

Menlough Study Center – Policy for responding to allegations of abuse of minors

Section I. Reporting Concerns

Anyone – Program Staff, minors, parents, and anyone else – should be made to feel welcome to express any concerns or complaints, including observations of others whose interactions may be suspicious or inappropriate, in connection with Menlough Study Center’s Programs.

In general, the best person to bring concerns or complaints to is the Program Director.

In general, if the concerns or complaints relate to the Program Director, the best person to speak with is either the Assistant Program Director or, if the matter is more serious, someone on the Board of Directors.

However, if the concerns or complaints relate to the Program Director’s interactions with Minors that may be suspicious or inappropriate, such concerns should be communicated immediately and directly to Menlough Study Center’s Board of Directors.

Concerns or complaints may be expressed verbally. Written communications are also encouraged, especially for more serious matters.

A. Responding to Concerns

We will treat each concern or complaint regarding Menlough Study Center’s Programs with the seriousness it deserves. We will provide a timely, thorough, and objective response. If a concern is regarding potential abuse of a Minor, the Program Director will maintain documentation of the concern and the response to the concern. When an individual shares a concern or complaint:

1. They will be given the time and attention necessary to allow them to share their thoughts in person;
2. They will be thanked for sharing their concerns and for contributing to maintaining a healthy environment for everyone;
3. They will be advised that their concerns will be taken seriously;
4. If the concerns require a response, once a response is decided, they will be informed, in general statements to protect others who may be involved, of the steps Menlough Study Center will take in addressing the matter;
5. They will be encouraged to speak again with the person they first spoke with if they have additional information; and

6. They will be protected from any form of retaliation for expressing their concerns.

B. Concerns about Sexually Inappropriate Behavior

Concerns are especially serious if sexually inappropriate behavior is involved. To assist with the immediate and thorough investigation of the issue, a verbal or written communication about the concern should include:

1. The name(s) of the individual(s) involved;
2. The date(s) the behavior occurred;
3. The name(s) of any known witnesses; and
4. A summary of the inappropriate conduct, including:
 - a. The specific behavior involved;
 - b. Direct quotes, when available; and
 - c. Any relevant documentation or other evidence.

C. Confidentiality

To the extent possible consistent with the law, Menlough Study Center will protect the confidentiality of anyone who reports concerns about abuse, or other violations of law or policy, as well as the confidentiality of other parties involved. Legal and civil authorities (for example, police or child protective services) may require confidential information in order to investigate any report of illegal conduct. However, confidential information will be disclosed only as strictly needed to conduct a proper investigation.

D. Anonymous Reporting

Reporting sexually inappropriate behavior or other abuse can be difficult. Because it is important to us that everyone be able to report concerns, anonymous reports can be mailed to Menlough Study Center at: address of the Third-Party organization

Please keep in mind that Menlough Study Center's ability to respond quickly and adequately may be negatively affected if the information provided is limited. The credibility and subsequent investigation of any anonymous allegation will be determined on a case-by-case basis. However, Menlough Study Center will respond to all anonymous reports to the extent possible.

E. Incident Reports

Program Staff should complete an Incident Report whenever:

- A concern about possible abuse is expressed either verbally or in writing;
- A concern about sexually inappropriate behavior is expressed either verbally or in writing; and

- A concern about the Christian atmosphere of programs is expressed, but only if the concern is grave and is expressed in writing (customarily, Program Staff discuss the Christian environment of activities with great frequency; such discussions do not warrant a writeup).

A sample Incident Report is produced in the Appendix to this policy.

F. Feedback from Program Staff

The Program Director should regularly meet with and listen to feedback from Program Staff and the Board of Directors should be attentive to whether this is being done:

- Do Program Staff understand and follow Menlough Study Center's Safe Environment policies and procedures, particularly with respect to one-on-one interactions with minors?
- Are Program Staff's Safe Environment concerns taken seriously?
- Are Program Staff well-informed about how to handle, report, and respond to suspicions or allegations of abuse?
- Is there anything about working with minors that Program Staff are concerned about?
- Do Program Staff have any suggestions for making activities better?

G. Feedback from Minors

Because mentoring is integral to Menlough Study Center's programs, Program Staff should have ample opportunity to learn about and respond to the concerns of minors related to Safe Environment. Examples of concerns that Program Staff should be especially sensitive to, and which should be reported to the Program Director or Board of Directors are:

- Do minors feel safe from bullying? Do minors think they can go to Program Staff for help regarding bullying?
- Do any minors feel unsafe? Why?
- Has any Program Staff or Adult Participant made a minor feel uncomfortable?
- Are there circumstances where minors are alone and without supervision during Menlough Study Center's Programs?
- Has any Program Staff or Adult Participant communicated with a minor in an inappropriate way (for example, on Social Media)?
- Does the minor have any suggestions for making activities better?

H. Feedback from Parents

Because partnering with parents is integral to Menlough Study Center's Programs, Program Staff should have ample opportunity to learn about and respond to the concerns of a Parent related to

Safe Environment. Examples of concerns that Program Staff should be especially sensitive to, and which should be reported to the Program Director or Board of Directors are:

- Is the Parent satisfied with the safety of their child at Menlough Study Center's Programs?
- Does the Parent/minor ever say anything about Program Staff or about the program in general that is of concern?
- Is the Parent concerned about the contacts Program Staff have with their child outside of regularly scheduled program hours?
- Does the Parent have any suggestions for making activities better?

Section II. Responding To Potential Abuse

A. Response of Program Staff to Red-Flag Behaviors or Policy Violations

Program Staff are obliged immediately to report their observations of red-flag (inappropriate) behaviors and/or policy violations to the Program Director or Board of Directors, in accord with Menlough Study Center's reporting procedures.

The following are examples of red-flag or inappropriate behaviors that all Program Staff are required to report:

- Any violation of Menlough Study Center's abuse prevention policies
- Anyone seeking unauthorized private time or one-on-one time with minors inside or outside of scheduled programs
- Anyone giving unauthorized gifts to individual minors
- Anyone sending unauthorized electronic communications through text messaging, social media, online gaming, etc. in violation of Menlough Study Center's electronic communication policy
- Anyone making sexually suggestive comments to minors
- Anyone showing favoritism towards a minor or minors with specific characteristics
- Minors disclosing that an adult makes them feel uncomfortable.

If Program Staff witness suspicious or inappropriate behaviors or policy violations from another Program Staff or adult participant, the individual is instructed to do the following:

- Interrupt the behavior;

- Report the behavior to the Program Director. If the concern is particularly serious, if possible, write down your observations;
- If you are not comfortable making the report directly, make it anonymously;
- If the report is about the Program Director, report to Menlough Study Center's Board of Directors;
- Complete an Incident Report but do not conduct your own investigation;
- Report the matter again if you see that it has not been resolved.

B. Response of Program Staff to Incidents or Allegations of Abuse

1. Program Staff are required to report any suspected or known abuse of minors perpetrated by other Program Staff or Adult Participants immediately and directly to the Program Director, so that immediate steps may be taken to ensure the safety of alleged victims and others who may be at risk. Such reports are confidential.
2. Program Staff are required to follow state mandated reporter requirements.

Additional guidelines for Program Staff responding to incidents or allegations of abuse:

- If you witness abuse, safely interrupt the behavior immediately.
- Be sure the minor is no longer in danger and take steps to prevent any further harm. Protect the alleged victim from intimidation, retribution, or further abuse to the extent possible.
- If an individual discloses an incident of abuse to you, assure the individual that they were correct to tell you.
- Immediately report the allegation or incident to the Program Director. If you report it to State authorities, make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency.
- Document the incident, disclosure, or any circumstances causing your suspicion of abuse. 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 and relied upon by others. Stick to the facts.
- It is not your job to investigate the incident, but it is your job to report the incident as outlined here in a timely manner. Menlough Study Center will follow its internal investigation procedures, in addition to cooperating with civil authorities.
- If it does not appear that any steps have been taken to correct the situation, you should report it again to the Program Director or the Board of Directors.

C. Response of Program Staff to Minor-To-Minor Sexually Inappropriate Behavior

Minor-to-minor 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 Program Staff witness minor-to-minor sexual behaviors, they should do the following:

- Safely separate the minors as soon as possible
- Calmly explain that such interactions are not permitted
- Complete an Incident Report, including what you observed and how you responded
- If the behavior involves explicit physical sexual activity, notify the Program Director. Unless the Program Director does so, also notify the minors' Parents and State authorities as required by mandated reporting laws.
 - Do not attempt to determine when the minors' behavior was "sexual curiosity." There is no standard definition of what normal sexual curiosity looks like. Trained civil authorities use criteria to investigate and determine when the minor's behavior is sexual curiosity.
- If the problem is recurring, or if the single incident was serious, the minors may not be allowed to return to Menlough Study Center's Programs.
- Identify how minors will be managed or supported to prevent further occurrences of sexual activity, including additional supervision requirements.

D. Program Director Response to Red-Flag Behaviors or Policy Violations

The Program Director will do the following when in receipt of a report of red-flag (inappropriate) behaviors or policy violations.

1. Determine the appropriate response based on the report. Take into consideration factors such as:
 - Context of the red-flag or inappropriate behavior or policy violation;
 - Severity of the red-flag or inappropriate behavior or policy violation;
 - History of red-flag or inappropriate behaviors or policy violations; and
 - Trainability of the Program Staff involved.
2. Choose one or more from among the range of appropriate responses that may be taken:
 - Small concerns: Allow the reporter to speak with the person involved, indicating the specific behavior, why the behavior does not meet the standard of Christian virtue, and explaining what correct behavior would be. (This could be understood as an instance of

the traditional evangelical practice called “fraternal correction.”) Examples of minor concerns:

- o Physical roughhousing
- o An adult behaving in a childish or immature way
- o An adult getting angry at a minor for making a mistake (as opposed to properly correcting the minor)
- o An adult being alone with a minor one time
- Boundary violations or mistreatment: The Program Director will advise the person who reported the behavior that their concern is being taken seriously and then the Program Director will speak directly with the person involved, indicating the specific behavior, why the behavior falls short of the standards of Christian virtue and Menlough Study Center’s Safe Environment policies, and explaining what correct behavior would be.
 - o Examples of boundary violations or mistreatment:
 - Repeatedly tackling, poking, or tickling minors
 - Playing favorites with minors, taunting minors when they make a mistake such as during sports
 - An adult being alone with a minor multiple times
 - Talking about sexual matters in an inappropriate way with minors
 - o Because a boundary violation or mistreatment is involved, the Program Director should document the conversation on an Incident Report.
 - o If a boundary violation or mistreatment is involved, and if the conversation with the Program Director does not produce a change in behavior, the Program Director will issue a written warning.
 - o If boundary violations or mistreatment behaviors continue, the Program Director may terminate Program Staff from activities with minors.
 - o The Program Director should check the file of the Program Staff involved to determine if there have been similar concerns in the past with the same individual.
- Explicit physical, emotional, or sexual abuse:
 - o Document the report on the appropriate form.
 - o If appropriate, notify parents.
 - o Contact the state authorities and file a report.
 - o Notify the Board of Directors.

- o Suspend the potential abuser from participating Menlough Study Center's Programs at least until an investigation is completed.
- o If serious policy violations are confirmed, the Program Staff will be subject to disciplinary action up to and including termination from Menlough Study Center's Programs and/or prosecution.

E. Corrective Action Responses to Red-Flag Behaviors, Policy Violations, or Incidents of Abuse

When a serious red-flag (inappropriate) behavior, a serious policy violation, or an incident of abuse has been confirmed, the Board of Directors should conduct an internal review to develop a Corrective Action Plan:

1. Define the problem. Identify Who, What, When, and Where.
2. Gather all information and data surrounding the problem.
 - a. Review the incident
 - b. Review documentation
 - c. Interview key individuals
 - d. Review policies
 - e. Review training curricula
3. Determine root cause(s)
 - a. Ask Why?
 - b. Examine what system-wide causes may have allowed the incident to occur.
4. Identify Corrective Action to prevent the problem from recurring
 - a. Is there a need for increased supervision?
 - b. Is there a need for additional training?
 - c. Do any policies and procedures need to be revised?
 - d. What policy or policy compliance was found to be deficient?
 - e. What best practice standards can be put into place to prevent a recurrence?
 - f. What resources are needed to implement the best practice standard?
 - g. How will Menlough Study Center implement the best practice and ensure compliance?
5. Implement the necessary solution(s).

F. Program Director's Response to Minor-To-Minor Sexual Activity

When the Program Director receives a report of a minor's sexualized behavior or minor-to-minor sexual activity, they should:

- Meet with the Program Staff who reported the sexual activity to gather additional information
- Confirm that the minors involved have been separated or placed under increased supervision
- Notify State authorities, if required by the circumstances and by law
- Review the Incident Report to ensure it is accurately and thoroughly completed
- Meet with parents of the minors involved
- Review the immediate steps taken by the Program Staff who initially responded
- Determine what additional actions should be taken to ensure there is not a recurrence, including dismissing the perpetrator from this or all of Menlough Study Center's Programs (in some cases, minors' behavior can be managed through a supervision plan)
- Develop a written corrective action or follow-up plan in response to the incident

Based on the information gathered, the Program Director may need to do the following:

- Assess whether the activities are suitable for the minors involved
- Review the need for additional supervision of minors
- Review the need for revised policies or procedures
- Review the need for additional Program Staff training
- Review the need for additional education of minors
- Alert other Program Staff

Appendix – Incident Report

Date/Time of Incident: _____

Location of Incident / Program: _____

Type of Incident:

- | | |
|--------------------------------|---|
| _____ General policy violation | _____ Adult-to-minor boundary violation |
| _____ Verbal assault | _____ Adult-to-minor sexual abuse |
| _____ Physical assault | _____ Minor-to-minor sexual activity |
| _____ Bullying/Hazing | _____ Other: _____ |

Name/Role of Program Staff Involved:

Name/Role of Witnesses:

Describe the Incident:

Describe the Response of Program Staff:

Date of Notification (if applicable):

_____ Parents

_____ Program Director

_____ Law enforcement - case # _____

_____ Child protective services - case # _____

Submitted by (Name/Role): _____

Signature: _____ **Date:** _____

PROGRAM STAFF OR DIRECTOR TO COMPLETE WHAT FOLLOWS:

Describe the Response/Corrective Action (for example, follow up with parents, notify law enforcement or child protective services, notify the Board of Directors, review with person reporting the incident, interview additional Program Staff, disciplinary action for the person involved, increase or revise monitoring and supervision of program involved, review policies and training for any amendments needed, etc...)

Submitted by (Print Name/Role):

Signature: _____ **Date:** _____