

A Unitarian Universalist Congregation —Affirming the Worth and Dignity of All People

292 State Street

Portsmouth, New Hampshire 03801 Telephone: 603. 436.4762 Fax: 603.436.3018 office@southchurch-uu.org http://www.southchurch-uu.org

# South Church Safe Congregation Policies and Procedures For Children and Youth

# 1. Policy Statement

Child Abuse means the non-accidental injury, sexual abuse (touching and non-touching), exploitation, neglectful treatment or the maltreatment of a child (from birth to 18 years) by any person under circumstances indicating that the child's health, welfare and safety are harmed.

South Church recognizes the reality of child sexual and physical abuse in our society, its impact on children and families, and the need for a responsible means of addressing this issue. By overcoming the secrecy too often applied to this sensitive topic and by providing a forum for possible problems and concerns, we will reflect our commitment to provide protective care for all children, youth, staff and volunteers who participate in church sponsored activities.

We will achieve these goals through:

- > Screening and training of all volunteers who work with children.
- > Screening of all volunteers and church leaders whose responsibilities give them access to privileged information.
- Screening and training of all church staff.
- > Supervising our children and those who work with them.
- Providing a specific process by which allegations of abuse are reported and investigated.
- > Treating all persons with dignity and respect.
- Requiring those with past incident, or who are under accusation, to refrain from contact with children.
- Making the congregation aware of these policies and procedures

While the main focus of these policies is upon those directly working with children and youth, all members of South Church are responsible to provide a safe and caring community in which children and youth:

- > are respected and their self worth affirmed,
- real are encouraged in their spiritual, social, and intellectual growth are encouraged.

We are committed to the care of our children, the safety for our volunteers and staff and to the principles of fairness, kindness and forgiveness that have long been part of our religious tradition.



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# 2. Policy Scope

## 2.1. Church Sponsored Activities

#### 2.1.1. Location

This policy applies to all church sponsored activities either held at South Church or off site\*.

\*In the event that an offsite activity is not safe congregation compliant, parents/guardians must be notified in writing and provide written permission.

#### 2.1.2. Activities

This policy applies to all committees, task forces, activities and organizations that function under the umbrella of South Church.

This policy also applies to other groups and events both sponsored by and using the facilities of South Church. (For example, when District Youth Conferences are held at South Church, all adult advisors are expected to have completed the screening process described below, or a comparable screening at their own congregation with written confirmation of compliance.)

#### 2.2. Children and Youth

In this document, "child" and "children" shall mean anyone less than 18 years of age and "youth" shall mean anyone from 12 to less than 18 years of age.

#### 2.3. Protective Care of Children

This policy considers the necessary precautions and procedures for the overall protective care of children. It details policies under which volunteers or staff of South Church shall have <u>Access to Children</u> and the polices under which volunteers or staff of South Church may <u>Supervise Children</u>.

#### 2.3.1. Access to Children

Staff, church leadership and volunteers who have access to privileged information or work with families or youth in the course of church sponsored activities are considered to have <u>Access to Children</u>. Such access should only be granted to screened and trained individuals according to the policies outlined below.

#### 2.3.2. Supervision of Children

For church sponsored activities where parents or guardians are not present and it is explicitly understood that children are in the care of volunteers or staff, said volunteers or staff are considered to be <u>Supervising</u> <u>Children</u>. Such a responsibility should only be granted to screened and trained individuals according to the policies outlined below.

# 3. Policy Administration

This policy is in effect at all times and therefore must be applied and monitored year round. Due to the confidential nature of the policies, it must be administered by a member of South Church's staff and not by the volunteer leadership.

This document presumes and makes reference to a Safe Congregation for Children and Youth Policy Administrator. Broadly, the Policy Administrator is responsible to manage and oversee the application of the policies below and where noted perform specific tasks required by the policies.

\*to be noted:\*The Board of Trustees is responsible for formally designating a staff member as the Safe Congregation Children and Youth Policy Administrator.



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# **Screening Requirements**

This section identifies and describes the levels of screening available - Full Screening, Provisional Screening and the Screening of a Minor - and the requirements for each.

For this document, references made to Fully Screened volunteers will encompass Screened Minors and Fully Screened adults.

In this and subsequent sections an 'applicant' refers to a current or potential volunteer or member of the staff who has not yet been screened or who's screening status is no longer current

#### 4.1. Six Month Rule

For all levels of screening, volunteers are required to have attended church services regularly for at least six months. Exception may be given for congregants moving from another UU church where they've been a screened RE volunteer. In the event of such an exception, a written recommendation must be received from the prior congregations staff, and the volunteer must still complete the South Church safe congregation screening.

## 4.2. Full Screening

For members of the church staff and all congregants entrusted with responsibility for children, safe congregation screening is required.

#### 4.2.1. Initial Screening

Upon initiation a Full Screening requires

- > Confirmation of the applicant's identity.
- > Verification of the six-month rule.
- Completion by the applicant of the following forms
  - Standard Screening Application
  - Criminal Records Request and Authorization Form
  - Code of Ethics Form
- > Three (3) written references to be requested and a minimum of two (2) returned to South Church
- > Criminal records check to be performed by South Church
- > Completion by the applicant of Safe Congregation for Youth and Children Training

#### 4.2.2. Screening Renewal

To remain current a Full Screening must be renewed every three (3) years through:

- > Completion by the applicant of the following forms
  - Standard Screening Application
  - Criminal Records Request and Authorization Form
  - Code of Ethics Form
- Three (3) written references to be requested and checked by South Church
- > Criminal records check to be performed by South Church
- Completion by the applicant of Safe Congregation for Youth and Children Training.



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Someone who has completed and is current with a Full Screening shall be considered Fully Screened.

#### 4.3. Provisional Screening

Provisional Screening is intended to be a temporary status, lasting no more than 6 weeks. Specifically, it may be allowable for a provisionally screened adult to assist other Screened or Fully Screened staff or volunteers during the time period that their screening is being completed and recommendation letters are being returned.

A Provisional Screening requires the following be performed prior to any interaction with children or youth.

- > Confirmation of the applicant's identity.
- ➤ Verification of the six-month rule.
- Completion by the applicant of the following forms
  - Standard Screening Application
  - o Criminal Records Request and Authorization Form
  - Code of Ethics Form
- > Completion by the applicant of Safe Congregation for Youth and Children Training

Someone who has completed a Provisional Screening shall be considered Provisionally Screened.

4.3.1. <u>Provisionally Screened</u> individuals shall never responsible for <u>Supervising Children</u> without the presence of another Fully Screened staff member or volunteer.

# 4.4. Screening of Minor Volunteers

Volunteers between the ages of 12 and 18 may be screened as follows

# 4.4.1. Initial Screening

Upon initiation the Screening of a Minor requires

- A personal interview with the applicant conducted by an immediate supervisor or supervising committee with written notes by interviewer to be kept on file
- ➤ Confirmation of the applicant's identity.
- Verification of the six-month rule.
- The parent or guardian of the minor shall together with the volunteer complete and sign each of the following forms
  - Standard Screening Application
  - o Code of Ethics Form
- > Three (3) written references to be requested and a minimum of two (2) returned to South Church
- > Completion by the applicant of Safe Congregation for Youth and Children Training.

## 4.4.2. Screening Renewal

To remain a current Screened Minor the screening must be renewed every three (3) years through:

- Completion by the applicant of the following forms
  - Standard Screening Application



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- Code of Ethics Form
- Three (3) written references to be requested and checked by South Church
- > Completion by the applicant of Safe Congregation for Youth and Children Training

A minor who has completed and is current with this screening process shall be considered a Screened Minor.

## 4.5. General Screening Requirements

The following requirements are applicable to all screening of staff and volunteers.

- 4.5.1. The Policy Administrator shall be responsible for overseeing completion of the appropriate paperwork, except where noted, and for checking references. The immediate supervisor of the Policy Administrator shall follow-up to ensure that the reference checks have been completed appropriately.
- 4.5.2. When criminal records checks are performed upon staff, they will be initiated and reviewed by immediate supervisor.
- 4.5.3. When criminal records checks are performed upon volunteers, they will be initiated and reviewed by the Policy Administrator.

## \*(omission)

- 4.5.4. Adults or youth who have criminal charges pending or have been convicted of child sexual or physical abuse or any other criminal charge which raise a question as to their suitability to interact with children shall not be allowed to work with children or youth.
- 4.5.5. If it is determined that a potential volunteer should have restricted access to children, he/she shall be requested to sign a limited access agreement, and shall not be allowed to have any further contact with children. If the same is determined for a potential church staff person, the person shall not be hired.
- 4.5.6. All Screening information will be kept confidential.

# 5. Screening of Staff and Volunteers

This section identifies the specific staff and volunteer positions requiring screening along with their commensurate screening levels.

## 5.1. Staff

All paid staff (including Ministers, Ministerial Interns, Nursery Supervisors, Church Staff, and RE Staff) of South Church shall be <u>Provisionally Screened</u> prior to beginning work with children and within 30 days assuming their duties.

#### 5.2. Church Leadership

Church leadership (including all members the Board of Trustees) shall be <u>Provisionally Screened</u> within 60 days of their election or appointment.

#### 5.3. RE Leadership

RE leadership (including members of the REC) shall be <u>Provisionally Screened</u> prior to beginning work with children.

#### 5.4. Pastoral Volunteers

5.4.1. Volunteers providing pastoral care to families with children (including Pastoral Associates, Network of Care Providers) shall be <u>Provisionally Screened</u> **prior to visiting families with children.** 



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5.4.2. Pastoral Volunteers shall be at least 18 years of age prior to visiting families with children.

#### 5.5. Youth Leaders

- 5.5.1. Those who lead youth groups or programs such as Our Whole Lives (OWL) and Coming of Age shall be Fully Screened **prior to beginning work with children**.
- 5.5.2. Youth leaders shall be at least 23 years of age.
- 5.5.3. To help ensure a safe congregation, youth leaders shall also receive continuing education about working with youth.

# 5.6. Roaming Supervisors

- 5.6.1. Roaming Supervisors shall be Provisionally Screened **prior to beginning work with children**.
- 5.6.2. Roaming Supervisors shall also be trained on the Safe Congregation policies regarding Nursery Supervision (see section 7.4 below) in order to better ensure compliance therewith.
- 5.6.3. Roaming Supervisors shall be over 18 years of age.

# 5.7. Young Church Teachers

- 5.7.1. Young Church Teachers 18 years of age and above shall be <u>Provisionally Screened</u> **prior to beginning work with children**.
- 5.7.2. Young Church Teachers under 18 years of age must be <u>Screened Minors</u> **prior to beginning work** with children.

#### 5.8. Nursery Supervisors

- 5.8.1. Nursery Supervisors shall be Provisionally Screened **prior to beginning work with children**.
- 5.8.2. Nursery Supervisors shall also be trained on the Safe Congregation policies regarding Nursery Supervision (see section 7.4 below) in order to better ensure compliance therewith.
- 5.8.3. Nursery Supervisors shall be over 18 years of age.

## 5.9. Nursery Volunteers

- 5.9.1. Nursery Volunteers 18 years of age and above shall be <u>Provisionally Screened</u> **prior to beginning** work with children.
- 5.9.2. Nursery Volunteers under 18 years of age must be <u>Screened Minors</u> **prior to beginning work with children**.

# 6. <u>Training</u>

This section describes the minimum requirements for educating the screened population on current practices, details of this policy and overall expectations. It also identifies the person responsible for this training.

#### 6.1. Trainer

- 6.1.1. Training on Safe Congregation for Children and Youth shall be provided by the DRE or DRE designee.
- 6.1.2. The DRE shall remain current on the best practices for safe congregation for children and youth training.



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#### 6.2. Curriculum

- 6.2.1. Every participant shall receive a copy of the Safe Congregation for Children and Youth Policy Statement.
- 6.2.2. Training on Safe Congregation for Children and Youth shall include
  - > the definition of child abuse;
  - > sexual and physical abuse symptoms;
  - what constitutes inappropriate conduct;
  - > church policies that govern working with children or youth;
  - > the civil and criminal consequences of misconduct;
  - reporting procedures for observed or suspected misconduct;
  - > the rationale behind screening procedures; and
  - > the current industry standards and best practices for safe congregation training

# 7. Supervision of Children

This section details the policies for how church sponsored activates for children and youth shall be supervised.

# 7.1. Children in Church Buildings

7.1.1. Church buildings will not be open to children or youth unaccompanied by a parent or guardian for any activity until two (2) Fully Screened adults are present.

# 7.2. Supervision of Children

- 7.2.1. Church sponsored activities providing the Supervision of Children ages 3-18 years old require:
  - 7.2.1.1. Two (2) <u>Fully Screened</u> and trained supervisors, <u>Screened Minors</u> and/or <u>Adults</u>, who <u>must be</u> present in the room at all times,
  - 7.2.1.2. an open or windowed door
  - 7.2.1.3. the presence of adults in the building
- 7.2.2. No child under the age of 13 will be dismissed from a church sponsored activity except to a parent, guardian or an authorized custodian. Youth age 13-18 years may be released without a parent if they have written permission from a parent to do so.

#### 7.3. Young Church Supervision

Young Church refers to the Religious Education classes for children ages 3-18 held during Sunday morning services.

- 7.3.1. During Young Church, a <u>Fully Screened Adult</u> Roaming Supervisor will be present when classes are being held. Roaming Supervisors shall
  - Accompany and Supervise children going to the lavatory
  - Supervise children removed from class for disciplinary purposes
  - Ensure there always remain two adequately Screened supervisors in the classrooms and nurseries.



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- Remain in contact with Karnan house via 2-way radio.
- 7.3.2. <u>Supervision of Children</u> ages 3-18 during Young Church shall be according to the policies described in section 7.2 above.
- 7.3.3. No child under the age of 13 will be dismissed from young church except to a parent, guardian or an authorized custodian. Youth age 13-18 years may be released without a parent if they have written permission from a parent to do so.
- 7.3.4. Windows will remain in the doors of all young church classrooms, including the Nursery.

#### 7.4. Nursery Supervision

When staff or volunteers are <u>Supervising Children</u> including one or more child less than three (3) years old during a church sponsored activity such a setting will be considered a <u>Nursery</u>. (Such a Nursery may be within South Church or at another site.) The following policies are specific to how we ensure the safety of our youngest children, least capable to advocate for themselves.

- 7.4.1. Anytime staff or volunteers are to be responsible for children under three (3) years old
- 7.4.1.1. there must be two (2) <u>Fully Screened adults present during Sunday morning nursery care</u>\*, each of which must be trained on South Church's Nursery Policies
- 7.4.1.2. \*On some occasions, our Director of Religious Education may approve the use of two (2) <u>screened minors</u> to provide childcare without the presence of a <u>Fully Screened</u> adult. These rare situations will be limited to instances where meetings are occurring in the proximity of the child care (in the same building/same floor) so that parents can be retrieved easily if needed. In these instances, screened minors must be at least 14 years of age with 2 years of experience as screened minors volunteering in the presence of Fully Screened adults. Parents will be made aware of this exception to standard policy. The number of children in the care of screened minors without the presence of an adult shall be no more than three (3) children.
- 7.4.1.3. To ensure that two (2) <u>Fully Screened</u> and trained volunteers remain in the nursery at all times there must be either a Roaming Supervisor as described in section 7.3.1 above or a third <u>Fully Screened</u> and trained adult available to:
  - ➤ Accompany and Supervise children going to the lavatory
  - > Supervise children removed from class for disciplinary purposes
  - > Ensure there always remain two adequately Screened supervisors in the classrooms and nurseries.
- 7.4.2. There shall not be more volunteers in the Nursery than can be effectively monitored and supported by the Nursery Supervisor.
- 7.4.3. There may be volunteers in the Nursery in addition to the two fully screened adults required in section 7.4 above as follows.
  - 7.4.3.1. Screened Minor Nursery Volunteers at the Nursery Supervisors discretion and consistent with section 7.4.2 above <u>Screened Minors</u> may act as Nursery volunteers under the supervision of the Nursery Supervisor.
  - 7.4.3.2. Provisionally Screened Nursery Volunteers at the Nursery Supervisors discretion and consistent with section 7.4.2 above <u>Provisionally Screened</u> adults may act as Nursery volunteers under the supervision of the Nursery Supervisor.



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- 7.4.3.3. Parents in the Nursery at the Nursery Supervisors discretion and consistent with section 7.4.2 above parents of children currently in the Nursery may be in the Nursery for the sole purpose of tending to their own child.
- 7.4.4. Parent/s or guardian/s of nursery children will check in their children through the Nursery Supervisor or designated volunteer by signing the Nursery Sign-In Form and will check out their child/ren through the same adult.

#### 7.5. Parental Consent

- 7.5.1. For church sponsored activities such as Field Trips, Youth Gatherings, Vehicle Rides, or Sleepovers, the following is required for each child participating
  - > Permission slips signed by a parent or guardian
  - Medical release forms completed and signed by a parent or guardian

#### 7.6. Toileting

- 7.6.1. When supervising a young child using the bathroom, volunteers should ask the child the child if they can manage on their own. In such an instance, the volunteer should remain in the hallway outside the restroom, leaving the door open to be sure the small child is safe. It is preferable for the child to do a sub-par job of toileting but to remain independent.
- 7.6.1.1. If a child is in need of assistance, the roaming supervisor or adult volunteer should seek a second adult to supervise from the open doorway.
- 7.6.1.2. At no time, should a Screened Minor be assisting a child with toiletting
- 7.6.1.3. No volunteer is obligated to assist any child with toileting. At any time, a volunteer may request that office personnel retrieve the child's parents or may request to switch out with a nursery supervisor or other Fully Screened adult who is comfortable handling the situation.

#### 7.7. Transporting Children in Vehicles

- 7.7.1. For church activities which include vehicle rides in addition to the requirements outlined in section 7.5 above, the following is required
  - ➤ Proof of 100/300 auto insurance for every driver
  - > Every person transported in a vehicle must wear a seatbelt
  - In the case of transportation, it is acceptable to have One (1) screened adult alone with a group of students, as long as:
    - The driver in each car is provisionally screened.
  - In the event that a single child/youth is being transported, there must be two screened adults in the vehicle.

# 8. Access to Children

This section details the screening and information handling policies for staff, volunteers and leadership with Access to Children.



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#### 8.1. Access to Children

Volunteers, church leadership and staff with <u>Access to Children</u>, as described in section 2.3.1 above, shall be Provisionally Screened.

## 8.2. Media and Publications

- 8.2.1. Images of children in church publications shall not be included without the written consent of their parent or guardian.
- 8.2.2. Children pictured in church publications (electronic or physical) shall not be identified by name.

# **Reporting and Responding Procedures**

Child Abuse means the non accidental injury, sexual abuse (touching and non-touching), exploitation, neglectful treatment or the maltreatment of a child (from birth to 18 years) by any person under circumstances which indicate that the child's health, welfare and safety are harmed.

## 8.3. Policy and Procedures for Previously Investigated Offenses or Charges

- 8.3.1. Anyone who becomes aware of child sexual or physical abuse charges made against an employee, volunteer, member, or attendee of the church should notify a Minister, the Chair of the Board of Trustees or the DRE. Of these, whoever receives the information shall be responsible for reporting to the others. In the event that the charges involve a minister, the next points of contact shall be the Board Chair, the District Executive of the Northern New England District, or the UUA Department of Ministry.
- 8.3.2. The Minister(s), the Board Chair, and the DRE shall:
  - 8.3.2.1. collect and review all pertinent facts regarding the incident or charges;
  - 8.3.2.2. review the application and reference forms kept on the person;
  - 8.3.2.3. determine what, if any, actions need to be taken; and
  - 8.3.2.4. carefully document all meetings, conversations, information, etc. regarding this matter, and keep all this information as confidential as the circumstances warrant.
- 8.3.3. If the allegations have merit or cannot be disproved, actions to be considered shall include:
  - 8.3.3.1. signing a limited access statement;
  - 8.3.3.2. determining who in the church and the larger community should be notified, and means of notification; and/or
  - 8.3.3.3. suspending or terminating employment, volunteer duties or membership.

## 8.4. Procedures for an Uninvestigated Occurrence

- 8.4.1. Any inappropriate conduct or relationships between a volunteer worker or paid staff and a youth or a child should be reported immediately to a Minister, the Chair of the Board of Trustees or the DRE.
- 8.4.2. Anyone informed of an incident of child sexual or physical abuse (whether the abuse may have occurred during a church activity or not) shall:
- 8.4.2.1. complete the Report of Suspected Abuse form included in all volunteer training packets or provided by the DRE; and

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- 8.4.2.2. report the incident to either a Minister, the Chair of the Board of Trustees or the DRE. Of these, whoever receives the information shall be responsible for reporting to the others. In the event that the charges involve a minister, the next points of contact shall be the Board Chair, the District Executive of the Northern New England District, or the UUA Department of Ministry.
- 8.4.3. New Hampshire state law, RSA 169-C, the Child Protection Act, states that <u>any person</u> who has reason to suspect that a child under the age of 18 has been abused and/or neglected must make a report to the Division for Children, Youth and Families (DCYF) immediately. This law also states that any person making a report in good faith is immune from any civil or criminal liability.
- 8.4.3.1. <u>In the presence of</u> one of the above listed church leaders, <u>such person</u> must report the incident to DCYF (1-800-894-5533). Such person should keep careful written notes of the telephone conversation and the name of the person you speak with. A follow-up written report by such person may be required by DCYF.
- 8.4.4. The entire matter <u>must</u> be kept confidential from anyone other than the Minister(s), the Board Chair and the DRE until you are informed that an investigation has been completed.
- 8.4.5. The Minister(s), the Board Chair and the DRE shall carefully document the handling of the incident, and report the incident immediately, as appropriate, to the child's parents, the church's attorney, the proper civil authorities, and the church's insurance company.
- 8.4.6. Do not prejudge the situation, but take the allegations seriously. The Minister(s), the Board Chair and the DRE shall reach out to the victim and the victim's family. Extend whatever pastoral resources are needed. Remember that the care and safety of the victim is the first priority.
- 8.4.7. In the event that knowledge of the incident becomes public, the Minister(s) and the Board Chair shall designate a spokesperson for the church. The spokesperson shall use the text of a prepared statement to answer the press and to convey the incident to the congregation, taking care to safeguard the privacy of all parties involved.
- 8.4.8. The Minister(s), the Board Chair and the DRE shall determine how to address the incident within the congregation. While civil authorities are investigating the reported incident, this committee shall determine the appropriate actions to be taken regarding the accused, as specified herein under "Procedures for Previously Investigated Offenses or Charges".

# 8.5. Procedures for Working with and Caring for a Person Against Whom Allegations Have Been Made

- 8.5.1. Treat the accused with dignity and support.
- 8.5.2. If the accused is a paid staff person or a volunteer, that person shall be suspended from all activities involving the supervision of children. This is true for an incident that allegedly occurred either within or outside the realm of the church. Suspension will continue pending the outcome of the investigation by the appropriate authority.
- 8.5.3. Regardless of where or under what circumstances the alleged incident takes place, if a paid staff person is involved and convicted, or a legal charge is brought but not acted upon for reasons that leave too many questions unanswered, it may be considered as job related and affecting job performance.
- 8.5.4. Reinstatement of a paid staff member or volunteer will occur only after all allegations have been cleared to the satisfaction of the Board of Trustees.

# 8.6. Procedures for Working with and Caring for a Person Who Has Been Convicted of Sexual Abuse

8.6.1. Because we "affirm the inherent worth and dignity of every person" we do not believe any person should be "automatically" excluded from our membership because of their past actions. However, we



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also believe we have a responsibility to insure the well-being of all of our participants, especially the most vulnerable. To date it is our understanding that the ability of sex offenders to change their behavior is problematic. If someone who has been convicted of sexual abuse, regardless of where it occurred, wishes to participate in this church, we will welcome him or her but their participation may be limited in ways to ensure the safety of our children.

# 9. Restricted Access to Children

If it is determined that any person should have restricted access to children, he/she shall be required to sign a Limited Access Agreement, and shall not be allowed to have any further contact with children.

# 10. Congregational Awareness

At least once a year an insert will be placed in the newsletter and order of service reminding the congregation of the Safe Congregation Policies for Children and Youth and a statement about these policies will be included in the new member packet.

## 11. Procedures and Forms

Procedures in adaptation to those outlined in this document are necessary for the fulfillment and enforcement of this policy. The documentation, review and revision of such procedures are the responsibility of the church staff responsible for the application of the policies in this document. Provided that they are consistent with the policies outlined in this document, and include the procedures explicitly required in this document, they may be amended without revising the Safe Congregation Policies for Children and Youth.

Similarly, revisions to the forms required in the application of these policies (e.g. the Standard Screening Form) do not require a revision of the policy.

# 12. Monitoring of Policies

While complete enforcement of policies may not always be possible, screening procedures, reference checks and initial training must always be enforced. The success of these efforts will be checked by the Board regularly.

The Board of Trustees will conduct a review of this revised policy adopted May 19, 2009 and its application within 18 months of its adoption and at least every three years thereafter. The Board will assess how well the policy is meeting its goals. As a part of this review, a brief questionnaire may be given to workers and representative church members asking for their reactions and concerns.