The Fellowship of Christians in Universities and Schools (FOCUS) is committed to providing a safe and secure environment for those participating in our ministry activities. In accordance with federal, state, and local guidelines and informed by established best practices, our leadership team has adopted the following procedures to be used, without exception, when selecting ministry volunteers and employees and supervising our students.

MISSION STATEMENT

"The mission of FOCUS is to present Jesus Christ, Lord and Savior, to independent school students to the end that they might come to know Him and glorify God through their Christian witness and through lives of Christian service in the Church and in the world."

REVISION OF POLICY AND PROCEDURES

The leadership of this ministry, with the assistance of legal counsel, will regularly review this policy and the procedures established within it. If necessary, the policies and procedures will be modified in accordance with the bylaws of the organization. When changes are made, ministry leaders will communicate them to all employees and volunteers affected by the policy changes.

DEFINITIONS

Minor - Any person between the ages of 0 and 18. A minor may include any 18-year-old still enrolled in high school.
Child or children - Any minor from birth through fifth grade.
Youth - Any minor from sixth through 12th grade. A youth may include any 18-year-old still enrolled in high school.
Volunteer - A person performing services or donating time or effort without compensation who is authorized to work with children or youth.
Employee - A paid staff member of the ministry.
Designated Staff - An employee who is designated for a specific time period as the individual to receive reports of any child protection concerns. (During the school year, this is the Area Director, and during National Programs, this is an assigned position).

VOLUNTEER SCREENING PROCEDURES

- Before consideration, all candidates seeking a volunteer position involving work with students will complete and return the volunteer leader application.
- The appropriate Area Director or Program Director will carefully review the application to ensure the candidate is a good match for the ministry position. The Programs

Registrar will store all application materials—the application, background checks, Child Safety Training certificates, etc.— in a secure location.

- If the individual appears to be an appropriate candidate for the ministry position, the Area Director or Program Director will check references for any volunteer unknown to FOCUS to confirm the information that the candidate provided on the volunteer leader application. If the volunteer lists another FOCUS staff member, the Area Director or Program Director will follow up with that staff member.
- The Programs Registrar will conduct a criminal background check through a reputable security company. Background checks include:
    - National Criminal Database Search
    - Social Security Number verification and address history
    - National Sex Offender Registry
    - Motor Vehicle Report Driving History Search (if applicable)
    - Criminal Search by County or State (as required by different states/counties)
- When indicated by our screening procedures, volunteer candidates who pose a threat to students will be removed from consideration for any ministry position involving students.
- Any former leaders with whom there is a child protection or related concern will not be allowed to return.

EMPLOYEE SCREENING PROCEDURES

1. The same procedures required for volunteers also apply to all potential employees, regardless of the ministry position for which they are being considered. (Applicable state and/or local law may regulate at which time during the hiring process and to what extent an interviewer may ask about an employment applicant's criminal history.)
2. References for potential employees are checked during the interview process. 2-3 references should be provided. One may be church-related, and another may be work-related.
3. When indicated by our screening procedures, employment candidates who pose a threat to children or youth will be removed immediately from consideration for employment anywhere within our organization.
4. Any applicant who has previously been a FOCUS volunteer will have their volunteer history reviewed, including past applications, program director feedback, and on-program performance review.

SUPERVISION

1. While adult workers should avoid being alone with a child or youth, some limited exceptions may be permitted for contact work. Any one-on-one interaction must take place in a location where the adult worker and the youth are both visible to others.
2. Adult employees and volunteers should never travel in a vehicle one-on-one with a minor.
3. During summer programs, per the FOCUS Driving Policy, only drivers cleared by the FOCUS Programs Office may drive FOCUS students. Drivers should not be alone in a car with one student.

BEHAVIOR GUIDELINES [1]

As a general rule, all touch should be welcome and accountable.

Appropriate interactions may include:

- Smiles
- Encouragements
- Handshakes, high fives, fist bumps
- Thumbs ups
- Side-to-side hugs
- Pats on the shoulder or upper back
- An arm around the shoulder

Inappropriate interactions may include:

- Spanking, slapping, or any form of physical discipline
- Shaming or belittling a student
- Meeting alone in non-public or isolated places (Leaders are encouraged to meet with students one-on-one to talk, but this should be done in a public area [e.g., on a bench near the Lodge], and not in an isolated place [e.g., by the pond when no one else is there].)
- Driving alone in a car with one student (When making pick-up runs, bring along another leader to prevent driving alone with one student.)
- Swearing in the presence of students
- Engaging in sexually oriented communications with or in proximity to students
- Wrestling, tickling, or backrubs
- Sitting on laps
- Full frontal hugs and/or kissing on the lips or any other kissing
- Commenting on students' bodies

[1] FOCUS Leaders' Manual

- Forcing unwanted affection
- Being nude in front of students (Leaders may change in a private bathroom stall or in their room near their stuff, but leaders should not walk around naked or partially dressed.)
- Contacting, following, or adding a student on social networking sites (Accepting requests is appropriate, but leaders should not initiate contact with students.)
- Showing favoritism or possessiveness
- Ridiculing the beliefs of a student's parents
- Allowing students to do things against the wishes of their parents
- Allowing students to view pornography or to visit inappropriate websites
- Asking a student to keep "secrets" from his or her parents
- Staring or taking pictures/videos while others are dressing or showering

DISCIPLINE OF LEADERS

- Disciplinary problems should be reported to the Program Director at the Study Center or the Area Director within the Area Ministry.
- Depending on the severity, volunteers will be "suspended" and/or asked not to return to programs.

SUSPICION OF CHILD ABUSE OR NEGLECT AND MANDATORY REPORTING[2]

- **Sexual, Physical, Emotional, Spiritual, and Other Forms of Abuse**: We must be very careful when dealing with the area of abuse. There are important and serious legal and personal implications when a minor "discloses" or reveals a situation or a history of abuse. As adult caretakers of students, we are *legally mandated and morally bound* to take every disclosure very seriously, report it, and follow through to the legal ends regarded as necessary by the state from which any student comes. Responding to the disclosure of abuse involves difficult judgment calls that you are not equipped to make about how to proceed for the benefit of a student. Do not "fish" for information regarding abuse. If you suspect there may be something to cause concern, please speak to the "Designated Staff" before having any further conversations. Do not speak to others about such matters. *See also: incident report section*
- **Suicide/Self-Harm (cutting, etc.):** Discussing suicide (either past attempts or current thoughts) or self-harm must be dealt with carefully. It is especially important to tell the "Designated Staff" as soon as possible if the student has current thoughts or plans of suicide or if they pose an imminent danger to themselves (through cutting or other forms of self-harm). While past suicidal thoughts or attempts do not necessarily hold the same safety and legal implications as current plans, it will be important from a pastoral

[2] Staff Ministry Handboo.k

standpoint to make sure that the “Designated Staff” knows so that they can act appropriately. Again, do not share this information with others.

- **Eating Disorders:** Anorexia and Bulimia are increasingly common today. So many students come to FOCUS with “eating issues” that it can be difficult to know what to do, even if they do not usually pose the same immediate threat to the safety of a student as other problems. If you suspect or a student reveals to you a serious eating disorder, contact the “Designated Staff.” *See also: incident report section.*
- **Drugs and Alcohol:** Many students come to FOCUS with experience with a variety of drugs and alcohol. While you do not need to report every student who has ever used drugs or alcohol, it may be necessary to act if a student has a serious addiction for their own safety and well-being. If you discover a student using alcohol or drugs while attending a FOCUS program, or if they reveal to you use of drugs or alcohol, you need to contact the “Designated Staff.” *See also: incident report section*
- As a FOCUS staff member or volunteer, when you speak with students, you may encounter issues that you cannot handle. Please follow these guidelines in all student conversations.
    - Know that you are not a “counselor”. As a leader at FOCUS, you are an older friend, not a counselor in the mental health sense. “Counseling” is done by a trained professional counselor. Thus, there are issues that are outside of your area of expertise.
    - Do not promise confidentiality. A student may reveal a problem to you that FOCUS is legally or morally required to act upon in several ways. You must, therefore, report these matters to the “Designated Staff” as soon as possible, without exception. If a student asks for confidentiality, you should respond that you will try to keep what they tell you confidential, but that you cannot guarantee it (depending on what the student discloses). In most cases, the student will proceed anyway. If you sense that the student is assuming confidentiality, it might be wise to let them know that you cannot guarantee it, but if a student's life or health is potentially at risk, it might be wiser to let them continue. If the threat or danger is serious enough, it might be important that you get the information from them even at the risk of breaking the student’s trust.
    - Once a disclosure has been made, it must be shared with the Designated Staff immediately.

PERSONAL CONDUCT[3]

- Substance use policy - The FOCUS Study Center and all other FOCUS rental facilities are alcohol, tobacco, and drug-free campuses (including electronic smoking devices) during FOCUS programs.
- Modesty statement - Because culturally acceptable attire is always changing, FOCUS considers it necessary to formally address the issue of modesty for FOCUS leaders. In particular, as FOCUS staff and leaders, we must seek to model modesty in lifestyle and appearance to best serve students. (As a rule of thumb, if there is any doubt about the appropriateness of your clothing/bathing suit, then please wear something else. If you have any questions or concerns, please talk with the Program Director, the Dean of Men or Dean of Women, or an Area Director. Remember, these guidelines are for leaders ONLY and do NOT apply to students.)
- Volunteer Leader Questions[4] - used within the Volunteer Leader Application to gauge the leader's personal behaviors.
    - Do you agree to not use tobacco products (including cigarettes, chewing tobacco, smokeless tobacco, cigars, etc.) or electronic smoking devices (including vaporizers, e-cigarettes, Juuls, etc.) at the FOCUS Study Center, FOCUS rental facilities, or at local student events?
    - Do you illegally or excessively consume alcohol? If yes, please explain.
    - Do you use marijuana or illegal drugs? If yes, please explain.
    - Have you ever been treated for alcohol or drug abuse or addiction? If yes, please explain.
    - Have you ever been convicted of, indicted for, or pled guilty to a sex-related or child abuse-related offense? If yes, please explain.
    - Have you ever been convicted of, indicted for, or pleaded guilty to any other crime? If yes, please explain.
    - Have you ever had sexual relations with a minor since becoming an adult? If yes, please explain.

PROMOTING SAFETY

- Web-based Child Safety Training through ProtectMyMinistry every three years.
- On the property, except during specified clean-up times, female living areas are off-limits to males and male living areas are off-limits to females.
- 1-2 Leaders will be assigned to each cabin.

[3] FOCUS Leaders' Manual
[4] Volunteer Application

- During free time, when students may be showering or changing, the Dean of Men will be at the bunkhouses and the Dean of Women will be at the palace to discourage peer-to-peer harm or bullying.
- Sexual Harassment Training is required for all staff and volunteers every three years.
- Parents are sent an email after their student attends a program that includes expectations of the type of communication to expect from FOCUS leaders:
    - Leaders may occasionally reach out by postcard, group message, or note of encouragement following the program.
    - We are committed to maintaining communication that is healthy, appropriate, and transparent.
    - Any communication should be group-based and focused on encouragement, connection, and support.
    - If you ever have questions or concerns about communication after the program, please reach out to us right away so we can address them promptly.

INFIRMARY PROCEDURES[5]

1. General

Infirmary Assistants provide infirmary care and oversight of student medications during FOCUS summer programs. They help provide continuity of care, providing information for the Registered Nurses, who carry out observations and treatments as directed by the Physician's Standing Orders. Infirmary Assistants also assist the Nurses during their visits. At least one Infirmary Assistant must be in the Infirmary during Coffee House to help with evening medication.

2. Nurse

The Nurse (RN) is available in the Infirmary after breakfast, during morning activities, and after dinner for dispensing medications and seeing students who are ill or need some kind of medical attention. The nurse is also available at any time by phone call and can return to the Infirmary to assess someone needing medical advice or attention. Infirmary Assistants assist the Nurse with the process of receiving medications on the first evening of each program. They also assist the Nurse throughout the program by sharing any pertinent information from the day, receiving instructions for any follow-up that is needed, and, if necessary, finding students who need to see the Nurse.

3. Receiving Student Medications

[5] Infirmary Assistant Orientation and Instructions

For each prescription medication that a student brings to a program, a separate medication sheet must be filled out; this applies to both prescription and over-the-counter (OTC) medications. Confirm that each medication the student turns in, along with the dose and schedule, matches the information on the student's medication information sheet for that program. If there is any discrepancy, the student's parents should be called by the Nurse.

Fill out each form completely. Be sure to include the number of pills received for each medication. All medications should be in their original container. Label each container with the student's name, and put all containers, along with the medication sheets, in a large ziplock. Label the ziplock with the student's name and lock it in the lock box.

Students who have Epi-pens are expected to bring two with them, one to keep in the infirmary and one to keep on their person at all times. Students who have an inhaler may store it in the infirmary for closer proximity to physical activities or may keep it with them.

4. Giving Prescribed Medications

When giving medications to students, always ask for their name and date of birth. Confirm with the student that the medication, dose, and schedule are correct. (If there is a discrepancy, the parents or one of the nurses should be consulted before giving any medication.) Then hand the medication to the student and observe them dispensing the correct amount and taking the medication. Record that dose on the corresponding medication sheet, adding your name (first initial, last name) and any comments as needed.

5. Treatments

When giving treatments or OTC medicine for an acute illness or injury, be sure to follow the guidelines in the Standing Orders. These orders have been approved by our supervising physician.

The Treatment Log is in the composition notebook, which must always stay in the infirmary. This log is a legal record of care given during FOCUS Study Center programs and is kept on file for 10 years. Make sure to write the location of injury and the dose of medication (e.g., 25mg should be written, not 1 pill) given to the student. Do not remove any pages, and do not leave any lines blank. If you need to make a correction, cross out text with a single line only.

Always perform hand hygiene before giving any kind of care.

When a student comes in with an injury or illness, record in the Treatment Log the date, the name of the student, and their complaint. Provide the student with the needed medication or treatment. Then record the treatment, your name (first initial, last name), and follow-up as needed, especially if the student needs to see the nurse on her next visit.

All treatments and medications must be recorded, even if it is just a Band-Aid. Infirmary supplies given to students, such as an ace bandage or crutches, should also be recorded.

Each evening at the end of the Coffee Hour shift, the Infirmary counter should be sprayed and wiped clean.

6. Communication and Confidentiality

Some students have sensitive medical issues that shouldn't be described or discussed in any public way.

However, in most situations, ongoing communication between Infirmary Assistants, the Program Office, and the Nurses is essential for providing good care for the students in our programs. At times, the Program Director and the Kitchen staff may also need to be kept informed of a student's activity, or his or her nutritional or medical status. Please inform the nurse of any pertinent information or care given when they are not present in the infirmary, so they can follow up if necessary.

7. Direct access to the Infirmary is limited to Program Office staff, Infirmary Assistants, the Nurses, and the Dean of Men and Dean of Women. Student medications are kept in the lock box, and over-the-counter medications are locked in the cabinet.

WATERFRONT SAFETY PROTOCOLS[6]:

- The lifeguard on duty is always in charge and the last word at the waterfront.
    - Leaders must respect the lifeguard's authority by supporting him/her in any waterfront or safety decisions.
- Lifeguards should know that swimming is an opportunity for unseen and/or unwanted touching.
    - If a lifeguard notices something suspicious, they should say something.
    - Vineyard staff should speak to Summer Program Hosts, and leaders should speak to the Program Director.
- All leaders must know, abide by, and help enforce all waterfront rules and lifeguard instructions.
    - Leaders help ensure that students know and follow the rules or instructions.
    - For example, help keep games (such as competitions on boards) safe and not too rough.
- All leaders act as an additional set of eyes on the water, for safety's sake.
    - Leaders must keep an eye out for weak or tired swimmers to make sure they reach shore or a board/boat safely. After the swim test has been completed, the

[6] Waterfront Safety Protocols

leadership team will be notified of students who did not take or did not pass the test (they may not swim), or passed the test as weak swimmers (they may swim, but an extra eye is to be kept on them).

- A leader on shore must always be available to respond to a lifeguard's call to get help in the event of an emergency (see Emergency Action Plans).
- Leaders are strongly encouraged to take the swim test with students.
- In-Service Training for Lifeguards: Continuous training for our lifeguards is essential for maintaining an effective and safe waterfront. A weekly 30-minute training for all lifeguards will happen. The training will be documented and will focus on a waterfront-related topic such as DROP drills and remedial guard-specific training, backboarding techniques, CPR and AED practice, emergency action plan drills, rule enforcement role-playing, recognition of medical events, and other waterfront safety skills.

On Uncle Seth's Pond and certain other locations, the lifeguard is provided by FOCUS. He or she may be a member of the Vineyard Staff, FOCUS staff, or a program volunteer. At other locations, such as public or town beaches, the lifeguard is provided by the facility. The lifeguard(s) must always be in a position to make a save. On Uncle Seth's Pond, this usually means being on a paddleboard or kayak. The only exception to this is a small group swimming near the beach. In that case, it may be better for the lifeguard to observe from the shore. He/she must put safety first. Whenever students are swimming or taking part in other waterfront activities, it is important that leaders other than the lifeguard(s) on duty are present and participating for the sake of safety, fun, and ministry opportunities with students. For Uncle Seth's Pond, the ratio should be in line with the American Red Cross standard of 1 lifeguard to every 25 swimmers. In addition to the lifeguard(s) on duty, please meet these minimum leader ratios: 1-5 students swimming: 1 leader in/on the water
6-10 students swimming: 1 leader in/on the water and 1 additional leader or lifeguard on shore
11-15 students swimming: 2 leaders in/on the water and 1 additional leader or lifeguard on shore

For every 5 additional students, at least 1 more leader in/on the water

INCIDENT REPORT PROCEDURE

- During summer programs, an Incident/Injury report is to be filled out, signed by the reporter, and given to the Program Director. The original is filed with the program office and sent to the Director of National Programs and Human Resources. HR will forward it to the COO and Executive Director as soon as possible.
- In Area Ministry, an Incident/Injury report is to be filled out and signed by the reporter and sent to Human Resources and the Area Director. Human Resources sends this immediately to the COO and Executive Director.

1. Staff members fill out a report within 24 hours at most upon hearing of or witnessing an incident.
2. The report is sent to the Director of Human Resources or (if it occurs in a national program) to the Director of National Programs.
3. The report is sent on to the Executive Director and Chief Operating Officer.
4. The Director of Human Resources or the Director of National Programs conducts an internal investigation for incident report clarification.
5. The Executive Director, Chief Operating Officer, and Director of Human Resources meet to discuss next steps.
6. General counsel is consulted as needed.
7. If it is found that abuse or neglect has been reported (as defined by that particular state), a report is filed with that state by the Director of Human Resources.
8. Additional developments are added to the report as they occur, and a follow-up summary is added to the report when the process is completed.
9. Reports will be kept on file permanently.