

SPNDS Child Protection Policy

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SPNDS Child Protection Policy

Purpose Statement:

SPNDS seeks to provide a safe and secure environment for the children who participate in our programs and activities. By implementing this policy, our goals are to protect the children participating in our organization from any harm and provide a clear path of response for staff and volunteers in the event of suspected abuse or neglect.

Provide a Safe Environment and Adequate Supervision of Children:

SPNDS seeks to provide a safe environment and adequate supervision of children by implementing the following:

Adequate supervision and accountability

SPNDS will comply with the Pennsylvania State required staff child ratios as follows:

- 1:6 minimum staff/child ratio for toddlers under age 3
- 1:10 minimum staff/child ratio for preschoolers aged 3-5
- 1:12 minimum, staff/child ratio for kindergarten aged children

At minimum, one approved staff must be present with the children during programs and will remain present until all children are back with their parent/guardian. At least one staff or volunteer must be an adult (age 18 or older). Non-SPNDS support staff will work with children only if a SPNDS staff member is present. If there is only one child left because of a late pick up, there will always be two staff present with the child for accountability. SPNDS is committed to always having sufficient staff to meet the needs of all children and adults present at any time. Non-SPNDS support staff will always be supervised by a staff member.

Check-In/Check-Out:

Play Pals (2-3 years)

- Toddlers brought to our program will be walked to the classroom by the parent or caregiver who will provide any special instructions and care items needed.
- The Play Pals teachers will check each child into Brightwheel when they arrive.
- The Play Pals will be dismissed from the SPNDS playground. Each parent or caregiver must check their child out with the Play Pals teacher who will check them out of Brightwheel. The person picking up the child must be listed as a pickup person on their emergency form, and any changes to pick up must be submitted to SPNDS in Brightwheel. A new pick-up person must also show their ID.

Preschool & Kindergarten (3-6 years)

- At drop off, each child will be brought to the attendance teacher for check in through Brightwheel. Children in the carline will be brought by a staff member, and children walking up to the playground will be brought over by their parents or caregivers.
- At pick up, each child will be brought back to the attendance teacher to be checked out of Brightwheel. The person picking up the child must be listed as a pickup person on their emergency form, and any changes to pick up must be submitted to SPNDS in Brightwheel. A new pick-up person must also show their ID.

Discipline:

SPNDS Staff do not use punitive, degrading, or physical punishment, psychological abuse or coercion in any situation with SPNDS children. Rather, teachers work with children to explain the reasons for following directions and/or daily routines. Redirection is a primary tool. A child may be temporarily moved to another area of the classroom or building via a physical escort should a difficult behavior problem need to be addressed in private or to keep all the children and adults in the room safe and comfortable. See note below with examples/definition of terms*

*Terms: examples and definitions

Examples of physical punishment: Shaking, hitting, spanking, slapping, jerking, squeezing, kicking, biting, pinching, excessive tickling and pulling of arms, hair, or ears; requiring a child to remain inactive for a long period of time.

Examples of psychological abuse: shaming, name calling, ridiculing, humiliation, sarcasm, cursing at, making threats, or frightening a child; ostracism, withholding affection, seclusion.

Examples of coercion: rough handling (shoving, pulling, pushing, grasping any body part): physical restraint (forcing a child to sit down, lie down, or stay down) except when restrain is necessary to protect the child or others from harm; physically forcing a child to perform an action (such as eating or cleaning up).

Note: the use of a physical escort as defined below and properly used when necessary to protect the child or others from harm is NOT coercion.

Mechanical restraint: “the use of devices as a means of restricting a student’s freedom of movement”: (H.R. 7174, 2018)

Physical escort: “the temporary touching or hold of the hand, wrist, arm, shoulder, or back for the purpose of inducing student who is acting out to walk to a safe location.” (H.R. 7124, 2018)

Physical restraint: “a personal restriction that immobilizes or reduces the ability of an individual to move the individual’s arms, legs, torso, or head freely, except that such term does not include a physical escort, mechanical restraint, or chemical restraint.” (H.R. 7124, 2018)

Seclusion: “the involuntary confinement of a student alone in a room or area from which the student is physically prevented from leaving except that such term does not include a time out.” (H.R. 7124, 2018)

Defining Appropriate and Inappropriate Physical Interactions

All staff must be sensitive to the way children interpret physical contact. All physical contact should be gentle and appropriate. Children have the right to refuse physical contact. SPNDS’s recommendations for appropriate and inappropriate physical interactions include but are not limited to:

<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
<p>Contact initiated by the child such as:</p> <ul style="list-style-type: none"> • Side hugs • Shoulder-to-shoulder or “temple” hugs • Pats on the shoulder or back • Handshakes/fist bumps • 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) 	<ul style="list-style-type: none"> • Hugs with arms around waist/under arms • Full Frontal Hugs • Kisses • Showing affection in isolated areas or while one-on-one • Wrestling • Piggyback rides • Tickling • Allowing a child to continue to cling to an employee’s or volunteer’s leg • Allowing children, older than kindergarten, to sit on an employee or volunteer’s lap • Any type of massage • Any form of affection that is unwanted by the child or the employee or volunteer • Touching bottom, chest, or genital areas that is outside authorized and documented personal care assistance

Diapering and Bathroom Help:

Diapering and bathroom help are considered appropriate physical interactions when required by the student.

- Diapers will be checked for wetness at least once per hour **and** when a child wakes up from a nap. Diapers will be changed at the changing table. Teachers will never leave a child unattended on the changing table. Teachers wash their hands before **and** after diapering and use gloves. Teachers wipe down the changing pad after each change with disinfectant wipes. Teachers will always change a soiled diaper. Soiled diapers will be disposed of in a separate trash can with a hands-free self-closing lid.
- Bathroom help: Children ages 2-3 who use the bathroom must be accompanied by an adult. Children ages 4-6 (preschool/kindergarten complement program) are permitted to go independently if they are in ear shot and in a safe environment (in the school setting). The adult should make sure the restrooms are unoccupied by non-participants before allowing children in the restroom and then remain outside the door. If the child requests help or the parent has noted that the child needs help, leave the door open and assist him or her. For students who may need additional assistance parents complete a special care form with specific instructions.

Prohibiting the Abuse or mistreatment of a child by another child

SPNDS has zero tolerance for abuse or mistreatment among any members of the SPNDS community. SPNDS is committed to providing all students and staff with a safe environment and will not tolerate the mistreatment or abuse of one person by another. Conduct that rises to the level of abuse or mistreatment will result in intervention or disciplinary action, up to and including suspension or expulsion. That said, the school will try to avoid the suspension or expulsion of students when other interventions are available.

Anti-Bullying Policy

SPNDS will not tolerate any behavior that is classified under the definition of bullying, and SPNDS will take the necessary steps to eliminate such behavior. Conduct that falls under the definition of bullying will result in intervention or disciplinary action, up to and including suspension or expulsion. That said, the school will try to avoid the suspension or expulsion of students when other interventions are available.

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

- Verbal bullying
- Physical bullying
- Nonverbal or relational bullying
- Cyberbullying
- Hazing
- Sexualized bullying

Defining appropriate and inappropriate verbal interactions

Employees and volunteers are prohibited from speaking to children and co-workers in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. SPC's policies for appropriate and inappropriate verbal interactions include but are not limited to:

<i>Appropriate Verbal Interactions</i>	<i>Inappropriate Verbal Interactions</i>
<ul style="list-style-type: none">• Positive reinforcement• Appropriate jokes• Encouragement• Praise• Strength-based conversations• Self-disclosure as a supervised therapeutic tool by licensed clinicians, medical professionals, and pastoral counseling	<ul style="list-style-type: none">• Name-calling• Off-color or sexual jokes• Shaming, belittling• Oversharing personal history• Derogatory remarks• Harsh language that may frighten, threaten or humiliate• Derogatory remarks about a child or their family

<ul style="list-style-type: none"> • Self-disclosure as part of accessing Deacon/Pastoral/Congregational Care • Self-Disclosure as an illustrative tool for faith formation/preaching/teaching, with healthy boundaries being maintained 	<ul style="list-style-type: none"> • Compliments relating to physique or body development
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Snacks and Food Allergies: Children bring their own snacks and lunches from home. We will make the school or certain classrooms nut-free zones as necessary for severe allergies. Families of children with allergies will complete a special care form regarding snacks or treats provided by the school.

Accidents, First Aid and Incident Reporting:

All adult staff maintain bi-annual pediatric first aid and CPR (cardiopulmonary resuscitation) training. All staff and volunteers can administer minor first aid to injuries such as small cuts, bumps, and bruises. All staff Always use gloves when dealing with blood.

In case of a more severe injury, deal with the immediate need (i.e., apply pressure to stop the bleeding), and then contact 911 and your supervisor/lead as appropriate to assist.

Any time a child is hurt, an accident/injury report needs to be filled out. This form can be found on the window across from the office. One copy should be sent home with the child and the other should be left in the office. The Director will report serious injuries to the appropriate county agency as required within 72 hours (about 3 days).

Breaks for Staff and Volunteers:

Sometimes interactions with children can become very frustrating. If you ever find yourself in a situation where you are getting truly angry with a child or a class, take a break. Contact your supervisor/leader and ask for a break or ask another classroom to combine classes while you take a break. Ensure you are calm and no longer angry before returning to the children.

Every Adult will have a break a least every four hours. Full-day staff are entitled to a 30-minute lunch.

Recognizing and Reporting Suspected Child Abuse:

The Pennsylvania Child Protective Services Law (CPSL) lays out the following categories of abuse. Staff and volunteers are required by law to report suspected child abuse as they are mandated reporters. Under the current PA CPSL, most employees and volunteers who work with children are mandated reporters.

Categories of Child Abuse:

- Bodily Injury
- Serious Mental Injury
- Sexual abuse or exploitation
- Serious physical neglect
- Likelihood of bodily injury or sexual abuse
- Medical child abuse (also known as Munchausen by Proxy)

Definition of Child Abuse:

The definition of child abuse was amended to require that acts or failures to act be committed by intentionally, knowingly, or recklessly doing one of these categories of abuse:

- Causing bodily injury through any recent act or failure to act;
- Fabricating, feigning or intentionally exaggerating or inducing a medical symptom or disease which results in a potentially harmful medical evaluation or treatment to the child through any recent act;
- Causing or substantially contributing to serious mental injury to a child through any act or failure to act or a series of such acts or failures to act;
- Causing sexual abuse or exploitation of a child through any act or failure to act;
- Creating a reasonable likelihood of bodily injury to a child through any recent act or failure to act;
- Creating a likelihood of sexual abuse or exploitation of a child through any recent act or failure to act;
- Causing serious physical neglect of a child;
- Engaging in any of the following recent acts:
 - Kicking, biting, throwing, burning, stabbing or cutting a child in a manner that endangers the child;
 - Unreasonably restraining or confining a child, based on consideration of the method, location or the duration of the restraint or confinement;
 - Forcefully shaking a child under one year of age;
 - Forcefully slapping or otherwise striking a child under one year of age;
 - Interfering with the breathing of a child;
 - Causing a child to be present at the location where an operation of a methamphetamine laboratory is occurring, if being investigated by law enforcement
- Leaving a child unsupervised with an individual, other than the child's parent, who the actor knows or reasonably should have known
- Is required to register as a Tier II or Tier III sexual offender, where the victim of the sexual offense was under 18 years of age when the crime was committed
- Has been determined to be a sexually violent predator or any of its predecessors
- Has been determined to be a sexually violent delinquent child
- Causing the death of the child through any act or failure to act;

- Engaging the child in a severe form of trafficking in persons or sex trafficking, as those terms are defined under section 102 of the Trafficking Victims Protection Act of 2000.

Training Staff

SPNDS recognizes that mandated reporter training is necessary for staff and volunteers to recognize child abuse and understand how to report it. Therefore, SPNDS will host in-person training every year.

New staff and volunteers who have never received mandated reporter training before will be required to take the online training before they begin working with children.

Reporting Suspected Child Abuse:

All Staff and volunteers are required by law to report suspected child abuse because they are mandated reporters. Under the current PA CPSL, most employees and volunteers who work or volunteer with children are mandated reporters. Being a mandated reporter means that if you suspect that a child is being abused, you must report it.

Reporting Steps:

1. If you suspect child abuse, you must immediately report it! There are two ways to report it

- i. Call **PA ChildLine at 800-932-0313**
- ii. Make a report online (mandated reporters only)

<https://www.compass.state.pa.us/cwis/public/home>

2. After making the report, you also must notify the SPNDS Director that you have made a suspected child abuse report.

Reporting from program participants, parents/guardians, staff and volunteers

Community members may make reports of abuse, neglect, boundary issues or violations, or other concerns with regards to program participants. These shall be documented by the Director and responded to confidentially. Reports can be made directly to the Director, President of the Advisory Committee or Head of Staff of SPC. An anonymous reporting box is available next to the staff mailboxes on the lower level that can be used if necessary for reporting any concern anonymously to the director. All complaints against the school are protected from any retribution.

There may also be incidents, injuries, or other situations where additional documentation should be made. These shall be stored confidentially. These types of documents could include:

- Incident reports
- Injury reports
- Physical restraint/de-escalation reports
- Satisfaction and/or feedback surveys from employees, volunteers, parents/guardians, and participants
- Turnover or retention of employees, volunteers, and participants
- Employee or volunteer exit interviews
- Complaints from participants, parents/guardians, and other stakeholders
- Reported concerns from employees, volunteers, participants, and parents/guardians
- Group Texts/Emails/Mass Text Programs

Regarding the prevention and detection of abuse, incident reports should include the following documentation of data:

- Date and time of incident
- Location of incident
- Type of incident (bullying and hazing, participant sexualized behavior, adult to participant abuse, adult to participant boundary violation, general injury, property destruction, verbal assault, physical assault, etc.)
- Names of participants and other individuals involved in the incident
- Names and positions of employees present during incident (or disclosure of incident)
- Names of witnesses present during incident
- Immediate actions taken by employee/volunteer
- How the incident was resolved
- Next steps taken by supervisor or administrators
- Who was notified internally and when and how they were notified
- Who was notified externally (i.e., police, abuse hotline, parents/guardians, Advisory Committee, Presbytery etc.) and when and how they were notified (i.e., phone call, email, online form)
- Reference numbers (if applicable) for calls to hotlines or law enforcement
- Identification of necessary corrective action to prevent a recurrence
- Require signature of key administrators who have reviewed the report
- Ongoing documentation of additionally learned information of investigation results

Responding to Complaints about Employees: Corrective Action and Grievance Policies

General Note:

Any action by any employee which causes harm to a child is grounds for termination of employment and not subject to the corrective action process. This includes leaving a child unattended at any time. However, to guarantee fair treatment of the accused, an investigation will be opened. The accused will either be supervised while on site or will not be able to have contact with children in our program until the investigation has concluded. Depending on the nature of the infraction a Childline report may be made. If the report requires no contact with children, then the employee will be given a leave of absence without pay pending the results of the investigation. If the report is unfounded, the employee will be entitled to full back pay.

Engagement by an employee in any illegal activity shall result in suspension without pay pending complete investigation and shall not be subject to the corrective action process.

SPNDS reserves the right to forgo one or more steps in extreme cases and in incidents including, but not limited to, those threatening the safety and welfare of the students, staff or other members of the SPNDS community.

Corrective Action

Corrective action will be implemented when a staff member has failed to follow the policies and procedures of SPNDS. The following three (3)-step process shall apply. The process shall be unbiased, objective, and impartial.

- **Step 1:** The Director will meet with the employee to discuss the incident at issue and the corrective action that must be taken. Both will complete, sign and date a Verbal Incident Form indicating that the discussion occurred. The completed Verbal Incident Form will be placed in the employee's personnel file.
- **Step 2:** If the misconduct continues, a detailed outline of the misconduct will be recorded by the Director and reviewed with the employee. The outline shall include a remediation plan which sets forth the steps to be taken and the time frame for the behavior/conduct change. Failure to comply with the stated remediation plan may result in the employee's suspension or dismissal. Both the Director and employee shall sign and date the written plan. Copies of the written plan should be given to the employee and to the Human Resources Manager of SPC for review. The original signed outline and plan shall be placed in the employee's personnel file.
- **Step 3:** The Director and employee shall convene within thirty (30) days of the agreed upon remediation plan to evaluate compliance with the plan. The Director and employee will sign and date the plan confirming successful remediation has occurred. Upon successful completion, the Director will report that completion to the Human Resources Manager of SPC. If remediation for corrective action is not successful, the Director may suspend without pay or dismiss.

Grievance Policy and Procedure

To file a grievance against a co-worker or to file a civil rights complaint against the school or an individual staff member, we have adopted the following procedure:

- **Step 1:** The person initiating an alleged grievance (“grievant”) shall first discuss his/her grievance with the Director within five (5) workdays of the grievant’s first knowledge that the alleged grievance occurred. If the grievance involves the Director, the grievant shall notify the staff representative on the Advisory Committee and/or the Head of Staff of SPC, the Pastor. If not satisfied with the results of the discussion, then the grievant shall initiate the next step, Step 1B.
- **Step 1B:** The grievant shall submit the alleged grievance in writing to the Director and the Staff Representative of the Advisory Committee within ten (10) workdays of the grievant first knowledge that the alleged grievance occurred. A copy of the grievance shall also be forwarded to the President of the Advisory Committee. Following discussion with the grievant, and any other parties deemed necessary, the Director shall respond in writing to the grievant within five (5) workdays of receiving the written grievance. A copy of the Director’s written response shall also be forwarded to the Staff Representative and President of the Advisory Committee.
- **Step 2:** If the grievance is not resolved to the satisfaction of the parties by the actions in Step 1 and Step 1B, the grievant shall refer the grievance, by written request, within five (5) workdays of receipt of the written response from the Director to the Human Resources Manager and Head of Staff of SPC. Failure to move the grievance forward at this point constitutes acceptance of the answer(s) as given in the previous step(s). If the SPC Head of Staff determines that the grievance lacks merit, or the decision(s) during Step 1 was (were) proper, he/she shall notify the grievant and action on that specific grievance shall terminate. If the Head of Staff determines that, in his/her opinion, the grievance is justified and the decision at step one is unsatisfactory, he/she shall call a meeting between the Director, Human Resources Manager, President of the Advisory Committee and the grievant within ten (10) school days of direct contact by the grievant and proceed to Step 3.
- **Step 3:** The Head of Staff shall 1) discuss the grievance brought before him/her, and 2) prepare a written recommendation for resolution of the grievance. If still dissatisfied with the outcome of the grievance, the grievant may request a hearing with the SPC Personnel Committee by submitting a written request to the chair of the SPC Personnel Committee within ten (10) days from the date of the above referenced meeting and written recommendation. The decision of the Personnel Committee shall be final. All

documents, communications, and records dealing with processing a complaint shall be filed in a separate file and shall not be kept in the personnel file of any of the participants.

* If the grievance is against the Director Step 1A may be excluded.

** If the grievance is against the Teacher Rep Step 1B may be excluded.

***If the grievance represents a complaint regarding discrimination steps 1a and 1b will be excluded and the complaint goes to Step 2. Processes within the larger body of the SPC may be applied.

****If the grievance is related to any allegation of child abuse as defined by the state, a ChildLine report will be filed. The accused will not be allowed access to the victim or the victim's family, and the school will abide by the findings of the investigators and the state's decision.

Staff Selection and Screening Process:

Basic staff Requirements for Lead Teachers:

- Bachelor's degree in early childhood or Elementary Education, or in a related field; or
- Associate degree in early childhood education with several years of experience; or
- CDA credential with a bachelor's degree in an unrelated field with several years of related experience.

Basic Staff Requirements for Assistant Teachers:

- Associate degree in early childhood education; or
- College background with previous early childhood work experience; or
- Coursework in ECE related classes; or
- Genuine interest in and love for working with children and willingness to pursue a CDA certificate

New Hire Screening Process:

All persons who desire to work/volunteer with the children participating in our programs and activities will be screened as follows:

- Resume OR application form: All persons seeking to work with children must submit a resume or sign a written application in a form to be supplied by us. The application will request basic information from the applicant and will inquire into 6 previous experiences with children. The Resume or application form will be maintained in the Personnel files in SPNDS office.
- Personal Interview: Upon completion of the application, a face-to-face interview will be scheduled with the applicant to discuss his/her suitability for the position. Depending on the position and timing, a demonstration lesson or time in the classroom may be arranged as a part of the screening process.
- Written references: References are checked (a phone call made to the individual used as a reference) and will be maintained in the staff member's file.
- Signed Disclosure Statement –Required by Child Protective Services Law
- Background Checks: The following certifications are also required:
 - Report of criminal history from the Pennsylvania State Police (PSP)
 - PA Child Abuse History Certification from the Department of Human Services (Child Abuse)
 - A fingerprint based federal criminal history (FBI) submitted through the Pennsylvania State Police or its authorized agent.
 - National Sex Offender Registry Verification (NSORV)
 - Additional criminal background checks will be required of potential staff from any additional states that they have lived in within the past five years.

New Hires and substitutes will not be permitted to be with children alone until all the requisite training and orientation has been completed.

Policy for Managing Interactions between Employees, Volunteers, and Students Outside the Organization

Research shows many cases of organizational abuse occur off-site and outside of regularly scheduled activities. Examples of contact outside of regularly scheduled program activities:

- Babysitting arrangements
- Tutoring
- Private lessons/coaching
- Mentorship
- Social interactions between employee’s or volunteer’s children and SPNDS students (Playdates, birthday parties, sleepovers, overnight trips and vacations, rides to/from school or extracurricular activities and events)
- Attending public events in a shared community (like graduation, sports events, religious ceremonies)

- Continued contact with a student after student leaves SPNDS

SPNDS strongly encourages employees and volunteers to refrain from outside contact with students with whom they do not have a preexisting familial or social relationship (i.e., children are friends at school, families attend same religious institution, etc.). If interactions with students outside of regularly scheduled program activities are unavoidable, SPNDS offers the following guidelines:

- If there is a pre-existing social or familial relationship, ensure proper boundaries are drawn by the employee or volunteer while in school.
- To increase transparency, consider texting or emailing an administrator when interactions like transportation and social outings occur.
- Ensure that rules prohibiting one-on-one interactions are still followed
- Please complete a preexisting relationship form if you intend to babysit/housesit/tutor/etc. This helps ensure transparency and protects the employee or volunteer from rumors. For example, if Coach Jones has hired Morgan to babysit and someone sees Morgan leaving Coach Jones' house at 10pm on a Friday night, it is much easier for the employee or volunteer and organizational leadership to respond to those concerns if they have been notified that interaction was going to take place. It is not a foolproof system, as abuse can certainly still happen in the situation given or an accusation of abuse, but it adds an extra layer of protection for employees, volunteers, and students.

Policy for Managing One-on-One Interactions Between Employees, Volunteers, and Students

Staff from outside agencies will never be left alone with children. A regular SPNDS employee will be within close view and hearing of therapist or other personnel provided by other agencies. Generally, staff should have more than one child with them at any given time. One-on-one interactions with students should only occur during programming under authorized circumstances. In situations where one-on-one interactions are authorized, employees and volunteers should observe the following guidelines to limit the risk of abuse or false allegations of abuse:

- Meet students in a public place where you are in full view of others.
- Avoid physical interactions and/or affection during one-on-one interactions at all costs. If physical interactions occur, ensure appropriate physical and verbal interactions align with our established policies and are limited to the task at hand. Immediately share the nature and extent of physical interactions that occurred during the one-on-one interaction with your supervisor after the interaction has ended.

- 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 and volunteers that you are alone with a consumer and encourage them to randomly drop in or pass by the interaction.
- To the extent possible, ensure one-on-one interactions occurring behind closed doors are scheduled in advance, occurring in a room with windows or glass in the door, and/or are communicated to your supervisor.
- Ensure one-on-one interactions are documented, especially if behind closed doors. Keep documentation of these meetings (such as in shared calendar, case notes, etc.) and share with your supervisor.
- Document and immediately report any unusual incidents, including physical interactions, disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted or that made you uncomfortable.

Policy for managing Electronic Communications and Social Media

SPNDS has chosen Brightwheel, a messaging and photo sharing app, as our primary communication tool. Staff will refrain from contacting parents through other means whenever possible. Administration will maintain a Facebook page and will be used to share information about enrollment deadlines, informational events and may share information about community-wide events geared toward families.

Families sign a photo release (found on permission form at the end of this document), for the use of photos in newsletters or promotional materials. We do not post photos of students on our social media page and staff may not post photos of our students on their personal social media pages. Best practice encourages staff to only interact with families in our Brightwheel app.

Staff are expected to read, sign, and abide by the SPNDS Electronic Communication and Social Media Code of Conduct. When using social media, please keep these guidelines in mind:

- **Employees are representatives of SPNDS:** It is important to remember to exhibit professionalism in all interactions. Be a positive role model by portraying an attitude of respect, loyalty, patience, courtesy, tact, and maturity. Remember that our actions, biases, and beliefs can affect our students and families.
- **Transparency:** Be honest on social media, but do not post any claims about the school or its programs or activities unless you receive authorization from the director. Please alert the director/administration about comments/concerns about our program on social media but refrain from responding or engaging with others regarding the comments.

- **Safety:** Keep passwords safe, and do not visit social media sites while using the Wi-Fi network at the school.
- **Own your views:** When you post your own opinions, add a statement clarifying your thoughts are your own and do not reflect the views of SPNDS.
- **Confidentiality:** Never disclose medical histories or other personal information about any student, family member or staff member. Do not comment on, or disclose, any information to other media outlets if there is ever a crisis that needs to be managed. Public statements will be made by the director in consultation with the church and the Advisory Committee.
- **Policy enforcement:** Any violation of social media policy will be met with disciplinary action, including termination in severe cases.
- **Report to the Director:** The director can be copied on emails and messages in the app. Please let the director know if inappropriate posts or inaccurate information are shared by staff or families. An anonymous suggestion/reporting box is available to staff and families near the teacher mailboxes if needed.

SPNDS Electronic Communication and Social Media Code of Conduct

Electronic Communication and social media present the potential for inappropriate behavior, increased access to vulnerable children, and privacy violations. Employees and volunteers participating in SPNDS programs, events, and activities shall adhere to the following Social Media Code of Conduct:

- 1) Do not engage in behavior or comments that are or could be construed by any observer to be harsh, abusive, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.
- 2) Do not engage in personal attacks, sexually oriented conversations, or discussions about sexual activity.
- 3) Be a positive role model by exhibiting professionalism in all interactions; portray an attitude of respect, loyalty, patience, courtesy, tact, and maturity.
- 4) Only program-related messaging may be communicated electronically between employees, volunteers of the organization and parents/guardians and students. Such communication should occur during standard business hours and using approved emails or communication platforms.
- 5) Employees and volunteers are prohibited from sending private messages to students and/or replying to private messages from the student. If a student attempts to privately communicate with an employee or volunteer electronically, their supervisor must be notified immediately.
- 6) Personal social networking profiles and/or blogs of employees and volunteers shall be private and not shared with students. Employees and volunteers with profiles on social networking sites shall not request to be “friends” with or follow students or approve friend or follow requests from students. Previous relationships will be disclosed to the administration.
- 7) Employees and volunteers may not engage in electronic communications or social media contact with other family members or friends of students except parents/guardians.
- 8) Never reveal sensitive or confidential information, including identifiable details or photos of a student, without written consent from their parent/guardian.
- 9) Employees and volunteers may not post or share on their personal social media accounts any photographs or videos of children participating in SPNDS programs.
- 10) Employees and volunteers may not post or share inappropriate photos or comment on photos of students.
- 11) Do not make pornography in any form available to students participating in SPNDS programs, events, or activities, or assist students or parents in any way in gaining access to pornography.
- 12) Employees and volunteers may not create webpages on behalf of SPNDS unless they have prior approval to do so and may not misrepresent their work as work by SPNDS.
- 13) Employees and volunteers engaging in social media and online communication become a public figure associated with SPNDS and are responsible to help protect our students and families. Always act in a professional and constructive manner and use sound judgement before posting or sharing content.
- 14) Rather than personally defend the school’s reputation, employees and volunteers should notify their supervisor or an administrator of a negative comment or online representation of the school that they see on social media. Employees and volunteers should also not comment if any member of the media contacts them about any matter related to SPNDS.
- 15) Employees and volunteers must adhere to uniform standards of electronic communication and social media use as outlined in any applicable organizational policies and procedures.

- 16) This Code of Conduct and associated policies and procedure shall be provided to parents/guardians of students. It will also be available on the organization's website for the public to view.
- 17) Parents/guardians may request in writing that a student not be contacted through any form of electronic communication or social media by an employee or volunteer of the organization.

Acknowledgment of Electronic Communication and Social Media Code of Conduct

I have received a copy and voluntarily agree to comply with the SPNDS Electronic Communication and Social Media Code of Conduct. I understand that failure to comply with these policies may result in my removal from SPNDS.

NAME: _____

DATE: _____

CRISIS MANAGEMENT PLAN

SPNDS' crisis management plan for the entire SPNDS community shall be followed for any situations involving students in our programs. A crisis is defined as any occurrence that harms a student or employee, threatens the public reputation or immediate financial integrity of the organization, or that may create a situation of legal liability to the school, the staff, the church, its ruling Elders, Teaching Elders, Deacons, or volunteers.

Key Crisis Management Objectives:

- Prioritize student and staff protection and safety.
- Be proactive, timely, transparent, accurate, consistent, and unified in the messages presented internally and to media, stakeholders, and the public.
- Maintain strong relationships with various stakeholders.
- Evaluate the school's policies and protocols and demonstrate to stakeholders and the public how the organization is evolving to correct past challenges and improve the organization's safeguarding efforts.

The Director is the sole spokesperson to media in any crisis, and in consultation with the Advisory Committee, the Head of Staff, Clerk of Session and Ruling Elders, is responsible for the creation of any Crisis Management Team and will determine who from the organization will be on the Crisis Management team.

Once Allegation/Incident Occurs:

Secure Immediate Safety and Minimize Access

- To the extent possible, ensure the victim-survivor is secure and safe from additional harm or abuse.
- Follow all mandated reporting requirements and contact the authorities as appropriate.
- Follow all mandated reporting requirements of the State of Pennsylvania

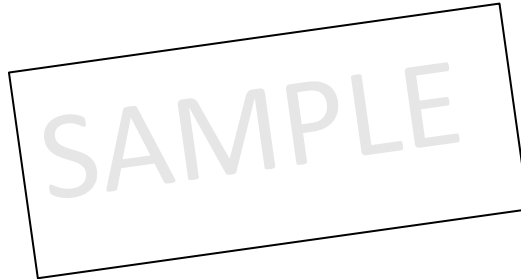
Initial Communication Plan

- Designate a point person to respond to all inquiries from parents/guardians, the media, and other stakeholders.
- Prepare a short media statement in advance or anticipation of receiving a media or public inquiry.
- All oral and written communication should speak with a voice of compassion and confidence.
- All employees and volunteers should know how to refer media inquiries to the appropriate spokesperson.
- As soon as possible, meet in person (not over the phone) with identified victim-survivors and their parents/guardians. Reassure them that you are taking the allegation or incident seriously.
- Find out what response the identified victim desires and be prepared to explain what support you will offer, such as counseling or therapeutic services.
- Consider reaching out in writing to parents/guardians of all SPNDS students, or students in the specific program in which the accused offender was involved or had contact with students.
- The message should communicate:
 - **Empathy:** Begin by stating that such incidents run counter to your organization's values.
 - **Facts:** Include a summary of the incident, including information about any suspensions, investigations, arrests, etc.
 - **Contact Request.** Ask parents/guardians to contact SPNDS or the specified authorities if they suspect their child may have been abused.
 - **Your Response:** Explain that SPNDS is fully cooperating with the authorities. Describe proactive steps the organization is taking such as offering resources to individuals, hosting a parent/community meeting, training employees and volunteers, and conducting an independent investigation to learn from this incident so SPNDS can prevent it from happening again.
- Host a parent/community meeting to speak directly with concerned families and directly answer any questions before rumors or misinformation is spread. During a meeting:
 - Communicate as much information as you can about the incident.
 - Provide information regarding the proactive steps leadership is taking in response to the incident.
 - Describe the resources SPNDS is providing families and give parents/guardians a chance to ask questions.

o Provide parents/guardians with information about how to talk to their children about abuse.

Ongoing Communication and Response

- Determine how to manage ongoing relations with authorities, parents/guardians, the community, and media relations.
- Consider adding a designated page to your website with updated details about the incident.
- Designate specific individuals in the organization to handle various communications and outreach efforts.



PERMISSION FORM

CHILD'S NAME: _____

A) PHOTO RELEASE

_____ I agree that SPNDS may use such photographs of my child without his/her name for any lawful purpose, including, for example such purposes as publicity, illustration, advertising, and Web content.

_____ Do not use my child's photos in published materials.

Parent Signature _____

Printed Name _____

Date _____

B) CONTACT INFORMATION VERIFICATION AND SPNDS STUDENT DIRECTORY

Student's Name: _____ Parents' Names: _____

Mailing Address: _____ Primary Phone Number: _____

Primary Email Address: _____

Each year, SPNDS publishes a **student directory** to be used by the current staff and enrolled families, which includes your child's name, address, parent(s) name(s), primary phone number and primary email address. Please indicate your preference regarding publishing your child's information in the current SPNDS Directory.

_____ Yes, I give permission to publish my child's information in the directory. *If yes, is there any information you'd like to omit from your listing, e.g., mailing address? If so, please list:*

_____ No, do not publish my child's information in the directory.

Parent Signature _____

Printed Name _____

Date _____

C) **FIELD TRIPS**

I hereby give my permission for _____ to go on supervised walking school trips. You will receive detailed information from your child's teacher in advance of any trip.

Parent Signature _____

Printed Name _____

Date: _____