

CHILD PROTECTION POLICY
BROADMOOR BAPTIST CHURCH

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1 PURPOSE

1.1 General policy:

- 1.1.1 It is the policy of Broadmoor Baptist Church ("Broadmoor ") to provide a safe environment for all minors participating in activities sanctioned by Broadmoor. All ministers, staff, volunteers and members who supervise minors at any Broadmoor sanctioned activity are required to abide by this policy, which finds its basis, in large part, from Scripture and the Broadmoor Mission Statement.
- 1.1.2 As explained more fully below, any person who believes this policy has been violated should report immediately such suspected violation to the Executive Pastor(s) or a member of Church Council.
- 1.1.3 As used in this policy, minor includes any person under the age of 18 or any person over the age of 18 who remains under the legal care and guardianship of an adult specifically including any special needs individuals.

1.2 General purpose:

- 1.2.1 The purpose of this policy is to provide a safe and spiritually nurturing environment for minors associated with the ministries of Broadmoor.

2 COMPLIANCE REVIEW

2.1 Compliance Team Structure:

- 2.1.1 Church Council shall annually appoint a team comprised of not less than five Broadmoor members for the implementation, compliance, and review of this policy.
- 2.1.2 The team will meet at least twice a year.

2.2 Compliance Team Purpose:

- 2.2.1 Make recommendations to Church Council for updates to training materials for all employees and volunteers, as related to the protection of minors.
- 2.2.2 Review ministry area and volunteer implementation and compliance with this policy.
- 2.2.3 Make recommendations to Church Council for revisions or modifications to this policy.

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3 APPLICATION

3.1 General Application

- 3.1.1 This policy supersedes any previous Child/Minor Protection policies, written or otherwise communicated, except for provisions contained in Broadmoor's Personnel Policy Manual (a copy of which is available on Broadmoor's website: Broadmoor.org/documents). If there is a conflict between these policies, the terms and provisions of the Personnel Policy Manual will govern. This policy extends to any Broadmoor sanctioned activity. A sanctioned activity is defined as any and all activities, events, meetings or gatherings planned by Broadmoor staff or lay-leadership for the purpose of furthering Broadmoor's mission where minors are supervised by an Adult Leader other than their parent or legal guardian regardless of location. A sanctioned activity officially begins at check-in for the activity. A sanctioned activity does not include picking up or dropping off of a minor at a Broadmoor activity by a parent, legal guardian, parent-designee or peer that has a valid driver's license. Provided, however, all transportation to or from the location(s) following the start of registration or activity (including a series of activities) is considered part of the sanctioned activity and must be approved by the supervising ministry director and be in compliance with the transportation polices below. For purposes of this policy, "supervising ministry director" shall mean the minister who is in charge of or directs the various ministries relating to minors – currently High School, Middle School, Children and Preschool ministries (Next Gen); also including Grace Ministry and Parent Day Out.
- 3.1.2 This policy applies to all people (regardless of age, status or training) who provide supervision to minors at Broadmoor sanctioned activities.
- 3.1.3 This policy is not exhaustive and cannot address all situations. Any questions regarding the applicability of this policy should be directed to the Executive Pastor(s). Broadmoor's Mission Statement and guiding Biblical principles should guide decisions in the absence of applicable written policy. Broadmoor's Mission Statement is: "We are church committed to following Jesus, being changed by Jesus, and joining Him in His mission to make disciples."

3.2 Special Needs:

- 3.2.1 Ministries that affect people with special needs will use this policy as a guideline for establishing protocols and broaden the term minor to include all persons dependent on care beyond that they are able to give to themselves.

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4 PERSONNEL

4.1 Broadmoor Employees.

4.1.1 All Broadmoor employees will complete an on-boarding process that includes an application, an interview, a national background check, and a reference check.

4.2 Adult leaders.

4.2.1 An “Adult Leader” is any minister, member, employee or volunteer 18 years or older who serves in any capacity as a supervisor of minors at a Broadmoor activity.

4.2.2 Adult Leaders will complete an on-boarding process that includes: application, interview, national background check, reference check and completion of training including child abuse awareness.

4.3 Minor staff

4.3.1 Minors who are 13 years of age and older can apply to serve in approved preschool or children ministry activities either as a part-time employee or volunteer (“minor staff”). The application process will include completion of the application, an interview, and approved training that will include child abuse awareness. If a minor (13 years of age or older) is not sufficiently mature to respond appropriately to the training, he or she is probably not suitable to supervise younger minors.

4.3.2 Parents have the following options to help their minors complete this training:

4.3.2.1 The parent/guardian can watch the child abuse awareness training before his or her minor views the training;

4.3.2.2 The parent/guardian and minor can watch the training together, using the training as a teachable moment to discuss child sexual abuse; or

4.3.2.3 The supervising ministry director shall receive written parent/guardian authorization before sending training directly to a minor part-time employee or volunteer.

4.4 Training

4.4.1 All employees, minor staff and Adult Leaders will complete training as applicable for their role as an employee or volunteer which shall include a child abuse awareness module as approved by Church Council.

4.4.2 Adult Leaders in place at the implementation of this policy will complete both the Next-Gen application and the applicable training including child abuse awareness and any other specified training no later than one month after the formal adoption of this policy.

5 FACILITIES

5.1 Facilities Definition:

5.1.1 Include, but are not limited to, all buildings, grounds, vehicles or other structures owned, leased or used by Broadmoor or an Adult Leader to facilitate any and all sanctioned activities.

5.2 Use of Facilities:

5.2.1 Where possible and practical activity organizers will make reasonable efforts to provide that access to the portion of any facility used is limited to participants and support personnel of the activity.

5.2.2 Activity organizers should make reasonable efforts to keep the minors in their charge within confines of the assigned activity space.

5.2.3 When activities are held in rooms inside a facility:

5.2.3.1 Activity organizers should make reasonable efforts to choose rooms that are: located in an area of the facility that affords the most practical opportunity for inspection by other adult leaders or assigned monitors with adequate lighting and minimal areas or corridors with restricted or obstructed view lines.

5.2.4 Facilities on Broadmoor's campus are fitted with a transparent window that allows an unobstructed view of a reasonable portion of the room. If windows are not available, activity organizers should provide that doors are left open sufficient to allow a visual inspection by other Adult Leaders or monitors.

5.2.5 Adult Leaders assigned to specific rooms should as much as practical position themselves in an area of the room that is easily seen from the window or door, can easily observe the minors and reduce or eliminate any restricted or obstructed view lines.

5.2.6 If minors move from one space to another during a Broadmoor activity, minors must be supervised by an Adult Leader during movement from one space to another. The only exception to this may include transportation during an activity that complies with the transportation policies below.

5.2.7 After every activity, the activity monitor and/or Adult Leader should check every room, area and restroom prior to leaving to ensure no minor is left behind or isolated.

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6 PRACTICES

6.1 Adult Leader Conduct:

6.1.1 All Adult Leaders should conduct themselves in a way that reflects appropriate physical, emotional, and spiritual care and concern for minors. Child abuse, sexual abuse, physical abuse, neglect and verbal abuse are strictly prohibited.

6.2 Protection from Abuse:

6.2.1 Child abuse of a minor means to allow or cause a minor to be subjected to sexual abuse, sexual exploitation, emotional abuse, mental injury, non-accidental physical injury or other maltreatment.

6.2.2 Sexual Abuse of a Minor is defined as violent or non-violent criminal act(s) that involve(s) a minor in sexual behavior including but not limited to sexual intercourse, oral sex or deviant sexual intercourse regardless of consent, touching of a minor's sexual or other intimate parts for the purpose of gratifying the sexual desire of either party, penetration of a minor, exposure of sexual parts, sexually provocative verbal or scripted communication, exposure to or participation in pornographic material, prostitution, or allowing a minor to witness a sexual activity.

6.2.3 Physical Abuse includes but is not limited to hitting, kicking, slapping, cutting, forceable shaking, shackling or restraining, or striking another. Broadmoor Adult Leaders will not use physical discipline (corporal punishment) in any manner. In limited exigent circumstances, reasonable physical intervention may be used by an Adult Leader where:

6.2.3.1 physical force is necessary to prevent injury in emergency situations; or

6.2.3.2 appropriate physical force consistent with training and experience is used within the Special Needs ministry to ensure the safety and well-being of individuals served by that ministry.

6.2.4 Verbal abuse is language directed toward a minor that is unwelcome, threatening, offensive, embarrassing, degrading, hostile, or diminishing. Examples include: name calling, belittling, destroying the minor's possessions, rejecting or isolating a minor. Adult Leaders should use clear instruction and positive reinforcement when engaging with minors.

6.2.5 Neglect means not meeting the basic needs of the minor, including, medical, lack of supervision, inadequate clothing and hygiene, lack of nutrition or inadequate shelter.

6.2.6 Duty to Act: Adult Leaders should make reasonable attempts to stop abuse that they witness at any and all Broadmoor activities. Duty to act also includes Adult

Leaders timely and properly reporting any fact, situation or suspicion of any form of abuse of a minor.

6.3 Reporting and Documentation:

- 6.3.1 Broadmoor requires all Adult Leaders to report immediately any fact, situation or suspicion of any form of abuse of a minor to the supervising ministry director and/or Executive Pastor(s), who shall ensure that the matter is reviewed and investigated and where appropriate or required by state law reported to the Mississippi Department of Child Protection Services and/or the Mississippi State Department of Health.
- 6.3.2 Broadmoor strongly encourages and asks that all parents/legal guardians and participants in any Broadmoor activities to report immediately any fact, situation or suspicion of any form of abuse of a minor to the supervising ministry director and/or Executive Pastor(s), who shall ensure that the matter is reviewed and investigated and where appropriate or required by state law reported to the Mississippi Department of Child Protection Services and/or the Mississippi State Department of Health.
- 6.3.3 Broadmoor shall require a written report be timely prepared and signed by the Adult Leader which documents the basis for the fact, situation or suspicion of any form of abuse of a minor in reasonable detail.
- 6.3.4 All Broadmoor leadership should be aware that abuse can and does occur at a peer-to-peer level. The duties to act and report listed above apply in cases of questionable peer-to-peer interactions or peer-to-peer abuse. All Adult Leaders must be diligent in their supervision and oversight with respect to any fact, situation or suspicion of any form of abuse of a minor by, between or among peers or peer groups.

6.4 Two-Adult Rule:

- 6.4.1 Adult Leaders will make reasonable efforts to ensure that during activities one adult is not left alone with a minor or minors. During Broadmoor sanctioned activities, two approved Adult Leaders are expected to provide supervision at all times.
- 6.4.2 If two Adult Leaders are related to one another as a spouse or minor of the Adult Leader, a third unrelated Adult Leader must be present and assist in supervising the sanctioned activity. In other words, a husband and wife equal one Adult Leader for purposes of this policy.
- 6.4.3 Adult Leaders must avoid being alone with an individual minor in any room or during any ministry program or activity. If one supervising adult must leave a group, another volunteer or employee must be notified so that the Two Adult Rule can be followed.

6.4.4 If an unusual circumstance occurs and you find yourself alone with a minor, take the individual to a room or building occupied by others, or to a location easily observed by others. Example: if a minor 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.

6.4.5 Limited one-to-one meeting exception:

6.4.5.1 If circumstances present that prohibit the application of Two-Adult Rule, the supervising ministry director may (but is not required to) authorize the activity to continue if the following conditions are met. Adult Leaders, including staff members and other volunteers, must observe the following guidelines when interacting one-to-one with a minor:

6.4.5.1.1 Adult Leaders must conduct one-to-one meetings with a minor at a time when others are present and where interactions can be easily observed, unless prior written approval is obtained from the parents. Reasonable efforts will be made to have two Adult Leaders present and/or observing. The first preference is to have two Adult Leaders present at all times.

6.4.5.1.2 If only one Adult Leader is available, at least two minors must be present neither of which are related to the Adult Leaders. This is the preference if only one Adult Leader will be engaged in the discussion with a minor.

6.4.5.1.3 In all activities that do not satisfy the Two Adult Rule, Adult Leaders must first notify the other Adult Leaders of the need for the one-to-one activity prior to meeting with the minor(s). Any such activity/meeting must be conducted in a highly-trafficked public place and situate themselves conspicuously in order to reduce or eliminate any restricted or obstructed view lines where other adults can easily observe the activity. If in a room, doors to the specific activity must remain open and other unrelated adults must be present where interactions can be easily observed.

6.5 Activity Monitor:

6.5.1 When more than one group is meeting in a single facility the activity organizer should provide that an Adult Leader is assigned as an activity monitor (i.e., floater). This person should remain conspicuous in the vicinity of the groups and make random non-intrusive inspections of the groups that help ensure compliance with this policy.

6.6 Off-site activities:

6.6.1 Informing/Communicating with Parents/Guardians: Activity organizers should secure written consent from a minor's custodial parent or legal guardian for a minor to attend an off-campus activity (such consent may apply to multiple activities but should be renewed annually).

6.7 Transportation:

6.7.1 An activity officially begins at check-in for the activity and ends at completion or check-out for the activity. Transportation to the activity before it begins and after completion of the activity is not part of the official activity.

6.7.2 All transportation to the location following the start of registration is part of the activity and must be approved by the supervising ministry director.

6.7.3 Adult Leaders may from time to time be in a position to provide transportation for a minor. If the transportation of a minor includes transporting to or from a Broadmoor sanctioned activity which is otherwise not part of or outside of the sanctioned activity, such Adult Leader shall obtain the prior permission of the minor's parents and avoid one-to-one transportation by including other minors or adults in the vehicle at all times during said transportation.

6.7.4 The following guidelines should be strictly observed when anyone is involved in the transportation of a minor during a Broadmoor sanctioned activity:

6.7.4.1 A minor should never be transported without parental permission.

6.7.4.2 If personal vehicles must be used, drivers must have personal insurance and be the driver of those vehicles.

6.7.4.3 The Two-Adult Rule applies to transportation.

6.7.4.4 When transportation is involved as part of a Broadmoor sanctioned activity, the supervising minister director may approve a lone adult to drive an automobile when at least two minors are also in the automobile who are unrelated to the lone adult. Note: Nothing in the policy allows for an adult in any situation to drive an automobile when there is only one minor passenger.

6.7.5 In connection with the transportation of minors, no one under the age of 25 should use or drive: (i) a vehicle belonging to Broadmoor or an Adult Leader,

staff member or other volunteer (other than their own personal vehicle), or (ii) a rented vehicle. In connection with the transportation of minors, no one under the age of 21 should use or drive a vehicle belonging to Broadmoor.

- 6.7.6 Documentation of parental/guardian permission is required for minors (aged 16-18) to drive themselves from the church to/from an off-site activity and/or transport additional minors to/from church activities.
 - 6.7.6.1 For any situations that fall outside of these parameters, parental/guardian written permission is required.
 - 6.7.6.2 All drivers must have a copy of their driver's license on file at the church office prior to driving.
 - 6.7.6.3 Drivers should sign the volunteer driver form prior to transporting a minor during a Broadmoor sanctioned activity.
- 6.7.7 A minor should be transported directly to their destination. No unauthorized stops should be made.
- 6.7.8 At no time should an adult sit alone beside a minor in a vehicle.
- 6.7.9 Adult Leaders, staff and other volunteers should avoid physical contact with a minor while in vehicles (only exception is buckling of an infant or small minor into an approved car seat). In transporting an infant or small child, the Adult Leaders, staff or volunteer must use a car seat or booster that meets the applicable state guidelines for transportation of minors.
- 6.7.10 No cell phones may be used by the driver while providing transportation of minors. In a limited situation and only if absolutely necessary, use of a hands-free cell phone may be permitted. No texting while driving in any situation. Drivers shall use reasonable efforts to avoid any type of unnecessary distractions while transporting minors.

6.8 Overnight Broadmoor Sanctioned Activities:

- 6.8.1 In certain situations, such as camps, Greater Weekend (formerly DNow) and retreats, the sanctioned activity may include overnight stays. The following guidelines should be strictly observed when anyone is involved in the overnight stay of a minor during a Broadmoor sanctioned activity.
- 6.8.2 A written permission / consent must be obtained from the custodian parent(s) or legal guardian.
- 6.8.3 The Two-Adult Rule applies to all aspects of the activity.
- 6.8.4 At no time should an adult be alone with a minor in any private situation, private accommodations or stay alone with a minor during any aspect of the activity. Nothing in the policy allows for an adult to be in any situation when there is only one minor present.
- 6.8.5 Adult Leaders, staff and other volunteers should avoid physical contact with a minor.

- 6.8.6 The Adult Leaders shall designate at least one adult of each gender to act as an Activity Monitor.
- 6.8.7 The Activity Monitor must provide for both regular and unscheduled check-ins as may be appropriate for the activity including room checks by Adult Leaders as appropriate.
- 6.8.8 Provide for two Adult Leaders of the same gender to monitor and sleep in rooms which contain minors. At least two of the minors staying in the room must be unrelated to one of the Adult Leaders. At no point should a room include minors and only one Adult Leader. If accommodations allow (such as a hotel) and parental consent contemplates such an arrangement, minors age 15-18 may stay in a room without a dedicated Adult Leader also staying in the room.
- 6.8.9 We recognize that the facilities applicable to any overnight activity will vary and that each location may have specific guidelines relating to minors. The supervising ministry director responsible for the overnight activity shall consider the location specific guidelines and shall make any necessary adjustments in a manner to maintain the health and safety of the minors. Any such accommodations or limitations shall be disclosed to the parents/guardian, the minors and the Adult Leaders participating in the activity before departure.

6.9 Communication with Minors:

- 6.9.1 Texting and other forms of electronic communication has become commonplace and is essential to communicating with minors. Broadmoor desires to promote a safe and healthy environment for texting and electronic communication with minors who participate in Broadmoor activities.
- 6.9.2 When communicating with minors in any form, Adult Leaders should not use any threatening, demeaning, harassing, abusive or sexually provocative language or tones of any type. Adult Leaders should not joke or communicate with minors in any way that might be construed as sexually suggestive.
- 6.9.3 Adult Leaders may not text, transmit or post in any manner any content that includes personal information of a minor without the prior written consent of the parents or legal guardian. Personal information includes a minor's name, phone number, e-mail address or photograph.
- 6.9.4 Adult Leaders and/or minor staff may not post, transmit, comment or like any content of a minor who is participating in Broadmoor activities in any form of social media (Twitter, Tik Tok, Snapchat, Facebook, etc.) in any way that might be construed as abusive, provocative or sexually suggestive in any manner.

6.10 Electronic Communication:

- 6.10.1 Every ministry at Broadmoor should encourage parents to check electronic communications of their minors regularly.

- 6.10.2 Adult Leaders should communicate with minors with the assumption that parents or guardians are monitoring.
- 6.10.3 Generally, if Adult Leaders use electronic communication with minors group messaging is strongly preferred. All group messaging and any other form of messaging should include at least one other Adult Leader.
- 6.10.4 Should Adult Leaders deem it necessary and appropriate to communicate with a minor individually they should only communicate with minors via text message and should include another Adult Leader to the extent possible. Individual texting with a minor is strongly discouraged.
- 6.10.5 Adult Leaders should not communicate with minors after 9:00 pm unless it is an emergency and any such communication must include another Adult Leader.
- 6.10.6 Adult Leaders should not communicate with a minor via video communication. Any video communication must be in a group setting with an open invitation to the entire group or a defined subset of the group which includes at least two Adult Leaders and one or more minors who are not related to the Adult Leaders. At least two Adult Leaders must be on the video communication at all times a minor is present, no exceptions.
- 6.10.7 All Broadmoor ministry social media accounts should have a minimum of two Adult Leaders with access to the account.
- 6.10.8 See also Sections 7.16 and 7.17 of Broadmoor's Personnel Policy Manual.

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