



# College Church

## PROTECTION POLICY

FOR CHILDREN, YOUTH, PERSONS WITH INTELLECTUAL AND/OR DEVELOPMENTAL  
DISABILITIES, AND THOSE WHO WORK WITH THEM

*REV. 2023-09-13*

### A HEART FOR THE VULNERABLE

College Church's vision is for the God-centered gospel of Jesus Christ to be proclaimed — in us as a church, through us to the world — by the transforming power of the Holy Spirit.

God “executes justice for the fatherless and the widow” (Deut. 10:18) and is “a stronghold for the oppressed,” one who “does not forget the cry of the afflicted” (Ps. 9:9,12). He calls us to “learn to do good; seek justice, correct oppression” (Is. 1:17).

God sent Jesus, who greatly valued children and the vulnerable, to a culture that often did not. Jesus warned of false prophets who come “in sheep’s clothing but inwardly are ravenous wolves” (Matt. 7:15) and religious leaders “who devour widows’ houses” (Mark 12:40) in abuse of power. He warned us to “be wise as serpents and innocent as doves” (Matt. 10:16). Later, the apostle Paul similarly warned us to “take no part in the unfruitful works of darkness, but instead expose them” (Eph. 5:11).

This policy has been written in response to the church’s vision and these truths. College Church has zero tolerance for abuse. As believers and as a church, we are called to love, protect, and shepherd the vulnerable under our care. How we do it either reflects God’s image through the redemptive work of Jesus by the power of the Holy Spirit or speaks a devastating lie about the gospel. The goals of this policy are to prevent abuse of the vulnerable in our church and, should abuse take place, to outline an appropriate response.

## 1. DEFINITIONS

**Abuse:** Abuse, as defined in this policy, is the mistreatment of a child under the age of 18 or a STAR by:

- A parent or his/her spouse or partner
- An immediate relative or someone living in the child's or STAR's home
- A caretaker such as a babysitter or daycare worker
- Any person responsible for the child's or STAR's welfare, such as a healthcare provider, educator, coach, or church program staff or volunteer.

Abuse is not limited to behavior that results in injury or puts the child or STAR at serious risk of injury. Abuse can be physical (e.g., bruises or broken bones), verbal (e.g., malicious speech), sexual (e.g., fondling or other inappropriate physical contact), or mental (e.g., leading to emotional injury or psychological illness).

Sexual abuse includes physical contact with a sexual or intimate part of the body, or other noncontact forms of sexual activity conducted against a child or STAR. Noncontact forms of sexual abuse may include but are not limited to sexual communication, texting, sexual contact on social media, photography, videotaping, displaying, or asking someone to display sexual or intimate parts of a person's body, or other sexual behavior.

**Child:** A person from birth through age 17.

**Member:** A person who has completed College Church's requirements for membership, agreed to its terms, and been approved by the Council of Elders and not removed or terminated.

**Neglect:** Neglect is the failure of a parent or caregiver to meet minimal parenting or caregiver standards for providing adequate supervision, food, clothing, medical care, shelter, or other basic needs.

**Pastor/Ministry Director:** The staff member in charge of a ministry area at College Church.

**Safeguarding:** A set of policies, procedures, and practices employed to actively prevent harm and abuse.

**Safeguarding Team:** A subcommittee of the Council of Elders tasked with oversight of the Protection Policy, documenting suspicions and allegations of abuse, and providing accountability for Staff, Volunteers, and elected church board members. Consists of two elders, two congregants, the Director of Children's Ministries, the Director of Disability Ministries, and the Executive Pastor.

**Staff:** A paid individual serving in a ministry of College Church.

**STARS:** Individuals with intellectual and/or developmental disabilities who are participants in the disability ministry of College Church.

**Student Helpers:** Persons ages 8 through 17 who assist the children's, youth, or STARS ministries on a volunteer basis.

**Supervisor:** A Pastor/Ministry Director or other adult who holds an elected leadership position in the church.

**Volunteer:** An unpaid ministry worker who has gone through the approval process for serving in the ministry.

**Youth:** A child in grades 6-12 under the age of 18.

## 2. SAFEGUARDING TEAM

The Safeguarding Team (as defined above) is tasked with policy implementation, compliance, and application. It is responsible for receiving, documenting, and responding to any policy violations or behavior of concern. It leads in responding to any allegations of abuse, contacting necessary authorities. It verifies screening of pastors, board members, elected leaders, staff, and volunteers. It also facilitates ongoing safeguarding education for the staff, volunteers, and congregation of College Church.

## 3. SCREENING

Scripture warns of the danger of making assumptions about a person's character. "The heart is deceitful above all things, and desperately sick; who can understand it?" (Jer. 17:9 ESV).

- A. All pastors, directors, board members, elected leaders, staff, and volunteers are to be screened. The [screening application](#) includes personal information; questions about faith, church, and ministry experience; educational and professional experience; potential concerns; affirmation of the church's [articles of faith](#) and [standards of the Christian life](#); references; a waiver; and a background check. It may also include a personal interview.
- B. Those who serve with children, youth, and STARS additionally must complete [Mandated Reporter Training](#) and the Sexual Abuse Awareness Training course from [Ministry Safe](#) every three years. Returning volunteers fill out a [shortened application](#) and complete a background check every five years. Student helpers (ages 8-17) applying to serve in children's ministries must complete a [Student Helper Form](#) annually.
- C. Exceptions to this process may be made for a substitute who must fill out the [sub form](#) and then is allowed to serve twice annually alongside a volunteer or staff member before completing the entire process, or an observer of a STARS classroom who must fill out an [Volunteer Observer Card](#) or [STARS Observer Card](#) permitting one STARS classroom visit.
- D. All volunteers must be members or regular attenders for at least six months unless granted exception by a Pastor/Ministry Director. College students may have the membership and regular attender requirement waived, though they are subject to all other screening criteria. Upon review, each volunteer will be approved or declined by the Pastor/Ministry Director in charge of the ministry. Relatives of the Pastor/Ministry Director must be approved by another member of the pastoral staff. Once approval is made, an authorized individual or the ministry's administrative assistant will indicate the approval in the church database by entering the appropriate codes.

- E. On occasion, family members or friends of STARS or STARS volunteers may desire to help in the STARS ministry even though they are not members or regular attenders. They still must fill out the [application](#), undergo [Mandated Reporter Training](#), and have a background check performed. If those are acceptable but the individual is not a Christian, the Pastor/Ministry Director may meet with the individual to explain the ministry values and purposes. The individual will then be paired with a volunteer or staff member, coded as QB4 (support role only), and not be allowed in a leadership or teaching position. Volunteers with this coding cannot make up more than 50 percent of the volunteers needed in a ministry.

#### 4. POLICY TRAINING

A signature indicating the reading and affirmation of this policy must be obtained as part of each annual screening. Ministries must administer entry-level and ongoing training on the policy. The policy must also be posted on the church [website](#).

#### 5. STAFFING AND SUPERVISION: "TWO DEEP"

- A. Children, youth, and STARS must be under adult supervision during the entire scheduled ministry time. A minimum of two adults ("two deep") is required regardless of the number of ministry participants. Volunteers and staff (in children's and STARS ministries) will wear nametags. Supervisors will make regular classroom visits to ensure policy requirements are being met. Small groups meeting concurrently within large rooms divided into smaller spaces with open doors may be staffed by a single volunteer. If an approved sub is serving, at least one adult in the room needs to be a preapproved volunteer. Not all volunteers in a room can be from the same family. Rooms for children from birth through age four must include at least one female volunteer or staff member.

- B. Staffing ratios of adults to children/youth/STARS:

Nursery: 1:3-5

Preschool: 1:6-8

Elementary: 1:10-12

Middle School: 1:15

High School: 1:20

Young STARS (up to age 12): 1:2-3\*

Teen STARS (ages 13-21): 1:3\*

Adult STARS (ages 22+): 1:4\*

Inclusion: 1:1

\*Some STAR participants may require 1:1 assistance.

## 6. REGISTRATION AND DROP-OFF

- A. An annual registration form must be completed for any child , youth , or STAR who regularly attends a program. All children (birth through grade five) must check in and wear a nametag that includes allergy, medical, or custodial alerts. All STARS must wear a nametag which includes allergies, pertinent medical information, contact information, and whether independent release is allowed.
- B. Children, youth, and STARS may not enter a classroom until there is two-deep supervision. Parents or guardians are responsible for the children, youth, or STARS under their care before and after scheduled program times.
- C. Parents of children kindergarten and younger will be issued a claim tag which must be used to release the child after the program. The number on a child's tag will be exhibited on numerical display boxes in the sanctuary if parents need to return early to pick up their child. A child will be released only to the person with the correct claim tag. A parent who arrives at children's ministries without a claim tag must be identified by a supervising staff member or display a photo ID matching the child's registration information at the Hub Welcome Center. All children not connected to the STARS ministry first grade and older will be independently released from their classrooms or programs.
- D. STARS living with guardians will be released only to an adult family member or caregiver unless prior written authorization is received from the parent or guardian.

## 7. HEALTHY BOUNDARIES: "OBSERVABLE AND INTERRUPTIBLE"

- A. All interactions between adults and children, youth, or STARS must be observable and interruptible. Any verbal or physical displays of affection must be healthy and respectful, not excessive, lingering, or imposed on others.
- B. At no time is a staff member or volunteer allowed to be alone with a child, youth, or STAR in a private, secluded, or uninteruptable location (i.e., cars, house basements, secluded nature areas, etc.). All classroom doors will include or be next to an unobstructed window. Nurseries and preschool rooms will have childproof safety gates or Dutch doors in their entry.
- C. Some examples of appropriate displays of care or physical affection include brief side hugs; child-initiated (pre-Kindergarten children only) kissing other than on the lips; gentle brief contact on heads, shoulders, arms, or hands; handshakes, high fives, and fist bumps; and words of encouragement, comfort, blessing, or praise. Physical contact between STARS and volunteers or staff members should be developmentally appropriate, conveying nothing more than friendship.
- D. Some examples of inappropriate verbal or physical displays of affection are extended, full-contact hugs; kissing on the lips or adult-initiated kissing; tickling; piggy-back rides; backrubs or massage; touching under clothing or in an area that would be covered by a bathing suit;

swearing or intimidation; suggestive comments or compliments. Lap-sitting is allowed only with children in nursery or preschool.

- E. Physical punishment should never be used. Instead, follow the guidelines specific to each ministry (i.e. [Discipline and Discipleship Policy for Kids' Harbor](#) or the [Discipline and Discipleship Policy for STARS](#)).
- F. There is to be no giving of individual gifts or excessive attention to one individual with rare exceptions to be granted by and with the agreement of appropriate Pastor/Ministry Director and only in compliance with the rest of the policy.
- G. Meetings for youth should consist of a minimum of three people (for example, one volunteer or staff member and two students). Exceptions are granted if a volunteer or staff member desires to meet with an individual youth and explicitly informs both a paid ministry staff member and the student's parent(s). Meetings with only one adult must occur in public places where other adults are present. Repeated contact between a child, youth, or STAR and a volunteer or staff member outside of scheduled ministry activities must only be carried out with parental knowledge and permission. At no time is dating or other romantic contact or communication of any kind permissible between a youth and an adult volunteer or staff member.
- H. Private one-on-one messaging via email, text, social media, etc., is prohibited between youth and adult volunteers or staff members. All forms of messaging must be "two deep", observable by the youth's parents and/or another volunteer or staff member. Communication primarily should be through official ministry channels or at scheduled ministry activities.
- I. Use of the internet on church-owned technology by volunteers for ministry during ministry time shall be protected by content filtering.

## 8. DIAPERING AND RESTROOM POLICY

- A. Infant diapers may only be changed by an approved volunteer or staff member. STARS diapers must be changed by the same gender volunteer or staff member. Changing tables or restrooms must be observable by a second volunteer or staff member, and infants and STARS must never be left unattended.
- B. Restrooms must be screened by an adult before a child (up through fifth grade) or STAR enters. Restroom visits must be escorted and observable by two approved adults with the entry doors open. If staffing ratios for Sports Ministries don't allow for this arrangement, children may be released to a single-use restroom within sight of the program. Preschoolers may be assisted in the stall by an approved female volunteer or staff member if the stall door is open and if both are observable by another volunteer or staff member. If able, STARS will enter and use the restroom independently. If the STAR requires personal assistance, the person assisting the STAR must be a staff member or approved female volunteer, the stall door must remain open, and both the STAR and person assisting must be observable by a second.

## 9. OFFSITE EVENTS AND OVERNIGHT RETREATS

- A. Church-sponsored offsite events and retreats for youth and STARS must be preapproved by the appropriate Pastor/Ministry Director. Youth [written consent and medical release forms](#) and [STARS medical forms](#) are required annually for each student participating.
- B. Retreat adult/student ratios for youth are 1:5 and 1:2-3 for STARS retreats, which is different from the onsite ratio. Two-deep supervision is required, and both male and female volunteers and/or staff members are required for mixed groups. When transportation is included, [the Transportation Policy and Application to Drive](#) must be followed and completed. At least one adult in a vehicle with students must be the same gender as the students.
- C. Youth and STARS may share the same sleeping space as adult volunteers or staff members of the same gender if two or more volunteers or staff members are present. STARS volunteers and staff members may not shower, bathe, or use the toilet in the same space as STARS participants. STARS volunteers and staff must change clothes separately from STARS participants. Volunteers and staff must not be present while a STAR is changing clothes unless assistance is needed, in which case two volunteers or staff members of the same gender must be present.

## 10. HEALTH AND MEDICAL INCIDENT OR INJURY REPORTS

- A. Anyone with active symptoms of illness (such as fever, cough, etc.) is requested not to participate in a ministry. Sanitary gloves should be worn by volunteers when changing diapers, assisting in the restroom, or encountering bodily fluids. Those with chronic medical conditions are welcome to attend programs with the consent of the appropriate Pastor/Ministry Director. Parents/guardians of medically fragile persons may be requested to remain on the premises.
- B. If a medical incident or injury necessitates stopping an activity for medical intervention, the supervising adult must complete and submit a [Notice of Incident or Injury](#) within 24 hours.

## 11. CHILDCARE AND/OR PROGRAMMING NOT SPONSORED BY COLLEGE CHURCH

All church space usage must be officially scheduled through completion of an [application](#) from the church office and must abide by the [Protection Policy for Guests](#). These will be provided by the staff member scheduling the event. College Church must be released from liability before church space can be used.

## 12. RESPONDING TO VIOLATIONS OF THE CHURCH'S POLICIES

Any staff, volunteer, or church member who witnesses or is informed about a violation of the church's safeguarding policy, or who wishes to self-report a violation, should promptly inform the appropriate Pastor/Ministry Director. If the violation is minor, has occurred only once, and elicits redirection and compliance when pointed out, the Pastor/Ministry Director will meet with the person violating the policy to determine next steps. The Pastor/Ministry Director should also inform the Safeguarding Team Leader and Safeguarding Team. If the meeting gives cause for increased concern that a violation occurred or that the violation is reportable under the mandated reporting law, the Pastor/Ministry Director must report the

abuse or neglect to the proper authorities (call 911 and [DCFS](#) or the [Office of the Inspector General for people with disabilities](#)) and also send it to the Safeguarding Team Leader, Safeguarding Team and Executive Pastor as soon as possible. The violation should be documented on the [Suspicion of Abuse--Policy Violation Form](#) and sent to the Safeguarding Team Leader and Safeguarding Team. The reporter and Safeguarding Team should also consider enacting a Limited Access Agreement. If the meeting eliminates concern, the incident must still be documented and sent to the Safeguarding Team Leader and Safeguarding Team for follow-up if needed.

## 13. RESPONDING TO SUSPICION OF ABUSE OR NEGLECT

### A. Potential Indicators of Abuse or Neglect

Possible indications of abuse may include a pattern of injuries not typical for everyday accidents, sexual knowledge not appropriate for developmental level, overtly sexual behavior, extreme reluctance to go to a particular place or be with a particular person, withdrawal or depression, or allusion to incidents in writing or through a prayer request. Possible indications of neglect include very poor hygiene or obvious lack of medical care.

### B. When a Child, Youth, or STAR Discloses Abuse or Neglect

A child, youth, or STAR who discloses abuse may do so tentatively or by accident and may later recant or deny it even when there is evidence of abuse. They may also pretend it happened to a friend. Be calm and show love and respect for the victim. Thank them for telling you and praise their courage. If appropriate, reassure them that they are not to blame and that you believe them. Allow them to talk freely without interruption. Use open-ended questions; do not place words into their mouth. Do not offer false assurances, such as promising to keep the disclosure a secret.

### C. Reporting Any Suspicion of Abuse

When there is disclosure or suspicion of abuse or neglect of a child or STAR, the volunteer must promptly report it to the appropriate authorities (the Wheaton Police Department and [DCFS](#) or [Office of Inspector General for people with disabilities](#)) as well as the Pastor/Ministry Director. If the alleged perpetrator is within the church, the Safeguarding Team Leader, Safeguarding Team, Director of Administration and Finance, and Council of Elders must both be notified as soon as possible, preferably within 24 hours, and the alleged perpetrator placed on leave until investigations have been conducted. It is not the responsibility of the reporting person or the Pastor/Ministry Director to substantiate any allegations or suspicions.

### D. Confidentiality and Attorney-Client Privilege

Mandated reporters must report abuse in accord with Illinois law. The report will remain confidential outside of those named in the process above except on a “needs-to-know basis” to protect others in the ministry and with respect to any applicable attorney/client privilege or clergy/penitent privilege under Illinois law. Those being counseled by Pastors and Directors are not guaranteed confidentiality in accordance with [Section 8-803](#) of the Illinois Code of Civil Procedure.



## 14. ASSESSING A REPORT OF ABUSE

Once the proper authorities have been contacted, the appropriate Pastors/Ministry Directors will make an assessment as soon as possible, preferably within 24 hours of the report, in consultation with the Safeguarding Team Leader and Safeguarding Team. The Council of Elders and Director of Administration and Finance will be immediately informed as well. All will work together to determine how to best proceed.

## 15. RESPONDING TO AN ALLEGED PERPETRATOR IN THE CHURCH

Treat the accused with dignity and support. Remove the accused from their position until the situation in question has been resolved. If an individual is confirmed to have been in violation of the policy, the church leadership will put in place a process of healing in consultation with the Safeguarding Team Leader and Safeguarding Team and other professionals. Future restoration to church fellowship should be handled with great care and consideration of the victim and the victim's family. If granted, restoration will include the alleged perpetrator submitting to a limited access agreement. If the accused is convicted legally, concern and support should be given with the goal of forgiveness and restoration. However, no one who has ever been convicted of abuse of any kind or of any improprieties involving children or disabled persons should ever be placed in a position to work with children, youth, or STARS. If the situation involves a sex offense against a child, youth, or STAR, the perpetrator will be subject to the elder policy on Ministering to a Known Sexual Offender, available from the [church office](#) upon request.

## 16. POLICY ON KNOWN SEXUAL OFFENDERS

The elders and pastors of College Church desire to provide a means to allow a sexual offender to live in grace as a part of this congregation. At the same time, church leadership must provide a safe environment for all activities that take place in the church. To achieve these goals, a formal process has been established in accordance with the elder policy on Ministering to a Known Sexual Offender. To be welcomed into the church community, known sex offenders must submit to an interview, application process, review of parole/probation records, limits on participation, constant escort by an approved sponsor while on church property, and identification to ministry leaders as appropriate. They must sign a Restricted Access Agreement, which does not permit work or contact with children, youth, or STARS or entrance into those ministry spaces. Known sex offenders are not permitted to hold leadership positions within the church, even if those positions are unrelated to vulnerable populations.

## 17. LIMITED ACCESS AGREEMENTS FOR THOSE NOT KNOWN AS SEXUAL OFFENDERS

Limited Access Plans clarify safe behavior around children, youth, and STARS for those in the church community who have engaged in concerning behavior as determined by staff. A Limited Access Plan may be a verbal or written agreement defining boundaries, limits, and other requirements to address an individual's behavior for the purpose of accountability. Staff may keep secure notes in the church's database and notify individuals with a need to know about the plan. Limited Access Plans do not apply to staff members, who, if in violation of the Policy, will be formally warned and subject to termination. Limited Access Plans do not apply to known sexual offenders, who must instead sign a Restricted Access Agreement in relation to the policy referred to above.

## 18. SUMMARY STEPS FOR RESPONDING TO SUSPICIONS AND/OR ALLEGATIONS OF ABUSE

- A. The Executive Pastor (or another designated staff leader), in collaboration with the Safeguarding Team Leader and Safeguarding Team, has the responsibility of verifying that the incident has been reported to the proper authorities and the appropriate Pastor/Ministry Director.
- B. The individual who suspects that abuse or neglect has taken place must document his/her efforts to handle the incident. First, DCFS or local authorities must be contacted as appropriate. Second, a [Suspicion of Abuse--Policy Violation Form](#) must be completed and sent to the Safeguarding Team.
- C. The Director of Administration and Finance will report the incident to the church's insurance company and legal counsel.
- D. If the parents are not the alleged perpetrators, the parents will be notified.
- E. The Executive Pastor, in collaboration with the Safeguarding Team Leader and Safeguarding Team, will set any appropriate boundaries with the accused for the protection of the vulnerable.
- F. The Executive Pastor will appoint a spokesperson to handle communication both within and outside the church.
- G. The spokesperson will prepare a public statement to answer any question from the media and to convey the news to the congregation.

## REVIEW PLAN

This policy will be reviewed annually by the Safeguarding Team Leader and Safeguarding Team with a report then given to the elders.

## CONCLUSION

Psalm 127:1 (ESV) says, "Unless the Lord builds the house, those who build it labor in vain. Unless the Lord watches over the city, the watchman stays awake in vain." While this policy equips College Church to prevent and respond to abuse, it is in our just and powerful God's protection that we ultimately trust.