Congregational United Church of Christ
Neenah/Menasha, Wisconsin

Approved 2/4/2024 by Congregational Vote

Safe Conduct™ Policy and Procedure

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Statement of Policy

Instead, as he who called you is holy, be holy yourselves in all your conduct. (1 Peter 1:15)

The main goal of this SafeConduct™ Policy is to prevent the abuse of Children and Vulnerable Adults. As a community of Christian faith, Congregational United Church of Christ Neenah-Menasha, Wisconsin (CUCCNM throughout the rest of this policy) is committed to creating and maintaining programs, facilities and a community in which members, friends, staff, and volunteers can worship, learn and work together in an atmosphere free from all forms of discrimination, harassment, exploitation or intimidation. The congregation of CUCCNM 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. CUCCNM strongly opposes and prohibits Sexual Exploitation, Sexual Harassment or any form of exploitation or abuse of others regardless of age, gender, race, national origin, sex, sexual orientation, sexual identification, mental capacity, disability, or any other protected characteristic. It is the intention of our congregation to affirmatively nurture good behavior and to prevent and correct behavior that is contrary to this policy. All Authorized/Licensed Clergy, retired clergy, church employees, church volunteers, parents and guardians have a role to lead those who look to them individually for guidance, to monitor their behavior and to 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. As we might conduct an orchestra, we shall guide and lead in ministry.

Glossary of Definitions

Authorized/Licensed Clergy: Includes any person who is admitted to ministry by The United Church of Christ and who serves the congregation in any capacity, whether called as pastor or serving in a retired, emeritus, administrative or volunteer capacity. Authorized/Licensed Clergy shall have fulfilled the background checking requirements of the United Church of Christ, as well as the background checking requirements of this policy.

Authorized/Licensed Clergy (active or retired) serving the congregation in any capacity shall hold themselves to a higher standard of care. This higher standard of care is in respect to their personal conduct and relationships with the congregation, church staff and volunteers, whether pastoral, administrative or personal in nature. The utmost care and good faith are expected.

Employee, Volunteer and Authorized/Licensed Clergy Conduct: Every employee, volunteer and Authorized/Licensed Clergy who works with Children and/or Vulnerable Adults has a

responsibility to lead those who look to them individually for guidance, to monitor their behavior, and to redirect them as they cross boundaries of SafeConduct™. Each employee, volunteer, and Authorized/Licensed Clergy, who works with Children and/or Vulnerable Adults, shall acquire knowledge of the details of this policy and related procedures in order to:

- Prevent Sexual Exploitation or Sexual Harassment of parishioners, employees, or others by anyone engaged in ministry on behalf of CUCCNM.
- Prevent abuse or exploitation of Vulnerable Adults, to include financial exploitation.
- Prevent abuse or mistreatment of Children, including abuse of one Child by another.
- Demonstrate appropriate physical contact and verbal interaction as defined in this policy. Prevent or redirect inappropriate interaction or physical contact by others.
- Enforce standards for contact between employees, volunteers and Authorized/Licensed Clergy with Children and Vulnerable Adults outside of scheduled programs.
- Enforce all communication guidelines, including Electronic Communications and social media.
- Manage risk of one-on-one contact between adults and Children or Vulnerable Adults.
- Act upon observations and allegations of behavior that is outside policy boundaries, including personal interactions, use of social media and use of church computers.
- Understand and accept obligations and know how to report Suspected Abuse of Children and Vulnerable Adults as required by this policy and the State of Wisconsin, as well as cooperating with related investigations.
- Recognize circumstances of Sexual Harassment and other forms of harassment, and the obligation and means to report to church leadership.
- Understand how—by action or inaction—employees, volunteers and Authorized/Licensed Clergy individually pose a risk to the church in the form of legal liability or loss of reputation.

Every employee, volunteer and Authorized/Licensed Clergy shall refrain from using a position of power or authority to exploit an advantage over any other person, adult, or Child.

Child/Children: We define a Child/Children as anyone age 17 or younger.

Electronic Communications: Electronic Communications include email, texting and any additional application or website that allows for direct communication.

Mandatory Reporter: Those persons required by the State of Wisconsin law to report "suspected abuse" to police or child welfare agencies. It is the individual responsibility of every employee, volunteer, and Authorized/Licensed Clergy to know if they are or are not a Mandatory Reporter, as well as the reporting requirements required by the state of Wisconsin and outlined in Wisconsin Statue WI 48.981(2)(a). To research these questions and participate in an optional training through the Wisconsin Child Welfare Development System, follow this link: http://wcwpds.wisc.edu/mandatedreporter/whois.html

Program Director: A paid church employee who is responsible for initiating, developing, organizing, supervising, monitoring or leading CUCCNM ministries.

Sexual Exploitation: Sexual activity or contact (not limited to sexual intercourse) in which an employee, volunteer or Authorized/Licensed Clergy engaged in the work of the church takes advantage of the vulnerability of a ministry participant by causing or allowing the participant to engage in sexual behavior with the employee, volunteer, or Authorized/Licensed Clergy.

Sexual Harassment: Repeated or coercive sexual advances toward another person contrary to his or her wishes. Sexual Harassment includes behavior directed at another person's sexuality or sexual orientation with the intent of intimidating, humiliating, or embarrassing the other person, or subjecting the person to public discrimination. Unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute Sexual Harassment when:

- submission to such conduct is made either explicitly or implicitly in a term, condition or circumstance of instruction, employment or participation in any church activity.
- submission to, or rejection of, such conduct by an individual is used as a basis for evaluation in making personnel or church-related decisions affecting an individual; or
- such conduct has the purpose or effect of unreasonably interfering with an individual's performance or participation in church activities or creating an intimidating, hostile or offensive work or church environment.

Prohibited Sexual Harassment includes unsolicited and unwelcome contact, of any kind, that has sexual overtones. Some examples include:

- written contact—written contact includes all forms of Electronic Communications and Social Medias—such as sexually suggestive or obscene emails, letters, notes, texts, or invitations.
- verbal contact, such as sexually suggestive or obscene comments, threats, slurs, epithets, sexual propositions, and jokes about gender-specific traits or sexual orientation.
- physical contact, such as intentional touching, pinching, brushing against another's body, impeding, or blocking movement, assault, or coercing sexual intercourse; and
- visual contact, such as leering or staring at another's body, gesturing, or displaying sexually suggestive objects, pictures, cartoons, posters, or magazines.

Sexual harassment also includes continuing to express sexual interest after being informed directly that the interest is unwelcome, and using sexual behavior to control, influence or affect the career, salary, work, learning or worship environment of another. It is not permissible to suggest, threaten or imply that failure to accept a request for a date or sexual intimacy will affect a person's job prospects, church leadership or comfortable participation in the life of the church. For example, it is forbidden either to imply or actually withhold support for an appointment, promotion or change of assignment; to suggest that a poor performance report

will be given because a person has declined a personal proposition; or to hint that benefits, such as promotions, favorable performance evaluations, favorable assigned duties or shifts, recommendations, or reclassifications, will be forthcoming in exchange for sexual favors.

Social Media: Electronic platforms such as Facebook, YouTube, Zoom or similar, that allow for reciprocal interaction between individuals.

Suspected Abuse: Actual abuse consists of physical, sexual, or mental abuse inflicted by a person responsible for a Child's health, welfare, or care, who may be a parent, guardian or other person having access to a Child. Abuse may include neglect of a person's health as a result of failure to properly feed, clothe or attend to apparent illness or mental well-being. As a caregiver in ministry, one need not directly witness, nor is one likely to directly witness, actual abuse. It is sufficient to suspect abuse based upon observations of general health, physical condition, patterns of irregular behavior, and environmental factors. Examples of observations might include bruising on multiple occasions, weight loss, chronic physical illness and anti-social or excessively withdrawn behavior. Environmental factors may include highly contentious divorce and custody battles, and parental drug use. One must use judgment in assessing multiple factors that lead to suspicion of abuse.

Note: While Suspected Abuse is defined here for the benefit of Mandatory Reporters for Children, the definition, for the purpose of this policy, includes Suspected Abuse of a Vulnerable Adult.

Vulnerable Adult: Any adult person who—by reason of physical disability or dependence, developmental disability, mental illness, relative social power, or cultural circumstances—may be susceptible to physical abuse, Sexual Exploitation, financial exploitation, or manipulation as a consequence of being unable to physically resist or render judgments regarding physical, mental, financial or environmental well-being. Such persons may be unable to act independently and may, to their detriment, manifest high levels of trust or fear of persons of perceived power or authority.

Congregational United Church of Christ Neenah-Menasha, Wisconsin

Code of Conduct for Working with Children and Vulnerable Adults

A full version of CUCCNM's SafeConduct™ Policy is available at www.cuccnm.org

The Congregational United Church of Christ of Neenah-Menasha, Wisconsin is referred to as CUCCNM throughout this policy.

The Code of Conduct for Working with Children and Vulnerable Adults (Code of Conduct throughout the rest of this policy) defines specific rules, procedures, behavior and conduct that all employees, volunteers, and Authorized/Licensed Clergy who work with Children or Vulnerable Adults are required to follow in order to comply with CUCCNM's SafeConduct™ Policy. All employees, volunteers and Authorized/Licensed Clergy who work with Children or Vulnerable Adults will receive and agree to implement the Code of Conduct prior to assuming responsibilities. Every two years, these individuals are required to review the Code of Conduct as part of their Volunteer Application. This biannual Code of Conduct update corresponds with CUCCNM's biannual background check update and training program refresher.

General Requirements

Each person subject to this Code of Conduct shall:

- Act as a team member in fulfilling ministry objectives.
- Treat Children and Vulnerable Adults fairly and with respect, without regard to race, age, gender, sexual orientation, or religion.
- Practice those behaviors we regard as necessary and positive, as well as refrain from those behaviors that have been defined as prohibited.
- Observe the 2:1 rule: Two adults may meet with a Child, or one adult may meet with two or more Children.

General Prohibitions

The following behaviors are prohibited at all times.

- Display affection toward a Child or Vulnerable Adult in private.
- Use profanity or tell off-color jokes.
- Discuss sexual encounters with or around Children or Vulnerable Adults, or in any way involve Children or Vulnerable Adults in one's personal problems or issues.

- Date or become romantically involved with Children or Vulnerable Adults.
- Use or be under the influence of alcohol or illegal drugs in the presence of Children or Vulnerable Adults.
- Possess sexually oriented materials, including printed or online pornography, on church property or at church-sponsored events.
- Have secrets with Children or Vulnerable Adults.
- Stare at or comment on anyone's body.
- Engage in inappropriate or unapproved communication with Children or Vulnerable Adults.
- Work one-on-one with Children in a private setting.
- Abuse Children or Vulnerable Adults in any way, including but not limited to the following:
    - Physical abuse: hit, spank, shake, slap, unnecessarily restrain.
    - Verbal abuse: degrade, threaten, curse.
    - Sexual abuse: inappropriately touch, expose oneself or engage in sexually oriented conversations.
    - Mental abuse: shame, humiliation, acting cruelly.
    - Neglect: withhold food, water, shelter.
    - Permit Children to engage in the following: hazing, bullying, derogatory name-calling, games of Truth or Dare, ridicule, humiliation, or sexual activity.
    - Manipulate or exploit a Vulnerable Adult in any way.

Reporting Obligations

Each employee, volunteer and Authorized/Licensed Clergy shall report:

- Concerns or complaints about other employees, volunteers, other adults or Children to the Authorized/Licensed Clergy or the Program Director associated with the program.
- Allegations or incidents of Suspected Abuse to the designated law enforcement or child welfare authority.

Specific Interaction Standards

CUCCNM employees, volunteers and Authorized/Licensed Clergy shall conduct themselves in a manner that fosters understanding of safe conduct in the context of serving Children and Vulnerable Adults. The standards articulated below serve two purposes:

1. To protect Children and Vulnerable Adults from abuse or grooming for abuse elsewhere.
2. To protect/prevent employees, volunteers, and Authorized/Licensed Clergy from engaging in patterns of behavior that may be construed as abusive or predatory. While a single infraction of guidelines may not constitute abuse, a pattern of repeated violations will result in disciplinary action up to and including dismissal from ministry.

Approval and Affection

In providing physical approval or affection, the following guidelines apply.

Appropriate Physical Interactions	Inappropriate Physical Interactions
• Side hugs • Shoulder-to-shoulder or "temple" hugs • Pats on the shoulder or back • Handshakes • High-fives and hand slapping • Pats on the head, when culturally appropriate • Touching hands, shoulders, and arms • Arms around shoulders • Holding hands with young children in escorting situations **Note: These may be inappropriate if unwanted by the Child or Vulnerable Adult.**	• Full-frontal hugs • Kisses • Showing affection in an isolated area • Lap sitting • Wrestling • Piggyback rides • Tickling • Allowing a Child to cling to an employee's or volunteer's leg • Any type of massage given by or to a Child • Any form of affection that is unwanted by the Child or the employee or volunteer • Compliments relating to physique or body development • Touching bottom chest or genital area

The manner of speaking with Children and Vulnerable Adults establishes respect. The following guidelines apply.

Appropriate Verbal Interactions	Inappropriate Verbal Interactions
• Positive reinforcement • Appropriate jokes • Encouragement • Praise	• Name-calling • Discussing sexual encounters or in any way involving Children in the personal problems or issues of employees and volunteers

	• Secrets • Cursing • Off-color or sexual jokes • Shaming • Belittling • Derogatory remarks • Harsh language that may frighten, threaten or humiliate Children • Derogatory remarks about the Child or his/her family

Adult-Child Ratios

For babies up to 18 months of age, a 1:4 ratio will be observed. For Children ages 18 to 36 months, 1:5, and for Children 36 months to age 9, a 1:10 ratio shall be maintained. A ratio of 1:25 is acceptable for Children over the age of 9. Employees, volunteers, and Authorized/Licensed Clergy under the age of 18 are not included in the ratio.

In all cases an employee, volunteer, or Authorized/Licensed Clergy under the age of 18 working with Children shall be under the supervision of an adult over the age of 21.

Employees, volunteers, and Authorized/Licensed Clergy under the age of 21 shall not supervise or lead a youth group in which the oldest participating Child is less than three years younger than the supervisor/leader.

Bathrooms and Changing Rooms

The following practices shall apply to supervision of bathrooms and changing rooms during church programs.

- No employee, volunteer or Authorized/Licensed Clergy shall enter with a single unrelated Child, unless the entry door is ajar (propped open) in a way that the employee, volunteer, or Authorized/Licensed Clergy can be observed by others. Children may not supervise other Children in the bathroom unless easily observed by another adult.
- Children in second grade or younger shall not enter unsupervised or enter as a lone pair.
- Supervised bathroom or changing room usage means that the adult in charge is within eyesight of the bathroom or changing room door.

- Children in eighth grade and younger are required to ask permission before using bathrooms.

Authorized/Licensed Clergy and Program Directors are to frequently and randomly check bathrooms and/or changing rooms to ensure proper usage as outlined above.

Transition and Free Time

Especially during day-long, off-site, or overnight activities, Children will periodically not be engaged in a supervised activity. Supervision shall be maintained during transition times through the use of chaperones, hall monitors and escorts to minimize the opportunity for security breach. Parents are expected to promptly pick up or drop off their Children to all church activities. Parents are responsible for their Children's safety and supervision when designated church activities are not taking place.

Free Time for Children during Adult/Parent Programs and Events

When designated church activities are taking place but mainly involve adults, it is the responsibility of the parents who bring children with them to be in the same room (or where Children may be easily observed by their parents) or to use available childcare provided by CUCCNM. It is the duty of the Authorized/Licensed Clergy or Program Director to inform parents of their supervision responsibilities and proactively ensure the adequate supervision of Children during programs.

Authorized/Licensed Clergy and/or corresponding Program Directors shall assess at what times and places additional duties are to be assigned to employees and volunteers to assure supervision of transition and free time.

Transportation of Vulnerable Adults

Authorized/Licensed Clergy, employee or volunteer driving Vulnerable Adults on behalf of CUCCNM to any official ministry event shall review SafeConduct™ Policy and Procedures, submit appropriate Code of Conduct, undergo a background check, and show proof of valid driver's license and auto insurance.

Transportation of Children

Transportation of Children—whether on buses, motor coaches or private passenger vehicles—is a serious responsibility. The utmost care shall be taken in view of the risks associated with managing transportation.

The following standards shall apply.

• No Authorized/Licensed Clergy, employee or volunteer shall transport a single Child who is not his/her own, except as may be required in an emergency with the approval of a supervisor. Communications shall be established to verify the whereabouts, expected arrival, and change of custody of the Child.

• Any driver operating a vehicle that holds 16 passengers or more, including the driver, shall possess a valid Commercial Driver's License (CDL).

• Any person who drives on behalf of CUCCNM-sponsored programs shall review SafeConduct™ Policy and Procedures, submit appropriate Code of Conduct, undergo a background check, and show proof of valid driver's license and auto insurance.

• Adult-Child ratios shall be maintained and within the safe loading limits of the vehicles being used. Before each trip, a Church Travel Manifest shall be provided to the church administrator that documents the departing time, arrival time, destination, mileage and names of passengers, supervising staff, and volunteers. Any unusual occurrences or significant changes in route should be documented.

• All passengers are to be seated and use safety belts, if available, when the vehicle is running.

• Employees and volunteers are to be seated in larger vehicles in a way that permits them to supervise young passengers.

• When passengers must disembark at a rest facility or destination, care shall be taken to obtain a head count upon arrival and departure. All passengers shall be required to complete a trip in the same vehicle to assure accountability.

• Provide a trip itinerary to the office administrator that documents the departing time, arrival time, destination, names of passengers and staff or volunteers.

Off-site Activities (Day Trips)

Off-site activities require special additional planning, taking into account the nature of the destination and exposure to the public at large. For example, attendance at a public venue such as an amusement park will require greater supervision than a visit to a sister church. Due to the increased risk of a Child becoming lost or injured during an off-site activity, extra care shall be taken to assure adequate supervision.

The following are the minimum requirements.

- All off-site activities shall be approved in advance by the supervisor of the employee, volunteer or Authorized/Licensed Clergy making the request.
- The trip leader shall provide a plan outlining transportation and supervision for the activity.
- Parent/guardian permission shall be obtained. Permission forms are to cite the destination(s) and dates of activity.
- Adult-Child ratios shall be increased by at least one adult person for the same number of Children. One adult may supervise only two persons under the age of 18 who are employees or volunteers.
- Each employee or volunteer shall be assigned to a specific group of Children to supervise. Each employee or volunteer must then maintain a roll sheet listing all of the Children in his or her group. Head counts and roll checks will be conducted routinely.
- Standards for bathroom activities, transition time and transportation shall be maintained.
- Parents/guardians shall be provided with a means to make emergency contact with the trip leader.

Overnight Activities

Camps generally have the experience and staffing to adopt different standards than these below. The assumption for the purpose of this standard is lodging at a public hotel, but this standard is applicable to overnights on the church premises and mission trips.

As with off-site activities, overnight activities present an even higher level of risk to Children than day trips, due to isolation from parents and the 24-hour supervision that is required throughout the activity.

The following standards will apply in addition to standards for off-site activities.

• Overnight activities, whether on the church site or not, shall have prior approval of corresponding Authorized/Licensed Clergy.

• All overnight activities include a minimum of two adult chaperones over 21 years of age.

• All volunteers and employees under 18 years of age must be supervised at all times.

• Trip leaders or other designated adults shall conduct routine walk-throughs of high-risk areas.

• In the event of a building evacuation, an outdoor rally point will be designated in advance.

• A roster will be maintained of the room assignments for each Child and adult.

• A bed check will be conducted at a specific time known to all.

• Adult-Child ratios are to be maintained for outings away from the lodging site.

• A daily schedule of events shall be maintained with supervisory duty assignments included.

• Double-queen lodging is preferred at hotels, four to a room. Children in each room will be of similar age. No adult will share a bed with a Child.

• Adult rooms will be scattered among rooms occupied by Children. There shall be at least one adult lodged on any floor on which Children are sleeping.

• Standards for bathrooms, out-of-the-way locations, off-limits locations, and transition time shall be maintained as the site circumstances and facilities may require.

• Use the Youth Behavioral Covenant.

Out-of-Program (Off-Site) Contact

CUCCNM generally recommends that employees, volunteers, and Authorized/Licensed Clergy do not have outside contact with Children from church programs. However, there are certain programs for which off-site contact is acceptable and where observing the 2:1 rule is required. The following forms of outside contact are appropriate and inappropriate for ministry with children:

Appropriate Outside Contact	Inappropriate Outside Contact
• Attending sporting events or other activities as part of a group • Attending functions at a Child's home with parents present	• Taking one Child on an outing without a parent's or guardian's written permission • Visiting a Child's home without a parent present • Entertaining one Child in the home of a church employee or volunteer • A lone Child spending the night with a church employee or volunteer

In addition, when outside contact is unavoidable, the Authorized/Licensed Clergy or Program Director shall identify for the employee or volunteer: what types of outside contact are appropriate and inappropriate (above), which off-site contact is acceptable for Children's ministry, and how parents will be made aware of such outside contact.

One-on-One Interactions

Because most abuse occurs when an adult is alone with a Child, private one-on-one meetings with a Child are prohibited unless approved in advance by the Authorized/Licensed Clergy or Program Director. When so permitted, the following guidelines shall apply.

One-on-One Interaction Guidelines
• When meeting one-on-one with a Child, always do so in a public place in full view of others. • Avoid inappropriate physical interactions as previously stated. • 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 employees, volunteers, or Authorized/Licensed Clergy that you are alone with a Child and ask them to randomly drop in. (Ask to be supervised.) • Document and immediately report any unusual incidents—including disclosures of abuse or maltreatment and behavior problems—and how they were handled, injuries, or any interactions that might be misinterpreted.

To the extent any of these guidelines may appear to be in conflict, the spirit of them is that one shall seek to be under the supervision of others while meeting privately with a Child.

The Congregational United Church of Christ of Neenah-Menasha, Wisconsin

Social Media and Electronic Communications

Social Media definition: Electronic platforms, such as Facebook, YouTube, Zoom, or similar, that allow for reciprocal interaction between individuals.

Electronic Communications definition: Electronic Communications include email, texting, video conferencing and any additional application or website which allows for direct and potentially private communication.

General Social Media Policy

In order to extend the life of the congregation, enhance communication and develop participation of young people in the life of the church and its ministry, CUCCNM will authorize certain employees, volunteers and Authorized/Licensed Clergy to manage the church's website and Social Media channels.

No party shall create a website or Social Media site in the name of, or purporting to represent, the church without the explicit, written permission of the Authorized/Licensed Clergy or Program Director most directly involved with the ministry. When an employee, volunteer, or Authorized/Licensed Clergy, acting in their capacity as a representative of the church, leads or coordinates activities using social media, the Program Director or Authorized/Licensed Clergy must review all electronic materials for appropriateness of content. These electronic materials may include Web pages, Facebook, email, and similar means. At CUCCNM we define Children as anyone age 17 or younger. Connection is defined as friending, following or in any way linking profiles together.

Social Networking Code of Conduct

Employees, volunteers, and Authorized/Licensed Clergy who manage public pages on behalf of church programs are responsible for monitoring communications and assuring that appropriate conduct is enforced in conversations. The employee or volunteer shall:

- As possible, post a link to this Social Networking Code of Conduct on all official Social Media pages of CUCCNM.
- Prohibit comments that are, or could be construed by any observer to be, harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating.
- Prohibit sexually oriented conversations or discussions about sexual activities.
- Prohibit posting inappropriate pictures (for example, sexually suggestive, exploitive, or voyeuristic) or inappropriate comments on pictures.
- Deny participation by individuals who repeatedly violate the Code of Conduct.

Each employee, volunteer or Authorized /Licensed Clergy who leads using the resources of social media shall:

- Encourage parents to play a role in monitoring their Children's interactions through electronic channels with employees and volunteers.
- Continuously remind Children how to interact appropriately through social networking sites.
- Authorized/Licensed Clergy or Program Directors shall notify parents/guardians of any new electronic channel of communication upon initiation and provide parents/guardians the opportunity to participate in said electronic channel.

Communication with Children

Due to the attendant risk of Electronic Communications with Children, especially the inability to supervise, the following standards shall apply.

- All Electronic Communications with Children and Vulnerable Adults in general must follow CUCCNM's Code of Conduct. Social Media and messaging with Children shall be limited to logistical matters, e.g., setting meeting dates, times, places or investigating matters of pastoral concern. When concerns regarding safety, legal matters or inappropriate discourse arise, the parents or legal guardians of the perceived victim shall be notified.
- All social networking communication with Children on behalf of the church must take place within the context of CUCCNM's official electronic channels.
- Employees, volunteers, and Authorized/Licensed Clergy shall not use personal social networking profiles or personal blogs to message with Children of the church to whom they are not related.
- Employees, volunteers, and Authorized/Licensed Clergy with personal profiles on social networking sites may not make any type of connection through social media with Children of CUCCNM to whom they are not related.
- Employees, volunteers, and Authorized/Licensed Clergy are allowed to communicate directly with Children of the church using a church or personal email account, CUCCNM electronic newsletter, or text messaging service, provided that the Child's parents are copied on all communications. Employees, volunteers, and Authorized/Licensed Clergy may make phone calls to Children directly only after receiving parental permission.

Refugee and Political Exiles Policy

As an extension of the mission of CUCCNM to advocate for justice both locally and abroad, CUCCNM may infrequently host refugees and/or exiles with outside partnering organizations. Because of the extenuating circumstances of this ministry, all representatives of CUCCNM will primarily observe the safe conduct (or related) policies of the hosting organization until the partnership between CUCCNM and the hosting organization is dissolved or the served individuals become members of CUCCNM. When/if a served individual joins CUCCNM, CUCCNM's SafeConduct™ Policy will then strictly be observed. In all situations, employees, volunteers, and Authorized/Licensed Clergy acting on behalf of CUCCNM will make every attempt to follow the Code of Conduct in this SafeConduct™ Policy to the extent to which it does not conflict with the outside ministry requirements or cause disruption to our temporarily partnered ministry.

Screening and Selection

Prior to beginning duties, each church employment, volunteer, and Authorized/Licensed Clergy candidate who desires to work with Children or Vulnerable Adults shall be subject to the following qualifying steps.

Application and Qualification

All employment and volunteer candidates shall:

1. Complete an application. The employment and volunteer application will include: disclosure of criminal convictions, work history, 10 years of residence history and education. Responses are required for each and every question; no answers may be omitted. Falsification of any aspect of the application shall be grounds for immediate dismissal from the employment and volunteer process.
2. Provide a minimum of three references, which shall include work-related, volunteer, and/or personal. One reference must be a family member.
3. Grant written permission to conduct a background check as specified by this policy.
4. Review, understand and ask any questions about the SafeConduct™ Policy and the Code of Conduct prior to submission of an application.
5. Complete all required training obligations prior to assumption of duties and within the time frame requested by the church. This includes reviewing and agreeing to implement the Code of Conduct. The agreement will be renewed every two years along with a biannual training update.

Volunteers shall be active members of the church, or otherwise affiliated with the church, for no less than six months before being permitted to work in programs associated with Children or Vulnerable Adults. Even when volunteer candidates come from another church with similar programs, the six-month affiliation rule still applies. The only exception to the six-month affiliation rule is for Confirmation mentors involved in the current Confirmation class. Personnel Committee, Authorized/Licensed Clergy or Program Director shall oversee the application, interview and training process for every employment and volunteer candidate.

Personnel Committee, Authorized/Licensed Clergy or Program Director shall assess suitability of each candidate for working with Children or Vulnerable Adults and specifically communicate the church's commitment to protecting all Children and vulnerable persons from abuse. Each employment candidate will undergo a formal face-to-face interview with Authorized/Licensed church representatives. Questions related to working with Children and Vulnerable Adults will be asked. Volunteer candidates will undergo an interview at the discretion of the Authorized/Licensed Clergy or Program Director.

The Personnel Committee will directly contact and interview at least three references for each employment candidate, a combination of professional and personal, ask standardized questions to assess suitability, and document responses. Volunteer candidates will be required to provide at least three similar references.

Background Checking

Authorized/License Clergy and/or Program Director shall ensure that a criminal background check on every employment and volunteer candidate is completed and meets the following criteria:

- National multi-state criminal records search.
- National sex offender registry search.
- Social security number trace and alias search.
- County criminal records search for every county where the applicant has lived or worked over the past 10 years.

Written or electronic permission to conduct a background check shall be obtained from each applicant prior to executing the check. Permission will be given by the applicant to the church to run multiple background checks for a period of up to two years. If concern is expressed, consideration will be made to exclude Social Security numbers from background checks, but additional provisions for security may be required.

Criminal background checks shall be repeated for employees and volunteers who perpetually work with Children or Vulnerable Adults every two years. This includes all Confirmation mentors. Criminal background checks may be repeated at a greater frequency when information exists that an individual's background or circumstances may have changed since a criminal background check was last performed.

Background Check and Reference Check Approval Procedure

Authorized/Licensed Clergy and/or Program Director shall review each background check and determine whether or not the candidate is eligible for church employment or volunteer consideration. If any concerns or discrepancies arise with the background check, the Pastor will be notified and shall retain the right to make a final approval. A criminal record is not an automatic bar for employment or volunteer work.

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

1. Seriousness of the crime.
2. Statutes that may legally disqualify the person from working with Children or Vulnerable Adults.

3. Length of time since the last offense.
4. Pattern of criminal activity.
5. Activities the applicant has been involved in since the offense(s) occurred.
6. Drug offense(s) or driving offense(s), depending upon position requirements.

Conviction for the following crimes shall be considered barriers for employment or volunteer work with Children and Vulnerable Adults:

1. Violent crimes.
2. Sexual assault.
3. Sexual abuse or neglect of a Child and/or Vulnerable Adult.

Arrest records are generally not grounds for disqualification. The status or relevance of crimes will be considered on a case-by-case basis.

Confidentiality

At all times, the privacy and security rights of individuals are to be protected with utmost care.

Grandfathering Not Permitted-Employees, Volunteers, Authorized/Licensed Clergy

Each incumbent employee, volunteer or Authorized/Licensed Clergy who works with Children or Vulnerable Adults, in any capacity and regardless of length of service, must be willing to set an example for all others who follow in their ministry. Therefore, at the time this policy is first adopted, all incumbent employees, volunteers and Authorized/Licensed Clergy who work with Children or Vulnerable Adults shall execute and sign applications and submit to a background check as is required for employment and volunteer candidates.

Grandfathering Not Permitted—Convictions of Sexual Misconduct

Each incumbent CUCCNM member, regular church attendee, or church employee who has been convicted of sexual misconduct shall identify themselves to one of CUCCNM's Authorized/Licensed Clergy. The Authorized/Licensed Clergy, in consultation with legal counsel, will determine whether the offense(s) warrant the individual's participation in CUCCNM's Limited Access Agreement for Cases of Sex Offenders found in this policy.

Record Retention

Volunteer applications shall be retained in the same manner as employee applications with due regard for the safety of private information. The individual record shall include:

- Employee or volunteer application.

- Permission to perform a background check (and credit check as may be required for some employees).
- Results of the background check.
- Background Investigation Results.

Training

The main goal of CUCCNM's SafeConduct™ Policy is to prevent the abuse of Children and Vulnerable Adults. CUCCNM's SafeConduct™ Policy is also dedicated to providing adequate training for all employees, volunteers and Authorized/Licensed Clergy who work with Children and/or Vulnerable Adults. It is difficult to comprehend that those among us, our friends and family, would commit such acts willingly. Nevertheless, some persons who have not been taught behavioral standards and do not understand boundaries may unwittingly engage in behaviors that may be perceived as predatory. Their personal reputations and the reputation of CUCCNM are then at risk.

To fulfill CUCCNM's training obligation to its employees, volunteers and Authorized/Licensed Clergy, every employee working in excess of twenty hours in a single calendar year and every volunteer who works with Children and Vulnerable Adults shall:

1. Receive instruction on how to access CUCCNM's complete SafeConduct™ Policy that is contained and maintained on the church website. Hard copies will be provided upon request.
2. Complete the appropriate online training (Child and/or Vulnerable Adult) and assessment prior to assuming duties. Completion of one (or both) online training program(s) and assessment results will be verified by Personnel Committee, the Authorized/Licensed Clergy or Program Director. Training will be repeated every two years in conjunction with background check updates. Training records will be maintained by the church office.
3. Review and agree to implement CUCCNM's Code of Conduct prior to assuming duties. Authorized/Licensed Clergy and/or Program Director will ensure that the Code of Conduct has been provided. Employees, volunteers, and Authorized/Licensed Clergy will review the Code of Conduct every two years in conjunction with background check updates and online training course refreshers.

Employees working less than twenty hours in a given calendar year who are not contracted to work directly with Children or Vulnerable Adults will complete a background check, and review and agree to implement CUCCNM's Code of Conduct but are not required to receive online trainings.

Monitoring and Supervision

Each employee, volunteer and Authorized/Licensed Clergy who is in a position of leadership shall regularly supervise and provide leadership in the fulfillment of CUCCNM's SafeConduct™ Policy.

The intent is to sustain relationships that encourage employees and volunteers to meet CUCCNM's SafeConduct™ policy objectives while being mutually supportive as a team. All employees, volunteers and Authorized/Licensed Clergy must be comfortable in reporting violations of the Code of Conduct. The objective of monitoring is, first, to protect Children and Vulnerable Adults, then to protect employees, volunteers, and Authorized/Licensed Clergy from false allegations, and to protect the reputation of CUCCNM.

Employees and volunteers must understand that their job descriptions include the obligation to observe and report behavior that violates the Code of Conduct.

Authorized/Licensed Clergy and Program Directors will continuously monitor adherence to the Code of Conduct using a variety of techniques, including:

- Scheduled visits.
- Unannounced random visits at unpredictable times.
- Review of past Code of Conduct violations.
- Personnel Committee, Authorized/Licensed Clergy or Program Director reviews to ensure that every two years, the following have been updated: background checks, training classes and Code of Conduct agreement updates.
- CUCCNM's Ministry of Stewardship, with the support of Ministry Council, will ensure that appropriate firewalls and filtering exist for all church computers.

Reporting and Responding

In ordinary administrative matters we expect employees, volunteers, and Authorized/Licensed Clergy to address concerns with their immediate supervisors. However, situations affecting the health and welfare of Children and Vulnerable Adults may require a direct and expedited means of communication to Authorized/Licensed Clergy and Program Directors.

When an employee, volunteer or Authorized/Licensed Clergy observes a violation of the Code of Conduct, they have a duty to report it directly to the Authorized/Licensed Clergy, Program Director, Church Moderator or Church Vice Moderator. The report shall be made to two of four positions, at the same time. Authorized/Licensed Clergy, Program Directors, Church Moderator and Church Vice Moderator are identified in this policy's Leadership and Reporting section.

If for any reason the observer is uncomfortable reporting violations to the Authorized/Licensed Clergy, Program Director, Church Moderator or Church Vice Moderator, the observer may contact higher levels of church authority, such as the Conference Association Minister. In addition, if the observer believes that the Authorized/Licensed Clergy, Program Director, Moderator, or Vice Moderator failed to respond to reports of Code of Conduct violations or has any conflict of interest, the observer may contact higher levels of church authority, such as the Conference Association Minister.

Note: The observer or victim shall be permitted to report violations of policy or circumstances of abuse anonymously.

While respecting and protecting the confidentiality wishes of the observer or victim, the Church Moderator will ascertain with reasonable certainty the relationship of the observer to the incident and the credibility of the information being provided. The Church Moderator will report the circumstances to the Personnel Committee. The Chair of the Personnel Committee shall initiate (1) investigation of the facts, (2) corrective action, (3) reporting as may be required by statute, and (4) contacting appropriate legal counsel. This process will be followed unless the specific circumstances suggest an alternate approach may be appropriate, including but not limited to turning the investigation over to the police or having others conduct the investigation if the Chair of the Personnel Committee is unavailable.

CUCCNM is committed to prompt, professional, and measured responses to all reports of Code of Conduct violations. CUCCNM is committed to (1) seriously consider the concerns of victims, (2) undertake a fair investigation of policy violations, (3) protect the confidentiality of parties involved in investigation to the extent possible under the circumstances, (4) report to as required and cooperate fully with public authorities, and (5) communicate fully with the congregation as appropriate under the circumstances.

Fulfillment of this commitment requires every employee, volunteer, and Authorized/Licensed Clergy to assume responsibility as part of their respective duties.

Responsibility of All Employees, Volunteers and Authorized/Licensed Clergy

Each employee, volunteer and Authorized/Licensed Clergy is required to follow CUCCNM's Code of Conduct, both by living the Code of Conduct requirements and helping others to do the same. Each employee, volunteer or Authorized/Licensed Clergy is required to guide and gently correct others, in order to comply with the Code of Conduct. When another person, regardless of status, rank, or power, commits a Code of Conduct violation, the observer must report the violation to Authorized/Licensed Clergy, Program Director, Church Moderator, or Church Vice Moderator.

Failure to report Code of Conduct violations will lead to disciplinary action. For employees, such disciplinary action could include termination of employment. For volunteers, such disciplinary action could include dismissal from volunteer duties and removal from the church.

Responsibility of Mandatory Reporters

Regardless of procedures outlined herein, each person who is considered a Mandatory Reporter under the statutes of Wisconsin Law WI 48.981 and shall in good faith report "abuse" as defined under the statutes of Wisconsin Law WI 48.02(1).

CUCCNM requires that employees, volunteers, and Authorized/Licensed Clergy immediately report circumstances described above to the Authorized/Licensed Clergy, Program Director, Church Moderator or Church Vice Moderator. Without delay, the highest-level church leader who is considered to be a Mandatory Reporter will make the initial report to police or Child welfare authorities on behalf of CUCCNM.

Note: Nothing in this policy shall be considered a restraint of an individual's statutory obligation to report to authorities. Furthermore, no person shall be restrained from reporting an incident on the basis that he/she is not a Mandatory Reporter.

Note: An employee, volunteer or Authorized/Licensed Clergy may be expected to recuse him/herself from the reporting and disciplinary process in situations where there appears to be a conflict of interest, such as a result of family ties or outside-of-church relationships but may not do so when he/she is a Mandatory Reporter as prescribed by Wisconsin State law.

Other Reportable Abuse

While the State of Wisconsin has defined abuse for the purpose of Child protection statutes and mandatory reporting, other kinds of abuse may occur. Other abuse that falls within the scope of CUCCNM's SafeConduct™ Policy includes (but is not limited to):

- Dangerous behaviors (hazing, truth or dare, drinking, etc.).
- c, whether Child-on-Child, adult-on-Child, or adult-on-adult.
- Physical, sexual, mental, or financial exploitation of a Vulnerable Adult.
- Child-on-Child sexual activity.

All such activity shall be reported by employees, volunteers, or Authorized/Licensed Clergy in the same manner as any violation of the Code of Conduct. In the event of a church-sponsored activity where there is not an identifiable Authorized/Licensed Clergy or Program Director reports can be made to the Church Moderator.

Other Disciplinary Processes

Other behaviors not necessarily involving Children or Vulnerable Adults, or which may not be considered strictly illegal are subject to other disciplinary practices as may be set out by the Wisconsin Conference United Church of Christ. Behaviors subject to other adjudication may include but are not limited to:

- Sexual harassment, whether among employees or volunteers.
- Authorized/Licensed Clergy and/or employee professional boundary violations.
- Sexual exploitation.
- Sexual relationships between an Authorized/Licensed Clergy and a Child, even when permitted by law.

All such activity shall be reported by employees, volunteers, and Authorized/Licensed Clergy in the same manner as any violation of the Code of Conduct. In cases where there is not an identifiable Authorized/Licensed Clergy, Program Director, reports shall be made to the Church Moderator.

Cooperation with Investigations

CUCCNM expects and requires the cooperation of all employees, volunteers, and Authorized/Licensed Clergy in the investigation of violations of the Code of Conduct. Any employee, volunteer or Authorized/Licensed Clergy who fails to cooperate with an investigation or who provides incomplete or inaccurate information may be subject to disciplinary action.

Note: Employees, volunteers, and Authorized/Licensed Clergy who aid in investigations shall not be retaliated against for their participation.

Notification of Parents/Guardians

A Child may be party to an incident either as an initiator or as the victim. Whether a Child is initiator or victim may not be clear in all circumstances, such as a Child-on-Child incident. Violation of policy does not necessarily create a victim. While notification of parents/guardians may be warranted, utmost care in communication is required. Therefore, an employee, volunteer or Authorized/Licensed Clergy having knowledge of an incident which warrants communication to parents/guardians shall first advise the Authorized/Licensed Clergy, Program Director, Church Moderator or Church Vice Moderator.

Note: Notification of parents/guardians shall not be delayed when immediate medical care is required.

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

• Whether mandatory reporting is a factor.

• 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).

• Which church Authorized/Licensed Clergy or Program Director(s) shall communicate with the parents/guardians and in what manner.

• Tentative remedial steps to prevent a further incident.

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Victim Needs

In cases of reportable abuse, the policy of CUCCNM is to be responsive to the needs of victims within the constraints and obligations imposed under insurance contracts. In general, we will attend to the immediate needs of victims by providing support and pastoral care.

Responding to Media

Media publicity following an incident or allegation of abuse or exploitation may be detrimental to the reputations of individuals, the congregation and CUCCNM. Without evading the media, contact with media must be managed and conducted only by a person specifically designated by

the Church Council. No other person(s) may speak on behalf of the church unless designated by the Church Council in a particular circumstance.

Prior to speaking to media, the Church Council-appointed spokesperson shall contact and consult with the Wisconsin Conference Legal Counsel and CUCCNM's insurance carrier to obtain an understanding of appropriate statements or admissions and issues of privacy that may apply to the situation.

Congregational Awareness

CUCCNM is dedicated to open communication and education surrounding the SafeConduct™ Policy. The congregation is entitled to know what to expect of church ministries and of employees, volunteers, and Authorized/Licensed Clergy, as well as policies and procedures created to protect the respective ministry constituencies. Constituencies include: Children, Vulnerable Adults, parents, guardians and employees, volunteers or Authorized/Licensed Clergy.

The entire SafeConduct™ Policy will be posted on the CUCCNM website. Authorized/Licensed Clergy and the Program Directors will ensure that the most recent version of CUCCNM's SafeConduct™ Policy is available on the church website.

At the time Children or Vulnerable Adults are enrolled in CUCCNM programs, parents or legal guardians will be directed to the CUCCNM website, which will include the entire SafeConduct™ Policy. Parents and guardians will be invited to receive the same abuse prevention training as provided to employees and volunteers.

Parents and guardians will be encouraged to report violations of policy, boundaries, or Suspected Abuse in the same manner available to employees and volunteers described in the Reporting and Responding section above.

Administrative Practices

Reporting to Church Leadership

When incidents or allegations occur that may have a bearing on the well-being of a church member, the congregation, the church's reputation, its ministries or employees, volunteers or Authorized/Licensed Clergy, the Authorized/Licensed Clergy or Program Director will inform Church Council. These types of incidents or allegations include, but are not limited to, SafeConduct™ Policy violations, such as suspicious or inappropriate interactions (adult-Child; Child-Child; adult-Vulnerable Adult), sexual activity between Children, allegations of abuse, or violations of professional boundaries.

Ministry Standards

Ministries subject to CUCCNM's SafeConduct™ Policy and its Code of Conduct include all CUCCNM-sponsored programs, classes, activities, trips and events that involve Children or Vulnerable Adults, whether held on church property or off-site.

No new ministry or program may be created in the name of CUCCNM without the expressed written consent of the related ministry committee and/or supervisor.

Each ministry of the church shall base its activities, training, documentation, safety practices and participants' and constituents' interests on the SafeConduct™ Policy, ensuring that all involved employees, volunteers, and Authorized/Licensed Clergy abide by and agree to the Code of Conduct.

When ministry is subject to state regulation (for example, day care, preschool) such regulations shall constitute minimum requirements. Without creating unnecessary duplication, the SafeConduct™ Policy shall apply in addition to regulatory requirements.

Ministry Standards—Outside Organizations

Prior to use of church facilities by an outside organization (lessee) to conduct activities equivalent to those cited above, and whether or not stipend or contributions are provided to CUCCNM (lessor), there shall be an evaluation of whether the organization has established sufficient standards to be regarded as a competent partner in ministry. A lease or use agreement will be required with the organization. This agreement shall cite fulfillment of the organization's written or statutory standards as a condition of continued occupancy of church property. The use agreement shall contain terms requiring that "lessee hold harmless, defend

and indemnify lessor for claims arising out of its occupancy of and activities on lessor's property" (or equivalent language). Outside organizations shall not be required to adhere to CUCCNM's SafeConduct™ Policy.

Monitoring Compliance with Standards

The success and strength of this SafeConduct™ Policy is not created by its words but by the actions of the employees, volunteers and Authorized/Licensed Clergy who must carry it out. From time-to-time employees, volunteers and Authorized/Licensed Clergy will be required to redirect, correct and remediate individuals who have not maintained the Code of Conduct. While violations of the Code of Conduct do not always constitute an incident of Suspected Abuse that requires statutory reporting, they do require a response. Employees, volunteers, and Authorized/Licensed Clergy must follow the Wisconsin Conference United Church of Christ Guidelines.

In the aftermath of an incident of Suspected Abuse or a violation of the Code of Conduct it may be necessary for the church and its employees, volunteers, and Authorized/Licensed Clergy to defend their actions which support this policy. Therefore, every employee, volunteer, and Authorized/Licensed Clergy of the church shares in the obligation to follow the Wisconsin Conference United Church of Christ Guidelines.

Policy Modification

CUCCNM may revise this policy as it feels appropriate. CUCCNM also reserves the right to deviate from any of the policy's terms should individual circumstances require. Should any provision of this policy violate applicable law, applicable law will be followed.

The Ministry of Faith Development is to review this policy every three years and recommend changes to the congregation as needed. Personnel Committee or Pastor is charged with employee orientation.

Leadership and Reporting Roster

The persons listed below are Authorized/Licensed Clergy and/or Program Directors at CUCCNM. Reports of SafeConduct™ Policy violations, suspicions or concerns can be made to any of the persons listed below, but preferably to the person in whose ministry or program the incident or allegation has occurred.

Position	**Name**	**Telephone**	**Email**
Pastor	Rob Van Ess	920- 273-9794	Pastor@cuccnm.org
Christian Education Director	Alanna Smith	414-793-7561	ce@cuccnm.org
Music Director	Jill Rosenthal	920-939-0128	jellenrosen@gmail.com
Conference Minister	Rev. Jane Anderson	920-540-2586	janderson@wcucc.org

Other important SafeConduct™ Policy reporting contacts include:

Church Moderator	Signa Meyers	(920) 659-2247	signa.meyers@gmail.com
Church Vice Moderator	Sue Knuth	(920) 850-9609	susan.j.knuth@gmail.com
Media Spokesperson	Marilyn Kostrzak	(920)680-5237	mkostrzak@aol.com
Law Enforcement Agency	Neenah Police Department	(920) 886-6000	
Child Welfare Agency	Winnebago Child Protective Services	(920) 236-4615	

To be updated annually after church elections

Sex Offender Guidlines

As a community of faith, serving by the example of Jesus Christ, CUCCNM seeks 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 reoffend 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:

- Document understanding of the statutory limitations applying in the State of Wisconsin to the movement and activities of a sex offender, taking into account the programs of the church.
- Consider and understand 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 particular programs of our congregation.
- Document understanding of limitations and prohibitions placed upon the offender by courts and probation authorities, if applicable. 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 staff member, 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 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 sex offender. 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 sex offender 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 ongoing eligibility. Violation of the agreement by the offender 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 sex offender is a member of the congregation, a regular church attendee, an employee or is a client of other services provided by the congregation, the sex offender 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 in the State of Wisconsin, and the parameters of confidence and privilege as defined the UCC. Authorized clergy shall inform the leadership of the church of the general principles of confidence and privilege under which they performs their clerical duties.

Chaperones – Conditions of limited access for a sex offender will commonly require that the offender have a chaperone while on the church premises or at church events elsewhere. A person serving as a chaperone shall not be a spouse, partner, friend or relative of the offender.

Approval & Supervision

With the advice and prior approval of the Ministry Council, a Limited Access Agreement with a sex offender shall be signed only by the pastor.

The pastor, in association with the chaperone who shall be named in the Limited Access Agreement, shall be responsible for the general supervision of the sex offender 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 sex offender.
- Knowledge of the sex offender's 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 sex offender.
- Willingness to intervene in any onset of a risky or problem behavior.
- Willingness to report all cases of non-compliance to the pastor.

The pastor shall assess, prior to selection, whether a proposed chaperone is willing to fulfill the above elements of supervision.

Professional privacy – Members or regular church attendees 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 members or regular church attendees. Such members or regular church attendees 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.