Faith Global Missions, LLC

Policy for Protection of Children and Vulnerable People

This Policy for Protection of Children and Vulnerable People ("Policy") establishes guidelines for conduct which is specifically related to Children and vulnerable people, including correction and discipline for offenses of child abuse, child neglect, or offenses of abuse or neglect of vulnerable people (both as defined herein).

1. Persons Affected

- 1.1. All FGM staff, volunteers, missionaries and missionary family members ("FGM Personnel") are included in the scope of this Policy.
- 1.2. Exclusion Statement: Consultants and contracted workers ("Contractors") not involved with Children and vulnerable people or other vulnerable persons are not subject to this Policy unless otherwise provided in the Contractor's agreement with FGM.

2. Board Parameters

- 2.1. FGM Personnel will be only those who are new creatures in Christ (i.e. saved, regenerated), who have a deep love for Him, and who are motivated by that love to involvement in the global spread of the gospel of Christ and the growth of His church.
- 2.2. All FGM Personnel wholeheartedly and without mental reservation agree to the Statement of Faith of FGM.
- 2.3. FGM Personnel accept the Bible as their final authority for life and conduct and hold that prohibitions on moral conduct as stated in the Old and New Testaments are, therefore, applicable and binding (excluding civil and ceremonial laws of the Old Testament).
- 2.4. FGM believes in creating a culture of responsibility, grace and trust, dependent on the Holy Spirit and the spiritual maturity of FGM Personnel, in the application of Biblical guidelines for moral conduct.

3. Administrative Policy

- 3.1 FGM values boys and girls of all ages and races, and FGM values all people regardless of age and regardless of whether they are healthy or infirm. The Bible teaches that Children are gifts from the Lord and that all adults have the solemn God-given responsibility to care for them properly. The Bible also teaches that believers are to minister to and protect those who are weak and vulnerable.
- 3.2 FGM believes that Children and vulnerable people have the right to protection from harm and abuse within the limits of the organization's jurisdiction.
 - 3.3 FGM expects proper moral and ethical conduct toward all Children and vulnerable people.
- 3.4 FGM recognizes that the reputation of an individual, church, or agency can be seriously harmed by a false report of abuse. Therefore, while protecting Children and vulnerable people as specified herein is FGM's primary goal, FGM will also seek to protect innocent parties.
- 3.5 Healthy human relationships between adults and Children include expressions of proper care and affection, guided by biblical standards of morality, ethics, and prudence.
- 3.6 Every person serving with FGM has the privilege of being a role model for the Children with whom they come in contact.

4. Definitions

- 4.1 <u>Accused</u>. A person (whether an Adult or a Child Perpetrator as described in Section 4.6.1 below) who is alleged to have committed an act of Abuse or Neglect, a serious violation of this Policy or has been charged with a crime involving Abuse or Neglect.
- 4.2 <u>Administrative Leave</u>. Relieving the Accused of assigned duties pending further notice from the Accused's FGM supervisor. Such leave will be with continuing pay and benefits while an investigation is pending. Provided, however, if there is irrefutable evidence of wrongful conduct worthy of termination, e.g. the Accused confesses to the alleged wrongful acts, or the wrongful acts are caught on video, then any administrative leave will be without pay or benefits.
 - 4.3 Adult. Any person who is eighteen (18) or older.
 - 4.4 <u>Child</u>. Any person under the age of eighteen (18).
 - 4.5 <u>Victim</u>. A Child or vulnerable person who is actually or allegedly the target of Abuse (defined in Sections 4.6 and 4.7), neglect (defined in Sections 4.6.5 and 4.7.3) or inappropriate behavior (defined in Sections 4.6.1 and 4.8.1).
 - 4.6 <u>Child Abuse</u>: The treatment of a Child, often in the context of a relationship of responsibility, trust or power that endangers or impairs the health or welfare of a Child. Child abuse can be perpetrated with or without the consent of the Victim. It can occur in a one-on-one encounter or in a group setting. Child abuse is recognized under four categories: Sexual Abuse (defined in Section 4.6.2), Physical Abuse (defined in Section 4.6.3), Emotional Abuse (defined in Section 4.6.4), and Neglect (defined in Section 4.6.5).
 - 4.6.1 <u>Child-to-Child Cases</u>. Should the Victim and the Accused both be under the age of eighteen, conduct will typically be considered to be Child Abuse if there is a difference based on (i) age (defined as_a difference of three or more years (1095 days) between the Victim and the other Child, or (ii) there is a difference in responsibility, trust, or power between them (the non-victim hereinafter called the "Child Perpetrator"). If neither (i) or (ii) exists, then what would

- normally be defined as Child Abuse will be considered "inappropriate behavior," with an action plan put in place to address the behaviors of concern and their effects.
- 4.6.2 <u>Sexual Child Abuse</u> is the involvement of a Child in sexual activity with an Adult or another Child (as defined above) which includes but is not limited to:
 - 4.6.2.1 <u>Verbal:</u> Remarks which include sexual threats, solicitation, sexually explicit language (whether in person, on the telephone, via text messaging, or internet), or any verbal expression with the intent to arouse or stimulate.
 - 4.6.2.2 <u>Visual</u>: Indecent exposure; showing or taking of suggestive pictures or pornographic material of genitals; or the showing of unclothed persons, any sexual activity or simulated sexual activity such as masturbation or intercourse; and peeping, leering, or staring.
 - 4.6.2.3. <u>Physical Touch:</u> Physical contact (or penetration by penis, fingers, or any other body part or object) with a Victim's clothed or unclothed genitals, pubic area, buttocks, or female breast; or causing a Child to perform any of these acts. Masturbation in front of or to the Victim, rubbing, holding, or kissing for the purpose of sexual gratification.
- 4.6.3 <u>Physical Child Abuse</u>: Any act which results in a non-accidental physical injury. Such acts may include, but are not limited to: slapping, punching, beating, kicking, biting, shaking, burning, holding under water, pulling hair, or holding against one's will.
 - 4.6.3.1. Physical discipline by a parent of their own Child, such as spanking or paddling, is not considered abuse as long as it is not unreasonably severe corporal punishment.
 - 4.6.3.2. Unreasonably severe corporal punishment of the Child by the Accused would include:
 - 4.6.3.2.1 Actions resulting in physical injury, including bruises (However, it is recognized that a small percentage of Children and vulnerable people bruise very easily, and that fact shall be considered).
 - 4.6.3.2.2 Inconsistent, arbitrary punishment designed not to educate, but to instill fear
 - 4.6.3.2.3 Punishment that is inappropriate for the age of the Child
 - 4.6.3.2.4 Punishment resulting from unreasonable expectations or demands on the Child by the caretaker
 - 4.6.3.2.5 Punishment that is the result of a caretaker losing control during discipline, including discipline being administered in anger.
 - 4.6.4 <u>Emotional Child Abuse</u>: Is defined by a pattern of behavior over time that impairs or risks impairing a Child's functioning or development. It includes acts of commission and acts of omission.
 - 4.6.4.1 Acts of commission. Acts of commission may include but are not limited to unreasonable restriction of movement, patterns of belittling, denigrating, screaming, threatening, scaring, humiliating, scapegoating, ridiculing, blaming, sarcasm, discriminating, bullying, hazing, unpredictable responses, constant family discord and double message communication, or other non-physical forms of hostile or rejecting treatment. Another form of unacceptable behavior is the failure or refusal of an Adult

exercising temporary or permanent control over a Child, in the context of resources reasonably available to them to provide food, clothing, shelter, basic medical care, education, or emotional and physical security and protection.

- 4.6.4.2 <u>Acts of omission</u>: Emotional abuse includes the failure to provide a developmentally appropriate and supportive environment, including the availability of a primary attachment figure, so that the Child can develop a stable and full range of emotional and social competencies commensurate with her or his personal potentials and in the context of the society in which the Child dwells.
- 4.6.5 <u>Child Neglect</u>: Child neglect is the failure of an Adult to provide for the development of the Child in all spheres: health, education, emotional development, nutrition, shelter, and safe living conditions, in the context of resources reasonably available to the family or caretakers, and causes or has a high probability of causing harm to the Child's health or physical, mental, spiritual, moral, or social development. This includes the failure to properly supervise and protect Children and vulnerable people from harm as much as feasible. Neglect also includes depriving a Child of the Child's basic needs of food, clothing, warmth and shelter, emotional and physical security and protection, medical and dental care, cleanliness, education, and supervision.

4.7 _Abuse or Neglect of a Vulnerable Person.

- 4.7.1 "Vulnerable persons" or "vulnerable people" are adults who: (a) are functionally, mentally, or physically unable to care for themselves; OR (b) have a court-appointed guardian; OR (c) have a developmental disability; OR (d) live in nursing homes, adult family homes, boarding homes, or any other facility; OR (e) get services from home health, hospice, or home care agencies.
- 4.7.2 "Abuse of a vulnerable person" means willful or non-accidental action or inaction that abuses or harms a vulnerable person. The abuse or harm of vulnerable people can be: physical or mental injury; unreasonably being held somewhere against their will; intimidation; sexual abuse; mental abuse; physical abuse; exploitation; or abandonment.
- 4.7.3 "Neglect of a vulnerable person" is when a person or agency with a duty to care for a vulnerable person acts (or fails to act) in a way that results in the vulnerable person not getting care needed to maintain his/her physical or mental health.
- 4.7.4 "Exploitation of a vulnerable person" is when an abuser illegally or improperly uses a vulnerable person or the vulnerable adult's income/resources, including trust funds or bank accounts, for the abuser's profit or advantage.
- 4.7.5 "Abandonment of a vulnerable person" is when a person or agency with a duty to care for a vulnerable adult acts (or fails to act) in a way that leaves the vulnerable adult unable to get needed food, clothing, shelter, or health care.

4.8 Inappropriate Behavior.

4.8.1 "Inappropriate behavior" is wrongful conduct that violates any code of behavior established by FGM, or is contrary to morality or integrity as established in the Bible, that, while serious in nature does not meet FGM's definition of Abuse or Neglect

5. Responsibility

7.1 FGM's Managing Director is responsible for overall enforcement of this Policy.

6. Procedures

- 6.1 <u>Screening</u>. FGM takes the following steps in order to use its best efforts to screen out Child abusers:
 - 6.1.1 <u>Job Descriptions</u>. All FGM job descriptions require that the person comply with the requirements of this policy and any other policies of FGM relating to conduct.
 - 6.1.2. Written Applications. Written applications for all FGM Personnel positions in which the applicant will work with Children and vulnerable people require the applicant to disclose his or her:
- 6.1.2.1 Specific history of employment and volunteer work with Children and vulnerable people;
- 6.1.2 .2 Answers to questions related to inappropriate behavior or abuse of Children and vulnerable people.
- 6.1.3 <u>References</u>. FGM requires at least three written references for all applicants who will be working with Children and vulnerable people, and has developed a set of reference inquiries which are designed to obtain information regarding past problems with Children and vulnerable people;
 - 6.1.4. <u>Interviews</u>. FGM conducts interviews (including at least one face to face) with all applicants and has developed a standard set of inquires about past experience with Children and vulnerable people;
 - 6.1.5 <u>Background Checks</u>. FGM requires background checks for all FGM Personnel, including criminal records checks and similar appropriate background checks relating to any conviction involving abuse of Children and vulnerable people, youth or adults.
 - 6.1.6 Zero Tolerance. FGM does not employ or accept as a volunteer, anyone with a prior conviction for, or a history of, Child Sexual Abuse or related offenses, or sexual abuse of a vulnerable person, during his/her adult life. FGM does recognize the biblical principles of repentance, forgiveness, progressive sanctification, spiritual growth and the "new man." Yet because the consequences of a mistake in evaluation can be so serious, FGM elects to err on the side of overprotection rather than underprotection of children and vulnerable people.

6.2. Training.

6.2.1 FGM Personnel Training

- 8.2.1.1 <u>Initial Training</u>. All FGM Personnel receive FGM's Child Protection Training as a part of the Orientation Training which is a condition of their engagement with FGM.
- 8.2.1.2 <u>Ongoing Training</u>. In addition, all FGM Personnel are required to take FGM's Child Protection Training on an annual basis as a condition to continued engagement by FGM.
- 6.2.2 <u>Record Retention for Training Compliance.</u> FGM maintains records evidencing that FGM Personnel (and others required to abide by this Policy where applicable) have

- reviewed and acknowledged receipt of this Policy and have completed the Initial and Ongoing Training.
- 6.3. <u>Code of Conduct</u>. The following are guidelines for working with Children and vulnerable people which are designed to reduce risk though minimizing isolation, maintaining modesty, using appropriate displays of affection, increasing accountability, and balancing power and control:
 - 6.3.1 Minimizing Isolation and Compromised Positions. When working with Children:
 - 6.3.1.1 <u>Visibility</u>. In order to avoid even the appearance of impropriety Adults should use best efforts at all times to be visible to others when with a Child.
 - 6.3.1.2 <u>Avoiding Isolation</u>. Whenever possible, the Adult should avoid isolation with a single Child by remaining in the presence of a minimum of two non-related Adults, or at least two Children.
 - 6.3.2 Modesty. An Adult should maintain modesty at all times by:
 - 6.3.2.1 Refraining from being alone with a Child at a time when either the Adult or the Child is changing clothes, or otherwise less than fully clothed.
 - 6.3.2.2 Being careful not to intrude into a Child's privacy, unless absolutely necessary to monitor the health and safety of the Child.
 - 6.3.2.3 Maintaining the Adult's own privacy, and refraining from freely discussing with a Child any sensitive subjects or unnecessary details about the private life of the Adult.
 - 6.3.2.4 Maintaining separate sleeping and changing areas for girls and boys, and refraining from sleeping in the same bed with a Child, other than the Adult's own Children.

6.3.3 Displays of Affection.

- 6.3.3.1 <u>Touch</u>. Proper touches are an important means of demonstrating our love and concern for the Children and vulnerable people and youth in our ministries. However touch should be: public rather than secretive; in response to the need of the Child or vulnerable person, not the Adult; and only with permission of the Child or vulnerable person. Regardless of background or culture, inappropriate touching includes, but is not limited to: touching or tickling Children or vulnerable people under their clothing; giving wedgies or pink bellies; touching buttocks, genital areas, the inner thighs or the female chest; or any touching described as abuse elsewhere in this Policy.
- 6.3.3.2 <u>Acceptable Signs of Affection</u>. The following are appropriate signs of affection: verbal praise; side hugs, pats on the shoulder, back, or head; and holding young Children.
- 6.3.3.3 <u>Unwelcomed Affection</u>. Some Children and vulnerable people come from backgrounds in which wholesome affection is not openly displayed, and therefore such Children and vulnerable people may be uncomfortable with even a genuine and wholesome display of affection. Personnel must be sensitive to these differences and use discretion and wisdom to avoid any affection that may be misinterpreted or which may make a Child uncomfortable.

- 6.3.4 <u>Increased Accountability</u>. All FGM Personnel are expected to interact with Children and vulnerable people in a mature, capable, safe, caring and responsible manner with a high level of accountability. All are responsible for giving and accepting feedback from others in order to maintain a high level of professionalism and integrity in interactions with Children and vulnerable people. When ministry to a child involves one-on one contact, the following procedures should be followed:
 - 6.3.4.1 <u>Advance Notification to Parents when Isolation is Unavoidable</u>. When ministry requires one adult and one Child (such as in the case of counseling) the Adult should be accountable to other Adults and parents must be notified in advance.
 - 6.3.4.2 <u>Parental Permission</u>. FGM personnel shall obtain parental permission for each Child prior to any activities, such as a retreat, youth activity, transporting a Child, keeping a Child after school, tutoring, overnights, and similar activities.
 - 6.3.4.3 <u>Use of Technology</u>. Whenever reasonably available, technology should be used to protect Children and vulnerable people from abuse or exploitation
- 6.3.5 <u>Balancing Power and Control</u>. When working with Children and vulnerable people balance the age, size, strength, power and authority between staff and Children and vulnerable people to help to lower risk. This can be done by sending two of the same age Children to the bathroom together with an adolescent or Adult helper, dropping off siblings together last in a carpool, or having a friend play in the room while talking to a Child after school.
 - 6.3.5.1 <u>Discipline</u>. All discipline administered to a Child shall be corrective rather than punitive. The following should be avoided: derogatory name-calling, ridicule, humiliation or shaming, publically singling out a Child for negative treatment or exclusion, yelling or belittling, hitting, slapping, or pushing. Corporal punishment may be administered only by a parent to his/her own Child.
 - 6.3.5.2 <u>Verbal interaction</u> should be used to encourage and support rather than shame, belittle, humiliate, threaten, or be derogatory. Comments that relate to body development are never appropriate. Also to be avoided are sexual jokes, inappropriate secrets, and discussion of sexual activity or desires.
 - 6.3.5.3 <u>Bullying by other Children and vulnerable people</u>. The following actions of one Child to another should be avoided: bullying, hazing, derogatory name-calling, ridicule, or humiliation, publically singling out another Child for negative treatment or exclusion, Child to Child inappropriate sexual touch, inappropriate sexually explicit language, showing of sexually explicit images, hitting, slapping, pushing, holding against their will, or otherwise assaulting another Child.

6.4 Reporting Violations of this Policy

6.4.1 Reporting within FGM. Any FGM Personnel ("Reporter") who have reason to believe or suspect for any reason (including but not limited to (i) the report of the Victim, (ii) the Reporter's own observations, and/or or (iii) any information received from a third party) that any Child is currently, or has historically been the victim of Child Abuse by another FGM Personnel or anyone else associated with FGM (such as a FGM partner who is or was working with FGM at the time of the Abuse) shall be obligated to report the Child Abuse in strict compliance with this Policy. This reporting obligation is not contingent on

the perceived validity or severity of the Child Abuse. The Reporter shall refrain from conducting any investigation of the allegations, and shall do the following:

- 6.4.1.1 <u>Immediately Report to Supervisor</u>. Report the incident or suspicion immediately to Reporter's supervisor if there is one, and to the FGM Managing Director. If neither the Reporter's supervisor nor the FGM Managing Director is not available (or if the Supervisor or FGM Managing Director is the Accused), then Reporter shall report to the Senior Pastor of Faith Church, Lafayette, Indiana.
- 6.4.1.2 <u>Confidentiality</u>. Once the Report has been made to FGM, except as required by law or this Policy, Reporter shall keep the matter confidential.
- 6.4.2 <u>Reporting to Outside Authorities</u>. FGM will make any reports required by law to the appropriate officials in the jurisdiction and residence of the Accused and the Victim, and (if different) also in the country where the incident occurred.
- 6.5 Investigative Protocol for a violation of this Policy.
- 6.5.1 <u>Process; Reporting and Immediate Action</u> All reports alleging abuse or the discovery of abuse must be verbally communicated immediately (i.e. as soon as possible that same day), by phone or in person to the supervisor, or if the supervisor is implicated or the case warrants special handling to the next person of great authority; and then also in writing to the Managing Director of as soon as possible, but in any case, no later than 36 hours later.
 - 6.5.1.1 The Reporter hearing an allegation of abuse, witnessing abuse, or having reason to suspect abuse, should complete the Incident Report form which includes the following information:
 - (1) Name of person reporting
 - (2) Date and time of all meetings
 - (3) Reasons for the initial suspicion
 - (4) Alleged victim's name and parent's name(s)
 - (5) Nature or extent o injury (if any)
 - (6) Present location of the child
 - (7) Alleged perpetrator's name
 - (8) How the information was obtained
 - (9) Who was contacted and when
 - (10) Details of what was reported or suspected (dates, times, places, specifics of what happened)
 - (11) Data gathered during the investigation
 - (12) Basis/rationale for why there was or was not "reason to believe" that child abuse or child neglect occurred
 - (13) If there was a report to any government agency or law enforcement agency, the date and time of such report
 - (14) Date of writing the report
 - 6.5.1.2 In addition to reporting as specified above, the Reporter who observes or receives a report of child abuse, shall observe the following guidelines:

- (1) Do not panic or overreact to the information reported by a minor or an adult.
- (2) Do not challenge, argue with, refute, or criticize the minor, or state to the minor any conclusion that the minor simply was wrong or misunderstood what actually happened.
- (3) In every way, respect the privacy of the minor who made the report. After having a second adult present be sure that any discussions concerning child abuse or child neglect take place at a location which is strictly private and where no one other than said two adults can overhear the discussion.
- (4) All reports of abuse must be handled in a quiet and confidential manner and no disclosure should be made to any persons other than as provided in this policy.
- (5) Be very sensitive to the emotional needs of the minor and try to relieve the stress and anxiety which accompany an abuse situation.
- 6.5.1.3 When the Managing Director of FGM receives a report about abuse, the first question to answer will be whether there is "reason to believe" that abuse has occurred such that there would be a reasonable cause for further investigation. If so, the Managing Director of FGM, in consultation with the supervisor involved, if any, shall proceed as follows:
 - (1) If the alleged perpetrator <u>is</u> involved in a FGM ministry or activity:
 - (A) Decide what needs to be done immediately to protect the victim(s). This will be done as discreetly and respectfully as possible.
 - (B) Decide how to confront the alleged perpetrator and remove him/her from ministry with minors or involvement with minors. This may include the reassignment or suspension of the alleged perpetrator during the investigation and will be done as discreetly and respectfully as possible. Such removal, and or suspension is not tantamount to a finding or conclusion that the alleged perpetrator is guilty.
 - (C) Decide the appropriate investigation process.
 - (D) Decide the best way to immediately notify the alleged victim's parents about the allegations and the investigation process.
 - (E) Report to the authorities when required or proper. The Managing Director of FGM shall remain in communication with legal counsel to be sure that the knowledge of the requirement of applicable law remains current (including necessary updating to this policy and its attachments).

- (2) If the alleged perpetrator is <u>not</u> involved in a FGM ministry or activity:
 - (F) Decide what needs to be done immediately to protect the victim(s). This will be done as discreetly and respectfully as possible.
 - (G) Decide the appropriate investigation process.
 - (H) Decide the best way to immediately notify the alleged victim's parents about the allegations and the investigation process.
 - (I) Report to the authorities when required or proper The Managing Director of FGM shall remain in communication with legal counsel to be sure that the knowledge of the requirements of applicable laws remains current (including necessary updating to this policy and its attachments).

6.5.2 <u>Investigation</u>

- 6.5.2.1 When further investigation is appropriate, the Managing Director of FGM or his designee(s) will investigate the allegations and assist with the resolution of the case. Those investigating will thoroughly investigate all allegations, reports, acts and/or suspicions. They will also try to determine if there are other victims.
- 6.5.2.2 The investigators will prepare a written report of their investigation to be used as the Managing Director of FGM determines.
- 6.5.2.3 An investigation that has been opened it will be considered complete when the following are completed:
 - (1) The Incident Report specified above has been filed with the Managing Director of FGM and the director of human resources of Faith Ministries.
 - (2) The investigation has been completed and a decision has been reached.
 - (3) If applicable, the report to a government agency or a law enforcement agency has been made.
- 6.5.3 <u>Cooperation</u>. All FGM Personnel are required to fully cooperate with any investigation as a condition to his or her continued employment or association with FGM.
- 6.6 <u>Outcomes of Investigations and Resulting Administrative Actions by FGM</u> The actions that will be taken by FGM at the culmination of an investigation of a reported incident will depend upon the findings as follows:

- 6.6.1 <u>Finding that Child Abuse was Committed</u>. When, at the culmination of the investigation, the credibility of the reporter and of the report have been substantiated and the report sufficiently corroborated to conclude that the Accused did in fact engage in Child Abuse or Abuse of a Vulnerable Person, FGM will take administrative action in accordance with this Policy, depending upon the type of Abuse, as follows:
 - 6.6.1.1 <u>Sexual Abuse</u>. If the Accused engaged in Sexual Abuse, then FGM will do the following:
 - 6.6.1.1.1 <u>Termination</u>. The Accused will be terminated without the opportunity to resign.
 - 6.6.1.1.2 <u>Classify Accused as Ineligible for future Service</u>. The Accused will not be eligible for future service with FGM, nor allowed to be present on any property owned or occupied by FGM in the future.
 - 6.6.1.1.3 Spouse of Accused Asked to Resign. Where the Accused is married to a spouse who is also an FGM personnel ("Spouse"), the Spouse shall be given an opportunity to resign in good standing, but if the Spouse does not do so, the Spouse shall also be terminated from FGM.
 - 6.6.1.1.4 <u>Notify Sending Church</u>. In order to provide proper accountability, notice describing the accusation and the ultimate determination by FGM will be sent to the sending church for the Accused.
 - 6.6.1.1.5 <u>Change Employment History for Accused</u>. In cases where Sexual Abuse is determined after the Accused has resigned or retired from FGM, FGM's records shall be changed retroactively to accurately reflect this new information.
 - 6.6.1.1.6 <u>Special Consideration for Minors</u>. Any Accused who committed Sexual Child Abuse before the age of 18 will be evaluated on a case-by-case basis, taking into account such factors as age, seriousness of the offense, acknowledgement of responsibility, and effectiveness of any treatment.
 - 6.6.1.1.7 <u>References</u>. Accurate employment references will be provided to other organizations considering employment of the Accused. If FGM becomes aware that the Accused is later employed by another organization where the Accused has access to Children or vulnerable people, FGM will promptly disclose to such organization the reasons for the termination of the Accused.
 - 6.6.1.1.8 <u>Follow-up Care</u>. FGM will make mental and spiritual health services available to the Accused, the Accused's family, the Victim, and others identified as being in need of such services.
 - 6.6.1.1.9 <u>Record of Outcome</u>. A Statement of Findings will be filed in FGM's records.
- 6.6.1.2 <u>Non-Sexual Abuse.</u> If the Accused engaged in Abuse or Neglect, but not Sexual Abuse, then FGM will do the following:
 - 6.6.1.2.1 <u>Action Plan</u>. An "Action Plan" will be put in place by FGM to provide accountability, mentoring, and counseling to the Accused in an effort to correct the behavior and to treat its causes. Failure to comply with the terms of the Action Plan will result in termination from FGM.

- 6.6.1.2.2 <u>Termination</u>. FGM reserves the right to terminate the Accused's relationship with FGM at its discretion based on the circumstances of a particular case. In cases of termination, later application and restoration to service in an assignment not related to Children or vulnerable people may be possible if the behavior and its causes were effectively treated.
- 6.6.1.2.3 <u>References</u>. Accurate employment references will be provided to other organizations considering employment of the Accused. If FGM becomes aware that the Accused is later employed by another organization where the Accused has access to Children and vulnerable people, FGM will promptly disclose to such organization the reasons for the termination of the Accused.
- 6.6.1.2.4 <u>Follow-up Care</u>. FGM will direct all involved to biblical counseling and recommend other appropriate services to the Accused's family, the Victim, and others identified as being in need of such services.
- 6.6.1.2.5 <u>Record of Outcome</u>. A Statement of Findings will be filed in FGM's records.
- 6.6.2 <u>Finding that Abuse or Neglect Not Confirmed</u>. If there is no substance to the allegations or FGM has been unable to sufficiently validate the victim's character and/or report, then FGM will:
 - 6.6.2.2 <u>Provision of Assistance for Restoring the Good Name of the Accused</u>. FGM will work with the Accused to restore his or her good name and reputation and to create a workable plan for the future so that the Accused can effectively resume his or her job duties and ministry responsibilities.
 - 6.6.2.1 <u>Follow-up Care</u>. FGM will direct all involved to biblical counseling and recommend other appropriate services to the Accused, the Accused's family, the Victim, and others identified as being in need of such services.
 - 6.6.2.3 Record of Outcome. A Statement of Findings will be filed in FGM's records.
- 6.6.3 <u>Inconclusive Findings.</u> If the victim's character has been sufficiently validated for FGM to conclude that the reported abuse did occur, but there is not sufficient corroborating information to conclude that the offender is as named in the victim's report.
 - 6.6.3.1 <u>Follow-up Care</u>. FGM will direct all involved to biblical counseling and recommend other appropriate services to the Accused, the Accused's family, the Victim, and others identified as being in need of such services.
 - 6.6.3.2 <u>Record of Outcome</u>. A Statement of Findings will be filed in FGM's records.
- 6.6.4 <u>Finding of Inappropriate Behavior but not Abuse</u>. Where the Victim's character has been sufficiently validated and the report sufficiently corroborated for FGM to conclude that inappropriate behavior did occur, that while serious in nature does not meet FGM's definition of Abuse or Neglect, then FGM will handle the matter as "inappropriate behavior." This category is also utilized when inappropriate sexual behavior occurs between two minors less than three years (1095 days) apart in age, and there is not significant threat or coercion.

- 6.6.4.1 <u>Termination</u>. FGM reserves the right to terminate the Accused's relationship with FGM at its discretion based on the circumstances of a particular case. In cases of termination, later application and restoration to service in an assignment not related to Children or vulnerable people may be possible if the behavior and its causes were effectively treated.
- 6.6.4.2 When the Accused is a Child. Any FGM Personnel whose Child has been determined to have committed sexual abuse or other abuse, or to have initiated inappropriate sexual behavior with another Child will be asked to follow through with the Action Plan put in place to resolve the causes and effects of the abuse or inappropriate behavior. Failure to do so will lead to termination of their relationship with FGM. Reapplication would be evaluated on a case-by-case basis and involve effective treatment and other factors.
- 8.6.4..3. Record of Outcome. A Statement of Findings will be filed in FGM's records.
- 6.7 <u>Costs of Investigations</u>. The costs associated with all investigations in connection with this Policy shall be paid for by FGM.
- 6.8 <u>Related Policies</u>. FGM may adopt additional policies, guidelines, handbooks, protocols and forms relating to moral conduct, child safety or safety of vulnerable people.

ADOPTED by the FGM Board of Directors on March 8, 2014

[03.04.2014]

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