

SafeConduct™ Policy

*Coral Gables Congregational Church,
United Church of Christ*

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I. Statement of Policy

As a community of Christian faith, Coral Gables Congregational Church, United Church of Christ (GablesUCC), is committed to creating and maintaining programs, facilities and a community in which members, friends, Clergy, employees, and volunteers can worship, learn and work together in an atmosphere free from all forms of discrimination, harassment, exploitation or intimidation. The congregation of GablesUCC supports principles of SafeConduct, which include individual responsibility to fulfill the highest standards of personal conduct toward others and to lead and guide the congregation in fulfillment of the standards set by our Christian faith. GablesUCC strongly opposes and prohibits “sexual exploitation”, “sexual harassment” or any form of exploitation or abuse of others regardless of age, sex, sexual orientation, sexual identification or mental capacity. It is the intention of our congregation to affirmatively nurture good behavior, and to prevent and correct behavior that is contrary to this policy and, as necessary, discipline those persons who violate this policy.

Every member of the Congregation, whether “authorized clergy”, leader, lay staff, volunteer or parent, has a role to lead those who look to them individually for guidance, to monitor their behavior and redirect them as they cross boundaries of SafeConduct. Our congregation shall nurture good conduct as demonstrated by personal behaviors that are consistent with our Christian values.

II. General Definitions

1. Physical abuse is injury that is intentionally inflicted.
2. Sexual abuse is any contact of a sexual nature that occurs between a youth and an adult or between two youth. This includes any activity which is meant to arouse or gratify the sexual desires of the adult or the other youth.
3. Emotional abuse is mental or emotional injury to a youth that results in an observable and material impairment in the youth's growth, development, or psychological functioning.
4. Neglect is the failure to provide for a youth's basic needs or the failure to protect a youth from harm.
5. A Youth or Child is anyone under the age of 18.
6. A Vulnerable Adult is anyone aged 18 or over, who is or may be in need of community care services by reason of mental or other disability, age, or illness, and who is or may be unable to take care of him or herself, or unable to protect him or herself against significant harm or exploitation.
7. Mandatory Reporters are those persons required under Florida Statute to report suspected abuse to police or child welfare agencies.
 - Any person who knows, or has reasonable cause to suspect, that a child is abused, abandoned, or neglected by a parent, legal custodian, caregiver, or other person responsible for the child's welfare is a mandatory reporter. §39.201(1)(a), Florida Statutes.
 - Any person, including but not limited to state, county, or municipal criminal justice employees or law enforcement officers, who knows or has reasonable cause to suspect that a vulnerable adult has been or is being abused, neglected, or exploited must make a report. §415.1034(a), Florida Statutes.
8. Authorized Clergy includes any person who is admitted to ministry by the United Church of Christ, who serves the congregation in any capacity whether called as pastor or serving in a retired, emeritus, administrative, or volunteer capacity.
9. Electronic Meetings include any meeting on an electronic meeting platform, like ZOOM. This would include meetings where more than one youth are present like Sunday School or Youth Group as well as any one-on-one mentoring.

III. Code of Conduct with Youth and Children (Youth)

GablesUCC provides our youth with the highest quality services available. We are committed to creating an environment for youth that is safe, nurturing, empowering, and that promotes growth and success.

No form of abuse will be tolerated, and confirmed abuse will result in immediate dismissal from GablesUCC. All reports of suspicious or inappropriate behavior with youth or allegation of abuse will be taken seriously. GablesUCC will fully cooperate with authorities if allegations of abuse are made that require investigation.

The Code of Conduct with Youth and Children outlines specific expectations of the Clergy, employees, and volunteers as we strive to accomplish our mission together.

1. Youth will be treated with respect at all times.
2. Youth will be treated fairly regardless of age, race, sex, sexual orientation, or religion.
3. Clergy, employees, and volunteers will adhere to uniform standards of displaying affection as outlined by GablesUCC.
4. Clergy, employees, and volunteers will avoid affection with youth that cannot be observed by others.
5. Clergy, employees, and volunteers will adhere to uniform standards of appropriate and inappropriate verbal interactions as outlined by GablesUCC.
6. Clergy, employees, and volunteers will not stare at or comment on youth bodies.
7. Clergy, employees, and volunteers will not date or become romantically involved with youth.
8. Clergy, employees, and volunteers will not use or be under the influence of alcohol or illegal drugs in the presence of youth.
9. Clergy, employees, and volunteers will not have sexually oriented materials, including printed or online pornography, on GablesUCC's property or visible during any online youth activity.
10. Clergy, employees, and volunteers will not have secrets with youth and will only give gifts with prior permission.
11. Clergy, employees, and volunteers will comply with GablesUCC's policies regarding interactions with youth outside of our programs.
12. Clergy, employees, and volunteers will not engage in inappropriate electronic communication with youth or engage in inappropriate behavior while on an electronic meeting platform.
13. Clergy, employees, and volunteers are prohibited from working one-on-one with youth in a private setting. Clergy, employees, and volunteers will use common areas when working with individual youth.
14. Clergy, employees, and volunteers are prohibited from working one-on-one with youth on an electronic meeting platform unless a) a parent or guardian is present with the youth or b) a parent or guardian has given written permission to clergy or person in charge of program. The supervisor and parent or guardian retain the right to visit the meeting at any time.
15. Clergy, employees, and volunteers will not abuse youth in anyway including (but not limited to) the following:
 - Physical abuse:* hitting, spanking, shaking, slapping, unnecessary restraints;
 - Verbal abuse:* degrading, threatening, cursing;
 - Sexual abuse:* inappropriate touching, exposing oneself, sexually oriented conversations;
 - Mental abuse:* shaming, humiliation, cruelty; and
 - Neglect:* withholding food, water, shelter
16. GablesUCC will not tolerate the mistreatment or abuse of one youth by another youth. In addition, GablesUCC will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, we will take steps needed to eliminate such behavior.

Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength. Bullying can take on various forms, including:

- a. *Physical bullying* – when one person engages in physical force against another person, such as by hitting, punching, pushing, kicking, pinching, or restraining another.
- b. *Verbal bullying* – when someone uses their words to hurt another, such as by belittling or calling another hurtful names.
- c. *Nonverbal or relational bullying* – when one person manipulates a relationship or desired relationship to harm another person. This includes social exclusion, friendship manipulation, or gossip. This type of bullying also includes intimidating another person by using gestures.
- d. *Cyberbullying* – the intentional and overt act of aggression toward another person by way of any technological tool, such as email, instant messages, text messages, digital pictures or images, or website postings (including blogs). Cyberbullying can involve:
 - Sending mean, vulgar, or threatening messages or images.
 - Posting sensitive, private information about another person.
 - Pretending to be someone else in order to make that person look bad.
 - Intentionally excluding someone from an online group.
 - Hazing – an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers that person regardless of that person’s willingness to participate.
 - Sexualized bullying – when bullying involves behaviors that are sexual in nature. Examples of sexualized bullying behaviors include sexting, bullying that involves exposures of private body parts, and verbal bullying involving sexualized language or innuendos.

Anyone who sees an act of bullying, and who then encourages it, is engaging in bullying. This policy applies to all youth, clergy, employees, and volunteers.

17. All clergy, employees, and volunteers must follow Florida’s mandatory reporting requirements. They should be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. They will:
 - a. Be familiar with the symptoms of child abuse and neglect, including physical, sexual, verbal, and emotional abuse.
 - b. Know and follow organization policies and procedures that protect youth and against abuse.
 - c. Report suspected child abuse or neglect immediately to the central hotline 1-800-96ABUSE (1-800-962-2873) as required by the state mandated reporter law.
 - d. Follow up to ensure that appropriate action has been taken.
18. Clergy, employees, and volunteers will report concerns or complaints about other employees, volunteers, adults, or youth to GablesUCC’s supervisor, clergy, or church council.
19. GablesUCC cooperates fully with the authorities to investigate all cases of alleged abuse. Any Clergy, employee, or volunteer shall cooperate to the fullest extent possible in any external investigation by outside authorities or internal investigation conducted by the organization or persons given investigative authority by the organization. Failure to cooperate fully may be grounds for termination.
20. Clergy, employees, and volunteers may not have engaged in, been convicted of, or under investigation for youth abuse, indecency with a youth, or injury to a youth.

IV. Policies for Working with Youth

A. Physical Contact

GablesUCC's physical contact policy promotes a positive, nurturing environment while protecting youth, Clergy, employees, and volunteers. GablesUCC encourages appropriate physical contact with youth and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by Clergy, employees, and volunteers towards youth in the organization's programs will result in disciplinary action, up to and including termination of employment.

GablesUCC's policies for appropriate and inappropriate physical interactions are:

<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
<ul style="list-style-type: none"> • Pats on the shoulder or back • Handshakes • High-fives and hand slapping • Verbal praise • Pats on the head when culturally appropriate • Touching hands, shoulders, and arms • Arms around shoulders • Holding hands (with young children in escorting situations) 	<ul style="list-style-type: none"> • Kisses • Showing affection in isolated area • Wrestling • Piggyback rides • Tickling • Allowing a youth to cling to an employee's or volunteer's leg • Any type of massage given by or to a youth • Any form of affection that is unwanted by the youth or the staff or volunteer • Compliments relating to physique or body development • Touching bottom, chest, or genital areas

B. Verbal Interactions

Clergy, employees, and volunteers are prohibited from speaking to youth in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Clergy, employees, and volunteers must not initiate sexually oriented conversations with youth. Clergy, employees, and volunteers are not permitted to discuss their own sexual activities with youth.

GablesUCC's policies for appropriate and inappropriate verbal interactions are:

<i>Appropriate Verbal Interactions</i>	<i>Inappropriate Verbal Interactions</i>
<ul style="list-style-type: none"> • Positive reinforcement • Appropriate jokes • Encouragement • Praise 	<ul style="list-style-type: none"> • Name-calling, gossiping, or cursing • Discussing sexual encounters or in any way involving youth in the personal problems or issues of Clergy, employees, and volunteers • Secrets • Off-color or sexual jokes • Shaming or belittling • Harsh language that may frighten, threaten or humiliate youth • Derogatory remarks about the youth or his/her family

C. One-on-One Interactions

Clergy, employees, and volunteers should observe the following additional guidelines to manage the risk of abuse or false allegations of abuse:

<i>Additional Guidelines for One-on-One Interactions</i>
<ul style="list-style-type: none"> • When meeting one-on-one with a youth, always do so in a public place where you are in full view of others. • Avoid physical affection that can be misinterpreted. Limit affection to pats on the shoulder, high-fives, and handshakes. • If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by. • Inform other Clergy, employees, and volunteers that you are alone with a youth and ask them to randomly drop in. • Document and immediately report any unusual incidents, including disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted. • When meeting one-on-one with a youth on an electronic meeting platform, always make sure a) a parent or guardian is present with the youth or b) a parent or guardian has given written permission to clergy or person in charge of program.

i. Mentoring:

Employees and volunteers should be aware of our policies regarding mentoring:

- a. Employees and volunteers must have approval for any mentoring sessions.
- b. Mentoring sessions with GablesUCC’s youth may not occur outside of the organization.
- c. Supervisors must keep a schedule of mentoring, which should include times, youth involved, location of sessions, and any electronic meeting links.

D. Off-site Contact

GablesUCC strongly recommends that staff do not have outside contact with youth from the organization. However, if off-site contacts are unavoidable, GablesUCC has determined that the following forms of outside contact are appropriate and inappropriate:

<i>Appropriate Outside Contact</i>	<i>Inappropriate Outside Contact</i>
<ul style="list-style-type: none"> • Taking groups of youth on an outing • Attending sporting activities with groups of youth • Attending functions at a youth’s home, with parents present 	<ul style="list-style-type: none"> • Taking one youth on an outing without the parents’/guardians’ written permission • Visiting one youth in the youth’s home, without a parent/guardian present • Entertaining one youth in the home of employees or volunteers • A lone youth spending the night with employees or volunteers

In addition, when outside contact is unavoidable, the following steps must be followed:

1. Supervisors must approve outside contact.
2. Clergy, employees, and volunteers must have the parents’/guardians’ permission to engage in outside contact with the youth.

E. Electronic Meetings

GablesUCC recognizes the importance of electronic meetings and has provided the following guidelines and regulations for clergy, employees and volunteers when engaging with youth on such platforms:

<i>Appropriate Electronic Meetings</i>	<i>Inappropriate Electronic Meetings</i>
<ul style="list-style-type: none"> Meetings with more than one youth (i.e. Sunday School) One-on-one meetings between youth and clergy or mentor when a) a parent or guardian is present with the youth or b) a parent or guardian has given written permission to clergy or person in charge of program. 	<ul style="list-style-type: none"> Engaging in a one-on-one meeting without parent or guardian present and without written permission from parent or guardian.

In addition, when engaging in an electronic meeting, the following steps must be followed:

- Supervisors must approve and have access to all electronic meetings.
- Clergy, employees, and volunteers must have the parents'/guardians' permission to engage in electronic meetings with the youth.
- For meetings with more than one youth, leader will not start meeting until at least 2 youth are present. In addition, at conclusion of the meeting, leader will stop meeting and ensure that all youth are logged off before leaving.
- If a meeting will include breakout rooms, an adult must be present in each breakout room and supervisor or meeting leader will monitor all breakout rooms.
- If using a background, leader will make sure that the background is neutral and not offensive in any way. Also, leader will monitor backgrounds of participants to ensure same.

F. Electronic Communication

Any private electronic communication between employees, volunteers, and youths, including the use of social networking websites like - Facebook, Instagram, Snapchat, instant messaging, texting, etc. - is prohibited. All communication between employees, volunteers, and youth must be transparent. Clergy are allowed to send and respond to messages to youth but should include parents in the conversation if the conversation is between one youth and the clergy. If the message is to a group of youth then parents do not need to be included. Clergy is responsible for following the steps outlined in section "VIII. Responding" if a youth does something or sends something inappropriate via electronic communication. Clergy may not engage in inappropriate or personal conversations with youth through private electronic communication.

The following are examples of appropriate and inappropriate electronic communication:

<i>Appropriate Electronic Communication</i>	<i>Inappropriate Electronic Communication</i>
<ul style="list-style-type: none"> Clergy sending and replying to messages from youth to aid or provide information regarding youth events so long as a parent is included in the conversation. Clergy sending and replying to <u>group</u> messages where multiple youth are included. 	<ul style="list-style-type: none"> Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating comments Sexually oriented conversations Private messages between employees and volunteers with youth

<ul style="list-style-type: none"> • Communicating through “organization group pages” on Facebook or other approved public forums • “Private” profiles for Clergy, employees, and volunteers which youth cannot access 	<ul style="list-style-type: none"> • Posting pictures of organization participants on social media sites • Posting inappropriate comments on pictures • “Friending” participants on social networking sites
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i. Cell Phone Use:

While assigned to work with youth, employees are not permitted to use electronic communications device except during approved breaks and emergency situations. Internet use, text messaging and/or emailing pictures while assigned to work with youth is strictly prohibited regardless of the type of device used and whether for business or personal reasons. Employees need to ensure that friends and family members are aware of this policy.

Use of personal electronic communication devices to contact (via voice, text, or pictures/video) organization members and/or program participants for personal and/ or inappropriate reasons shall be grounds for discipline up to and including termination of employment.

There are occasions in which employees will need to use personal or organization issued electronic communication devices. In these cases, employees will have explicit direction from supervisors governing use. Situations which may require use of organization issued or personal electronic communication devices include:

- a. Field Trips;
- b. Off-site Programs; and
- c. Emergencies.

G. Gift Giving

Clergy, employees, and volunteers should only give gifts to groups of youth, and only under the following circumstances:

- 1. Administration must be made aware of and approve the gift.
- 2. Parents must be notified

V. Screening and Selection

A. Standardized Application Process

Employment at GablesUCC shall be in accordance with article XI of the Bylaws of GablesUCC.

Employees will not be hired until a background check has been successfully completed.

Volunteers must be active members of GablesUCC for a minimum of six months before being permitted to work in youth-oriented programs. There will be **no exceptions** to this policy, even when volunteer candidates come from another church with similar programs.

B. Interviews

All applicants will be interviewed during the selection process and prior to employment. The Senior Pastor will interview and may choose others to be part of the interview and hiring process for each candidate.

C. Reference Checks

Reference checks will be conducted for all applicants prior to employment. If the person responsible for screening the applicant does not believe the references are appropriate, he or she can ask for different ones. References should be conducted by telephone. The person responsible for the screening should inform the referent that the applicant is applying for a position with the organization and will explain that the applicant will have access to a vulnerable population.

D. Background Checks

Criminal history and sexual offender registry checks will be conducted for all applicants. Generally, the information should be obtained prior to employment of the applicant; however, if the length of time needed to receive the results of these checks is unduly long, GablesUCC could have the applicant start the position and remain in the position until the criminal background results are obtained and reviewed. New employees and volunteers should not be left unsupervised with youth until the criminal history results are returned.

The background check(s) should include the following:

- National multi-state criminal records search;
- National sex offender registry search;
- Social security number trace and alias search; and
- County criminal records search for every county where the applicant has lived or worked for the past 7 years

Written permission to conduct a background check shall be obtained from each applicant prior to executing the check.

In addition, all applicants should undergo criminal drug screening prior to employment, and applicants responsible for transportation should have a driver's license check performed to identify past driving concerns.

E. Employment Decisions

The Senior Pastor, Search Committee, or appointed hiring committee shall review each background check and agree that the applicant is eligible for employment as Clergy, employee or volunteer.

Where a criminal record exists, consideration shall be given to:

- Seriousness of the crime;
- Statutes that may legally disqualify the person from working with minors;
- Length of time since the last offense;
- Pattern of criminal activity; and
- Activities the applicant has been involved in since the offense(s) occurred.

Conviction for the following crimes shall be considered barriers to employment or volunteer work with children:

- Violent crimes;
- Sexual assault;
- Sexual abuse or neglect of a child; and
- Drug offenses or driving offenses (depending upon position requirements)

Arrest data are not grounds for disqualification, only convictions. The status or relevance of other crimes will be considered individually.

Before an offer of employment is made, screening managers involved in the Screening process should review all information obtained. The employment process should last a sufficient length of time to allow Employment Committee to carefully collect and evaluate information about applicants and to allow the applicant time to self-select out of the process if they have concerns about the position.

Following the review, each committee member shall sign and date one of two documents that becomes part of the applicant's or employee's permanent personnel file:

*"We have reviewed the criminal history of Applicant X and determined, based on the information we had available at this time, the applicant would be **acceptable** for the position."*

OR

*"We have reviewed the criminal history of Applicant X and determined, based on the information we had available at this time, the applicant is **not acceptable** for the position."*

VI. Training

The mission of GablesUCC is first to prevent abuse of children and other vulnerable adults. We wish to identify and nurture SafeConduct™, to lead and to guide through adequate training. It is difficult to comprehend that those among us, our friends and family, would commit such acts willingly. Nevertheless, persons who have been presented no behavior standards and do not understand boundaries may unwittingly engage in behaviors that may be perceived as predatory. Their personal reputations and that of GablesUCC are then at risk.

To fulfill our leadership obligation, all clergy and employees shall complete a specific program of training annually. All volunteers will be encouraged to complete a specific program of training annually. Fulfillment of training requirements shall be documented by the Training Administrator and respective program Director.

Training shall be repeated annually. Records shall be maintained by the Training Administrator and respective program Directors. Training records shall be audited annually by the Training Administrator.

Abuse prevention curriculum shall include:

- Organization level
 - Review of expected conduct and boundaries defined in this policy.
 - Review of standards applicable to ministry.
 - Explanation of procedures for reporting violations of standards of conduct and suspected child abuse.
 - Explanation of individual statutory reporting obligations.
 - Identifying and managing high-risk situations such as bathroom use, transition times, and free times.
 - Physical security procedures.
- Abuse prevention education:
 - Effects of sexual abuse.
 - Types of child molesters.
 - Characteristics of abusers.
 - How child molesters operate: access, privacy, and control.
 - Protecting oneself from false allegations.
 - Examples of child-on-child sexual abuse, even among young children.
 - Characteristics of children more likely to act out sexually.
 - Characteristics of children more likely to be abused.
 - High-risk activities and circumstances.
 - Specific monitoring and supervision activities to prevent child-on-child sexual activity.
 - How to respond to incidents of sexual activity between children.

Program Directors shall assure that each employee and volunteer has mastered requirements and provide additional supervision and guidance as required to assure required conduct.

VII. Monitoring and Supervision

A. Facility Monitoring

Building architecture can increase or mitigate the risk of an incident or accident. Because most incidents of sexual behavior occur in private, the extent to which privacy is managed, risk is managed. All locations will be properly and consistently monitored.

B. General Supervision

General supervision procedures:

1. **Administrative and Supervisory Visits to Youth Programs-** Youth supervisors and administrators will regularly visit all youth programs to ensure that all activities are well-managed and that youth policies are observed by all in attendance, including any meeting or event via electronic meeting platform.
2. **Ratios-** The youth to clergy/employee/volunteer ratio shall be 5:1 except electronic meetings.
3. **Mixed Age Groups-** In most incidents involving one youth abusing another youth, the youths are from different age groups. Each program is responsible for establishing specific guidelines for additional monitoring and supervision of activities that involve youth from different age groups. Clergy, employees, and volunteers must be aware that close line of sight supervision is required when monitoring programs that mix age groups.

C. Monitoring Youth in Facilities

1. A parent or legal guardian will complete a membership application which includes identifying information, any special medical or behavioral circumstances, any legal indemnifications, the youth's date of birth, and emergency contact information. All youth will sign-in AND to sign-out of the facilities so that the program has a record of the youth who are in the facility at all times. A parent or legal guardian must sign youth out of Sunday School, except high school youth, who may sign themselves out.
2. Youth and parents/legal guardians will sign a Code of Conduct/Covenant that outlines the program's behavioral expectations and policies regarding appropriate and inappropriate interactions. Youth will be suspended or dismissed from the program for policy violations.
3. While a parent orientation may not be feasible in all circumstances, we recommend encouraging parents to attend an information session with a program representative. This meeting will provide an opportunity to review expectations and requirements, and the chance to establish a relationship with the parents. This can be helpful if any problems arise in the future.
4. While in the facility youth will be supervised directly. All youth must be supervised at all times, regardless of age.
5. All program staff should wear nametags or identifying clothing so that the youth can easily recognize them as staff.

D. Monitoring High Risk Activities

i. Bathroom Supervision

When supervising restroom use, adult staff members should first quickly scan the bathroom before allowing youth to enter.

- a. For "Group Bathroom Breaks":

- Staff will take groups of two or more youth to the bathroom – following the “rule of three” or more.
 - If the bathroom only has one stall, only one youth should enter the restroom while the others wait outside with staff.
 - If there are multiple stalls, only send in as many youth as there are stalls.
 - Minimize youth of different ages using the bathroom at the same time.
 - Staff will stand outside the bathroom door but remain within earshot.
- b. For single use restrooms:
 - Youth must ask permission to use the bathroom.
 - Staff will frequently check bathrooms.
 - c. Staff will NOT use the bathroom at the same time as youth.
 - d. If assisting young youth in the stalls, the staff will keep the door to the stall open.

ii. Shower Supervision

Staff and youth must shower at different times. Create shower schedules that will permit supervision of the youth while staff shower.

- a. While the youth shower, at least one staff member should stand outside the bathroom and within earshot of the youth. Ensure that only one youth is in each shower.

iii. Transition Times and Free Times

- a. Youths will remain in line-of-site of staff at all times.
- b. The staff to youth ratio is 5:1.
- c. Specify narrow geographic boundaries in the program areas.
- d. All staff will be assigned specific areas to supervise (“zone monitoring”).
- e. Include bathroom procedures.
- f. Periodic roll calls for each age group will take place.
- g. Supervisors will conduct periodic check-ins and sweeps of the entire activity area.

iv. Transportation Activities

- a. Written parent permission and medical releases are required for all youth on the trip. Staff will take these permission forms and medical releases with them on the trip.
- b. Staff will have a list of the youth on the trip. The staff will take roll when boarding the bus, when leaving the bus, periodically throughout the trip, and then again when boarding the bus.
- c. The youth to staff ratio is 5:1
- d. Staff will sit in seats that permit maximum supervision.
- e. Mixed age groups should not sit together. When possible, high risk youth will be seated by themselves or with a staff member.
- f. Drivers will not make unauthorized stops.
- g. Where applicable, staff will document the beginning and ending time of the trip and the mileage, names of the youth being transported, and the destination.
- h. Staff will document any unusual occurrences.

When public transportation is used:

- a. In addition to the transportation procedures listed above, youth should remain in one area, if possible.

- b. Clergy, employees, and volunteers that are assigned to a group should remain with that group.
- c. Take a head count or call roll immediately after entering and leaving.

In situations where staff transport youth in non-organization vehicles:

- a. Administrators must be notified of all transportation activities.
- b. At least two adults must transport a single youth, or at least two youth must be present if transported by a single adult.
- c. Youth must never be transported without written permission from a parent.
- d. Youth must be transported directly to their destination. No unauthorized stops may be made.
- e. A staff member must document beginning and ending times and mileage, the names of youths, and other Clergy, employees, and volunteers who are involved in transportation, purpose of the transportation, and destination.
- f. Staff must avoid unnecessary physical contact with youth while in vehicles.
- g. When possible, staff should avoid engaging in sensitive conversations with youth.

v. Off-Site Activities

- a. Supervisor will approve all off-site activities.
- b. Parental approval is required.
- c. Youth to staff ratio is 5:1
- d. Staff and youth will be easily identifiable.
- e. Include specific bathroom and locker room procedures as applicable to outing.
- f. Include transportation procedures.
- g. Include instructions for a supervisor to observe the off-site activities at scheduled times and random intervals.
- h. Consider specific recommendations based on the location and type of activity (for example, Amusement parks, Water Parks, Arcades, etc.).

vi. Overnight Activities

- a. All overnight activities must be documented and approved in writing by the Supervisor.
- b. Administrators are expected to regularly and randomly observe overnight activities on a scheduled and periodic basis.
- c. A meeting with all staff is conducted to discuss the unique risks of overnight trips, unique elements of the specific overnight trip and to review the specific policies and procedures.
- d. Provide parents with written information about the overnight activity. All parents must sign a permission slip for their youth to attend the overnight.
- e. The youth to staff ratio is 5:1
- f. Meetings with the group should be hosted in open and observable areas; meetings should not be hosted in staff or youth rooms.

Overnights at the Facility:

- a. Physical boundaries within the organization must be clearly defined and explained to the youth.

- b. Assign each staff to a specific group of youth to supervise. Each staff should then maintain a role sheet that lists all of the youth in his or her group. Head counts and roll checks should be conducted routinely throughout the evening.
- c. Assign staff to high risk areas in GablesUCC's facility, such as the bathrooms, entrances and exits, hallways, etc. If it is not possible to assign specific staff to these areas, assign specific staff to conduct periodic facility "walk-throughs".
- d. With regards to sleeping arrangements, separate the male and female youth into separate rooms and post staff at the entrances and exits to these rooms. If this is not feasible, separate males and females by as much space as possible.
- e. When performing room checks, staff should always go in pairs.

Overnights Away from the Facility:

- a. Overnight stays at private homes are prohibited unless approved by the administration.
- b. Physical boundaries at the off-site location must be clearly defined and explained to the youth.
- c. Assign each staff to a specific group of youth to supervise. Each staff should then maintain a role sheet that lists all of the youths in his or her group. Head counts and roll checks should be conducted routinely throughout the event.
- d. If in a cabin type setting, the staff should be placed in bunks to maximize supervision around the cabin and in a way that decreases the chances of youths sneaking out (such as by the door).
- e. In hotel rooms, assign youth to rooms based on sex and age. Staff should have their own rooms. If staff must share rooms with youth, they must have their own beds and never change in front of youth.
- f. All staff are to be on duty in the halls or cabins at night until an hour after lights out and all rooms are quiet.

E. Teen Leadership Program

- a. A screening process for teen leaders may include
 - A standard application
 - An interview with behaviorally based interview questions
 - References (from teachers, counselors, family friends, etc.)
- b. Train teen leaders in their role in programs and on program policies about appropriate and inappropriate interactions. This training should include the following information:
 - Appropriate and inappropriate physical and verbal interactions and the importance of maintaining behavioral boundaries between teen leaders and younger youth and between teen leaders and Clergy, employees, and volunteers.
 - Prohibiting teen leaders from being one-on-one with youth.
 - Prohibiting teen leaders from assisting youth with changing their clothes.
- c. A system will exist to monitor the teen leaders.
 - A specific employee or volunteer will be in charge of the teen leadership program and its participants.
 - Teen leaders will wear clothing or lanyards that identify them as leaders-in-training and differentiate them from both Clergy, employees, and volunteers and from younger youth.

- A supervisor will conduct daily check-ins with teen leaders and their program supervisors.
- Teen leaders will keep a log documenting their daily activities and any problems they encounter. The program supervisor should review these logs daily.

VIII. Responding

A. Responding to Suspicious or Inappropriate Behaviors or Policy Violations

Because GablesUCC is dedicated to maintaining zero tolerance for abuse, it is imperative that everyone actively participates in the protection of youth. In the event that a clergy member, employee, or volunteer observe any suspicious or inappropriate behaviors and/or policy violations on the part of others, it is their personal responsibility to immediately report their observations.

Remember, at GablesUCC, the policies apply to everyone.

Examples of Suspicious or Inappropriate Behaviors Between Clergy, Employees, Volunteers, and Youth

- Violation of the abuse prevention policies described above
- Seeking private time or one-on-one time with youths
- Buying gifts for individual youths
- Making suggestive comments to youth
- Picking favorites

All reports of suspicious or inappropriate behavior with youth will be taken seriously. Our procedures will be carefully followed to ensure that the rights of all those involved are protected.

i. Employee and Volunteer Response:

If an employee or volunteer witness suspicious or inappropriate behaviors or policy violations from another employee or volunteer, they are instructed to do the following:

Guidelines for Employee/Volunteer Response to Suspicious or Inappropriate Behaviors and/or Policy Violations

- Interrupt the behavior.
- Report the behavior to a supervisor, director, or other authority.
- If you are not comfortable making the report directly, make it anonymously.
- If the report is about a supervisor or administrator, contact the next level of management.
- Document the report but do not conduct an investigation.
- Keep reporting until the appropriate action is taken.

ii. Supervisor Response:

In the event that a supervisor receives a report of suspicious or inappropriate behaviors or policy violations from a staff member or volunteer, the supervisor is instructed to do the following:

Guidelines for Supervisors and Administrators Response to Suspicious or Inappropriate Behaviors and/or Policy Violations

- Report to the clergy or church council.
- Determine the appropriate response based on the report.
- Speak with the employee or volunteer who has been reported.

- Review the file of the employee or volunteer to determine if similar complaints were reported.
- Document the report on the appropriate form.
- If at any point in gathering information about a report of suspicious or inappropriate behavior, a concern arises about possible abuse, contact state authorities and file a report.
- If appropriate, notify parents and/or guardians.
- Advise the person who reported the behavior that the report is being taken seriously.

Based on the information gathered, the following may be required:

- Increase monitoring or supervision of the employee, volunteer, or program.
- If policy violations with youth are confirmed, the employee or volunteer must be subject to disciplinary action up to and including termination and prosecution..
- If more information is needed, interview and/or survey other Clergy, employees, and volunteers or youth.

iii. Organizational Response:

- | |
|---|
| <i>Guidelines for Organizational Response</i> |
| <ul style="list-style-type: none"> • Review the need for increased supervision. • Review the need for revised policies or procedures. • Review the need for additional training. |

B. Responding to Suspected Abuse by an Adult

i. Employee or Volunteer Response to Abuse:

Any person who knows, or has reasonable cause to suspect, that a child is abused, abandoned, or neglected by a parent, legal custodian, caregiver, or other person responsible for the child’s welfare is a mandatory reporter. §39.201(1)(a), Florida Statutes.

Each report of known or suspected child abuse, abandonment, or neglect by a parent, legal custodian, caregiver, or other person responsible for the child’s welfare . . . shall be made immediately to the department’s central abuse hotline. §39.201(2)(a), Florida Statutes.

The hotline number is 1-800-96ABUSE (1-800-962-2873)

A person who mistakenly reports suspected abuse is immune from civil or criminal liability as long as the report was made in good faith and without malice. In addition to reporting to state authorities, clergy, employees, and volunteers are required to report any suspected or known abuse of youth directly to leadership so that immediate and proper steps may be taken to ensure the safety of alleged victims and others who may be at risk. Reports of suspected or known abuse may be made confidentially to the following:

- Immediate supervisor
- Clergy
- Church Council

- | |
|---|
| <i>Additional Guidelines for Employee/Volunteer Response to Incidents or Allegations of Abuse</i> |
| <ul style="list-style-type: none"> • If you witness abuse, interrupt the behavior immediately. • If abuse is disclosed to you, assure the individual disclosing that he or she was correct to tell you. |

- Protect the alleged victim from intimidation, retribution, or further abuse.
- Immediately report the allegation or incident to the proper organization authorities (based on mandatory reporting requirements above) and the designated authority.
- Be sure to document the incident, disclosure, or any circumstances causing your suspicion of abuse. State only the facts.
- **It is not your job to investigate the incident, but it IS your job to report the incident to your supervisor in a timely manner.**
- Check back to make sure appropriate steps were taken. If not, report again to your supervisor or the designated organization authority.

ii. Supervisor Response to Abuse:

In addition to the above response procedures, supervisors should ensure the following:

- | <i>Guidelines for Supervisor Responding to Allegations or Incidents of Abuse</i> |
|--|
| <ul style="list-style-type: none"> • First, determine if the youth is still in danger and if so, take immediate steps to prevent any further harm. • Gather as much information about the allegation as you can. For example, who made the report, who was allegedly abused, who was the alleged abuser, what was the nature of the alleged abuse, where and when did the alleged abuse occur, etc. • Accurately record everything you learn in as much detail as you can. Remember your notes may be read by others. Stick to the facts. • Contact the appropriate local authorities as indicated by the mandatory reporting procedures above. Make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency. • If the alleged abuse involves an employee or volunteer, notify clergy or the church council. • Suspend the accused employee or volunteer until the investigation is completed. |

C. Responding to Youth-to-Youth Sexual Abuse and Sexualized Behaviors

Most serious incidents of youth-to-youth abuse are preceded by more subtle incidents such as name-calling, taunting, or roughhousing. Interrupting these interactions early and establishing and communicating standards of conduct can keep the program environment safe. GablesUCC recognizes that the following interactions are high risk and should be prohibited:

- | <i>Prohibited Youth-to-Youth Interactions</i> |
|--|
| <ul style="list-style-type: none"> • Hazing • Bullying • Derogatory name-calling • Games of Truth or Dare • Singling out one child for different treatment • Ridicule or humiliation |

In order to adequately respond to and track incidents within the organization, all sexual activity between youth and sexualized behaviors of youth must be consistently documented.

i. Employee and Volunteer Response:

Youth-to-youth sexual behaviors can include inappropriate touching, exposing body parts, using sexualized language, making threats of sexual activity, engaging in sexual activity, and similar types of interactions.

If employees or volunteers witness youth-to-youth sexual behaviors, they are instructed to follow these guidelines:

Guidelines for employees and volunteers Responding to Youth-to-Youth Sexual Activity

- If you observe sexual activity between youth, you should immediately separate them.
- Calmly explain that such interactions are not permitted and separate the youth.
- Notify your supervisor.
- Complete the necessary paperwork including what you observed and how you responded.
- Follow your supervisor's instructions regarding notifying the authorities and informing the parents of the youth involved.
- In some cases, if the problem is recurring discipline may be required including not allowing one or both youth to return to the program.

ii. Supervisor Response:

In the event that a supervisor or administrator receives a report of a youth's sexualized behavior or youth-to-youth sexual activity, the supervisor should do the following:

Guidelines for Supervisors Responding to Youth-to-Youth Sexual Activity

- Meet with the staff who reported the sexual activity to gather information.
- Confirm that the youth involved have been separated or placed under increased supervision.
- Review the steps taken by the staff on duty.
- Review the incident report to confirm it is accurately and thoroughly completed.
- Meet with parents of the youth involved.
- Determine what actions should be taken to make sure there is no recurrence, including assessing the suitability of the program for the children involved.
- Notify the proper authorities.
- Develop a written corrective action or follow-up plan in response to the incident

Based on the information gathered, the following may be required:

- a. Review the need for additional supervision.
- b. Review the need for revised policies or procedures.
- c. Review the need for additional training.
- d. Alert others in the organization.

iii. Organizational Response:

After the internal review of the sexualized behavior or youth-to-youth sexual activity, the organization will determine what can be done to prevent a reoccurrence, such as:

Guidelines for Organizational Response

- Review the need for additional supervision.
- Review the need for revised policies or procedures.
- Review the need for additional training.
- Alert others in the organization.

D. Responding to Victims

In the event of cases of reportable abuse, the policy of GablesUCC is to be responsive to the needs of victims within the constraints or obligations imposed under insurance contracts. In general, we will attend to the immediate needs of victims by providing support and pastoral care. An incident of alleged abuse that requires medical or psychological care for a victim or family shall be reported to the Insurance Board by the Church Moderator. The latter shall discuss with the Insurance Board Claims Department whether the circumstances warrant initiation of Crisis Management services which may include psychological counseling. Upon approval, counseling services may be offered to a perceived victim(s), which may include family members.

E. Notification of Parents

While communicating with a parent, and **being mindful of the importance of timely communication**, care shall be given to assessing:

- The specific facts;
- Whether a disciplinary or termination process is required;
- Whether a child should be dismissed from a program (requiring notification of other parents/guardians);
- Whether “mandatory reporting” is a factor;
- Who shall and in what manner communicate with the parents/guardian;
- Whether the Pastor should be involved in the communication;
- Tentative remedial steps to prevent a further incident.

Notification of parents shall not be delayed when immediate medical care is required.

F. Responding to Media

Media publicity following an incident of abuse or exploitation may be detrimental to the reputations of individuals, the congregation, and GablesUCC. Without intending ever to evade the media, contacts with media must be managed and conducted only by a person specifically designated by the Church Council to represent the church. Unless designated differently by the Council in a circumstance, the exclusive spokespersons for the church shall be the Church Moderator and/or Senior Pastor.

Prior to speaking to media, the Church Moderator and/or Senior Pastor shall contact and consult with the Florida Conference (UCC) Legal Counsel, to obtain an understanding of appropriate statements or admissions and issues of privacy that may apply to the situation.

The Church Moderator and/or Senior Pastor shall give immediate consideration to securing Insurance Board media relations and crisis management resources. Considering the speed of news cycles, a prompt determination is required, erring on the side of seeking help.

IX. Congregational Awareness

We are dedicated to a policy of open communication and education for the benefit of the children, parents, vulnerable adults and guardians we serve. They are entitled to know what to expect of our ministries, the

Ministers who serve them, and to know the related policies and procedures created to protect the respective ministry constituencies. Constituencies include the children, the parents, the vulnerable adults, the guardians, and the Ministers.

This entire policy shall be posted on the GablesUCC website, [<https://www.gablesucc.org>].

At the time children are enrolled in GablesUCC programs, parents or legal guardians shall be provided a copy and/or link to the GablesUCC Safeconduct policy.

Parents and guardians shall be invited to receive the same “abuse prevention” training as provided to clergy and employees to be taken at their option.

Parents/guardians shall be encouraged to report violations of policy, boundaries or suspected abuse to the Director of the respective ministry at which an incident has occurred or clergy or the church council.

X. Registered Sex Offender Policy

As a community of faith, serving by the example of Jesus Christ, we also seek to attend to the needs of all who seek healing, redemption and fellowship among us. We shall be prepared to accept in our midst those who have violated the most sacred mores of our society at large, in order to provide them refuge, peace, example and support in their recovery and penitence. We commit to doing so with utmost care for the welfare of our congregation, collectively and individually, and the community we serve.

We accept that there are risks to be born in our deliberate association with and ministry to sex offenders who are considered a pariah among the community-at-large as evidenced by the many constraints placed upon their interaction with the community. We agree to honor the needs of the congregation and our community to have reasonable assurance that a sex offender in our care will not have an opportunity to re-offend as a result of lapses in our management of the offender.

We shall consider limited participation or membership of a sex offender in our congregation with utmost care which shall include the following elements:

Documented understanding of the statutory limitations to the movement and activities of a sex offender.

Understanding the character of the crimes which have resulted in requiring an individual to register as a sex offender, the passage of time without repeated conduct or behavior and the risk and opportunity of re-offending that is presented by the programs of our congregation. Participation in children, youth, vulnerable adult programs and entrance into Christian Education buildings by the offender is strictly prohibited.

Documented understanding of limitations and prohibitions placed upon the offender by courts and probation authorities. The opinion of a mental health professional regarding the suitability of the person to participation in the life of the church shall be obtained. In all cases where probation is in force, we shall obtain the explicit approval of and conditions of participation specified by the probation officer. A recommendation by law enforcement or mental health professionals to deny participation to an offender shall be honored in all cases.

Understanding that, with respect to a person who is an employee, volunteer or in a position of church leadership, who has previously been conviction for acts of sexual misconduct as defined by insurance contracts, knowledge by church leaders and managers of such prior conviction will have the effect of voiding coverage for the individual employee, volunteer or church leader and for the church for future acts of sexual misconduct by that person.

Given that criminal convictions are a matter of public record, there shall be no expectation of secrecy on the part of the offender. As a condition of participation in our faith community, the offender must agree that the leadership of the church shall make it known to the members, constituencies and customers of the church that we have accepted among us a registered sex offender (RSO). The conditions and limitations that apply to participation in the life of the church shall be known to all.

With the advice of legal counsel, and in all cases, the conditions of participation by a RSO shall be defined by a “limited access agreement” executed by the offender and church. Such agreement shall be approved by probation authorities as may be necessary according to para. 3., above. The agreement shall be reviewed annually to validate on going eligibility. Violation of the agreement by the RSO shall be considered as grounds for immediate cancellation of the agreement.

The following additional considerations shall apply:

Victims in the congregation – In such case as the victim of a RSO is a member of the congregation, employee or is a client of other services provided by the congregation, the RSO shall not be permitted to attend the church or church activities.

Clergy-penitent privilege – “Clergy-penitent privilege” is a “Rule of Evidence” defining or limiting information which clergy may reveal in a court of law only. “Clergy penitent privilege” does not prevent clergy from informing the congregation of matters which may be relevant to their safety; it does not require clergy to hold information in secrecy.

Ordained clergy shall assume responsibility and take extraordinary care to understand the scope and limitations of clergy-penitent privilege, and the parameters of confidence and privilege as defined by the United Church of Christ. Authorized clergy shall inform the leadership of the church of the general principles of confidence and privilege under which (s)he performs his/her clerical duties.

Escorts – Conditions of limited access for a RSO will require that they have an escort while on the church premises or at church events elsewhere. A person serving as an escort shall not be a spouse, partner or relative of the offender.

Approval & Supervision –

With the advice and prior approval of the Church Council, a Limited Access Agreement with a Petitioner (known RSO) may be signed only by the Senior Pastor.

The Senior Pastor, in association with other “authorized clergy” and escorts, who shall be named in the Limited Access Agreement, shall be responsible for the general supervision of the Petitioner in all of the latter’s activity in relation to the church. Elements of supervision shall include the following:

Knowledge of the terms of the Limited Access Agreement, including activity limitations placed upon the Petitioner.

Knowledge of the Petitioners offense history sufficient to understand the risks of association with the church and its ministries.

Willingness to assert activity limitations and to report any violation of restrictions placed upon the Petitioner.

Willingness to intervene in any onset of a risky or problem behavior.

Willingness to report all cases of non-compliance to the Senior Pastor.

The Senior Pastor shall assess, prior to selection, whether a proposed escort is willing to fulfill the above elements of supervision.

Professional privacy – Members who are employed in certain occupations may have a statutory obligation to maintain privacy around the criminal history of their clients who may also be parishioners. Such members shall decline to accept leadership roles which may put them in a position of decision-making regarding individuals who may be their professional clients.

Juveniles – While the criminal record of a juvenile is ordinarily concealed by the courts, the church may come to know the juvenile’s history by other means. Honest disclosure by a juvenile and parents in the volunteer application and screening process may reveal that a record exists without knowing the specifics. While a limited access agreement will be required for the juvenile, as for others, every precaution will be taken to preserve the privacy and confidentiality which the law affords a juvenile.

XI. Acknowledgment of SafeConduct Policy and Procedure

I have read and agree to comply with my organization's policies regarding sexual abuse prevention.

Signature of Employee or Volunteer

Date

XII. Appendices

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**CORAL GABLES CONGREGATIONAL CHURCH
UNITED CHURCH OF CHRIST
YOUTH EVENTS**

Chaperone Covenant

Because God calls us to be a community of faith and leaders in Christ's church, I covenant with God and each other to conduct our life together at this Coral Gables Congregational Church, United Church of Christ Youth Event in a manner that promotes a community of faith.

I will participate in all activities, working together to learn and grow from my event experience.

I will treat all people with dignity and respect

I will respect the property of all people.

I will use the facilities made available to us with care. If I hurt or accidentally damage any property, I will take responsibility for the damage done.

I will not smoke or use tobacco products.

I will not bring or use alcohol and/or illicit drugs, realizing that such behavior is destructive to Christian community and would require my dismissal.

I will not engage in sexual activity.

I will not visit the rooms/cabins of persons of the opposite sex.

Because community is important, once at the event, I will remain until the conclusion.

I will be mindful of my roommates' right to privacy.

I will honor the "lights-out" curfew.

I will not travel alone at night.

I will be responsible for overseeing the youth who are on the event that I have agreed to chaperone.

I have read and agree to abide by the SafeConduct Policy of Coral Gables Congregational Church, United Church of Christ.

As an Adult Leader, I am a role model for others and will fully participate in the activities of this Coral Gables Congregational Church, United Church of Christ Youth Event. I will work as a team with others to ensure the safety, well-being, and positive experience for the participants. I will create an atmosphere of acceptance for participants in small group discussion and work to create community. I will share my Faith Journey with participants and be open to be shaped by and grow from my event experience.

I will take responsibility for helping to hold youth and other adults accountable to these covenants, confronting issues if I see them, reporting to youth leaders involved, and reporting to the leadership team. I understand my role as a mandatory reporter as defined in the SafeConduct Policy and Florida Statute.

Chaperone Signature _____ Date _____

**CORAL GABLES CONGREGATIONAL CHURCH
UNITED CHURCH OF CHRIST
YOUTH EVENTS**

Youth Covenant

Because God calls us to be a community of faith and leaders in Christ’s church, I covenant with God and each other to conduct our life together at this Coral Gables Congregational Church, United Church of Christ Youth Event in a manner that promotes a community of faith.

I will participate in all activities, working together to learn and grow from my event experience.

I will treat all people with dignity and respect

I will respect the property of all people.

I will use the facilities made available to us with care. If I hurt or accidentally damage any property, I will take responsibility for the damage done and inform a chaperone or event leader right away.

I will not smoke or use tobacco products.

I will not bring or use alcohol and/or illicit drugs, realizing that such behavior is destructive to Christian community and would require my dismissal. Prescribed drugs must be left with an event leader.

I will not engage in sexual activity.

I will not visit the rooms/cabins of persons of the opposite sex.

Because community is important, once at the event, I will remain until the conclusion. Because being present is important, I will not use any electronics (especially my cell phone) during any scheduled programming or community time.

I will be mindful of my roommates’ right to privacy.

I will honor the “lights-out” curfew.

I will not travel alone at night.

I understand that every youth must have a chaperone during the event.

I have read and agree to abide by the SafeConduct Policy of Coral Gables Congregational Church, United Church of Christ.

I understand that at this Youth Event I am a representative of Coral Gables Congregational Church and the entire United Church of Christ. I will keep this in mind and behave accordingly.

We, the youth of Coral Gables Congregational Church, United Church of Christ declare ourselves to be multi-racial, multi-cultural, open and affirming, and accessible to all; creating a safe and welcoming space for all people at all Coral Gables Congregational UCC Youth/Faith Events.

Participant’s Signature _____ Date _____

Parent/Guardian Signature _____ Date _____

**CORAL GABLES CONGREGATIONAL CHURCH
UNITED CHURCH OF CHRIST
SAFECONDUCT INCIDENT REPORT**

Date: ___/___/_____

Person(s) Impacted: _____

(Include age and gender)

Parent/Guardian: _____

(If applicable)

Contact Information: _____

Time/Date/Location: _____

Narrative Description of Incident: _____

(If more space required, attach additional page)

What action was taken by staff/volunteers? _____

Witnesses: _____

Did this incident meet the criteria for mandatory reporting? Yes: _____ No: _____

If yes, was the case accepted: _____

Name and Position of Reporter: _____

Signature of Reporter: _____ Date: _____