

Rainbow Mennonite Church

Abuse Prevention Policy

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TABLE OF CONTENTS

I. Abuse Prevention at Rainbow Mennonite Church

- A. History
- B. Introduction
- C. Policy Statement and Purpose
- D. Applicability
- E. Scope
- F. Administration
- G. Education

II. Abuse Prevention Guidelines

- A. Definitions
- B. Guidelines for Working with Minors
- C. Approval and Supervision of Volunteers Working with Minors and Vulnerable Adults
- D. Selection and Supervision of Employees
- E. Pastoral and Congregational Care Guidelines

III. Procedures for Responding to Allegations of Abuse

- A. Considerations and Priorities
- B. Reports (under age 18)
- C. Reports (18 years and older)
- D. Special personnel considerations
- E. Special considerations involving Renter(s), Visitor(s), Vendor(s), etc.
- F. Response to individuals known or alleged to have perpetrated abuse in the past, or in other settings
- G. Record security

IV. Appendices and Forms

- A. RMC Volunteer Registration Form
- B. Abuse Prevention Covenant
- C. Authorization and Request for Criminal Records Check
- D. Limited Access Agreement
- E. Social Media Policy
- F. Reporting Abuse Form

I. Abuse Prevention at Rainbow Mennonite Church

A. History

In 2005 a Safe Sanctuary Taskforce was formed. This Taskforce developed and recommended a policy to Church Council in 2006. The policy was adopted 2008. In 2012 and 2017, the policy underwent editorial revisions. A major reworking of the policy was approved in 2020, which corresponded with constitutional amendments (adding of the Safe Sanctuary Committee). The most recent revision was approved by Church Council in 2022.

B. Introduction

Rainbow Mennonite Church (RMC) strives to be a caring and supportive church community whereby we minister to one another in ways that help all feel welcomed, a sense of belonging, cared for, and safe. We recognize that carrying out our mission involves people and relationships, which presents the possibility for people to abuse their power by exhibiting inappropriate conduct (i.e., harassment or abuse). Therefore, RMC establishes this Abuse Prevention Policy and accompanying guidelines to demonstrate our commitment to creating and maintaining a church environment that is safe from abuse and nurturing for all children, youth, and adults.

All Employees, Interns or Short-Term Volunteers, and Congregants (see II. A. Definitions) involved in and/or representing RMC should act in a manner that upholds the high standards of Christian ethics. Everyone will be held accountable to this policy and are expected to interact in appropriate and respectful ways.

Reports of child abuse, emotional abuse, neglect, physical abuse, sexual abuse, spiritual abuse, and harassment (See II.A. Definitions) will be taken seriously and addressed. In light of these beliefs, the following policy and guidelines will be followed. The RMC Safe Sanctuary Committee (SSC) carries special responsibility to monitor these guidelines, delegate and consult as necessary, and propose future changes to this policy for Church Council approval.

The following policy and guidelines have been developed in order to reduce the risk of incidents of abuse, to educate RMC Employees, Interns or Short-Term Volunteers, and Congregants regarding abuse, and to develop a clear direction for a trauma-informed response to reports of abuse. In order to accomplish this, we will follow safety measures in the selection and recruitment of Employees and Interns/Short-Term Volunteers; we will implement prudent operational procedures in all programs and events; we will educate our Employees, Interns or Short-Term Volunteers, Congregants and Renters regarding all appropriate policies and procedures; we will have a clearly defined procedure for reporting all suspected incidents of abuse inclusive of all requirements of state law; and we will be prepared to respond.

These guidelines for activities and programs sponsored by RMC were developed in accordance with recommendations from Mennonite Church USA (MC USA) via the Western District Conference (WDC). Materials from Dove's Nest, Mennonite Central Committee, Safe Sanctuaries: Reducing the Risk of Child Abuse in the Church, FaithTrust Institute, and information from Church Mutual Insurance Company were utilized.

C. Policy Statement and Purpose

RMC commits to creating a safe and secure environment for all who participate in any and all activities organized and sponsored by RMC. The following Abuse Prevention Policy represents a critical initiative towards the institution of the church as a place of safety and protection for all who enter to worship or participate in congregational activities.

We commit ourselves and our resources to the nurture, care, and protection of all. We pledge to provide the structure, education, and policies that keep all safe from sexual, physical, emotional harm and abuse while participating in RMC activities. Further, this policy will guide RMC as an institution in the conduct of its Employees, Interns or Short-Term Volunteers, and Congregants in order to prevent incidents and allegations of abuse.

D. Applicability

All RMC Employees, Interns or Short-Term Volunteers, Congregants, and Renters are governed by this policy, which supersedes all prior RMC abuse protection policy statements. This policy applies to all activities organized and sponsored by RMC such as but not limited to:

Children's Programs — 0 to 5th Grade:

- Nursery
- Sunday School/WorshipArts
- Special programs

Youth Programs — 6th to 12th Grade:

- Youth Group
- Sunday School
- Mission Trips/Retreats/Conferences
- Mentoring
- Fellowship Events

All Renters are required to give signed acknowledgment that they have received and read this policy prior to their occupancy. Should there be perceived conflicts or ambiguities in interpretation and application of this policy, the SSC will consult with Church Council as they deem appropriate, as well as WDC Conference Minister, and if needed, a third party of their choosing in order to resolve these conflicts or ambiguities. Should a concern arise between an individual or individuals within RMC (Employee, Intern or Short-Term Volunteer, Congregant) and someone outside RMC (Renter,

Vendor/ Community Visitor, or Event-Based Visitor, see Section III. E.)

E. Scope

- a. Employees, Interns or Short-Term Volunteers, and Congregants who fail to follow the procedures listed in this policy place themselves at risk for accusations of abuse and may have their responsibilities terminated or involvement suspended for failure to abide by this policy. This action may be taken regardless of the outcome of any investigation if the SSC (Personnel Committee and/or Deacons for Employees) determines that the Abuse Prevention Policy and procedures have not been followed.
- b. The possibility of being accused of abuse, whether true or false, is a risk each person faces. Each person must assume responsibility for one's own actions while involved at RMC and for attending annual Safe Sanctuary training (which will cover abuse prevention and safe sanctuary expectations for all ages).

F. Administration

The SSC shall consist of five members: RMC Pastor, Past Moderator, and three appointed committee members. All appointed committee members shall be appointed by the Moderator, with the approval of the Church Council. The appointed committee members will serve staggered three-year terms. One of these members, other than Pastor, shall serve as the Chair. The SSC will involve other RMC staff in their work if and when they deem it necessary.

The SSC will:

- a. Implement and enforce this Policy
- b. Review and make recommendations to the Church Council for revising this Policy as well as contracts with Renters as it pertains to this policy or RMC's Building Use Policy.
- c. Provide training for all Employees and Approved Adults working with Minors regarding child safety, child abuse, and this Policy
- d. Review all Approved Adult Volunteer Registration Forms
- e. Maintain a list of Approved Adults and share that as needed
- f. Monitor Approved Adults and volunteers to ensure that policies are being followed
- g. Keep the Church Council apprised of all activities of the committee
- h. Supervise required background clearances (All background checks go directly to the Pastor, and the Pastor will consult with the SSC Chair regarding any concerning background check findings related to abuse). In addition, the SSC may evaluate whether in extraordinary circumstances, short-term waivers (e.g. Interns or Short-Term Volunteers) of the screening and training requirements applicable to Approved Adults may be issued to any Interns or Short Term Volunteers who

- otherwise meet the Approved Adult requirements.
- i. Receive and process reports of suspected abuse (See Section III. D. for situations involving an Employee)
- j. Receive reports of any and all investigations regarding abuse (See Section III.D. for situations involving an Employee)
- k. Make available, upon request of an individual, his/her background clearance reports
- l. Annual review of this Policy
- m. General education on issues outlined in this Policy for congregation
- n. Research, develop, and adhere to best practices when developing fair and consistent investigative procedures
- o. Ensure that proper and appropriate insurance coverage is in place for RMC
- p. Develop and review brochures and/or flowchart to make this policy more accessible/user friendly

The SSC Chair will:

- a. Ensure that required forms are received for all Approved Adults and proper records are maintained
- b. Call meetings as often as needed, but no less than once each year

G. Education

- a. Copies of the Abuse Prevention Policy will be available in RMC's library, copy room, website, and at annual Safe Sanctuary trainings.
- b. All Employees, the SSC, Deacons, Church Council, Faith Formation Board, Sunday School teachers, nursery workers, child care providers, youth sponsors, mentors, and anyone else working with Minors or Vulnerable Adults are required to attend an annual Safe Sanctuary training and sign the annual Abuse Prevention Covenant. Since this policy addresses complainants/survivors of all ages, anyone who serves on a volunteer committee or is active in congregational life is encouraged to attend annual training and sign the Abuse Prevention Covenant.
- c. The SSC is responsible for scheduling and facilitating Safe Sanctuary Training on an annual and as-needed basis for Employees, Interns or Short-Term Volunteers, and Congregants. The Director of Faith Formation and Congregational Life will assist in training as requested by the SSC.
- d. Education on healthy relationships and boundaries will be provided to Minors annually. Materials used during these sessions will be reviewed by the Faith Formation Board.

II. Abuse Prevention Guidelines

A. Definitions

Adult: *A person who is 18 years of age or older.*

Approved Adult: *Any adult including Employees who works with Minors or Vulnerable Adults. Must have a Volunteer/Employee Registration Form on file, yearly signed Abuse Prevention Covenant, up to date background check (for youth sponsors, mentors, and Employees), and yearly training on the Abuse Prevention Policy.*

Care Team: *Made up of Congregants assigned by SSC. One (or more if applicable) Care Team member will be assigned to the complainant/survivor (Guardians if under 18) and a different Care Team member will be assigned to the accused. Their respective roles will be to provide spiritual and emotional support, communicate with, and respond to questions, requests and other needs as they arise. The SSC may assign additional Care Team members to respond to the spiritual and emotional support of other congregants impacted. Individuals with complaints have the right to decline support from the Care Team but must work with the entity assigned to conduct the investigation.*

Child Abuse: *Any physical injury, physical neglect, emotional injury, or sexual act inflicted upon a minor or between minors under the age of 18.*

Congregant: *A member or individual who repeatedly attends or participates in worship and/or RMC events. Membership at RMC is extended by invitation of the Pastor and Deacons and affirmed by the congregation. See RMC Constitution Article IV.*

Emotional Abuse: *Verbal or non-physical actions whose purpose is to gain power and control over another person. This is done by means such as threats, intimidation, gaslighting, derogatory language, belittling, isolation, etc.*

Employee: *A person hired to fulfill job descriptions at RMC for pay, whether short-term or long-term, exempt or non-exempt. An Employee is categorized as either credentialed or non-credentialed per denominational and conference licensing requirements.*

Event-Based Visitor: *A person outside RMC who is temporarily in church building or grounds and/or who interfaces with RMC Employees, Interns, Short-Term Volunteers, or Congregants while attending events at RMC such as weddings, picnics, showers, funerals, community events, or seminars.*

External Advocate(s): *An individual or professional organization from outside RMC, who seeks to support the complainant/survivor and advocate for their best interests regarding the report/experience of abuse, review, and investigation process.*

Harassment: *Unwanted, often-repeated behavior that humiliates, demeans, or embarrasses a person; the behaviors appear to be disturbing, upsetting, or threatening. They serve no useful purpose beyond creating alarm, annoyance, or emotional distress. Forms of harassment include but are not limited to the following:*

- **Sexual:** *Unwelcome sexual advances, requests for sexual favors, and/or verbal or physical conduct or written communication of an intimidating, hostile, or offensive nature.*
- **Verbal:** *Harsh or insulting language directed at a person. The most common way verbal abuse is used is an attempt to control behaviors, thoughts, or feelings of another human being.*
- **Media:** *Harassment directed at a person or group through text, social media, email, or other electronic communication.*
- **Religious:** *Statements expressing offensive religious opinions, particularly those which disparage the religion and the beliefs of another person for the purpose of exposing the other person to contempt and ridicule; the behavior which can be defined as unwanted conduct violating a person's dignity, or creating an intimidating, hostile, degrading, humiliating or offensive environment.*
- **Racial:** *An incident or series of incidents intended or likely to intimidate, offend or harm an individual because of their ethnic origin, color, race, religion or nationality. Common examples include derogatory name calling, verbal threats, insults and racist jokes, display of racially offensive material, exclusion from normal workplace conversation or activities, and physical attack including encouraging others to commit any such acts.*
- **Psychological:** *Any improper conduct that takes place over a period, is repetitive or systematic and involves physical behavior, spoken or written language, gestures or other acts that are intentional and that may undermine the personality, dignity or physical or psychological integrity of any person.*

Intern or Short-Term Volunteer: *A person who fulfills specific tasks or learning goals at RMC within a temporary or defined time frame, whether paid or unpaid.*

Minor: *A person under the age of 18.*

Neglect: *Endangering a person's health, welfare, or safety through negligence -- failure or threatened failure to meet their needs.*

Offender: *Any individual who has a current or historical record of substantiated abuse from a legal, third party, or church investigation.*

Physical Abuse: *Deliberately or intentionally causing bodily harm to another person.*

Renter(s): *Those who occupy Rainbow church building and grounds on a contractual basis whether short-term or long-term, with accompanying rental fee or no fee.*

RMC Spokesperson: *A Congregant who is assigned by SSC to communicate with and respond to inquiries into the situation such as from media or other internal or external entities.*

Sexual Abuse: *When any person is forced, tricked, persuaded, enticed, or coerced into any sexual contact or interaction for the sexual stimulation of the abuser, or another person.*

Spiritual Abuse: *A form of emotional and psychological abuse that is characterized by a systemic pattern of coercive and controlling behavior in a religious context. Spiritual abuse may include manipulation and exploitation, enforced accountability, censorship of decision making, requirements for secrecy and silence, coercion to conform, control through use of sacred texts or teaching, requirement of obedience to the abuser, the suggestion that the abuser has a 'divine' position, isolation as a means of punishment, and superiority and elitism.*

Vendor or Community Visitor: *A person outside RMC who temporarily interfaces with RMC Employees, Interns/ Short-Term Volunteers, and Congregants around the Rainbow church building and grounds such as while asking for assistance, making deliveries, and doing repairs or sale runs.*

Vulnerable Adult: *Includes adults with physical or mental challenges.*

B. Guidelines for Working with Minors

- a. Approved Adults must be a Congregant and have an active and positive involvement at RMC for at least six months prior to submitting a Volunteer Registration Form. Exceptions must be approved by the SSC. (example: Interns or Short-Term Volunteers)
- b. We recommend that Congregants under the age of 21 who work with Minors be five years older than those they are helping. Exceptions must be approved by the SSC, in consultation with the Faith Formation Board. Minors may volunteer to help with children's programs under the supervision of two Approved Adults.
- c. Two Approved Adults should be present during any church activity involving Minors, except in the case of the mentor program. In rare situations where only one Approved Adult is present for Sunday School or other church activities, volunteers will notify an Employee or the Faith Formation Board Chair as soon as possible prior to or after the event. Care will be taken to insure coverage. This may include leaving the door open or finding another Approved Adult to check-in periodically. We acknowledge that the one-one-nature of the mentor program

constitutes a unique exception to this guideline. See guideline i. (below) for more details.

- d. There will be a window in the door of all offices and classrooms. If this is not the case, the door will be left open while the office is in use for counseling or the classroom is in use with Minors.
- e. All displays of physical and verbal (including electronic) affection shall be non-sexual in nature and intent and have the prior consent of the recipient. Physical affection should always leave the recipient with a choice, for example asking before giving a side hug. We will practice consent. Any refusal of such a display of affection will be respected. Examples of appropriate displays of affection may include a side-to-side hug, handshake, or a pat on the back or forearm.
- f. When Sunday School teacher orientation is held, the Faith Formation Board may include appropriate ways of addressing a Minor's disruptive or inappropriate behavior in a restorative manner. Physical discipline/corporal punishment is never permitted. The Faith Formation Board is a year-round resource to all Approved Adults concerning discipline issues with Minors.
- g. Minors will be encouraged to use bathroom facilities before and after classes or other programs. Any Approved Adult other than the child's Legal Guardian(s) assisting a Minor in the bathroom will stand outside the door or if a Minor needs assistance will have a second Approved Adult present during the process. It is recommended, when possible, that two Approved Adults (if no Legal Guardian(s) is present) will be present when changing diapers or checking for injuries under Minor's clothing or diapers. In the unlikely event that two Approved Adults are not present for a needed diaper change or assistance in the bathroom, the Approved Adult present will notify the Legal Guardian(s) that the contact occurred.
- h. Off-property activities or overnight functions involving Minors will be scheduled with knowledge of the Faith Formation Board, Employee(s), and written approval of a Legal Guardian(s). At least two Approved Adults will be present at all times.
- i. One-to-one mentoring activities should be visible to others or held in public. It is also recommended that Legal Guardian(s) set communication expectations at the beginning of the relationship. Mentors should consider how to support their mentee while maintaining good boundaries in terms of emotional support, physical and verbal affection, and communication about a mentee's social life. Before private one-to-one contact between an Approved Adult and Minor occurs (for example, transportation or mentoring), a Legal Guardian(s) is to be informed (text or email). If this cannot occur, circumstances of the situation will be explained to a Legal Guardian(s) as soon as possible.

- j. Legal Guardian(s) of Minors who regularly participate in church activities will complete a Medical Release and Liability Waiver form annually, to be filed in a designated employee office. This information will be made available as needed to those who work with Minors.
- k. Legal Guardians of Minors will be notified in advance of any trips off the church premises by an Employee. A signed Trip Permission Form from the Legal Guardian(s) will be collected at the beginning of each program year. Each time a field trip or overnight event occurs, a copy of the Trip Permission Form and phone numbers of Legal Guardian(s) must be taken with Approved Adult(s) while a copy of the Trip Permission Form remains in the church office. No Approved Adult shall transport a Minor in a vehicle alone on a church sanctioned trip unless the Legal Guardian(s) has given approval. Communications with the Legal Guardian(s) shall be established to verify the whereabouts, expected arrival and change of supervision of the Minor. Approved Adults who volunteer to drive Minors on trips shall hold a valid driver's license and insurance applicable per state regulations.
- l. Unless otherwise noted, the Director of Faith Formation and Congregational Life is responsible for monitoring that adequate records are maintained to show compliance with guideline j. and k. above.
- m. Administering and recording First Aid to minors: A stocked First Aid cabinet will be kept in the education wing of the church. Other First Aid kits can be found under the sink in the youth kitchenette and basement kitchen. A list of Congregants who are medical personnel or have CPR and/or First Aid training will be kept with all First Aid kits (the RMC Church Administrator will be responsible for updating this list). Arrangements will be made to offer CPR and AED training at the church, on even years, for Employees and others who are interested, especially those who are appointed by the church to work with Minors and others who are interested (non-employees will pay for this training).
- n. For many today, social media is a venue for communication, discussion, and community. There are positive aspects to various social media platforms, as well as potential areas of concern. We ask the RMC Community to observe some of these "social media best practices" when sharing about RMC on your individual sites/platforms.
 - i. When sharing video or photos from church events, functions, or worship services, please be sensitive when tagging or revealing other participants' involvement without their expressed permission.
 - ii. When uploading photos or sharing information online, please refrain from posting confidential information pertaining to a Congregant or anyone being served by a ministry of this church.

- iii. All Approved Adults are asked not to post any pictures or videos of RMC activities where Minors are pictured on their personal social media accounts when serving in your church appointed or volunteer position.
- iv. See RMC's Social Media Policy (Appendix E).

C. Registration and Supervision of Volunteers Working with Minors and Vulnerable Adults

- a. All interested volunteers must complete a Volunteer Registration Form (See Appendix A)
- b. The Volunteer Registration Forms will be reviewed by SSC members and the information, along with a background check (as outlined in section e. below) will determine a volunteer's suitability to work with Minors and/or Vulnerable Adults. In addition, the Director of Faith Formation and Congregational Life will be granted access to Volunteer Registration Forms for review. Completed forms will be kept on file in a locked cabinet in the Pastor's office, as long as individuals are active in congregational life and five years thereafter.
- c. Recruitment and screening steps will be completed prior to volunteers and staff being placed in a role with Minors and Vulnerable Adults.
- d. An Approved Adult is cleared to work with Minors or Vulnerable Adults once the following actions are taken: Informed of the guidelines in this policy, undergo Safe Sanctuary Training, sign the Abuse Prevention Covenant, and receive background check clearance (as outlined below in e.).
- e. Background Checks:
 - i. Processing of background checks will be overseen by the SSC, inclusive of identifying necessary checks and selecting a third party background check vendor.
 - ii. All mentors and youth sponsors are required to authorize and undergo the following background checks before working with Minors: KBI or state equivalent, National Sex Offender Registry, and National Crime Information Center, and Motor Vehicle. Background checks will also include checking against the Mennonite Abuse Prevention list (MAP). Background checks will be conducted every subsequent 4th year per individual or more often if deemed necessary by SSC.
 - iii. All Congregants working with Minors will be checked annually against the National Sex Offender Registry website by the SSC or their designee such as the Director of Faith Formation and Congregational Life.

- iv. Documentation of all background checks will be handled with concern for confidentiality; information will be shared as needed with others.
 - v. The SSC reserves the right to do a background check at any time on anyone who desires to volunteer with Minors or Vulnerable Adults in the church. Should a background check be requested, the Congregant will be required to complete the background check authorization form before resuming as an Approved Adult.
 - vi. Results will be stored in a locked cabinet in the Pastor's office.
- f. If there is a question or concern about information received via the Volunteer Registration Form, Abuse Prevention Covenant, or background check results, the SSC will work together to review and make the decision whether or not to allow an individual to volunteer.
 - g. Each year, returning Approved Adults must undergo Safe Sanctuary training, re-sign the Abuse Prevention Covenant, and update background check information as needed. The on-file Volunteer Registration Form will be updated as needed.
 - h. Representatives from the SSC will initiate individual or group meetings to address program concerns or individual needs as they arise.

D. Selection and Supervision of Employees

- a. An authorization and request for Criminal Records Check Form will be completed by selected candidate and processed by a third party vendor selected by the Personnel Committee prior to date of hire. Note that MC USA runs background checks as part of the Ministerial Leadership Inquiry process for credentialed ministers. MC USA recommends that congregations also run their own background check before hiring a credentialed minister. (<http://mennoniteusa.org/resource/sexual-misconduct/>)
- b. The RMC Personnel Committee Chair reserves the right to re-run background checks on all Employees as deemed necessary.
- c. Individual background checks on prospective Employees, including credentialed ministers, will include KBI, National Sex Offender Registry, and National Crime Information Center, and the Mennonite Abuse Prevention list (MAP). If there is a question or concern on a background check relating to abuse or neglect, the Personnel Committee Chair will consult with the SSC prior to making final decision on employment. All background check documentation will be stored in a secure location reserved for personnel files in the Pastor's office.

- d. All Employees shall be made aware of the Abuse Prevention Policy prior to beginning their duties. There shall be written acknowledgement that the policy information has been read, understood, and will be followed by signing the Abuse Prevention Covenant, upon start date, as well as annually.
- e. An Employee Handbook is overseen and updated regularly by the RMC Personnel Committee. The Handbook outlines employment matters such as Employee conduct expectations, annual performance evaluation protocols and supervisory structure, grievance procedures for misunderstandings or disagreements, and termination procedures.
- f. Credentialed ministers must remain in compliance with WDC annual accountability requirements and procedures for ministerial ethics.

E. Pastoral and Congregational Care Guidelines

- a. Usual settings for one-on-one pastoral care visits by designated employees and Deacons include the following: a public place, a church office with a window for observation, or a person's home under certain circumstances. If an unusual setting is called for, the Employee or Deacon caregiver shall discuss this with a supervisor or a Deacon in advance (if feasible), or as soon as possible afterwards (as in the case of an emergency). If the recipient is a Minor, the Pastor, Director of Faith Formation and Congregational Life, and Deacons are authorized to provide caregiving one-on-one with notification to Deacon or supervisor and prior written or verbal consent of Legal Guardian(s).
- b. The Pastor will review pastoral care visits and concerns monthly with the Deacons, noting date and details of the visit or contact.
- c. The type and scope of activities shall reflect the limits of Employee or Deacon expertise and training. Employees and Deacons shall engage in pastoral care and spiritual counseling, but will refer persons to formal psychological, medical, or legal counseling and not attempt to provide such counsel themselves. Employees and Deacons may remain in supportive contact with persons requiring specialized psychological, medical, or legal counsel.
- d. All displays of verbal and physical affection shall be non-sexual in nature and intent and have the prior consent of the recipient. Examples of appropriate displays of affection include a brief hug or pat on the back or forearm or the like. Any refusal of such a display of affection will be respected between Congregants and Employees alike.
- e. Anyone who is appointed to provide pastoral and congregational care are required to give adequate attention to their own spiritual, emotional, and physical well-being to maintain a healthy attitude towards ministry.

III. Procedures for Responding to Allegations of Abuse

A. Considerations and Priorities

- a. When allegations of abuse are reported, the SSC may instigate, as necessary, an internal or external investigation through a team designated by SSC, WDC, or MCUSA. Regardless of whether an internal or external investigation is conducted, both the SSC and the external entity are charged with ensuring there are no parties involved who have conflicts of interests.
- b. When the SSC determines an outside investigation is warranted, a reputable survivor-centered, trauma-informed third party organization will be contacted. Any referrals and resulting contracts to outside entities must go through Church Council for approval before such parties can engage in the investigation.
- c. If either the complainant/survivor (Guardian(s) if a Minor) or the accused is working with an External Advocate, the SSC or the designated Investigative Team will copy one External Advocate in communications.
- d. When applicable, an RMC Spokesperson will be assigned by the SSC. Only this person will be authorized to speak on behalf of the SSC or the congregation when there are inquiries, such as with media or other internal or external inquiries.
- e. In the event that an SSC member is the accused party they will be removed from their defined role in the response or during any proceedings with the complaint.
- f. In particularly complex situations or situations that do not fit completely into the categories established by this policy, the SSC, in discussion with other church leadership (Church Council, Deacons, Personnel Committee) and the WDC Conference Minister, may decide upon and contact an appropriate third party.
- g. The SSC Chair and anyone else from RMC who is involved in conducting the investigation will make good-faith attempts to document and save summaries of meetings, notifications, and discussions pertaining to the abuse allegations and any subsequent response or follow up. Such documentation is subject to protections under attorney client privilege.
- h. It is recommended that at least two members of the SSC (male/female if possible) work together whenever contacting WDC Conference Minister. See <http://mennoniteusa.org/resource/prevention-and-response-sexual-abuse-and-non-credentialed-individuals/>
- i. Any retaliation or intimidation experienced by the complainant as a result of their complaint should be immediately reported to the Past Moderator who will notify the SSC. Reports of retaliation can be made to the Past Moderator using the confidential email account: pastmoderator@rainbowmennonite.org

- j. During the complaint process, the confidentiality of the information received, the privacy of the individuals involved, and the wishes of the complainant will be protected to as great a degree as is possible, taking into account any safety considerations for other parties or the congregation as a whole. The expressed wishes of the complainant for confidentiality will be considered in the context of the church's legal obligation to act on the charge and the right of the charged party to obtain information.

B. For cases of suspected abuse where the victim is under the age of 18

The following steps will be taken unless there is a special situation in which the complainant/survivor, the parent or legal guardian, Care Team member or External Advocate (if applicable), the SSC, and an outside professional resource agree a different plan should be followed.

- a. The complainant/survivor and/or their parent(s)/legal guardian(s) or the person who received the disclosure of abuse (Past Moderator) will, with complainant/survivor's and their parent(s) or legal guardian(s) permission (documented preferably), disclose the concern with the SSC. All efforts should be made to assure immediate safety and make sure any medical needs are addressed. SSC and/or Past Moderator will support complainant in connecting with a safety plan and community services (advocacy, sexual violence crisis center, therapy) to help meet identified needs (see item C below). If the Past Moderator is the person who is being accused of misconduct then the complainant shall disclose the concern to the Pastor of RMC. In the case where multiple people receive the disclosure of the abuse, for instance a Sunday School teacher, and the family of the Minor, both parties should follow the procedure included in item B (below). Any questions about who should file a complaint on the behalf of a Minor may be directed to the Past Moderator.
- b. When individuals wish to report abuse they will use the following email address to do so: pastmoderator@rainbowmennonite.org. This email account is confidential and is only monitored by the Past Moderator. Individuals should use the provided email address to state they have a concern and the Past Moderator will send them a form to fill out which should then be emailed back to the same account. The Past Moderator will acknowledge receipt of formal complaints within 24-48 hours. The form provided by RMC will include the following: 1) The name, address, and age of the Minor, the name(s) and address(es) of the Parents or Legal Guardians; 2) The name of the accused and the relationship to the complainant/survivor; 3) A description of the incident(s), including the date(s), location(s) and the presence of any witnesses; 4) The effect of the incident(s) on the complainant; 5) The names of other individuals who might have been subject to the same or similar complaint; 6) Any other information the complainant/survivor believes to be relevant to the complaint; 7) The report should be signed and dated by the parent/guardian of the complainant/survivor. Note: If the Minor is unable to provide the necessary information, it's recommended that no party continue to question or investigate further, instead utilize the Department of Children and Families for support-
www.dcf.ks.gov

- c. The Past Moderator or an appointed SSC member will immediately make a report to the 24-hour Department of Children and Families (DCF) Report Center (1-800-922-5330) or respective state equivalent. If the Minor has serious injuries or is in immediate danger call the Kansas City, Kansas Police Department or respective state authorities. In the event where the person disclosed to or who has suspicions is a mandated reporter, they will follow the procedure described in item B (above) and make their own report to DCF.
- d. The Past Moderator or an appointed SSC member will notify WDC Conference Minister (see h. above) that a report has been made as well as RMC's Insurance Carrier.
 - g. The Past Moderator and the SSC Chair will document the disclosure and any steps taken to support the victim, including notifying non-offending parents or legal guardian(s). Documents will be filed in a locked cabinet in the Pastor's office.
 - h. The SSC will appoint a Care Team member who will respond to the complainant/survivor's wellbeing as well as their non-accused family members. See Section II.A. Definitions. The complainant/survivor and/or their non-accused family or legal guardians have the right to refuse support from a Care Team.
 - i. The Pastor, along with members of the SSC will follow up with the person who made the report to acquire and clarify information as well as provide necessary pastoral care. The SSC Chair will document all information received about the reported or suspected abuse and actions taken by Employees, Interns or Short-Term Volunteers, and/or Congregants. The SSC will share this documentation with the WDC Conference Minister, the Deacon Chair, (if deemed necessary), as well as the non-offending Legal Guardian(s) of the victim. If one of these parties is an accused person, he or she shall be removed from the proceedings.
 - j. In addition, and in consultation with the respective Legal Guardian(s), appointed Care Team member(s) (if applicable), the SSC will discuss how and when to notify the accused of the allegation and how and when to assign a Care Team member (if applicable). The SSC will communicate with the accused's Care Team member(s) (when applicable).
 - k. If the accused is active in the church community, the SSC, in consultation with the complainant/survivor's Care Team member(s) (if applicable) and non-accused Legal Guardian(s), reserve the right to immediately suspend the accused's church voluntary assignment/duties.
 - l. Unless there is concern about interfering with DCF investigations/process, the SSC reserves the right to inform Congregants of the allegation/complaint and make an open call for other complainants to come forward.
 - m. If the SSC determines church-wide disclosure of substantiated abuse is warranted, while the Legal Guardian(s) requests to keep the information about abuse confidential, the SSC will consult with a third party organization and/or the WDC Conference Minister or legal counsel to determine the best course of action.

- n. Upon completion of DCF investigation, no matter the results, the SSC will determine next steps regarding communication with the Deacons, Church Council, Employees, Interns or Short-Term Volunteers, or Congregants, including disclosure of substantiated abuse.
- o. Throughout the DCF investigation and afterwards, no matter the results, the SSC, and the Deacons as appropriate, will attend to the dynamics that prompted the allegations and carefully consider the degree to which individuals involved need to remain separated and/or seek additional help. In addition, the SSC, and the Deacons as appropriate, will pay attention to the need for healing/processing by the faith community itself (informational meetings, circle processes, etc.)
- p. If credible allegations of abuse are substantiated, and the Offender desires to remain part of the church, the SSC, in consultation with the victim's Legal Guardian(s), the Deacons, and the WDC Conference Minister, will ask the Offender to sign a Limited Access Agreement. See Appendix D. See Church Constitution Article IV, C *Discipline and Restoration* for situations where terminating a Congregant's membership is discussed.
- q. If abuse is not substantiated by DCF, the SSC will attend to the dynamics that prompted the allegations and carefully consider the degree to which individuals involved need to remain separated and/or seek additional help.

C. For cases of suspected abuse where the complainant/survivor is 18 years or older. Please see D. below for procedure if the report of abuse involves RMC employees.

The following steps will be taken unless there is a special situation in which the complainant/survivor, Care Team member or External Advocate (if applicable), the SSC, and an outside professional resource agree a different plan should be followed.

- a. The complainant/survivor or the person who received the disclosure of abuse (Past Moderator) will, with complainant/survivor's permission (documented preferably), disclose concern with the SSC. All efforts should be made to assure immediate safety and make sure any medical needs are addressed. SSC and/or Past Moderator will support complainant in connecting with a safety plan and community services (advocacy, sexual violence crisis center, therapy) to help meet identified needs. If the Past Moderator is the person who is being accused of misconduct then the complainant shall disclose the concern to the Pastor of RMC.
- b. When individuals wish to report abuse they will use the following email address to do so: pastmoderator@rainbowmennonite.org The email account is confidential and is only monitored by the Past Moderator. Individuals should use the provided email address to state they have a concern and the Past Moderator will send them a form to fill out which should then be emailed back to the same account. The Past Moderator will acknowledge receipt of formal complaints within 24-48

hours. The form provided by RMC will include the following: 1) The name of person or persons involved; 2) A description of the incident(s), including the date(s), location(s) and the presence of any witnesses; 3) The effect of the incident(s) on the complainant; 4) The names of other individuals who might have been subject to the same or similar complaint; 5) Any other information the complainant/survivor believes to be relevant to the complaint; 6) The report should be signed and dated by the complainant/survivor.

- c. Adult complainants/survivors will choose whether or not to involve law enforcement. In the case that the abuse involves a Vulnerable Adult, it will be reported to the DCF Report Center (1-800-922-5330) and/or call Kansas City, Kansas Police, or respective state authorities/equivalents. Website: www.dcf.ks.gov
- d. The SSC Chair will document the disclosure and any steps taken to support the individual. Documentation will be filed in a locked cabinet in the (non-accused) Pastor's office.
- e. The SSC will appoint a Care Team member who will respond to the complainant/survivor's wellbeing. Complainants/survivors have the right to refuse support from the Care Team. See Section II.A. Definitions.
- f. The SSC will determine if and when to notify the WDC Conference Minister of the situation, as well as third party consultation.
- g. When and how to notify the accused of the allegation depends on the situation, the wishes of the complainant/survivor, and what risks that poses for the complainant/survivor. If and when the SSC or an outside entity (if assigned) determines it is safe to do so, the accused will be notified and assigned a Contact Person within the congregation regarding requests and questions that may arise.
- h. Regarding any kind of investigation, the complainant/survivor and their Care Team should be consulted with and informed of the steps taken by the church related to their concern. An investigation may include interviews of the complainant/survivor, accused, potential witnesses, and/or other pertinent individuals. Factors regarding confidentiality will be addressed throughout the process.
- i. The SSC will coordinate with other congregational and community resources as needed to assure that ongoing care is provided for others affected by the concern.
- j. The SSC reserves the right to inform the church community that allegations (keeping the complainant confidential) have been made and reported, inviting others to report abuse by the accused individual.

- k. Upon conclusion of the investigation, the SSC will make sure the complainant/survivor and the Care Team knows of the investigation results before reporting to other bodies.
- l. While a complainant's/survivor's requests should always be respected and prioritized, there may be times when the community's need for safety overrides the request for non-disclosure. If the SSC determines church-wide disclosure of substantiated abuse is warranted while the complainant/survivor requests to keep the information about abuse confidential, the SSC will consult with a third party organization and/or the WDC Conference Minister or legal counsel to determine best course of action.
- m. As necessary, the SSC will appoint an RMC Spokesperson who is assigned to communicate with and respond to inquiries into the situation such as from media or other internal or external entities.
- n. If credible allegations of abuse are substantiated and the offender desires to remain part of the church, the SSC will consult with and consider the request of the victim/survivor regarding the abuser's ongoing participation in the church. In consultation with the Deacons and the WDC Conference Minister, the SCC will ask the offender to sign a Limited Access Agreement. See Appendix D.
- o. See Church Constitution Article IV, C *Discipline and Restoration* for situations where terminating someone's church membership is discussed.

D. The following are special considerations in addition to the age-specific processes outlined above when the report of abuse involves an RMC employee.

- a. In the event of alleged abuse on the part of a non-credentialed employee, the SSC will immediately inform the Personnel Committee. The Personnel Committee, with consultation from the SSC and the WDC Conference Minister (and third party counsel if applicable), will determine if immediate suspension (paid or unpaid) is needed and how to communicate that to the Employee, as well as how and when to make an appropriate announcement to others in the church regarding the allegation and/or immediate suspension.
- b. The Personnel Committee, with consultation from The SSC and WDC Conference Minister (and third party counsel if applicable) will then take the lead in ensuring steps in this policy are followed, including assigning an appointed designee to be in direct communication with the Employee during the process.
- c. In the event of alleged abuse on the part of a credentialed Employee, the SSC will immediately inform the Deacons. The Deacons, with consultation from the SSC and the WDC Conference Minister (and third party counsel if applicable) will determine if immediate suspension (paid or unpaid) is needed and how to communicate that to the minister, as well as how and when to make an

appropriate announcement to others in the church regarding the allegation and/or immediate suspension.

- d. The Deacons, with consultation from the SSC and the WDC Conference Minister (and third party counsel if applicable) will then take the lead in ensuring steps in this policy are followed.
- e. Note: RMC has adopted the sexual misconduct policies of Mennonite Church USA for credentialed ministers. All credentialed ministers hired by RMC will be made aware of this policy prior to beginning their duties. For more information, see Ministerial Sexual Misconduct Policy and Procedure of Mennonite Church USA, available on the WDC or MC USA websites.
<http://mennoniteusa.org/resource/sexual-misconduct>
- f. See Church Constitution Article VI, *Removal from Office 2: Pastor*
- g. All employment decisions will be determined up to and including termination based on Kansas employment laws. Therefore, seeking legal counsel is strongly advised.
- h. The RMC Personnel Committee oversees all non-abuse related concerns and grievances whether from the perspective of an Employee who has concerns about their work environment or for those in the congregation who have concerns about the Employee's performance on the job. RMC Church Constitution Article V, Standing Committees: Personnel Committee
- i. In the event an Employee files a report of abuse:
 1. For a non-credentialed Employee who wishes to file a concern/report of abuse: The Employee will submit an initial report to the Personnel Committee. Upon review, the Personnel Committee will consult with SSC as well as the WDC Conference Minister if deemed necessary.
 2. For a credentialed minister who wishes to file a concern/report of abuse: The credentialed minister will submit an initial report to the Deacons. Upon review, the Deacons will consult with the SSC, as well as the WDC Conference Minister. The Personnel Committee may also be called upon to assist. In situations where the minister feels it is safest to first report to the WDC Conference Minister, he or she is encouraged to do so.

E. Special considerations when concerns or report of abuse involve Renter(s), Vendor(s)/ Community Visitor(s), or Event-Based Visitor(s):

- a. The SSC (or the Personnel Committee and/or the Deacons if it involves Employees) will seek to understand and document the concern and determine next steps which may include reporting concern to state authorities (police), discussing

matter with the Vendor or the Vendor's Supervisor(s), or other avenues that can help address the concern.

- b. If a concern or report of suspected abuse involves a Renter, the SSC, in consultation with the Church Council, may alter, suspend, or terminate the rental agreement. As noted in Section I. D. Applicability Renter(s) are required to give signed acknowledgment that they have received and read this policy prior to their occupancy. If reports of suspected abuse are disclosed by a Renter(s), Vendor(s)/Community Visitor(s), or Event-Based Visitor(s) involving an RMC Employee, Intern or Short-Term Volunteer, or Congregant, the SSC (or the Personnel Committee or the Deacons if an Employee) will follow the Action Plan outlined in this policy unless there is a special situation in which the complainant/survivor, the SSC, and an outside professional resource (if needed) agree a different plan should be followed.

F. When RMC leaders receive a concern regarding a person who may pose a safety risk (due to current/historical alleged abusive behavior) to RMC, and who is participating or wishes to participate at RMC as an Intern/Short-Term Volunteer, or Congregant

- a. The Deacons will work with the SSC to respond to the situation. This will include consulting with the WDC Conference Minister and if determined necessary, a third party organization (e.g. an independent survivor network).
- b. Depending on the nature of risk, the Offender(s) may be required to sign a Limited Access Agreement. Such an agreement will be required in all cases that involve an Offender sexually abusing a Minor.
- c. The Limited Access Agreement provided (Appendix D) is considered the baseline for such a document. Further restrictions may be added.
 - i. This may include whether further church attendance/participation is possible.
 - ii. Supervision by an adult not related to the Offender while in church facility or attending church activities.
 - iii. Limitation related to specific responsibilities, activities, areas of church building.
 - iv. Support for the Offender(s) to move toward positive change, implementation and who monitors and reviews non-compliance.
 - v. If the Offender does not agree to sign a Limited Access Agreement and/or if it is known that the Offender will attend or is attending another congregation, a designated SSC member will contact and inform that congregation of the situation and nature of the abuse.

G. Maintaining Security of Records

- a. Records required for this policy include Volunteer forms (Volunteer Registration and Abuse Prevention Covenant) and background check forms. These records shall be organized by last name and kept in manila file folders in a locked file cabinet in the pastor's office.
- b. Any records related to reports of incidents or complaints will be kept in a separate file folder at the back of the locked file cabinet.
- c. The file cabinet will be locked at all times except during the access times for filing or retrieving records. In addition, the pastor's office is locked at those times when the Pastor is not in.
- d. Individuals with access to the key for the records may include the SSC Chair, Director of Faith Formation and Congregational Life, Deacon Chair, and Personnel Committee Chair.
- e. When materials are accessed, the record of entry should be noted on the manila file folder with the date of access.
- f. Volunteer Registration Form records will be kept as long as the registrant is participating in the life of the church and five years thereafter.
- g. Employee records are kept separately in a locked file cabinet in the Pastor's office, accessible by the Pastor and the Personnel Committee Chair; and maintained in accordance with EEOC and applicable federal laws. All Employee records are maintained securely seven years after termination of employment.
- h. Any record of incident or complaint will be kept as long as the person making the complaint is participating in the life of the church or as long as the accused party is either a part of the life of the church or living in the metropolitan area— whichever is longer— and five years thereafter.
- i. When records or materials are destroyed they should be shredded.

IV. APPENDICES AND FORMS

A. RMC Volunteer Registration Form

Name: _____

Address: _____

Home phone: _____ Cell phone: _____

Are you above the age of 18? Yes _____ No _____

Occupation (If Applicable): _____

Employer (If Applicable): _____

What volunteer role are you primarily registering for? _____

Why would you like to volunteer as a worker with Minors?

What qualities do you have that would help you work with Minors?

Have you ever been charged, convicted of, or pled guilty to a crime, either a misdemeanor or a felony (including, but not limited to drug related charges, child abuse, other crimes of violence, or theft)? _____ No _____ Yes

If yes, please explain fully: _____

Have you ever been involved with an incident of abuse or neglect that would impact your ability to follow this policy and guidelines? _____ No _____ Yes

If yes, please explain: _____

B. Abuse Prevention Covenant

Rainbow Mennonite Church is committed to providing a safe and secure environment for all who participate in ministries and activities sponsored by the church. The following policy statements reflect our congregation’s commitment to preserving this church as a holy place of safety and protection for all who would enter and as a place in which all people can experience the love of God through healthy relationships with others.

Please answer each of the following questions by circling your response:

1. As a Volunteer / Employee in this congregation, do you agree to observe and abide by RMC’s Abuse Prevention Policy? yes no

2. As a Volunteer / Employee in this congregation, do you agree to observe the Two Adult guideline at all times (as outlined in Abuse Prevention Policy)? yes no

3. As a Volunteer / Employee in this congregation, do you agree to promptly report abusive or inappropriate behavior to RMC Safe Sanctuary Committee? yes no

4. As a Volunteer / Employee of this congregation, do you agree to inform the pastor (before beginning your assignment) if you have ever been convicted of child abuse? yes no

5. As a Volunteer/Employee of this congregation, do you agree to complete a background authorization form when and if requested, understanding that failure to complete a background authorization form when requested could result in immediate suspension/and or termination of duties or position? yes no

I have read and agree to observe and abide by the Abuse Prevention Policy, and I agree to observe and abide by the policies set forth above.

Your Signature

Date

Print Full Name

E. Rainbow Mennonite Digital Communication Guidelines

The online community of Rainbow Mennonite Church should be open, transparent, and safe for all users. The following best practices and guidelines hopefully clarify how we best embrace digital communications.

Website

1. The Church Administrator, Pastor, and related committees will write copy, select graphics, locate suitable links, and provide assistance to users of the site.
2. The Church Administrator will train and assist Employees who wish to upload content.
3. The Church Administrator and our website developer, Flint Hills Design, ensure that the website, website pages, and all links function properly.
4. The Church Administrator ensures the website meets the need of visitors, members, and friends of the Church and works with the developer to expand usage of the site.
5. Information from church bulletin will be added to the site. Church newsnotes will be edited to exclude members' personal information such as: contact information, hospitalizations, health concerns, and other private matters.
6. Photos of members, including children, will be used unless the members have notified the Church Administrator that they would not like their photo used publicly. In captions, only first names will be used and all names of Minors will be omitted. A reminder of the opt-out option will be included in the newsnotes one Sunday in January.
7. Staff will determine change of password frequency.

Other Social Media (blogs, Facebook, etc)

Administrators

The Church Administrator and Lead Pastor are responsible for maintaining and updating Rainbow Mennonite Church's social media including: Facebook, Pastoral blog, etc. No Rainbow social media sites are to be created by individuals not employed or contracted by Rainbow Mennonite Church without the prior conversation with staff and Church Council.

Content

The content of these social media sites will represent the current and upcoming events of the, news, and commentary related to Rainbow Mennonite Church and will be reflective of the church mission statement.

Reposting information

Information will be reposted from organizations and links that are in line with congregational goals.

Tagging

If you would prefer not to be tagged, please let the church office know.

This policy will be continually evaluated and reminders of the policy will be sent to the congregation at least once a year.

The Personnel Committee will consider a separate policy concerning staff personal social media presence.

F. Reporting Abuse Form

Rainbow Mennonite Church strives to be a caring and supportive church community whereby we minister to one another in ways that help all feel welcomed, a sense of belonging, cared for, and safe. Reports of abuse, neglect, and harassment will be taken seriously and addressed. All reports of abuse should be sent to pastmoderator@rainbowmennonite.org. This email is confidential and is only monitored by the Past Moderator. If you wish to know the name or mailing address (in case you wish to submit a hard copy) of the current Past Moderator before submitting this report, contact the church office at office@rainbowmennonite.org or 913.236.8820. This Reporting Abuse Form is also available on the church website: www.rainbowmennonite.org

Today's date:

Your name:

Are you self-reporting or are you reporting on behalf of someone else?

If you are reporting on behalf of someone else, please include that person's name.

If you are reporting on behalf of someone else, are they aware that you are reporting this?

If you are reporting on behalf of someone else, are they a Minor (under the age of 18)?

Please include a description of the incident(s) including the name(s), date(s), location(s), and presence of witnesses. If you are comfortable, please share about the impact on you (if self-reporting) or on the person you are reporting on behalf of.

Are you concerned about other individuals who might have been subject to the same or similar complaint/incident?

If yes, please describe:

Do you believe that you or the affected individual may be in immediate danger or require immediate action or medical attention?

If yes, please describe:

Are there other people with whom you have shared this that you want RMC to be aware of?

Please feel free to add any other information that is important to you to share:

Your Signature