



**BROTHERHOOD
MUTUAL®**

GUIDELINES FOR CAMPS

Child Protection in a Camp Environment

IMPORTANT INFORMATION

The information in this publication is intended to help camp leaders better understand issues of child abuse and assist them in developing a child protection program for their Christian camps. No portion of this publication should be used without prior legal review, revision, and approval by an attorney licensed to practice law in your state.

Brotherhood Mutual Insurance Company assumes no liability for reliance upon the information provided in this publication, nor for the use and distribution of the sample forms provided.

Copyright © 2020 Brotherhood Mutual Insurance Company

All rights reserved. No part of this publication may be reproduced, stored in a retrieval system, or transmitted, in any form or by any means, electronic, mechanical, photocopying, recording, or otherwise, without prior written permission of Brotherhood Mutual Insurance Company.

For information about obtaining additional copies of this publication, contact Corporate Communications, Brotherhood Mutual Insurance Company, 800.333.3735, or visit our website at www.brotherhoodmutual.com.

INTRODUCTION

PREVENTION PROGRAMS HELP REDUCE THE RISK OF ABUSE

Safeguarding the physical and spiritual well-being of young people and vulnerable adults, and caring for their mental, emotional, and social needs, may be one of the most important responsibilities of any camp organization. Policies, procedures, and a robust screening program designed to protect campers from abuse are important components of providing a rewarding camp experience. When implemented in harmony, an abuse prevention system maximizes the safety of children, youth, and vulnerable adults and helps defend the camp’s reputation.

This guide can help you develop such a program. Background information and sample documents provide a starting point for your organization and its attorney. Use these documents as you develop or update an abuse prevention program specific to your camp.

CONTENTS

- 1: Identifying Abuse: Disrupting the Culture of Trust** pg. 5
- 2: Preventing Abuse: Policies Set Safe Boundaries for Campers and Workers**pg. 9
- 3: Screening Guidelines: Preventing Access**.....pg. 13
- 4: Mandatory Reporting: Who, What, How, and When**.....pg. 17
- 5: A Safe Space: Superior Supervision**.....pg. 21
- Sample Protection Policy for Camps and Campers**.....pg. 25

DOWNLOAD FORMS
Do you have procedures in place for handling reports or suspicions of abuse? Do staff members know how to access the report form or who receives the report? You can download a sample form for reporting abuse along with other forms mentioned in this guide at www.brotherhoodmutual.com/camp-safety.

CHAPTER 1

IDENTIFYING ABUSE: DISRUPTING THE CULTURE OF TRUST

Generally, abuse occurs in several forms, all of which could be happening at the same time. The definition of criminal abuse varies by state. Please refer to your state statutes for its definition of abuse.

WHAT IS ABUSE?

Emotional abuse conveys the message that a person is worthless and undeserving of love and care. It can take the form of threats, critical words, demeaning terms or names, deprivation of affection, or similar emotional cruelty. It can be spoken or unspoken.

Sexual abuse can be defined by any form of sexual contact between a child and an adult or older youth. This could include showing or talking about sexually explicit material.

Physical abuse is intentional, deliberate behavior that causes bodily harm to a person. It can take several forms, including assault, shaking, kicking, or choking. In general, it includes all non-accidental physical injuries.

Neglect is failing to meet a person's needs. This could be nutritional, physical, emotional, educational, or safety needs. Signs of neglect can include lack of weather-appropriate clothing, lack of food that results in a child or vulnerable adult being extremely underweight, or lack of running water for bathing or cleaning clothes.

WHO ARE THE ABUSERS?

An estimated 700,000 children are abused in the U.S. annually—that's a rate of around 9 victims for every 1,000 children.¹ The youngest children are the most vulnerable to maltreatment—more than one-quarter of victims are younger than 3 years old.¹ That means by the time a teen enters your camp, he or she already may be a victim of abuse.

For more information about protecting children from sexual abuse, read "5 Steps to Protecting Our Children" at www.d2l.org/education/5-steps

Roughly 83% of perpetrators are 18–44 years old, and while abusers are often a parent or guardian of the victim, more than 13% are not.¹ Additionally, nearly 60% of sexual offenses against minors are committed by someone known to the child but who is not a family member, such as a babysitter or other child care provider.²

Sexual predators do not generally stand out in any particular way. They generally match societal norms regarding education, employment, and social status. Most are male, but females also commit sexual offenses. One study indicated that 93% of child molesters identify themselves as being religious.³

SEXUAL PREDATORS' SECRET TECHNIQUES

Sexual abuse can be difficult to detect. However, awareness of pre-abuse behaviors, often called *grooming*, can help detect the potential for abuse.

BY THE NUMBERS



THE REALITY OF ABUSE

- **58,114 cases** of child sexual abuse and **123,065 cases** of physical abuse were reported in 2017.¹
- **578 victims** have reported alleged abuse at children's camps since the 1960s.⁵

VICTIMS OF SEXUAL ABUSE

- Approximately **1 in 20 boys** and **1 in 5 girls** are victims of child sexual abuse.⁶
- **82%** of all juvenile victims are female.⁷

PERPETRATORS OF SEXUAL ABUSE

- Perpetrators in the age group 25–34 account for nearly **42% of all perpetrators**—that's the highest rate of any age group.¹
- An estimated **85%** of perpetrators of sexual offenses or sexual abuse are known to the victim.²
- Not all perpetrators are adults. About **35%–37%** of reported sexual offenses against juveniles are committed by individuals under the age of 18.²

It's important to note that predators will use grooming techniques not only on their victims but also on the gatekeepers (e.g., victim's parents, camp employees, volunteers).

Grooming behaviors typically include:

- Selecting the victim.
- Gaining trust by cultivating friendships with the gatekeepers.
- Offering gifts (jewelry, money), compliments, and lavish attention.
- Gaining access by justifying or creating situations to be alone with the victim.
- Creating opportunities to slowly establish an increasingly physical connection (touches, tickles, hugs).
- Encouraging or threatening a child to “keep their special secret” by using shame and blame.

These techniques are slowly introduced and can cause abuse to remain a secret for some time—whether the abuse is committed within a camp setting or outside of it.

Remember, grooming behaviors are very difficult to spot, but if something seems out of place, bring it to the attention of camp leadership. Hold each other accountable and strictly follow policies.

DISCLOSURE AND INDICATORS OF ABUSE

Regardless of where abuse takes place, many times camp leaders and workers don't readily detect and respond to incidents of abuse because they are unaware of the behavioral and emotional signals. In fact, direct physical signs of sexual abuse are not common. Signs that a child is being sexually abused are often present but are often indistinguishable from other signs of childhood stress, distress, or trauma.⁴

Victims of abuse often gradually disclose what has happened. Children are especially reluctant to talk about abuse. They are afraid of negative reactions of adults or of “getting into trouble” with the abuser. Always listen to children,



PROTECT AGAINST ONLINE ABUSE

- Roughly **1 in 5 youth** experience unwanted online exposure to sexually explicit material; **1 in 9 youth** experience online sexual solicitation.⁸
- Perpetrators use online communications to establish trust and confidence. About **64% of offenders** communicated online with victims for more than one month before an in-person meeting.⁹

To protect youth in camp settings, do not allow employees or volunteers to communicate one-on-one with youth via text message or email. All communication should be done through camp-approved channels.

youth, and vulnerable adults—but remember, disclosure can take many forms: verbal, nonverbal, behavioral, and emotional.

¹ “Child Maltreatment 2017.” *U.S. Department of Health & Human Services, Administration for Children and Families, and Administration of Children, Youth and Families*, 2019, <https://www.acf.hhs.gov/cb/research-data-technology/statistics-research/child-maltreatment>. Accessed 26 July 2019.

² Juvenile Justice Bulletin. *Characteristics of Crimes Against Juveniles*. United States Department of Justice, Office of Justice Programs, Office of Juvenile Justice and Delinquency Prevention, June 2000, <https://www.ncjrs.gov/pdffiles1/ojdp/179034.pdf>.

³ Abel, Gene G., M.D., and Harlow, Nora. “The Abel and Harlow Child Molestation Prevention Study.” Excerpt from *The Stop Child Molestation Book*, Xlibris, 2001.

⁴ “Childhood Sexual Abuse Statistics—Signs of Child Sexual Abuse and What to Do.” *Darkness to Light*, http://www.d2l.org/wp-content/uploads/2017/01/Statistics_7_Signs_What-to-do.pdf. Accessed 13 November 2019.

⁵ “Hundreds of sexual abuse cases reported at children's camps across U.S.” *CBS News*, 10 December 2018, <https://www.cbsnews.com/news/hundreds-sexual-abuse-cases-childrens-camps-reported-across-us-cbs-this-morning/>. Accessed 26 July 2019.

⁶ “Child Sexual Abuse Statistics.” *National Center for Victims of Crime*, <https://victimsofcrime.org/media/reporting-on-child-sexual-abuse/child-sexual-abuse-statistics>. Accessed 13 November 2019.

⁷ Snyder, Howard N., PhD. “Sexual Assault of Young Children as Reported to Law Enforcement: Victim, Incident, and Offender Characteristics.” *U.S. Department of Justice, Bureau of Justice Statistics*, July 2000.

⁸ Mori, Camille and Sheri Madigan. “Prevalence and prevention of unwanted online sexual encounters among youth.” *Atlas of Science*, 25 October 2019, <https://atlasofscience.org/prevalence-and-prevention-of-unwanted-online-sexual-encounters-among-youth>. Accessed 26 November 2019.

⁹ Wolak, Janis; Evans, Lindsey; Nguyen, Stephanie; and Hines, Denise A. (2013) “Online Predators: Myth versus Reality,” *New England Journal of Public Policy*: Vol. 25: Iss. 1, Article 6.



WHEN YOU HEAR AN ACCUSATION: DO'S AND DON'TS

It's imperative that camp staff, volunteers, and leaders pay special attention to accusations of abuse. Always take the accusation seriously. It might be tempting to assume children often report false allegations of abuse. Most research does not support this.

Seek help from your camp's legal counsel and local law enforcement representatives if you're uncertain whether a report to authorities is warranted. Then, take the appropriate steps. Camp leaders, staff, and volunteers may be required to report any reasonable suspicion of abuse, not just hard evidence.

WHEN A CHILD OR VULNERABLE ADULT CONFIDES IN YOU...

DO:

- Remain calm. Reassure the person that he or she has done the right thing by telling.

- Let the child or vulnerable adult use his or her own words.
- Be a good listener and don't make promises to "fix this."
- Document what you were told. Immediately alert camp leaders and report the suspected abuse to the appropriate authorities in your state.

DON'T:

- Criticize or interrogate.
- Make suggestions or attempt to alter the person's story.
- Launch your own investigation. You risk exposing your camp to increased liability. Rely on the authorities to make determinations.

PREVENTING ABUSE: POLICIES SET SAFE BOUNDARIES FOR CAMPERS AND WORKERS

Each year, more than 14 million¹ children and adults attend a camp. Providing a safe, secure camp environment requires policies and procedures specially developed to screen, educate, and monitor employee and volunteer workers. It involves awareness of the potential risks of abuse and a commitment to minimizing the risk.

WHY DEVELOP A POLICY?

A formal abuse prevention document establishes a culture of safety and accountability. It provides a written record of camp policies, practices, guidelines, and procedures designed to protect children, youth, and vulnerable adults.

As you begin developing policies and procedures, keep in mind these key underlying principles:

- Abuse against a child or vulnerable adult is always wrong and a grievous criminal matter in every state. Every state has some form of mandatory reporting laws. Become familiar with the reporting laws in your state.
- Child victims are never responsible for causing the abuse. They are not legally or morally capable of consenting to abusive behavior.

Camps can demonstrate their commitment to providing a safe environment by establishing standards that govern the behavior of those working in their camps or programs. Once established, the document should be made readily available to parents or guardians.

HOW TO DEVELOP A POLICY

Before you begin writing your abuse prevention policy, research the issue by consulting with both secular and Christian camps. This information will be helpful as you assess the needs of your organization and address the potential concerns and objections of employees, volunteers, and leaders.

TRAIN TODAY. TRAIN TOMORROW. TRAIN AGAIN.



Education personnel (e.g., teachers, teacher assistants, administrators, and other employees of public or private educational institutions or programs) are the largest group³ to recognize and report abuse in children ages 9 and older. Your camp staff may be in a similar position as educators to hear of or identify potential abuse. It's an incentive to educate your staff to recognize the signs of abuse and to learn how to spot grooming techniques.

Start the training and education process for everyone directly associated with your camp—staff, volunteers, and even board members. Openly discuss your camp's abuse prevention program during interviews, onboarding, and staff meetings. Include a brief description of your policy in newsletters, bulletins, and camper registration packets.

Training should:

- **Include** information and resources for camp leaders, staff, and volunteers.
- **Detail** grooming techniques and abuse warning signs.
- **Offer the truth:** no camp is immune from incidents of child abuse. Discuss how it can take years to rebuild trust and restore the camp's reputation following a single accusation.
- **Emphasize** that a robust abuse prevention program protects camp workers and volunteers from false accusations of abuse or sexual misconduct.
- **Occur** annually for new and returning workers and periodically throughout your seasons.
- **Solicit** regular input from staff and volunteers. Open communication is critical to successfully adopting, implementing, and administering your program.

You can download sample forms and checklists mentioned in this guide at www.brotherhoodmutual.com/camp-safety.

For help developing a child protection policy, see the **Sample Protection Policy for Camps and Campers** included in this guide. Every camp is unique. Ensure that you cover all the elements needed to create your policies and screening processes as completely and effectively as possible.

At a minimum, camp organizations should develop a policy that includes the following elements:

- **Screening.** Robust screening policies are essential for minimizing the risk of a sexual predator gaining access to children, youth, and vulnerable adults—its importance cannot be overstated. Simply put, screen all employees, volunteers, and anyone who will have contact with children or youth. Do your research. Interview your staff and volunteers. Check their background. Pay close attention to who gets the privilege of working with your campers.
- **Statement of restriction.** Your written policy should state specifically that any person who has a history of sex offenses or who may pose a threat to children, youth, or vulnerable adults will be prohibited from working for your organization. A restriction statement clearly communicates your commitment to identifying potential predators or others unsuitable to work with or around campers.
- **Supervision.** Supervision is another critical component of minimizing the risk of abuse in your camp. Develop supervision policies for both on- and off-site activities.
- **Rules for behavior and physical interaction.** Your policies should clearly identify what you

BALANCING POLICIES WITH SPECIAL NEEDS CAMPERS



Take additional care when protecting your most vulnerable campers. Children and adults with special needs can be particularly vulnerable to sexual predators.² In addition to your abuse prevention policies, your organization should consider incorporating additional protections for those with special needs.

The American Camp Association maintains a database that helps organizations navigate state-specific laws applicable to camps. You can access state laws and regulations at www.acacamps.org/resource-library/state-laws-regulations.

Consult with your attorney as you develop and implement an abuse prevention program. An attorney can help you align your program with specific state and local requirements.

expect from staff and volunteers, including those behaviors on and off your property that are appropriate and those that are not. The restrictions portion of your policies should include rules for avoiding the appearance of impropriety and safety check procedures for keeping track of campers.

Detail which kind of physical contact is appropriate with campers and which is not. Your camp may choose to restrict hugging of any kind but allow pats on the back. Include role-play and scenarios in your staff and volunteer training so that each person is clear on your procedures. Consider including role-playing to demonstrate how a worker should react if a camper violates a rule, like a camper who continually hugs a camp counselor.

- **Discipline and children.** Your policies should clearly indicate what, if any, discipline is appropriate. They should also clarify how to report discipline issues.
- **Abuse notification and reporting procedures.** There should be a clear process for how abuse is reported and recorded. A licensed attorney in your area can help you become familiar with your state's mandatory reporting laws.



DO YOU ALWAYS FOLLOW YOUR POLICY?

Don't be tempted to skip critical screening steps, even for people you know well. This keeps a level playing field and ensures you are following your written policies.



RESTRICT ACCESS TO NO-GO AREAS

Policies and procedures that include strong guidelines for eliminating unsupervised one-on-one interaction can be extremely helpful in reducing the potential for abuse. Your policy specifically may list areas that are off-limits (no-go zones). These could be offices, equipment storage buildings, backstage areas, etc. Whenever possible, access to these areas should be restricted.

• **Social media guidelines for staff, campers.**

Camps should consider developing guidance and training regarding social media. Decide which staff members are allowed to post from the camp's social media sites before, during, and after a session. Consider the following: can workers share official camp posts or post about their camp experience on their personal social media sites? Will you allow workers to follow or connect with a camper or camper's family on social media that they don't already have a relationship with outside of camp? Train staff so that they understand the dangers of taking and storing photos of campers using their personal devices or sharing photos of minor campers on their personal social media.

Note: Brotherhood Mutual does not recommend camps allow direct, one-on-one electronic communication between its camp staff/volunteers and its campers.

For additional information, please visit www.brotherhoodmutual.com/camp-safety.

- **Communicating your plan.** Take time to consider how your organization will communicate your abuse prevention policy to parents and campers. Parents and guardians can be a valuable advocate for your abuse prevention procedures and help spread your message. If parents understand the reasoning behind a policy or procedure, they're better able to spot troubling behavior early on.

UPDATE YOUR POLICIES AND PROCEDURES

No plan is current forever. Review it regularly, updating it whenever necessary. Providing a safe experience requires leadership and constant vigilance to ensure that all camp policies and procedures are enforced.

¹ "2015 ACA Business Operations Report." *American Camp Association*, <https://www.acacamps.org/press-room/aca-facts-trends>. Accessed 26 July 2019.

² "State School Health Policy Database." *The National Association of State Boards of Education*, http://www.nasbe.org/healthy_schools/hs/bytopics.php?topicid=4110. Accessed March 7, 2018.

³ "Child Maltreatment 2017." *U.S. Department of Health & Human Services, Administration for Children and Families, and Administration of Children, Youth and Families*, 2019, pg. 19. <https://www.acf.hhs.gov/cb/research-data-technology/statistics-research/child-maltreatment>. Accessed 26 July 2019.

SCREENING GUIDELINES: PREVENTING ACCESS

Parents and guardians commonly think of Christian camps and other ministries as safe places for their children. Your hired workers and volunteers can make or break your reputation as a quality organization.

QUALITY STAFF = QUALITY CAMP

Whether you're introducing a screening program or looking to improve a current one, screen all existing workers, not just new hires. Doing so provides a level playing field and helps ensure that you did not miss a convicted or accused child abuser currently on staff.

If you already screen employees, revisit the process periodically and update your records as you do. A screening company can help you manage the process. Many background screening providers offer different options to make it easier for Christian ministries to customize their screening programs based on their unique needs.

Carefully screening all employees and anyone who will have contact with campers before allowing them to work in your camp is one of the best ways to protect your organization from incidents of abuse.

FOUR KEY ELEMENTS OF SCREENING

1. Written application. Many states regulate what an employer can and cannot ask on an employment application, and rules can differ state-to-state. In general, your written application should ask for:

- **Personal information**—name, address, phone number, and driver's license number if driving is involved

SCREENING PROVIDERS

When it comes to background screening, be sure to choose a reputable provider. Brotherhood Mutual feels confident working with several companies. Go to brotherhoodmutual.com and search "background screening options" to see the list.

- **Background**—criminal convictions or guilty/no contest pleas (other than minor traffic offenses),* commission or allegation of abuse/sexual misconduct, prior membership in any camp or Christian ministry, prior work or service involving children or youth, residence history, employment history, and education
- **References**—personal and professional references and contact information
- **Verification and release**—signed by the applicant

There are less restrictions as to what can be asked of a volunteer applicant than for an employment applicant. Regardless of whether you develop one form for both types of applicants or two separate forms, it's important to have your camp's attorney review the application(s) to ensure you are following state and federal laws.

- 2. References check.** The best references come from places where the applicant has worked with children and youth. Character references also are important. Ensure that the applicant signs a release before the reference check is conducted. The release should enable you to interview anyone you believe can provide valuable information about the applicant, even if those individuals are not listed on the application. Make sure you check at least two references, including ministries or other camps where the applicant has worked.
- 3. Background checks** for employees and volunteers. Criminal records checks have become common elements in employee hiring. Regardless of the position, all employees should undergo a background check as a part of your policy. You also should conduct a background check on all volunteers who will have access to children, youth, and

*Some states do not allow inquiries into criminal history to be conducted on employment applicants until either an interview has been conducted or a conditional offer of employment has been made. Check with a local attorney to ensure your policies follow state and local laws.

vulnerable adults. A criminal records check, while very important, is only one of the recommended screening tools because most sexual predators have no criminal history. It's important to include all four elements outlined here as a part of your comprehensive screening program.

4. Personal interviews. Information learned through the application, references, and

HOW TO MANAGE BACKGROUND CHECKS



Because of seasonal hiring for employees and volunteers, some camps may see screening as an unmanageable task. However, many camps have been able to solve this problem by establishing an account with a background screening provider.

Once your camp has an account with a screening provider, it takes only seconds to type in the name and Social Security number of each person you want screened. Most background check results are available in two to three business days. Some database searches provide immediate results.

Under the federal Fair Credit Reporting Act, you must have a person's written permission to perform a background check. If you use information from the background check to deny someone, the law may require you to provide adverse action notification. A screening provider can help you comply with this law.

From a risk management perspective, it's a good idea for camp organizations to renew their criminal background checks for staff and volunteers at least every three to five years. Annually, we recommend that camps require employees and volunteers to complete a renewal application. The renewal application can serve as an annual inquiry that will help uncover any potentially serious situations involving existing employees and volunteers. Information provided on a worker renewal application or through other means may give your organization reason to conduct an updated background check sooner than three to five years.

background check may help you develop questions and discussion points for the personal interview with the applicant.* It may be helpful to have more than one person present during the interview to compare notes afterward.

Use the interview to gain further information on topics that arose out of the application, reference checks, and background check. It also is an opportunity to address any inconsistencies in responses or information gathered. During the interview, watch for evasive answers or questions as answers. These are signs of defensive behavior and could indicate deception.

Sometimes, camp leaders fear they may scare off potential employees and volunteers if they ask workers to answer personal questions and undergo a background check. But parents expect camps to be safe places. If your camp communicates that it is committed to making itself safe, screening actually could attract, not repel, workers. Conversely, a robust screening process can deter predators from seeking work at your organization.

WORKERS ON A J-1 VISA

More than 20,000 camp counselors came from foreign countries on visas in 2017.² Screening students working on a J-1 cultural exchange visitor visa is complex, but it's important to put in the money and effort. These cultural exchange visitors are recruited through a U.S. Department of State program. Camps can secure a J-1 student by working with an organization the State Department deems a "sponsor" of the program.³ Sponsors are responsible for ensuring compliance with the regulations of the program. While the sponsor is responsible for conducting screening and background checks on its J-1 workers,⁴ camps should conduct their own screening procedures. For example, you may require the applicant to complete an application and supply references but obtain other elements of the background check from the sponsor.

*Some states do not allow inquiries into criminal history to be conducted on employment applicants until either an interview has been conducted or a conditional offer of employment has been made. Check with a local attorney to ensure your policies follow state and local laws.

The American Camp Association delves into this subject in detail. Read “Criminal Background Checks and International Staff” at www.acacamps.org.

SCREEN ALL WORKERS—NO EXCEPTIONS

Screen all employees, regardless of position, and all volunteers who will work with children, youth, or vulnerable adults in your camp—no exceptions. This can turn away potential wrongdoers and show that your organization has taken steps to safeguard its campers.

When starting a screening program, you should screen all existing workers, not just new ones. This provides a level playing field. Also, new workers might object less to background screening if they know that everyone is treated equally.

SCREENING MINORS

Juvenile abusers applying for work at your camp are hard to catch in the screening process simply because performing a criminal background check on a minor presents legal challenges in most states.

The best way to protect against a juvenile abuser and ensure that a youth is a good candidate to serve or work in a position involving the supervision of other minors is to use other screening tools and the same procedures you would use for adult volunteers. You will need to rely on applications, reference checks (e.g., teachers, employers, staff at the individual’s church), and personal interviews. Don’t be tempted to skip screening for minors. It is estimated that minors account for 20% of arrests for sexual assault.¹

YOUR DILIGENCE CAN PREVENT ABUSE

Can worker screening protect a camp from every instance of child sexual abuse? No. A potential offender can hide in plain sight, often appearing to be a trustworthy individual.

By implementing a screening program, you can significantly decrease the likelihood that misconduct will occur. It also will demonstrate that your organization has acted with reasonable care to select appropriate workers. If sexual abuse or other crimes do occur at your camp,



More than 14 million children and adults attend camps each year.²

But there are no national regulations for camps to follow. Eight states have no requirements for overnight camps to be licensed, and 18 states don’t require background checks for employees.

those organizations that have screened the alleged perpetrator will be in a better position to defend themselves in court—and protect their reputations—than camps that have not.

¹ “Fact sheet: What You Need to Know About Sex Offenders.” *Center for Sex Offender Management*, www.csom.org/pubs/needtoknow_fs.pdf. Accessed March 8, 2018.

² “Hundreds of sexual abuse cases reported at children’s camps across U.S.” *CBS News*, 10 December 2018, <https://www.cbsnews.com/news/hundreds-sexual-abuse-cases-childrens-camps-reported-across-us-cbs-this-morning>. Accessed 26 July 2019.

³ “Criminal Background Check and International Staff.” *American Camp Association*, April 2014, <https://www.acacamps.org/resource-library/campline/criminal-background-checks-international-staff>. Accessed 26 July 2019.

⁴ “J-1 Visa Basics: Common Questions.” *U.S. Department of State, Bureau of Educational and Cultural Affairs*, <https://j1visa.state.gov/basics/common-questions>. Accessed 26 July 2019.

MANDATORY REPORTING: WHO, WHAT, HOW, AND WHEN

Reporting abuse or neglect may be uncharted territory for most. However, the consequences of looking the other way far outweigh the awkwardness. If abuse goes unreported, a child or vulnerable adult may endure more abuse, suffer lifelong physical and emotional scars, and may become an abuser later in life.¹

Your camp organization can help staff and volunteers understand their moral and legal responsibilities associated with this serious issue. A clear policy, supported by leadership, explains how to recognize abuse, respond to allegations of abuse, and what steps to follow if an individual admits to abuse.

WHO REPORTS

- **Know mandatory reporting laws in your state.** Many states include camp professionals as mandatory reporters. Ask your attorney about mandatory procedures, including those in your organization required to report. If your camp is accredited by an organization (e.g., the American Camp Association) or your state's department of health, you may need to follow additional guidelines.

In more than half the states, laws name clergy members, including youth ministers, as mandatory reporters.² Note that this may include "privileged" communications. While youth threats of suicide may not mandate a report to be made in itself, you may be required to report this to authorities if abuse or neglect appears to be a contributing factor. You can search for your state statutes at www.brotherhoodmutual.com/mandatoryreporting. Some states have criminal penalties for not complying with mandatory reporting requirements.

WHAT DOES "GOOD FAITH" REPORTING MEAN?

Every state provides protection against liability when an individual reports suspected abuse in "good faith," meaning the person has a reasonable belief that abuse has occurred or is ongoing.

MANAGING INFORMATION DURING A CRISIS



Responding to law enforcement or the media during a crisis can be challenging. A communication plan is key to help those involved remain calm and guide a clear-thinking response. Consider hiring a public relations firm to assist in your response. Ideally, the best time to hire a firm is before you need one.

Your plan should include:

- **A pledge for full cooperation.** All camp organization leaders, employees, and volunteers should cooperate fully with law enforcement and investigating agencies.
- **A procedure to contact your legal counsel.** The leadership should seek legal counsel as soon as possible after the camp receives notice of possible abuse. Advice from legal counsel should be the basis for your timely response.
- **A designated spokesperson.** A single spokesperson should handle all inquiries from the news media. Offer training on how to convey information in a way that avoids compromising an ongoing investigation.
- **A script or statement for anyone answering phones.** Instruct all staff members to refer media inquiries to your designated spokesperson.
- **A media statement other than 'No comment.'** If the media contacts you, call the camp attorney. Your legal counsel will know what information you can share with the public. Avoid holding a news conference; direct reporters to the authorities investigating the incident.

WHAT TO REPORT

- **Train staff and volunteers** to identify abuse. Abuse takes many forms. When it comes to warning signs, staff and volunteers may be concerned that they are not qualified to recognize warning signs. Education and training are key. Start by including behavioral cues in your plan.

A camper may self-report to a staff member about abuse he or she is suffering at the hands of a parent, relative, teacher, or neighbor. Mandatory reporting rules apply in these situations, too.

HOW TO REPORT

When someone at your camp reports abuse or exhibits signs of abuse or neglect—whether a camper or a minor working at your camp—camp leaders need to act immediately. Contact your state social services agency or local law enforcement and follow their lead. Camp leaders, supervisors, and other camp workers should cooperate fully with civil authorities.



DO YOUR WORKERS UNDERSTAND YOUR POLICY?

It's important that staff and volunteers fully understand your reporting policy, which should explain your camp organization's moral obligations and your state's legal requirements. How to make a report should be clear to all.

- **Create a document** that outlines internal procedures. Who is the first person to hear of the suspected abuse? Who alerts authorities? What should the worker or volunteer do if the first person on the list is the one suspected of abuse? A locally licensed attorney can help organize a chain-of-command policy that complies with the laws in your area.
- **Train workers** how to report abuse. Once you have a written plan, thoroughly train workers on your reporting procedures. Staff and volunteers should have clear guidance and step-by-step instructions. Set an annual date for retraining and evaluating your plan.

BARRIERS AND CONCERNS	POINTS TO CONSIDER
Our camp doesn't have the expertise to deal with a victim or accused.	You don't have to be an expert. The victim or accused should be referred to authorities.
Our staff and volunteers are afraid they'll make a false accusation.	Education is the key to alleviating fear. Make sure you're training and retraining staff.
The suspected perpetrator will retaliate against the camp if we report suspected abuse.	States protect the anonymity of those making a report. You don't have to inform others that you're reporting suspected abuse.
Our governing body doesn't want employees to get involved in private family matters.	It is your legal responsibility to protect the vulnerable in your care.
Our camp will lose credibility or be scandalized.	An effective protection policy reflects the heart of your organization and shows your commitment to protecting children, youth, and vulnerable adults. If the abuser is a camp employee, then use that experience as an opportunity to strengthen your abuse prevention plan and your moral and legal commitments to the community.
I know a camp leader is an abuser. I'm afraid of what will happen to me if I tell.	Your camp and its leaders could be personally liable for failing to report an accusation. Do the right thing, even if those with greater authority discourage you from reporting.

Inform parents and guardians of campers about any new policies so that they will understand the care their camper is receiving.

- **Create a need-to-know chain of command.** Keep the number of people who hear of an allegation or suspicion to a minimum prior to contacting authorities. This helps streamline the process, preserve the integrity of the information, and protect the privacy of those involved.
- **Document everything.** Know what documentation you'll need and where to find required forms. From a risk management perspective, it is good practice to document everything, including conversations, dates, and circumstances in which the individual learned of, suspected, suffered, or was accused of abuse.
- **Leave the investigation to authorities.** Most mandatory reporting laws only require a reason to believe or a reasonable suspicion that a child is the victim of abuse or neglect. Your camp organization should not confirm an allegation prior to reporting. Investigations are best left to highly skilled professionals in law enforcement and social services. Interviewing the suspected individual, the person claiming abuse, or the person exhibiting possible warning signs of abuse can do more harm than good. You could unintentionally tamper with an investigation by affecting a child's recollection of events or divulging critical details to the accused. Stick to a few clarifying questions necessary to make an accurate report.

WHEN TO BREAK WITH PROCEDURE

Regardless of whether a worker is required to report, most states permit you to report if you have a reasonable suspicion that abuse has occurred. If you suspect someone is in danger or presents an immediate threat to someone else, call the police.

BARRIERS TO REPORTING

Protecting the most vulnerable people should be your camp's top priority. Unfortunately, some may feel that's in conflict with safeguarding the reputation of staff and the organization.

GOOD RECORDKEEPING



Camps that keep excellent records are more successful in showing that policies were followed, and reasonable steps were taken in any situation. If a claim is filed, or the police launch an investigation, your insurance company and authorities will be interested in your recordkeeping. Having well-documented procedures can help bolster your camp's position.

As a part of your camper abuse prevention program, take care to preserve documents related to employment, screening, injuries and discipline, sexual abuse reporting, the Americans with Disabilities Act, foreign workers, maintenance, and camper drop-off/pick-up procedures. In addition:

- **Consult with your camp attorney** regarding best practices for document retention. How long you keep any document often is governed by federal, state, or local laws.
- **Develop strong records and paperwork practices.** All camp records should be maintained by camp management for an appropriate duration, as directed by your camp's attorney.
- **Ensure** that employees, maintenance and cleaning staff, counselors, and volunteers understand the importance of accurate documentation and preserving all records.
- **Implement extensive measures** and precautions to ensure that records are not accidentally discarded or lost. Those precautions extend to keeping sensitive camper information protected from anyone who does not have the right to view the records.

It's important to address this concern among leaders and workers who may wrestle with the consequences of reporting abuse. Fear can be a powerful deterrent. Keeping a secret or not disclosing a confidence may perpetuate more abuse and do more harm to a camp's reputation. The chart on page 18 addresses common barriers to reporting.

WHEN A CAMP DIRECTOR IS ACCUSED

The most important thing to remember is that most camp staff are likely mandated reporters.³ Any allegations must be taken seriously and reported to the proper agency in your state. You can find your state agencies for reporting child abuse and neglect at www.brotherhoodmutual.com/mandatoryreporting. The fact that an allegation is against a high-ranking member of your organization should not change your response or cause you to deviate from your reporting plan.

The American Camp Association lists these other considerations:⁴

- The accused must withdraw from campers, camp activities, and staff. You may need to make other accommodations if the director lives on site.
- Staff should be told basic information about the situation. Instruct them how to deal with inquiries from media and investigators.
- The person named second-in-command to the camp director should be familiar with aspects of performing the job. Create a cross-training plan before a crisis hits. Then train and retrain at the beginning of every season.

You can download a sample form for reporting abuse along with other forms mentioned in this guide at www.brotherhoodmutual.com/camp-safety.

1 "The Long-term Consequences of Child Abuse and Neglect, Fact Sheet April 2019." *Child Welfare Information Gateway, U.S. Department of Health and Human Services, Administration for Children and Families, Administration on Children, Youth, and Families Children's Bureau*, www.childwelfare.gov/pubpdfs/long_term_consequences.pdf. Accessed 28 July 2019.

2 "Mandatory Reporters of Child Abuse and Neglect." *Child Information Welfare Gateway*, 2016, www.childwelfare.gov/pubpdfs/clergymandated.pdf.

3 "Remember: Camps are Mandated Reporters." *American Camp Association*, May 2011, www.acacamps.org/resource-library/campline/remember-camps-are-mandated-reporters. Accessed 28 July 2019.

4 "Top 10 Considerations Suggested if Sexual Abuse Is Alleged Against a Camp Director." *American Camp Association*, www.acacamps.org/resource-library/articles/top-10-considerations-suggested-if-sexual-abuse-alleged-against-camp-director. Accessed 22 July 2019.

A SAFE SPACE: SUPERIOR SUPERVISION

Screening provides the base for good child protection policies. But safeguarding campers requires more than just finding caring individuals. Proper supervision also plays a key role in protecting camper safety and limiting potential problems. Good supervision not only helps deter abuse but helps avoid false allegations of abuse.

The goal is to prevent situations that allow one employee or volunteer to be alone with a minor or vulnerable adult anywhere at camp where they cannot easily be supervised.

The following guidelines can help your organization continue to offer a rewarding program while protecting all participants. Superior supervision starts with good hiring practices, advanced planning, and creating effective policies for all activities, discipline issues, or possible emergencies.

WHEN HIRING, FOCUS ON...

Sexual predators often seek camps with lax structure to apply for work or volunteer positions. Camp organizations that consistently follow their rules increase accountability, deter misconduct, and reduce the chance of a false accusation. Focus on:

- **Code of conduct.** Require that all employees and volunteers commit to protecting the children, youth, and vulnerable adults in their care. A local attorney can help with language specific to your state's laws.
- **Maturity and good judgment.** Although teenagers in your camp can be good hires for seasonal work, they often lack the experience needed to deal with crisis situations. Look for employees and volunteers who have demonstrated maturity and good judgment. Mature individuals can exert the appropriate amount of authority essential to maintaining a safe environment. Young people often test the limits of authority or rules—a good staff member understands that policies and procedures protect both campers and staff.

RULES BY THE NUMBERS



• ONE-ON-ONE INTERACTION.

A camp's goal is to limit any adult employee or volunteer from being alone with a child, youth, or vulnerable adult. If your camp offers counseling or mentoring, put into place the following precautions:

- **Obtain** prior written consent from the youth's parents/guardians.
- **Set a limit** for the duration and frequency of any continuing one-on-one contact, like three 30-minute sessions.
- **Meet only in a public location** where the staff member and the youth are easily observable by others.

- **THE TWO-ADULT RULE.** Brotherhood Mutual recommends the two-adult rule. This rule creates accountability that helps prevent and deter misconduct. It also helps reduce the ability for anyone to make a false accusation. The rule requires that two screened and unrelated adults be present at every activity and in each building, vehicle, or other enclosed area that involves children, youth, or vulnerable adults. The level of accountability is diminished if the two adults are husband and wife, or are otherwise related. There is a presumption that family members would be biased if required to provide an account of each other's actions. In many states, an individual cannot be compelled to testify against his or her spouse.

OR

- **THE RULE OF THREE.** When the two-adult rule cannot be supported, the rule of three requires at least three individuals be present, with at least one being a screened adult employee or volunteer. The age and capacity of the children, youth, or vulnerable adults being supervised should be taken into consideration when using this rule. For the rule of three, it's about accountability. The rule of three is not recommended for the supervision of very young children. Also, it is not appropriate for one screened adult to be alone with a teen and a very young child because there's no accountability regarding the interactions between the adult and the teen. The two-adult rule is preferred for children under 5 years of age.

CAMP ACTIVITY: ADVANCE PLANNING

Different camp activities may require different levels of supervision. Begin by grouping campers by age and developmental stages. This allows you to give all participants the attention they need.

- **Events involving greater risk or younger participants require more supervision.** Most states also require that state-licensed camps meet a particular staff-to-camper ratio. Camp accrediting bodies, like the American Camp Association, may have different requirements than your state. Your attorney can advise which state or accreditation body requirements apply to your camp.
- **Handle all disciplinary problems professionally.** Prior to an event, ensure that each worker understands procedures for consistently handling discipline problems and emergencies. Clearly establish that physical restraint should be used only when there is no other reasonable means to prevent the camper from self-harm or hurting others.
- **Require workers to report all injuries and disciplinary actions.** Create a procedure that makes it clear who receives the report. Notify parents as soon as possible.
- **Evaluate risks.** Supervisors and staff should meet prior to activities to evaluate possible risks. It helps to visit the activity area and role-play possible scenarios.

SLEEPING ARRANGEMENTS

Part of the fun of camp is spending nights away

CHILD CUSTODY BATTLES

A child custody situation has the potential to erupt at camp, just as it might at any school or day care center. If a worker releases a child to an individual who doesn't have custody, the camp could be legally responsible. It's easy to see why well-followed drop-off/pick-up procedures are essential to your camper protection policies. There are many ways to check children in and out of camp, but all share the same goal: Allow no camper to leave your property with the wrong person.

ARE ALL OF YOUR PROCEDURES IN WRITING?

Written policies ensure consistent training and follow-through. Staff and volunteers that work with children, youth, and vulnerable adults should be working from the same playbook designed to protect campers and workers.

from home. However, sleeping arrangements can present challenges for camp organizations: how to keep your campers and workers safe while providing a rewarding experience.

For overnight events, start by separating youth into rooms by the same gender and age. The two-adult rule applies for sleeping arrangements, too. Adult workers should sleep in separate rooms, but in close proximity to campers, if possible. Workers and campers should change clothes in the bathroom.

If an adjoining room is not an option and adult workers will be staying in the same room as campers, the organization should ensure that workers are not sharing beds with other adults or campers. Adult workers nearby or in an adjoining room ensures that they are available for emergencies and to keep campers inside for the night.

When possible, campers and workers should enter and exit sleeping quarters as a group. Again, the goal is to prevent any scenario that leaves any one camper alone with an adult worker or an older peer.

Camps can communicate sleeping arrangements to parents/guardians as a part of its overall safety policies and procedures.

PREVENTING PEER-ON-PEER ABUSE

Peer-on-peer abuse is a tough topic. Children who have been sexually abused often repeat the behavior they have seen or experienced. Children molested at a young age may be more likely to molest other children at a young age and tend to have more victims.²

Provide training for your workers about the risk of peer-on-peer abuse. It's during transitional times—trips to the bathroom, showers, changing

for swimming, and between programs and mealtime—that campers are most vulnerable to abuse by peers.³ Train your staff to be especially vigilant during these times. As noted above, sleeping arrangements also represent a high risk of peer-to-peer abuse. A good set of policies surrounding these topics provides some protection. As noted in Chapter 3, juvenile abusers applying for work at your camp are harder to catch in the screening process, too.

ESTABLISH A RESTROOM/BATHING FACILITY POLICY

Restroom and showering procedures are particularly sensitive because of the potential one-on-one exposure of a camper to a worker or an abusive peer.

Every camp is different. Your camp may have communal showers or individual stalls, with or without shower curtains. Evaluate your particular facilities with an eye toward eliminating opportunity for abuse. Remember, predators take advantage of relaxed policies to gain alone time with a camper—and campers are particularly vulnerable in a restroom. Once you've created your policies, training and accountability are key to making them successful.

The following are considered best practices. Your assessment may identify the need for additional policies:

- No worker should be alone with a child inside the restroom or shower facility.
- Require campers to always use the restroom or shower facilities accompanied by at least one other camper.
- Staff should check the restroom to ensure that it is safe before any camper enters.
- Position a staff member at the door to monitor activity at all times.
- Set a time limit for bathing and schedule shower times by age groups. This ensures that younger children are not bathing at the same time as older children.

For most campers, no assistance is needed, but

PAY ATTENTION TO STAFF-TO-CAMPER RATIOS



Most states require legally mandated staff-to-camper ratios. Ask your attorney to help you determine what your state requires. Applicable state requirements should take precedence, but generally, the following ratios¹ provide a good rule of thumb:

- **Ages 6–8:** 1 staff member per 6 overnight campers, and 1 staff member per 8 day-campers.
- **Ages 9–14:** 1 staff member per 8 overnight campers, and 1 staff member per 10 day-campers.
- **Ages 15–18:** 1 staff member per 10 overnight campers, and 1 staff member per 12 day-campers.

Some activities or locations may require additional staff members be present. Identify those situations and include them in your procedures manual.



Don't be tempted to fill a last-minute vacancy with a worker who has not been screened recently, even if that person was on staff in a previous year. Keep a list of screened emergency volunteers who can help in a pinch.

supervision is required. Some campers may need assistance, especially if your camp serves vulnerable adults or disabled children and youth. To properly supervise bathroom visits for these groups, incorporate these additional guidelines:

- Screened staff should accompany younger children and vulnerable youth and adults to and from the restroom.
- If assistance is required, two screened adults should be present. Prop open the door so that a second adult can visually monitor the assisting adult.

Good supervision is essential to providing a safe and secure camp environment. A well-crafted supervision plan helps protect the children in your care, maintains trust, and helps organize and monitor children's activities.

¹ "ACA Standards That Relate to Staff Screening, Supervision, and Training." *American Camp Association*, <https://www.acacamps.org/resource-library/accreditation-standards/aca-standards-relate-staff-screening-supervision-training>. Accessed 18 July 2019.

² Abel, Gene G., M.D., and Harlow, Nora. "The Abel and Harlow Child Molestation Prevention Study." Excerpt from *The Stop Child Molestation Book*, Xlibris, 2001.

³ "ACA Camp Crisis Hotline Annual Review 2014." *American Camp Association*, October 2014. <https://www.acacamps.org/resource-library/articles/aca-camp-crisis-hotline-annual-review-2014>. Accessed 25 July 2019.

*This is a sample policy only. See Chapter 2 for information on how to personalize the sample policy to fit your camp's unique needs.

Sample Protection Policy for Camps and Campers

This camp ministry is committed to providing a safe and secure environment for those children, youth, and vulnerable adults participating in our camp activities. We are also committed to minimizing unwarranted accusations of improper behavior that staff members may experience as they carry out their duties. To fulfill these commitments as fully as possible, our camp has adopted the following policy and procedures.

DEFINITIONS

Camp director(s)/Camp leaders/leadership—includes persons in any leadership position appointed and trained to make decisions on behalf of the camp organization.

Child or children—Any minor from birth through fifth grade.

Employee— A paid staff member of the camp.

Minor—Any person between the ages of 0 and 18. A minor may include any 18-year-old still enrolled in high school.

Staff/Staff Members—includes camp leaders, employees, and volunteers authorized to work with children, youth, and vulnerable adults.

Volunteer—A person performing services or donating time or effort without compensation.

Vulnerable adult—Any person 18 years of age or older who is unable to legally consent, unable to comprehend the nature of certain actions, or susceptible to coercion or abuse. This may include individuals who are mentally or physically disabled and the elderly.

Youth—Any minor from 6th through 12th grade. A youth may include any 18-year-old still enrolled in high school.

SCREENING PROCEDURES

The following screening procedures are required for all employees, regardless of position, and all volunteers who will work or interact with children, youth, or vulnerable adults.

The organization's screening procedures involve four key elements:

1. **Written application.** Prior to consideration, all candidates seeking a staff position at our camp will complete and return a staff application, no exceptions. The camp director in charge of hiring will carefully review the applications, ensuring that each candidate is an appropriate match for the position.

The camp director will store all application materials (the application form, background checks, reference checks, notes from interviews, etc.) in a locked file cabinet, password-protected electronic filing systems, or in other secure manner. Application materials are private records and will only be released when a legal need for access has been demonstrated.

2. **Reference checks.** The camp director will check at least two references to confirm the candidate's information on the initial staff application. Applicants must sign a release allowing the camp director to interview anyone who may have valuable information about the applicant's qualifications, even individuals not listed on the application.
3. **Background checks.** The camp director will conduct a criminal background check through a state law enforcement agency or a reputable provider of those services.*
4. **Personal interview.** A personal interview is required for all applicants prior to being hired or permitted to serve with children, youth, or vulnerable adults. Information gathered from reference and background checks may be used as the basis for questions and discussion points during the interview with the applicant.

When indicated by our screening procedures, candidates for employment or volunteer positions who pose a threat to children, youth, or vulnerable adults will be removed from consideration for any camp position.

**Some states do not allow inquiries into criminal history to be conducted on employment applicants until either an interview has been conducted or a conditional offer of employment has been made. Check with a local attorney to ensure your policies follow state and local laws.*

SCREENING MINORS

With respect to staff members or volunteers who are minors, there is typically no formal criminal background screening available for anyone who is under 18 years of age in most states. In most states, juvenile court records are only accessible by law enforcement or by court order. Instead, our camp relies on other types of screening when a minor applies to work or volunteer in our camp. For minors, we require: 1) an application form, 2) reference checks (e.g., teachers, employers, previous camps or ministries), and 3) a personal interview.

SUPERVISION

We will ensure that a lone staff member will never be alone with a single camper.

1. **Two-Adult Rule:** At least two screened and unrelated, adult staff members will be present at every activity involving children, youth, and vulnerable adult campers.

Rule of Three: When the two-adult rule is not possible or not consistent with essential camp operations (i.e., in cabins that are too small to accommodate more than one staff member), at least three individuals will be present, with at least one being a screened adult staff member. The two-adult rule should be followed at all times for activities or events involving children under the age of five.

For purposes of this policy, an adult staff member must be at least 18 years of age and at least five years older than the oldest camper being supervised.

2. Every reasonable effort will be made to maintain appropriate staff-to-camper ratios. Appropriate staff-to-camper ratios are determined by recommendations from relevant state agencies. The staff-to-camper ratio will never be 1:1.
3. Two or more adult staff members will be assigned to monitor all areas of the camp at all times, other than during normal camp activity hours.
4. Our camp has identified the following "no-go zones": (list areas where campers are forbidden). Storage sheds, unused buildings, outdoor structures, and other areas that are difficult to properly supervise, are to be kept locked with limited key access (review the "Eliminate Secluded Areas

Checklist” at www.brotherhoodmutual.com/camp-safety to help you identify areas of concern unique to your camp)

5. Staff members will follow procedures that verify campers’ presence at each stage of the day or event.
6. Staff members are to release campers only to a properly identified parent/guardian or a properly authorized individual—an adult who has written authorization from the parent/guardian to take the child from the camp.
7. Staff should avoid traveling in a vehicle one-on-one with a minor.

COUNSELING

When practical, individual campers will receive needed spiritual/emotional counseling with two adult staff members present. When only one adult staff member conducts the counseling session, the session will be conducted in full view of other staff members in a public place. One-on-one counseling will be limited to no more than three sessions, with each session lasting no longer than 30 minutes. If additional counseling is required, the camper may be referred to a qualified professional counselor. Written consent from parents/guardians must be obtained before a referral to a professional counselor.

STAFF RESTRICTIONS

1. All staff members are required to sign and follow a morals clause and standards of conduct agreement.
2. Staff members will not participate in public displays of affection (e.g., kissing, hugging) while at the camp or serving as a camp representative.
3. The use of tobacco, vaping and vaping products, alcohol, or illegal drugs is prohibited at camp.
4. Prescription medications used in accordance with a doctor’s prescription must be kept out of reach of campers. Any unexplained or suspicious disappearance of prescription medications must be reported immediately to the camp director.
5. Staff members will abide by rules regarding appropriate touch with campers.

DISCIPLINE

1. Staff members should never spank, grab, shake, or otherwise physically discipline anyone. Physical restraint will be used only in a situation where it is reasonably necessary to prevent an individual from physically harming himself or another individual.
2. Disciplinary problems will be promptly reported to the camp director and to a parent/guardian.

INJURIES OR ILLNESS

1. Staff members and campers who are ill will be separated from campers to the extent practical and/or sent to the camp infirmary. The Two-Adult Rule or the Rule of Three also applies in these situations.
2. Parents of ill or injured campers will be contacted to determine whether or not the camper will remain on property.
3. Camp employees will be trained in basic first aid/CPR procedures, including procedures for safely responding to potential exposure to blood, saliva, and other bodily fluids. Volunteer staff will be trained in basic first aid and medical emergency procedures.

4. A staff member or camp director will initiate the necessary steps to ensure that an injured person receives proper medical attention and provide appropriate supervision for the remaining activity participants. When practical, the staff member/director will review the camper's medical information before administering first aid.
5. For obviously minor cuts and scrapes, a staff member or camp director will administer first aid. The parents or guardians will be notified of the injury and treatment when they pick up the camper or any staff member under the age of 18.
6. In the event of an injury untreatable by simple first aid, a staff member or camp director will seek appropriate medical attention immediately. If the injured person is a minor, the parents or guardians will be immediately notified. If the injury requires immediate professional attention, a staff member or camp director will call emergency medical personnel.

SUSPICION OF CHILD ABUSE OR NEGLECT, MANDATORY REPORTING

All camp leaders, employees, and volunteers subject to mandatory reporting guidelines are expected to fully comply and report any reasonable suspicion of abuse or neglect to local authorities. (Note: mandatory reporting requirements and the standards for making a report vary by state)

1. Employees and volunteers who become aware of or have reason to suspect that a child, youth, or vulnerable adult has been abused or neglected must immediately inform their activity coordinator, supervisor, or camp director, unless the activity coordinator, supervisor, or camp director is the suspected perpetrator. The employee or volunteer may be required to complete a Suspected Abuse or Neglect Report form (at www.brotherhoodmutual.com/camp-safety).
2. Activity coordinators and supervisors who become aware of or have reason to suspect that a child, youth, or vulnerable adult has been abused or neglected must immediately inform the camp director unless that person also is the suspected perpetrator. If the employee or volunteer did not complete a Suspected Abuse or Neglect Report form, the activity coordinator or supervisor should complete the form.
3. A camp director who becomes aware of possible abuse or sexual misconduct involving a participant must ensure that the participant's parent or guardian is immediately informed that possible abuse or sexual misconduct has occurred. If the parent or guardian is the suspected perpetrator, the camp director will defer to local authorities on notifying the parent or guardian.
4. If a camp director is considering whether or not a report should be made to the authorities, the camp director will ensure that an attorney is immediately contacted to provide a written opinion as to whether the organization should report the suspected abuse or neglect to authorities. The written opinion should be obtained within 24 hours after the camp director first becomes aware of the situation. The attorney's advice should be acted upon immediately, including reporting the incident to the authorities. An attorney should be contacted immediately if any staff member becomes aware of possible abuse or neglect of a camper by a parent or guardian and is unsure whether to make a report to the authorities.
5. A camp director must promptly notify our organization's insurance carrier (general or professional liability insurance) upon notice of abuse or sexual misconduct. The camp director also reports allegations to (name of denominational or headquarters contact person or office).

RECORDKEEPING

1. Records will be maintained for campers and staff members present at each camp session. Any off premises events during a camp session will be recorded, including the date and location of the event, and the names of all campers and staff members who were involved. All camp records will be maintained by camp leadership for an appropriate length of time as directed by the camp's attorney.
2. The camp director will prepare a written Notice of Injury or Disciplinary Action Report whenever an injury or disciplinary action occurs during camp activities. Camp leadership will include the report in camp records for an appropriate length of time.
3. Camp leadership will maintain records containing personal or private information in a locked cabinet or other secure location. This information will be released only when a legal need for access has been demonstrated.

COMMUNICATION POLICY

Texting, emails, and social media can be a vital part of camp communications, but their improper use can produce serious consequences. The organization desires to promote safety and to create a healthy environment for electronic communication and social media between staff and participants in camp activities. As a result, the organization has developed the following guidelines:

1. Only designated staff members are permitted to communicate with campers using texting, email, or social media, or photograph or create videos of campers to post on official camp social media sites. The designated person(s) must first sign a consent form and attend training class. The class will outline the recommended practices, limitations, and legal parameters for electronic communication with campers and their families. All other staff members may not electronically communicate with campers or post photographs/videos of campers either on organization social media sites or their personal sites.
2. Staff may not transmit any content that is illicit, unsavory, abusive, pornographic, discriminatory, harassing, or disrespectful when communicating with each other or with campers.
3. Except in an emergency, staff may not transmit any personal information pertaining to a camper without the campers and his or her parents or guardians signing consent forms. This applies to group texting, group email, social media, or any other public method of electronic communication. Personal information may include such things as a camper's name, phone number, email address, or photograph.
4. Staff will discourage campers from using cell phones during camp sessions or programs except in an emergency, to contact a parent or guardian, or to place a call specifically approved by a leader.
5. Staff will instruct campers occasionally about the organization's communication policy and the dangers of "sexting" and unauthorized communication.
6. A staff member who becomes aware of possible child abuse or neglect through electronic media must immediately follow protocol outlined in this policy. The organization will consult with its attorney and report abuse as required by law.
7. All information, images, or videos shared electronically through official organization communication channels aren't considered confidential.

8. To participate in organization communications, parents or campers must sign a communication consent form and a photo use agreement form.
9. Campers who violate this policy may lose electronic communication privileges or be removed from camp. The organization's leadership will notify parents immediately of any violation.
10. Staff on organization business may never use a cell phone while driving—including hands-free devices/technology—unless it's an emergency.
11. Any approved texts or emails sent by a staff member to campers must go to a group rather than to individuals.

DEALING WITH LAW ENFORCEMENT, NEWS MEDIA

1. Camp leadership will cooperate with law enforcement and other government officials in accordance with the guidance of the camp's attorney. Staff members will cooperate with law enforcement and other government officials as directed by the leadership.
2. Camp leadership will designate a spokesperson to act as the point of contact for law enforcement and government officials. The spokesperson will convey information regarding any allegations or investigations to the news media. The spokesperson will work closely with the camp's attorney and camp leadership when performing these duties.
3. The camp's attorney will provide guidance to camp leadership when communicating with members of the news media. Staff members will direct members of the news media regarding any alleged abuse or molestation occurring at the camp to the designated spokesperson.

INTERNAL INVESTIGATION

1. This organization considers any allegation of abuse or molestation a serious matter. Each situation will be fully investigated first through civil authorities, then by camp leaders with the assistance of legal counsel. Camp leaders will not interfere with a pending law enforcement investigation.
2. Employees who are the subject of an investigation will be removed from their position pending completion of the investigation. Employees who admit to the abuse or molestation will be terminated consistent with the established employment practices of the camp.
3. Volunteer subjects of any investigation will be removed from their positions pending completion of the investigation.
4. The camp will permanently remove any employees or volunteers from their duties within the organization if they are found guilty of abuse or molestation. Whenever termination of employment is a factor, we also will consult with legal counsel.

VIOLATION OF POLICY OR PROCEDURES

1. Staff members will promptly notify the camp director or leadership of any violation of this policy or its procedures.
2. Camp leadership will take all necessary steps to ensure compliance with this policy and its procedures.
3. The camp director will remove staff members from their positions, when necessary, to ensure compliance with the policy.

ANNUAL REVIEW

1. Camp leaders will review this policy and its procedures at least once each year and consult with an attorney in identifying policies and procedures that require modification. When reviewing this policy and its procedures, camp leaders and legal counsel will examine potential conflicts between this policy and the bylaws or other governing documents of the camp.
2. Upon completion of this review, camp leadership will conduct annual training for all staff members to familiarize them with existing, changed, and new policies.
3. All staff members will complete a renewal application annually. Should the renewal application indicate that any employees or volunteers have become unsuitable for working with children, youth, and vulnerable adults, they will be removed immediately.

REVISION OF POLICY AND PROCEDURES

Camp leadership, 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. Camp leaders will communicate changes to all employees and volunteers affected by the policy changes.

This is a sample document only. Your organization is responsible for compliance with all applicable laws. Accordingly, this sample policy should not be used or adopted by your organization without first being reviewed and approved by an attorney. © 2020 Brotherhood Mutual Insurance Company.® All rights reserved. Brotherhood Mutual assumes no liability in the preparation and distribution of this sample policy.



**BROTHERHOOD
MUTUAL®**

Insuring America's churches and related ministries® | www.brotherhoodmutual.com | 800.333.3735
Property & Liability Insurance | Commercial Auto | Workers' Compensation | Mission Travel Services | Ministry Payroll

© 2020 Brotherhood Mutual Insurance Company. All rights reserved. Brotherhood Mutual is licensed in most states.

6400 Brotherhood Way, Fort Wayne, Indiana 46825