

Child Protection Policy Overview

Purpose

To provide a safe and spiritually nurturing environment for minors and adults with special needs in Broadmoor's ministries.

General Policy

- Establishes safe environment requirements for all church-sanctioned activities
- Requires immediate reporting of policy violations
- Executive Pastor(s) handle questions about policy applicability

Prevention of Abuse and Neglect

- **Leader Conduct:** Zero tolerance for abuse; requires Christ-like behavior
- **Screening/Onboarding:** Requires background checks, interviews, and training
- **Training:** Mandatory child abuse awareness training for all staff/volunteers
- **Two-Adult Rule:** Minimum two unrelated adults present with minors
- **Communication:** Guidelines for electronic communication, including social media
- **Facility Use:** Requirements for room visibility and supervision
- **Transportation:** Rules for vehicle use and driver requirements
- **Overnight Activities:** Special guidelines for camps/retreats
- **Diapering/Bathroom:** Specific procedures by age group

Reporting and Response

- Immediate reporting required for suspected abuse
- Verbal reports must be followed by written documentation
- Reports go to ministry director and/or ministers
- Includes peer-to-peer abuse monitoring
- Mandatory reporting to Mississippi Department of Child Protection Services

Compliance Review

- Church Council appoints a Caring Well Team to review training materials, property safety, and policy implementation, handling of abuse reports, and work with Broadmoor Security Team in monitoring registered sex offenders in the community

This policy applies to all minors (under 18) and vulnerable adults in church activities, with special provisions for those with disabilities or special needs.

OUR MISSION:

Broadmoor Baptist Church Mission Statement: We are a united family of faith joining Jesus on His mission for the Glory of God and the good of our communities.

Next Generation Discipleship Ministry partners with parents to disciple their children through support, guidance, and resources that help families participate in Jesus' mission.

PURPOSE:

With our mission in focus and our values motivating us, the purpose of this policy is to provide a safe and spiritually nurturing environment for minors and adults with special needs associated with the ministries of Broadmoor.

1. GENERAL POLICY

- 1.1 It is the policy of Broadmoor Baptist Church ("Broadmoor ") to provide a safe environment for all participants of activities including minors and vulnerable adults sanctioned by Broadmoor. All ministers, staff, volunteers, and members who supervise minors at any Broadmoor-sanctioned activity are required to abide by this policy, which finds its basis, in large part, from scripture, the Broadmoor mission statement, and state and federal laws.
- 1.2 As explained more fully below, any person who believes this policy has been violated shall immediately report such suspected violation to any two persons: a staff pastor, a member of the Church Council, any other member of the staff, or a member of the Broadmoor Safety and Security Team. Optional Revision: As explained more fully below, if someone suspects a violation of this policy, report it immediately to any two leaders: pastors, Church Council members, staff members, or Safety/Security Team members. See the church's website for a current list of church leaders.
- 1.3 This policy is not exhaustive and may not address all situations. Any questions regarding its applicability shall be directed to the Executive Pastor(s). Broadmoor's Mission Statement and guiding Biblical principles shall guide decisions in the absence of an applicable written policy.

2 DEFINITIONS: As used in this policy, the following definitions apply unless otherwise clearly stated:

- 2.1 **Broadmoor Employee:** Any person hired by Broadmoor, whether exempt, nonexempt, regular full-time, regular part-time, or temporary part-time. While independent contractors are not employees, they are required to comply with this policy when providing services for Broadmoor.
- 2.2 **Adult Leader:** a minister, member, employee or volunteer 18 years or older who

serves in any capacity as a supervisor of minors at a Broadmoor activity.

- 2.3 **Child abuse:** to allow or cause a minor to be subjected to sexual abuse, sexual exploitation, emotional abuse, mental injury, non-accidental physical injury or other maltreatment.
- 2.4 **Facilities:** Include, but are not limited to, all buildings, grounds, vehicles or other structures owned, leased or used by Broadmoor or an Adult Leader to facilitate any and all sanctioned activities.
- 2.5 **Minor:** is any person under the age of 18 or any person over the age of 18 who remains under the legal care and guardianship of an adult specifically including any individuals with special needs.
- 2.6 **Neglect:** not meeting the basic needs of the minor, including, medical, lack of supervision, inadequate clothing and hygiene, lack of nutrition or inadequate shelter.
- 2.7 **Physical Abuse:** hitting, kicking, slapping, cutting, forceable shaking, shackling or restraining, or striking another.
- 2.8 **Sanctioned Activity:** any and all activities, events, meetings, or gatherings planned by Broadmoor staff or lay leadership to further Broadmoor's mission, where minors are supervised by an Adult Leader other than their parent or legal guardian regardless of location.
- 2.9 **Sexual Abuse:** violent or non-violent criminal act(s) that involve(s) a minor in sexual behavior including but not limited to sexual intercourse, oral sex or deviant sexual intercourse regardless of consent, touching of a minor's sexual or other intimate parts for the purpose of gratifying the sexual desire of either party, penetration of a minor, exposure of sexual parts, sexually provocative verbal or scripted communication, exposure to or participation in pornographic material, prostitution, or allowing a minor to witness sexual activity.
- 2.10 **A Person with Special Needs:** an individual with a disability (as defined by the American Disabilities Act): a person who has a physical or mental impairment that substantially limits one or more major life activities, a person who has a history or record of such impairment, or a person who is perceived by others as having such impairment.
- 2.11 **Supervising ministry director:** the minister who oversees or directs the various ministries relating to minors – currently High School, Middle School, Children Preschool ministries, Special Needs Ministry, and Broadmoor's Weekday Preschool.
- 2.12 **Verbal abuse:** language directed toward a minor that is unwelcome, threatening,

offensive, embarrassing, degrading, hostile, profane or diminishing. Examples include: name calling, belittling, destroying the minor's possessions, rejecting or isolating a minor.

- 2.13 **Activity Monitor:** A person who is assigned to supervise activities but not assigned to one specific group.
- 2.14 **Appropriate Touch:** All physical contact should serve the child's needs, not the adult's, and must occur in observable spaces with other adults present. Appropriate touch between adults and minors includes these key guidelines:
- Touch must be age-appropriate and child-initiated (e.g., Side hugs, high fives, fist bumps only)
 - Touch should be brief and in public view
 - Respect the child's right to refuse to touch
 - All children above preschool age should sit next to, not on, adults. Nursery and preschool children may choose to sit in an adult's lap while being read to or comforted.
 - When children initiate hugs, keep them brief and side-to-side
 - Do not engage in roughhousing, wrestling, or aggressive play
 - Do not touch a child's private body parts (areas covered by a bathing suit) or reach under their clothing for any reason. Follow approved diapering policies below.
 - Physical support is only for safety/health needs

3. PREVENTION OF ABUSE AND NEGLECT

3.1 Screening / Onboarding

- 3.1.1. All Broadmoor employees and Adult Leaders will complete an onboarding process that includes an application, an interview, a national background check, and a reference check, completion of training, including child abuse awareness.
- 3.1.2. Individuals who have ever been convicted of, or who have ever entered a plea of guilty or a plea of "no contest" to any crime under any state or federal law involving sexual abuse, physical abuse, child pornography, neglect of children, or any sexual conduct, whether a felony or a misdemeanor, or which involve violence, threats of violence will not be permitted to serve or be employed for any Church-sponsored activity or program involving the supervision, custody, or training of children, minors, and adults with special needs. Individuals arrested for or charged with any of the crimes listed above, but who were found not guilty of such crimes or had the charges dismissed may be eligible to serve as a worker in a Church-sponsored activity or program involving the supervision, custody, or training of children, minors, and adults with special needs but the facts and circumstances surrounding the arrest or charges brought against the applicant will be reviewed by the appropriate Executive Pastor, Human Resource Department and members of Broadmoor's

Church Council.

- 3.1.3. Minors 13 years of age and older may apply to serve as part-time employees or volunteers in approved preschool or children's ministry activities. The application process includes completing the application, an interview, and approved training that includes child abuse awareness.

3.2. Training

- 3.2.1. All employees, minor staff, and Adult Leaders will complete training as applicable to their role as employees or volunteers, which shall include a child abuse awareness module as approved by the Church Council. This training will include the content of this policy, state law, reporting procedures, and other content that the Compliance Team deems necessary. The Compliance Team shall review all training content and compliance annually (see Section 4.5).
- 3.2.2. If a minor (13 years of age or older) is not sufficiently mature to respond appropriately to the training, he or she is not ready to assist in supervising younger children.

3.3. Leader Conduct

- 3.3.1. All Adult Leaders shall conduct themselves in a Christ-like way that reflects appropriate physical, emotional, and spiritual care and concern for others. Broadmoor has zero tolerance for physical abuse, sexual abuse, verbal abuse, and / or neglect.
- 3.3.2. Adult Leaders shall, as much as practical, position themselves to be easily seen by others.

3.3.3. Two-Adult Rule:

- 3.3.3.1. Adult Leaders will make reasonable efforts to ensure that during activities one adult is not left alone with a minor or minors. During Broadmoor-sanctioned activities, two approved Adult Leaders are expected to always provide supervision.
- 3.3.3.2. If two Adult Leaders are related to one another as a spouse or minor of the Adult Leader, a third unrelated Adult Leader must be present and assist in supervising the sanctioned activity. In other words, a husband

and wife equal one Adult Leader for purposes of this policy.

- 3.3.3.3. If one supervising adult must leave a group, another volunteer or employee must be notified so that the Two Adult Rule may be followed.
- 3.3.3.4. If an unusual circumstance occurs and you find yourself alone with a minor, take the individual to a room or building occupied by others, or to a location easily observed by others.
- 3.3.3.5. Multiple groups meeting in one facility require an assigned adult monitor who stays visible and conducts periodic checks to ensure policy compliance.

3.3.4. Physical Discipline

- 3.3.4.1. Broadmoor Adult Leaders will not use physical discipline (corporal punishment) in any manner. In limited urgent circumstances, reasonable physical intervention may be used by an Adult Leader where:
 - 3.3.4.1.1. physical force is necessary to prevent injury in emergency situations; or
 - 3.3.4.1.2. appropriate physical force consistent with training and experience is used within the Special Needs ministry to ensure the safety and well-being of individuals served by that ministry.
- 3.3.4.2. Adult Leaders shall use clear instruction and positive reinforcement when engaging with minors. Verbal abuse, as defined by this policy, is strictly prohibited.
- 3.3.4.3. Duty to Act: Adult Leaders must immediately intervene to stop any witnessed abuse during Broadmoor activities. Leaders must also report any known facts, situations, or suspected abuse of minors through proper reporting channels.

3.3.5. Limited one-to-one meeting exception:

- 3.3.5.1. If circumstances prohibit the application of the Two-Adult Rule, the

supervising ministry director may, but is not required to authorize the activity to continue if the following conditions are met:

- 3.3.5.1.1. Adult Leaders must conduct one-to-one meetings with a minor at a time when others are present and where interactions may be easily observed unless prior written approval is obtained from the parents or guardians. Reasonable efforts will be made to have two Adult Leaders present and/or observing. The expectation is to have two Adult Leaders always present.
- 3.3.5.1.2. If only one Adult Leader is available, at least two minors must be present, neither of whom is related to the Adult Leader. This is the preference if only one Adult Leader will be engaged in the discussion with a minor.
- 3.3.5.1.3. In all activities that do not satisfy the Two Adult Rule, Adult Leaders must first notify the other Adult Leaders of the need for the one-to-one activity prior to meeting with the minor(s). Any such activity/meeting must be conducted in a highly-trafficked public place and situated conspicuously to reduce or eliminate any restricted or obstructed view lines where other adults may easily observe the activity.

3.3.6. Communication

- 3.3.6.1. Broadmoor desires to promote a safe and healthy environment for texting and electronic communication with minors who participate in Broadmoor activities. Every ministry at Broadmoor shall encourage parents to check the electronic communications of their minors regularly. Adult Leaders shall communicate with minors with the assumption that parents or guardians are monitoring.
- 3.3.6.2. When communicating with minors in any form, Adult Leaders shall not use any threatening, demeaning, harassing, abusive or sexually provocative language or tones of any type. Adult Leaders shall not joke or communicate with minors in any way that might be construed as sexually suggestive.
- 3.3.6.3. Adult Leaders may not text, transmit or post in any manner any content that includes personal information of a minor without the prior written consent of the parents or legal guardian. Personal information

includes a minor's name, phone number, e-mail address or photograph.

- 3.3.6.4. Adult Leaders and/or minor staff may not post, transmit, comment or like any content of a minor who is participating in Broadmoor activities in any form of social media in any way that might be construed as abusive, provocative or sexually suggestive in any manner.

3.3.7. Electronic Communication

Broadmoor believes that electronic communication can be an important part of effective youth ministry but that no ministry should depend on it with minors.

- 3.3.7.1. Group messaging is the preferred form of communication with minors. A group text can involve one adult leader and two or more minors.
- 3.3.7.2. Adult Leaders should avoid initiating private electronic communication with minors. Broadmoor recognizes that there are specific instances where a text message is a beneficial ministry aid (i.e., a happy birthday message, an informational reminder, a short encouragement, or a quick check-in), but adult leaders should not be initiating serious, lengthy conversations with a minor via electronic communication. If a minor initiates this type of electronic conversation with an adult leader, the adult leader should not ignore the minor but encourage them to continue the discussion in person and set up a specific time to meet in a manner consistent with our policy (See 3.3.5). If the minor appears to be in crisis, the adult leader should respond to communication but include another adult leader. Adult leaders should avoid electronic communication with students via social media.
- 3.3.7.3. Adult Leaders shall not communicate with minors after 9:00 pm unless it is an emergency, and any such communication must include another Adult Leader. If ministry programming necessitates late-night communication after 9:00 pm (e.g., retreats, camps), communication must be reviewed and / or approved by the ministry director.
- 3.3.7.4. Adult Leaders should not initiate video communication with minors. If a minor initiates a video call and the leader chooses to accept the call, more than two people should be present on the call. If not, the leader should end the call. There should be no video communication at night. If there is an event where there needs to be a training or lesson conducted via video, there should be two adult leaders on the call.
- 3.3.7.5. All Broadmoor ministry social media accounts shall have a

minimum of two Adult Leaders with access to the account.

- 3.3.7.6. Electronic Location Sharing: Adult Leaders and minors are prohibited from sharing electronic location data with one another. However, temporary location sharing may be permitted with advance written parental consent for special events like mission trips, but it is strictly limited to the event duration.

3.4. Facility Use

- 3.4.1. A sanctioned activity officially begins at check-in for the activity.
- 3.4.2. Where possible and practical activity organizers will make reasonable efforts to provide that access to the portion of any facility used is limited to participants and support personnel of the activity.
- 3.4.3. Activity organizers shall make reasonable efforts to keep the minors in their charge within the confines of the assigned activity space.
- 3.4.4. When activities are held in rooms inside a facility, activity organizers shall make reasonable efforts to choose rooms that are located in an area of the facility that affords the most practical opportunity for inspection by other adult leaders or assigned monitors with adequate lighting and minimal areas or corridors with restricted or obstructed view lines.
- 3.4.5. Facilities on Broadmoor's campus are fitted with transparent windows that allow an unobstructed view of a reasonable portion of the room. If windows are not available, activity organizers shall provide that doors are left open sufficient to allow other Adult Leaders or monitors to inspect the room visually.
- 3.4.6. If minors move from one space to another during a Broadmoor activity, minors must be supervised by an Adult Leader during movement from one space to another. The only exception to this may include transportation during an activity that complies with the transportation policies below.
- 3.4.7. After every activity, the activity monitor and/or Adult Leader shall check every room, area, and restroom before leaving to ensure no minor is left behind or isolated.

3.5. Transportation

- 3.5.1. An activity officially begins at check-in for the activity and ends at completion or check-out for the activity. Transportation to the activity before it begins and after completion of the activity is not part of the official activity.
- 3.5.2. The following guidelines shall be strictly observed when anyone is involved in the transportation of a minor during a Broadmoor-sanctioned activity:
 - 3.5.2.1. A minor shall never be transported without parental permission.
 - 3.5.2.2. If personal vehicles must be used, drivers must have personal insurance and be the driver of those vehicles.
 - 3.5.2.3. The Two-Adult Rule applies to transportation.
 - 3.5.2.3.1. When a Broadmoor-sanctioned activity necessitates transportation, the supervising minister or director may approve an adult to transport two or more minors without a second adult present. In these instances, all adults should follow the rule of three – if an adult is driving alone, there should be two minors present. If a minor is alone, there should be at least two adults present. If only three people are present, no one should be related to one another.
 - 3.5.2.3.2. In connection with the transportation of minors, no one under the age of 21 shall use or drive: (i) a vehicle belonging to Broadmoor or an Adult Leader, staff member or other volunteer (other than their own personal vehicle), or (ii) a rented vehicle.
 - 3.5.2.3.3. At no time shall an adult sit alone beside a minor in a vehicle.
- 3.5.3. For any situations that fall outside of these parameters, parental/guardian written permission is required.
- 3.5.4. Documentation of parental/guardian permission is required for minors (aged 16- 18) to drive themselves from the church to/from an off-site activity and/or transport additional minors to/from church activity.

- 3.5.5. All drivers must have a copy of their driver's license on file at the church office prior to driving.
- 3.5.6. Drivers shall sign the volunteer driver form prior to transporting a minor during a Broadmoor-sanctioned activity.
 - 3.5.6.1. A minor shall be transported directly to their destination. No unauthorized stops shall be made.
 - 3.5.6.2. Adult Leaders, staff and other volunteers shall avoid physical contact with a minor while in vehicles (only exception is buckling of an infant or small minor into an approved car seat). In transporting an infant or small child, the Adult Leaders, staff or volunteer must use a car seat or booster that meets the applicable state guidelines for transportation of minors.
 - 3.5.6.3. The driver may not use cell phones or other handheld devices while transporting minors. In a limited situation and only if absolutely necessary, a hands-free device may be permitted while driving in any situation. Drivers shall use reasonable efforts to avoid any type of unnecessary distractions while transporting participants.

3.6. Overnight Broadmoor-Sanctioned Activities

- 3.6.1. In certain situations, such as camps or retreats, the sanctioned activity may include overnight stays. The following guidelines shall be strictly observed when anyone is involved in the overnight stay of a minor during a Broadmoor-sanctioned activity.
 - 3.6.1.1. Written permission/consent must be obtained from the parent(s) or legal guardian.
 - 3.6.1.2. The Two-Adult Rule applies to all aspects of the activity.
 - 3.6.1.3. At no time shall an adult be alone with a minor in any private situation, private accommodations or stay alone with a minor during any aspect of the activity. Nothing in the policy allows an adult to be in any situation when only one minor is present.

- 3.6.1.4. Adult Leaders, staff, and other volunteers shall not initiate physical contact with a minor.
 - 3.6.1.5. The Adult Leaders shall designate at least one adult of each gender to act as an Activity Monitor.
 - 3.6.1.6. The Activity Monitor must provide for both regular and unscheduled check-ins as may be appropriate for the activity including room checks by Adult Leaders as appropriate.
 - 3.6.1.7. Provide for two Adult Leaders of the same gender to monitor and sleep in rooms that contain minors. At least two of the minors staying in the room must be unrelated to one of the Adult Leaders. At no point shall a room include minors and only one Adult Leader. If accommodations allow (such as a hotel) and parental consent approves such an arrangement, minors age 15-18 may stay in a room without a dedicated Adult Leader also staying in the room.
- 3.6.2. We recognize that the facilities applicable to any overnight activity will vary and that each location may have specific guidelines relating to minors. The supervising ministry director responsible for the overnight activity shall consider the location specific guidelines and shall make any necessary adjustments in a manner to maintain the health and safety of the minors. Any such accommodations or limitations shall be disclosed to the parents/guardian, the minors and the Adult Leaders participating in the activity before departure.

3.7. Diapering

- 3.7.1. Nursery Diapering (ages 0-3)
 - 3.7.1.1. Diaper changes are done by trained volunteers, in a manner consistent with our two-adult rule.
 - 3.7.1.2. Workers and volunteers will follow the posted procedures in the room for diaper changing, disposal, and sanitizing.

3.7.2. Preschool Diapering (ages 4-5)

- 3.7.2.1. Call a ministry staff member if a child needs to have a diaper changed. They will call a parent or guardian.

3.7.3. Special Needs Ministry Diapering

- 3.7.3.1. A worker or volunteer who has been trained by Ministry staff may change a diaper, adhering to the training procedure.
- 3.7.3.2. If a trained worker is not available, call the Special Needs Ministry Director.

3.7.4. Nursery and Grace Ministry Bathroom Policies (ages 0-3)

- 3.7.4.1. Nursery children should only use bathrooms in their classrooms.
- 3.7.4.2. A worker or volunteer should never take a child into the bathroom alone.
- 3.7.4.3. If a child can toilet independently, allow them to do so with the door closed.
- 3.7.4.4. If a child needs assistance, a worker or volunteer should ask an additional adult to stand by the open door as they assist.

3.7.5. Bathroom Policy (1st through 5th Grade)

- 3.7.5.1. Children are not required to have an adult accompany them to the restroom on campus. Trained adult volunteers may monitor multi-stall bathrooms from outside the door, entering only if needed for misbehavior or emergencies. The volunteer will be the same gender as the children. If they enter, they'll inform the ministry director about the situation. This policy ensures safety and respect for all children.
- 3.7.5.2. For public restrooms off-campus, a trained adult volunteer should first check if adults are inside. If the restroom is empty, the volunteer should remain outside and monitor who enters and exits from outside. If adults are present, a volunteer of the same gender should stay in the restroom area but not enter the stalls. They will be vigilant and ready to intervene if any suspicious or inappropriate

behavior is observed. Any incidents or concerns will be promptly reported to the ministry director.

4. REPORTING AND RESPONSE

- 4.1. Broadmoor requires all Adult Leaders to report immediately any fact, situation or reasonable suspicion of any form of abuse of a minor to the supervising ministry director and/or any minister (s); executive staff members shall ensure that the matter is reviewed and investigated and where appropriate or required by state law reported to the Mississippi Department of Child Protection Services at 1-800-222-8000, or local law enforcement. See Broadmoor's current Sexual and Physical Abuse Resolution located on the church's website or by calling 601.898.2345.
- 4.2. Broadmoor strongly encourages and asks that all parents/legal guardians and participants in any Broadmoor activities to report immediately any fact, situation or reasonable suspicion of any form of abuse of a minor to the supervising ministry director and/or any minister (s); executive staff members shall ensure that the matter is reviewed and investigated and where appropriate or required by state law reported to the Mississippi Department of Child Protection Services and/or the Mississippi State Department of Health.
- 4.3. Following the immediate verbal report described in 4.1, Broadmoor shall require a written report to be prepared within the hour and signed by the Adult Leader which documents the basis for the fact, situation or suspicion of any form of abuse of a minor in reasonable detail.
- 4.4. All Broadmoor leadership shall be aware that abuse may and does occur at a peer-to-peer level. The duties to act and report listed above also apply in cases of questionable peer-to-peer interactions or peer-to-peer abuse. All Adult Leaders must be diligent in their supervision and oversight with respect to any fact, situation or suspicion of any form of abuse of a minor by, between or among peers or peer groups.

4.5.COMPLIANCE REVIEW

4.5.1. Compliance Team Structure:

4.5.1.1. The Church Council shall appoint a team comprised of at least five Broadmoor members to implement, comply with, and review this policy. Team members will serve terms determined by the Church Council, who have the authority to appoint and remove members.

4.5.1.2. The team will meet at least twice a year.

4.5.2. As part of the Annual Risk Compliance Review, the Compliance Team shall:

4.5.2.1. Make recommendations to the Church Council regarding updates to training materials for all employees and volunteers related to the protection of church activity participants.

4.5.2.2. Review the physical property of the ministry area and volunteer implementation and compliance with this policy.

4.5.2.3. Make recommendations to Church Council for revisions or modifications to applicable policies and physical property which further safeguards participants.

4.5.2.4. Review the training, implementation, and compliance of applicable policies and report findings to the appropriate staff and the Church Council.

4.5.2.5. Investigate reports and allegations of abuse in order to create mechanisms to further protect participants.

4.5.2.6. Instruct Broadmoor's security team to provide an updated list of registered sex offenders in the surrounding community and within church membership.

ATTACHMENTS:

MS Code § 43-21-353 (2019):

- (1) Any attorney, physician, dentist, intern, resident, nurse, psychologist, social worker, family protection worker, family protection specialist, child caregiver, minister, law enforcement officer, public or private school employee or any other person having reasonable cause to suspect that a child is a neglected child, an abused child, or a victim of commercial sexual exploitation or human trafficking shall cause an oral report to be made immediately by telephone or otherwise and followed as soon thereafter as possible by a report in writing to the Department of Child Protection Services, and immediately a referral shall be made by the Department of Child Protection Services to the youth court intake unit, which unit shall promptly comply with Section 43-21-357.