no different from their use in any other kind of publication or publicity material. However, FBI is aware of the potential risk of inappropriate use of images because of the lack of control over who might see the image and the wide extent of the misuse of the Internet by certain people. Young people and parents/guardians need to be aware that images on the Internet may be re-used by third parties without the knowledge or agreement of FBI. FBI will seek the consent of young people or parents regarding the use of images on the Internet. Children's names will not be included in photographs of children published on the church website or in social media unless agreed beforehand by the young person or parents of the children concerned.

## **7. The Press**

First Baptist Icard will provide names of children to accompany photographs published in newspapers and magazines only where the young person, parent or guardian have provided their consent.

## **8. Consent**

FBI will seek the consent of young people and parents/guardians regarding the use of images of children. Records of these consents will be retained securely.





# PEER-TO-PEER CHILD SEXUAL ABUSE RISK:

## Protecting Children from Other Children

By Gregory Love & Kimberlee Norris

**Where child sexual abuse is concerned, peer-to-peer abuse provides the curveball of sexual abuse risk.**

**To recognize and address it properly, a ministry must be watching for it.**

### Common fact patterns

Peer-to-peer sexual abuse — children molesting or abusing *other children* — unfolds in predictable patterns.

Some years ago, we were asked to assist a church in correctly responding to a child sexual abuse scenario. This ministry served very young children in a horseshoe-shaped building with a fence across the top of the horseshoe, creating a courtyard. The fenced area contained a playground for children surrounded by windows looking into the play area. In the center of the playground was a play structure with panels near the base, creating a box-like cube. One Sunday, while two staff members sat 20 feet away, a 7-year-old boy enticed a 4-year-old girl into the cubed play structure and sexually molested her there.

Later that day, the little girl shared with her parents — in a vague and inarticulate manner — what she had experienced that morning in the play structure. The girl's parents believed her (which doesn't always occur) and contacted a ministry supervisor. Ministry leaders, in turn, contacted our firm.

In assessing the situation, we interviewed the two staff members who supervised the playground, who were present on the day in question.

During the interview, these staff members were courteous and concerned but became defensive when asked about the *possibility* of sexual abuse occurring on the playground several days before, saying, "That's not possible." When asked why they were convinced that sexual abuse couldn't occur on the playground, they replied, "We have a fence." In this circumstance, these conscientious ministry workers believed sexual abuse could only originate from *outside the fence*.

What these ministry workers did not grasp is that the majority of sexual abuse risk arising in a ministry context occurs *inside the fence*. These staff members had received minimal sexual abuse training: from



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their standpoint the risk of abuse, to the extent it existed *at all*, came from *outside the church*. They had no training or understanding regarding the preferential offender (see prior article at [www.churchexecutive.com/archives/stop-sexual-abuse-2](http://www.churchexecutive.com/archives/stop-sexual-abuse-2)) or peer-to-peer sexual abuse: sexual abuse occurring at the hands of *other children*.

Where child sexual abuse is concerned, *we cannot reduce a risk we do not understand*. This truism is particularly apt in addressing and preventing peer-to-peer sexual abuse. In our experience, peer sexual abuse is the least understood and expected risk likely to be encountered in ministry contexts: the *curveball*.

Peer sexual abuse is not prevented by a background check, child check-in system or six-month member rule.

What about the two-adult rule? In the fact pattern above, two adult staff members supervised the playground — the church was following the two-adult rule. Unfortunately, these two adults had no real understanding of the risk of peer sexual abuse, much less how to prevent it. Peer sexual abuse is shockingly prevalent: offender studies indicate that convicted male abusers begin their predatory behavior, on average, at 13 or 14 years of age. The majority of convicted male abusers admit their first offense occurred *before* reaching 18 years of age. US Department of Justice reports indicate that *one out of three* reported cases of child sexual abuse are peer-to-peer abuse allegations.





## Peer Sexual Abuse: Sexually harmful behavior between children involving an aggressor and a child who does not seek or want the sexual interaction.

What's more, peer abusers tend to take opportunities where they find them; where they spend time anyway — school, sports, camp, younger cousins or siblings, and church. Children who have been sexually abused tend to act out in a sexual manner with other children. Even very young children can act out in a sexually harmful context.

So how should a ministry act to reasonably address this known risk? Ministry staff members must be trained to understand and recognize scenarios where this risk is higher: anywhere *clothes come off*, for any reason (e.g. the restroom), any location on your church campus which is *less easily seen* (e.g. play structures) and any activity *less easily supervised* (e.g. *any activity involving swimming or group play*). Effective training must define peer sexual abuse, address where it is more likely to occur and how to correctly respond.

### Responding to an allegation

Responding correctly to peer sexual abuse allegations requires an exercise of judgment, and ministry leaders must avoid two common misconceptions.

Error: No sexual behavior between children is harmful — simply indicative of curiosity or *play*.

Error: *All* sexual behavior between children is dangerous and harmful.

Some childish behaviors are predicated upon natural sexual curiosity. In the course of normal human development, children commonly engage in harmless sexual curiosity or play. This behavior, thought innocent, should always be redirected.

### What constitutes harmful sexual behavior between children?

*Any adult sexual behavior that children should have no knowledge of or experience with* should be reported to child protective services. This is because these behaviors are typically learned behaviors resulting from interaction between an adult (or older child) and a child, and the abused child is replicating these learned behaviors with other children. The purpose of a report is to get appropriate resources to the children impacted, redirect the harmful behavior and determine where the sexual conduct *began*: generally at the hands of an *adult* who has abused a child.

Clearly, any coerced or forced sexual behavior is harmful. In most jurisdictions, criminal prosecution of peer sexual abuse requires three elements: an *aggressor*, a *non-aggressor* and an *imbalance of power* favoring the aggressor. The imbalance of power is typically age, but size, mental acuity or the existence of a disability can create the imbalance. In most states in the US, a three-year age gap between children creates a *presumption* of an imbalance of power.

One indication that sexual behavior between children is something other than simple curiosity or play is when the behavior is hidden or accompanied by a sense of shame or culpability. When a child is hiding behavior or enticing another child into a closet or other unseen area, the conduct is problematic.

### Peer sexual abuse must be reported

Although peer sexual abuse constitutes *one third* of all reported sexual abuse in the US, peer abuse tends to be underreported. One reason it isn't reported is the belief that mandatory reporting requirements do not apply to children who sexually abuse other children. Untrue: mandatory reporting requirements are driven by the age of the *victim*, not the age of the abuser.

### Peer sexual abuse fire drill

Peer abusers are opportunistic — they take opportunities where they find them and where they spend time *anyway*, including church programs. While on church property or participating in church programs, children must be safe and protected — sometimes from other children. Church staff members are responsible for the safety and welfare of *each* child participating until that child is returned to a parent or caregiver.

Like fire, peer sexual abuse is a foreseeable risk. Where this risk is concerned, a church's primary protection is *effective training* coupled with intentional supervision.

Many ministry workers believe that peer sexual abuse won't happen in their church or ministry. This illusion is dangerous to both the ministry and the children it serves. Because peer abusers are opportunistic, greater opportunity exists in church programs staffed by workers who don't understand or acknowledge the reality of this risk.

The first step to a better understanding of this risk is effective training: when staff members learn the facts, they are better equipped to protect children in their care. **CE**

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**Kimberlee Norris & Gregory** Love are partners in the Fort Worth, Texas law firm of Love & Norris [ [www.lovenorris.com](http://www.lovenorris.com) ] and founders of MinistrySafe, providing child sexual abuse expertise to ministries worldwide. After representing victims of child sexual abuse for more than two decades, Love and Norris saw recurring, predictable patterns in predatory behavior. MinistrySafe grew out of their desire to place proactive tools into the hands of ministry professionals. Love and Norris teach the only graduate-level course on Preventing Sexual Abuse in Ministry as Visiting Faculty at Dallas Theological Seminary.