

SIL INTERNATIONAL

Abridged Administrative Procedures Manual For JAARS Workers

Child Abuse

SIL International

Child Abuse Administrative Procedures Manual

PREFACE

SIL Policy: “Child Abuse (sexual, physical, and emotional) and Neglect is not tolerated by SIL and is prohibited by its Moral Conduct Standard.

- Anyone who is known or determined to have committed sexual abuse of a child under the age of 18 at any time during his/her adult life is not eligible for service and, if serving, will have his/her relationship with SIL terminated immediately, with no later opportunity to serve as a member or a volunteer, accompany a member for an assignment, or be on SIL properties. There is no option of resignation.
- It is normal SIL practice that spouses cannot remain in membership following the discipline and dismissal of the other spouse. However spouses are offered the opportunity to resign in good standing.
- Anyone under the age of 18 who committed sexual abuse of a child before the age of 18 will be evaluated on a case-by-case basis, taking into account such factors as age, seriousness of the offense, acknowledgement of responsibility, and effective treatment.
- Any member whose children (under the age of 18) have been determined to have committed sexual abuse will be asked to follow through with the action plan put in place to resolve the causes and effects of the abuse taking into account such factors as age, age difference between offender and victim(s), seriousness of the offense(s), acknowledgement of responsibility, and effective treatment. Failure to do so will lead to termination of their relationship with SIL. Reapplication would be evaluated on a case-by-case basis and involve effective treatment and other factors listed above.
- The Moral Conduct Standard of the SIL Legislative Procedures Manual will be utilized in determining appropriate administrative actions for anyone found to have committed physical or emotional abuse or neglect of a child under the age of 18. This may include termination of membership. Mitigating circumstances may allow lesser discipline than termination of relationship with SIL, or if the relationship is terminated, later reapplication and restoration to membership, in an assignment not related to children.
- If SIL is asked to provide a reference, SIL will generally disclose the reasons for termination when the termination involves abuse. Further, if SIL becomes aware that a former member or volunteer of SIL becomes employed by another organization where the individual has access to children, SIL will normally make that organization aware of the reasons for SIL's termination of membership of the individual.
- SIL will recommend to Wycliffe WMOs or other sending organizations that membership in their organization also be terminated. Allowing voluntary resignation is seen to be counterproductive to the goals of appropriate accountability in such matters. In the case of sexual abuse which has come to light many years later, the recommendation would be the same if the individual is still a member, retired member, or volunteer of Wycliffe. If the individual is no longer associated with Wycliffe it would involve the recommendation that the Statement of Findings and Action Plan be maintained in the former member or volunteer's file as long as that file exists.

- In cases where abuse is determined after a member has resigned or retired from the organization, the recommendation will be made that the Wycliffe membership status be changed retroactively to accurately reflect this new information.

(Refer to SIL policy in Appendix C2.)

Background. In this broken world, we mourn the damage that child abuse does to victims, victims' families, offenders' families, administrators and the community. This manual sets out administrative policies and procedures, applicable throughout SIL, that are designed to support SIL's Child Abuse policy, and outlines SIL's response to allegations of child abuse or neglect that involve members or members' children. It is understood that these policies and procedures also apply to an SIL member's abuse of a non-SIL child and to a non-member's abuse of an SIL child as far as they apply.

While we strive to apply these policies and procedures consistently and respectfully, it must be recognized that SIL reserves the right to alter any part of this manual at any time. Further, this manual is not intended to create or to constitute an expressed or implied contract or other legally enforceable promise or right that binds or commits SIL to follow specific procedures or standards in every circumstance. Further, the manual is not intended to modify the "at will" employment relationship that exists between SIL and its staff members. Any modification of the provisions of this manual must be approved in advance by the SIL International Vice President for Personnel (VPP).

Cultural Issues affecting Procedures. It will not be possible to include in this set of procedures all the ramifications of cultural background that may affect the practical working-out of each step. Nonetheless, it is crucial that sensitivity to the cultural background of both the victim(s) and offender(s) be seriously considered in the process. Issues of national language, "victim security", aspects of "shame" affecting both victim(s) and offender(s), and issues of propriety during interviews are just some of the factors that may affect a proper working-out of these procedures from a cultural perspective. When there is a question as to how a particular cultural background might affect the process, this should be brought to the attention of the VPP who, in turn, may need to contact the Sending Organization, or other partner, to help all parties be sensitive to the impact that cultural backgrounds may have in the process on various levels.

Bearing in mind the need to be culturally sensitive during the process of working out these administrative procedures, from a corporate perspective there can only be one definition of the various aspects of abuse, which cannot be redefined according to the cultural background of the victim(s) or offender(s). There needs to be one standard that is adhered to throughout SIL regardless of the cultural backgrounds of those involved.

The time frame for this process is generally assumed to be "as soon as possible". There may be occasions when the working-out of the administrative procedures is slowed down to accommodate cultural or practical issues, but this will be a decision made by the VPP.

It will be the responsibility of the WMO or Sending Organization to ensure that its members are aware of this document and how it might affect them from their particular cultural background.

Where this policy fits in legislation. This set of procedures fits into a series of overall corporate legislation starting with SIL's constitution and bylaws. More specifically, this policy must comply with Board Policy as expressed in its Executive Limitations (SIL International's Board Policy Manual, May, 2004, available on the SIL Intranet).

Appeals to decisions made as a result of these procedures. The policy regarding "Member Discipline and appeal" will be followed in the event a member is the subject of a child abuse investigation and that investigation results in actions taken which affect their membership.

Reporting Laws on File with VPP's Office. It is strongly urged each SIL entity and WBTI-approved organization have a copy of the reporting laws of its country on file with the VPP by January 1, 2007 or a formal statement that no reporting laws exist.

I. INTRODUCTION

A. Purpose of the Manual

The purpose of this manual is twofold:

1. To inform SIL members and volunteers, offenders, and sending organizations of the policies and procedures used to protect our children and to deal with allegations of child abuse and neglect when they occur. We believe it is important for members and volunteers in SIL to have this information available before an incident occurs. This information is also designed to be helpful, for example, to a parent who may be going through, or may face in the future, a situation in which their child has been abused. For these reasons this manual is being made available to the whole SIL membership.
2. To provide SIL administrators a clear set of procedures designed to protect our children and to follow whenever allegations of child abuse and neglect arise.

B. Principles Supporting these Procedures

SIL places a high value on our children, and thus strives to provide a safe environment for them. We are committed to protecting their social, spiritual, and moral well-being, and physical and mental health. SIL takes child protection very seriously for a variety of reasons:

- Christian principles.
- The highly destructive effects of child abuse on children, their families, and the community.
- The aberrant nature of adults being sexual with children.¹
- The high rate of recidivism for those who sexually abuse children.

The goal is not to usurp in any way the parents' role as primary caregivers and guardians of their children, but to supplement and support their efforts to provide a safe and secure environment for children.

Because the safety of children is so important and child abuse is so destructive², the organization's approach needs to be thorough and vigorous, both in protecting children and in responding when an allegation is made.

Offenses against children also need strong administrative responses since children's age, physical size, and communication abilities often prevent them from being able to protect themselves adequately.³

Our goal is to apply the procedures consistently regardless of the position within the organization of the families involved or other circumstances. At the same time SIL reserves the right to alter these procedures when we determine this is appropriate in providing the best possible response in the circumstances. Any modification must be approved in advance by the VPP.

¹ 94% of abuse perpetrated against boys and 86% of abuse perpetrated against girls is committed by adult males. 30% of offenders were sexually abused as children (American Humane Association, 1981). Sexual abuse can start at a young age and one study found that adolescents commit about 20% of sexual abuse. 75-89% is perpetrated by someone within the child's immediate social circle, including family, relatives, friends of the family, or neighbors (Finkelhor, 1979). Nearly half of victims are abused more than once and it frequently occurs over a period of years (Green, 1996).

² A 2001 study by Paolucci, Genuis & Violato found that sexual abuse results in 20% increase in post-traumatic stress disorder (PTSD), 21% increase in depression, 21% increase in suicide, 14% increase in sexual promiscuity, 8% increase in victim-perpetrator cycle, and 10% increase in poor academic achievement. Ross & O'Carroll (2004) also noted poor self-esteem, anxiety, fears, self-injurious behavior, and disturbed peer and family relationships. The effects vary depending on the age of development during which the abuse occurred and the context in which it occurred.

³ Offenders often tell victims that the acts are normal and/or frequently utilize bribes or threats to keep children from disclosing the abuse.

Corporate standards and resulting procedures regarding Child Abuse apply throughout all SIL entities.

In allegations of abuse, SIL places priority on the safety and security of children. SIL policy on child abuse and neglect does not require a court conviction. Once the Investigation Procedure leads to the conclusion that SIL child abuse policies should be applied, SIL policy may require immediate termination of the offender's relationship with SIL, depending on the kind of abuse or other behavior found to have occurred. See Preface for specifics.

SIL's definition of child abuse is consistent with various international Christian as well as secular bodies.

SIL takes seriously its objective of protecting children of SIL members and volunteers as well as children of partnering organizations, national and expatriate, who are served by our ministry. This involves a commitment to excellence in screening and training staff, and educating them regarding child protection, prevention, and response. It also involves establishing clear procedures for identification of child abuse and neglect, as well as reporting, internal investigation, treatment, and follow-up. All supervisors and/or administrators should seek to ensure that all staff members reporting to them have received appropriate, current orientation and training regarding child abuse prevention and response procedures.⁴

By taking child protection and response seriously, we believe that the likelihood of offenders entering SIL is decreased.

II. DEFINITIONS^{5,6}

Child abuse is the ill treatment of a child under the age of 18 by a parent, caretaker, someone living in their home or anyone who works with or around children in the context of a relationship of responsibility, trust, or power. Abuse of a child is any action (or lack of action) that causes injury or endangers or impairs a child's physical, mental, or emotional health and development. Child abuse can be physical, sexual, or emotional. Neglect happens when a parent or responsible caretaker fails to provide adequate supervision, food, clothing, shelter or other basics for a child. Child abuse occurs in different ways. All forms of abuse and neglect are harmful to the child.

The question has been raised as to how we judge shame-based rather than guilt-based cultural communication styles. This will be handled in the investigative stage by ensuring that cultural issues are addressed from the outset. Cultural representation during the investigative interview process is one example.

SIL confines its policy and procedures to protection from the following kinds of maltreatment of children: child sexual abuse, physical abuse, emotional abuse, and neglect.

⁴ Pedophiles often look for organizations to join where they will have access to children. Churches and organizations like SIL are attractive because of being close and trusting communities.

⁵ This general definition (as well as the specific definitions noted later) is taken, with minor adaptations, from "The International Child Abuse Network" and the "Report of the Consultation on Child Abuse Prevention", World Health Organization, Social Change and Mental Health, Violence and Injury Prevention. March 1999 as reported on the International Child Abuse Network at <http://www.yesican.org/defined.html>.

⁶ See also these websites for International definitions of physical, psychological, emotional child abuse and neglect.

International Child Abuse Network: <http://www.yesican.org/defined.html>.

International Society for Prevention of Child Abuse and Neglect <http://www.ispcan.org/publications.htm>.

(Several African countries are members)

USA National Clearinghouse on Child Abuse and Neglect: <http://nccanch.acf.hhs.gov/index.cfm>.

A. Types of Abuse

1. Sexual Abuse

Sexual abuse is the involvement of a child in sexual activity that he or she does not fully comprehend, is unable to give informed consent to, or for which the child is not developmentally prepared and cannot give consent, or that violates the laws or social taboos of society.

It is activity between a child and an adult or another child who by age or development is in a relationship of responsibility, trust, or power. This may include but is not limited to:

- a) **Verbal:** Remarks which include sexual threats, innuendoes, comments about a person's body or appearance, solicitation, inappropriate sexual talking, obscene phone calls, obscene or inappropriate sexual talking via the internet, inappropriately affectionate comments, or any verbal expression with intent to arouse or stimulate; in summary, any obscene communication.
- b) **Visual:** Indecent exposure, showing or taking of suggestive pictures, peeping, leering, or staring. Visual sexual abuse also includes voyeurism⁷, exhibitionism⁸, showing of pornographic material of genitals, or the showing of any sexual activity or simulated sexual activity such as masturbation or intercourse.
- c) **Physical Touching:** Fondling, sexual touching, masturbation in front of or to the victim, rubbing, holding, and kissing for the purpose of sexual gratification. Further examples include oral, genital, anal and breast stimulation; penetration by penis, fingers, or any other body part or object, of mouth, anus, or vagina; physical contact with a person's clothed or unclothed genitals, pubic area, buttocks, or in the case of a female, breast.

Physical Abuse

Physical abuse is any act that results in a non-accidental physical injury. Inflicted physical injury most often represents unreasonably severe corporal punishment or unjustified punishment. The parent or caretaker may not have intended to hurt the child; rather, the injury may have resulted from over discipline or physical punishment. Physical abuse may also include, for example, slapping, punching, beating, kicking, biting, shaking, burning, holding under water, pulling hair, or holding against one's will. Depending on the circumstances, this may also include excessive spanking done in anger.

Emotional Abuse

Acts of Omission: Emotional abuse includes the failure to provide a developmentally appropriate, and supportive environment, including the availability of a primary attachment figure, so that the child can develop a stable and full range of emotional and social competencies commensurate with her or his personal potentials and in the context of the society in which the child dwells.

Acts of Commission: There may also be acts toward the child that cause or have a high probability of causing harm to the child's health or physical, mental, spiritual, moral or social development. These acts must be reasonably within the control of the parent or person in a relationship of responsibility, trust or power.

Acts include restriction of movement, patterns of belittling, denigrating, scapegoating, threatening, scaring, humiliating, screaming, blaming, sarcasm, discriminating, ridiculing, or other non-physical forms of hostile or rejecting treatment.

⁷ ***Voyeurism:** obtaining sexual gratification from seeing sex organs and sexual acts; one who habitually seeks sexual stimulation by visual means.

⁸ ***Exhibitionism:** a perversion marked by a tendency to indecent exposure.

Emotional abuse is defined by a pattern of behavior over time.⁹

Although Spiritual Abuse is a concern, there does not seem to be a generally understood definition of child spiritual abuse that fits our setting. Consequently, it will be understood to fall under the category of emotional abuse.

Neglect

Neglect is the failure to provide for the development of the child in all spheres: health, education, emotional development, nutrition, shelter, and safe living conditions, in the context of resources reasonably available to the family or caretakers, and causes or has a high probability of causing harm to the child's health or physical, mental, spiritual, moral, or social development. This includes the failure to properly supervise and protect children from harm as much as feasible.

Neglect also includes depriving a child of their basic needs of food, clothing, warmth and shelter, emotional and physical security and protection, medical and dental care, cleanliness, education, and supervision.

B. Age Factors

The legal definition of abuse refers to actions against individuals under the age of 18. Should both the victim and the alleged offender be under the age of 18, factors considered in evaluating whether abuse has occurred include the following: differences in responsibility, trust, power, development, awareness and understanding, coercion, and threats, whether implied or verbal. Typically abuse between individuals under the age of 18 is defined as any sexual behavior that occurs without consent or understanding by one party, without equality, or as a result of coercion.

III. REPORTING AND INVESTIGATIVE PROCEDURE SUMMARY

A. The Preliminary Procedure involves taking an initial report that is to be submitted to SIL's Vice-President for Personnel (VPP). If it is determined by the VPP that there is no substance to the allegation, a Statement of Findings¹⁰ to this effect will be issued and the case closed. If it is determined by the VPP that the allegation may have merit, then the VPP will institute the Investigation Procedure.

B. The Internal Investigation Procedure involves a review and internal investigation of the allegations and ordinarily results in a Statement of Findings and Action Plan, administrative follow-up, and determination of and referral or provision for care to both victim(s) and their families and the alleged offender and his/her family.

⁹ As parents, teachers, and other adults involved in children's lives, we may have been verbally and possibly emotionally inappropriate with our children and students at one time or another. This policy does not refer to situations like this. Emotional abuse implies a pattern of behavior. This concept of sustained activity is at the heart of SIL's policy. There is a distinction between one time inappropriate behavior, which needs to be addressed to prevent recurrence, and repeated action, which would necessitate a Preliminary Report of abuse.

¹⁰ **Statement of Findings:** The official report of the internal investigation. The Statement of Findings contains a history of how the report initially came to light, a summary of the allegations, a summary of the internal investigation, and the outcome determined (see below). A draft is written by the Abuse Investigation Team, then finalized and signed by the VPP. If the determination is that SIL child abuse policies should be applied, it provides a one-paragraph description of the specific actions (where, when, how, how long, what behaviors were involved, name of the offender, names & ages of victim(s)), and the acknowledgement or denial by the alleged offender. If SIL child abuse policies are not applied, it states why. It also details the administrative actions taken in regard to the alleged offender as a result of the findings and is accompanied by recommendations for an Action Plan of abuse or inappropriate behavior is affirmed.

IV. REPORTING AND INVESTIGATIVE PROCEDURE CHECKLIST

A. Preliminary Report Procedure

Need to report all situations, no matter how minor. Should any abuse allegation be made, or come to a leader's or member's attention, no matter how minor in the eyes of the individual receiving the information, and regardless of the ages of the individuals involved, the following procedures are to be followed. This process is aimed at utilizing staff that have the most training in the area of abuse to help evaluate the scope and seriousness of an incident and whether it requires further review and investigation.¹¹

Statute of Limitations on Internal investigation. Some legal systems make provision for a statute of limitations on investigating abuse incidents, allowing offenders to avoid prosecution if a certain amount of time has passed since the offense was committed. SIL will, however, pursue allegations of abuse, no matter how old, because of the importance to the victim, other children, and the organization itself. A sexual abuse offender's relationship with SIL will be terminated if the allegations are confirmed, regardless of any statute of limitation.

In cases where adult MKs report abuse that occurred to them as children living on SIL centers or attending SIL schools or committed by SIL members, these cases will follow the Abuse Investigation Procedure B.

The Reporting Process:

- 1. Abuse is Reported.** When any adult in the community is reasonably suspicious¹², observes, is given an allegation of child abuse, or has knowledge which gives reason to suspect child abuse or neglect, he or she must make an initial report to the Entity Director¹³ immediately, preferably by in-person contact, telephone conversation, facsimile, or electronic mail, without taking any other action or doing any preliminary investigation.

The reporting duties are individual and no supervisor, administrator, or board member may impede or inhibit the reporting duties, and no person making a report will be subject to any sanction by SIL for making a reasonable report.

Reporting the information regarding a case of possible child abuse or neglect to another staff member or volunteer, or person other than the Entity Director will not be a substitute for making the mandated report to the Entity Director.

The Entity Director will confer with the individual reporting the incident as soon as possible and explain the corporate procedures followed in dealing with the incident. Further, the Entity Director will contact the VPP concerning the matter and will consider with the VPP whether it is necessary and appropriate to make a report to local law enforcement or social services authorities at this stage; any such report should be coordinated by the VPP.

Form Preliminary Report Team.

Upon receiving this report, the Entity Director forms a Preliminary Report Team. This Team includes no more than three individuals: the Entity Director (or his designee), the adult to whom the victim first reported the abuse, and one other person chosen by the Entity Director. This Team includes, if possible, at least one person of the same sex as the victim¹⁴ and one the same

¹¹ A question sometimes arises regarding allowing the entity Director to determine when an issue is big enough to report to the VPP. Generally entity leadership has found the input of those with greater experience in such matters useful in assisting them through the complexity of child abuse investigations:

¹² **Reasonable suspicion** is defined as it being objectively reasonable for a person to entertain a suspicion, based on facts that could cause a reasonable person, drawing on his/her training and experience (when appropriate) to suspect child abuse or neglect.

¹³ **Entity Director:** The top administrator of the affected community where the alleged abuse took place.

¹⁴ **Victim:** Anyone under age 18 who is believed to be the subject of alleged physical, sexual, or emotional abuse or neglect.

sex as the alleged offender¹⁵ whenever possible. Cultural and language representation is also included on the Team if possible, or at least someone knowledgeable of the culture and language of both victim and offender.

Presumption of Innocence and Guilt.

SIL's procedures to investigate allegations of abuse and neglect are designed to prevent, as much as possible, bias or presumption to exist during the investigative portion of the process. The internal investigation will be guided by two parameters: climate of belief, meaning that abuse could have taken place; and innocence should be presumed until the internal investigation leads to sufficient corroboration that the determination is made that SIL's child abuse policies should be applied.

Integrity of the Process.

Following the abuse reporting procedure with two levels of decision-making and a team approach gives credibility to the findings regardless of the outcome. If the allegation is confirmed to be true, the confidence level is raised, because a full review was followed. Likewise, if the allegation is shown to be unfounded, those involved in the process can have confidence that the VPP was involved, and had access to the Abuse Investigation Team for purposes of reviewing the initial report.

When Victims are Reluctant to Pursue Allegations.

Because of the danger offenders pose and the importance we place on the care and protection of children, the organization will take responsibility for investigating allegations of child abuse, rather than expecting victims to pursue claims independently.

Some believe that if victims do not desire an investigation of an abusive action against them, the organization should not pursue the claims. However, if claims were not investigated, then abusers would continue to have access to other children and possibly abuse them. SIL cannot allow potential abusers to remain in the organization and have access to other children because a victim does not want the claim pursued. We often find that victims are willing to report abuse but do not want to be perceived as pushing an investigation. Failing to pursue reports of abuse would have the additional impact of preventing additional victims from obtaining the safety and treatment needed to overcome the effects of the abuse. SIL will therefore investigate allegations, even if victims are hesitant to pursue claims independently. When victims or their parents are reluctant due to fear of reprisal, lack of understanding of other potential victims, or lack of current symptoms, SIL will seek to provide support, education, and care to them while pursuing the internal investigation.

Maintain Confidentiality.

Confidentiality is critical and SIL expects that a "need to know" position will be strictly adhered to throughout the reporting process. At this stage the only people who need to know of the abuse allegation are: those legal authorities whom the VPP determines should be informed, the Entity Director and the Preliminary Report Team, and the VPP. No other leaders or community members are to be involved at this stage. It is presumed the parents of the victim are part of the need to know group unless they are themselves involved in the abuse or pose a threat. The alleged offender ordinarily is not to be advised of the allegations at this point. Only if/when the internal investigation has moved to the Internal Investigation Procedure level will the alleged offender be informed. At the time when the alleged offender has been apprised of the allegations, the "need to know" group may then expand.

Manual.

This *SIL Child Abuse Administrative Procedures Manual* will guide the process. If members of the Preliminary Report Team are not familiar with these procedures, they should be reviewed first.

Care and Protection for the Victim.

The first task of the Preliminary Report Team is to make arrangements intended to safeguard the

¹⁵ **Alleged Offender:** An individual accused of abuse or neglect.

child victim. Secondly, the Team should consider whether it is appropriate to offer to the victim or the victim's family emergency arrangements or support for care for the victim, including medical attention and counseling if needed to deal with immediate physical and emotional needs. (See Appendix D for resources). If sexual abuse involving intercourse is alleged, it is vital, and preferably within 24 hours of the incident, to follow the Medical Protocol instructions in the Sexual Assault section of the Personnel Manual. (*Refer to Appendix C3.*)

Complete Child Abuse or Neglect Reporting Form.¹⁶

The Preliminary Report Team completes the Child Abuse or Neglect Reporting Form with those who are bringing the allegations (refer to Appendix B). All interviews will typically have two Team members present. This helps to provide that the session is remembered accurately. The second person is also the one who transcribes the interview. It is important that the interview is transcribed accurately and fully, recording both the questions asked and the individual's responses in their own words, utilizing the Child Abuse or Neglect Reporting Form to guide the questions.

This report contains only those facts that are known at the time and is based only on the information given by the victim(s), any witnesses accompanying them, and their spokesperson(s). No additional investigation should take place. All those involved will be asked not to pursue anything further or disclose any facts to anyone until a response has been received from the VPP. If the Preliminary Report Team runs into any complicating factors, or there is a need to alter procedures, or the Team becomes unsure of how to respond, the Team (or the Entity Director acting for the Team) is to contact the VPP for advice and assistance.

Maintain Evidence.

The Preliminary Report Team may receive documents, photos, records and other tangible evidence from the person(s) reporting the abuse. The Team should safeguard these materials and make copies if possible to be attached to the Child Abuse or Neglect Reporting Form provided to the VPP. Team members should not engage in searching for or gathering evidence at this stage, but may receive and hold materials submitted by the persons reporting abuse. If medical personnel and/or law enforcement officials request materials held by the Team, Team members should be generally cooperative, but should contact the VPP if possible before releasing any materials to such persons. In some instances, the VPP may coordinate the collection and handling of evidence with a professional consultant.

Notify VPP.¹⁷

Immediately fax or e-mail the Child Abuse or Neglect Reporting Form to the VPP. It is expected this will take place within 24 hours unless extenuating circumstances such as travel are involved. It is also advisable to call the VPP and inform him that the information is on the way.

Decision by VPP.

After review of the Child Abuse or Neglect Reporting Form, the VPP, in consultation with the Entity Director, will decide what direction will be taken. If the conclusion is that this report indicates no abuse or other inappropriate behavior occurred, the VPP might convene the Abuse Investigation Team to review this conclusion before the VPP makes a final decision.

VPP Statement of Findings and Action Plan if SIL Abuse Policies Are Not Applied.

If it is determined that there is no indication that abuse or other inappropriate behavior occurred and the matter thus warrants no further action, the VPP will issue a Statement of Findings to that effect to both the individuals involved, with copies placed in the internal investigation files of the VPP. The VPP may also formulate an Action Plan, if the VPP determines that the situation warrants such a plan. It is important to remember that legal and cultural issues may be involved which vary among SIL entities, and affect the action taken by the VPP.

¹⁶ **Child Abuse or Neglect Reporting Form:** A form on which any child abuse or neglect report is recorded so that all necessary information is included. It includes names of identified victims, alleged offenders, and a specific description of the alleged abuse. This form contains all information needed for reports to government authorities, when indicated.

¹⁷ Whenever the VPP is indicated, the VPP may delegate the function to others.

Follow up with Alleged Victim and Action Plan if Abuse Policies Are Not Applied.

The Preliminary Report Team will share the Statement of Findings with the identified victim and/or victim's parents. The Team is also responsible for implementing any Action Plan and reporting back to the VPP on its outcome. This will close the investigative file.

VPP Action if Abuse Allegations Need Further Investigation.

If the VPP determines the allegations may be accurate and disclose abuse or other inappropriate behavior, the Internal Investigation Procedure will be followed. In this case, the responsibility of the Preliminary Report Team ends and the Internal Investigation Procedure begins.

B. Internal Investigation Procedure¹⁸

If the VPP determines that the Internal investigation Procedure is warranted, the following checklist is utilized by those involved in the investigation:

- 1. Abuse Investigation Team Appointed.**
- 2. Composition of the Abuse Investigation Team**
- 3. Logistics**
- 4. Manual**
- 5. Child Abuse or Neglect Reporting Form**
- 6. Planning**
- 7. Timely Investigation**
- 8. Documentation**
- 9. Confidentiality**
- 10. Offender and Victim Roles**
- 11. Meet with Victim(s), Parents of Victim(s), and Witnesses, if any**
- 12. Prevent Further Abuse**
- 13. Support for Victim**
- 14. Counseling for Victim(s)**
- 15. First Meeting with Alleged Offender and Witnesses, if any**
- 16. Signed Statement**
- 17. Support/Accountability for Alleged Offender**
- 18. VPP and Entity Director**
- 19. Administrative Leave.¹⁹**
- 20. Relocation of Alleged Offender**
- 21. Notification of Sending Organization.²⁰**
- 22. Initial Notice in Cases Involving More than One Victim**
- 23. Continue Interviews**
- 24. Prepare Investigative Summary as Internal Investigation Progresses**
- 25. Follow-up Interviews with Victims, Alleged Offender, or Witnesses**
- 26. Additional Victims**
- 27. Intermediate Notices**

¹⁸ **Internal investigation Procedure:** An investigative process that occurs after a Preliminary Report has been filed with the VPP and it has been determined that further investigation needs to be done. The Abuse Investigation Team, in consultation with the VPP, informing the Entity Director, and utilizing community members when appropriate, conducts it.

¹⁹ **Administrative Leave:** Mandatory leave from an SIL assignment for an alleged offender during the course of an investigation. Administrative leave allows the internal investigation to proceed quickly without being delayed by an appeal to EC.

²⁰ **Sending Organization:** An organization approved by WBTI to second personnel to SIL.

28. Complete Investigative Summary
29. Draft Statement of Findings and Recommendations for Action Plan.

Possible Outcomes reported in the Statement of Findings:

- a. Apply SIL Child Abuse Policies:.
 - b. Do Not Apply SIL Child Abuse Policies:
 - c. Inconclusive:
 - d. Apply SIL Policies Regarding Inappropriate Behavior but not Child Abuse
 - e. Abuse
 - f. Other
30. VPP Statement of Findings and Action Plan
 31. Administrative Decision (Appeals to decisions made be made as a result of these procedures.)
 32. Communicate to Victim, Alleged Offender, SIL Entity Director and Sending Organizations
 33. Outcome Notice to the Affected Community
 34. Debriefing Appropriate Groups
 35. Documentation
 36. Respond to National Reporting Laws
 37. Evaluate
 38. Incorporate Appropriate Changes
 39. Review Procedures

V. NATIONAL REPORTING LAWS

The requirement of reporting identified or confirmed child abuse has several different aspects. For this reason, the Entity Director where the abuse is reported immediately reports all abuse incidents to the VPP by following the Preliminary Report Procedure. The VPP then seeks to evaluate relevant legal requirements, if any, in the context of the circumstances.

Normally, SIL will report to the state civil authorities in the state of Texas where SIL is incorporated and in the state or country where the offender currently resides.

In the Affected Community

When the internal investigation leads to the conclusion that SIL child abuse policies should be applied, the VPP in consultation with the Entity Director will determine the appropriate reporting response under the statutes of the reporting community's government authorities. Quite often the alleged offender is immediately sent back to his or her passport country to protect the victims and prevent any further abuse.

When Involved Parties Have Returned to their Home Countries

When it is determined that SIL child abuse policies should be applied, in most instances, SIL will work to ensure that an offender is returned to his/her home/passport country and will address the application of that country's reporting laws. In most cases, the VPP will likely choose to do this in cooperation with the Sending Organization. If the Sending Organization is not in the country to which the offender returns, VPP will seek to discover whether there are applicable reporting requirements in that country and, how they would apply to the circumstances.

VI. COSTS OF THE INVESTIGATION

The International Administration will pay for all Abuse Investigation Team expenses, which include such things as transportation, food and lodging prior to commencing the internal investigation in the affected community. It will also cover the costs of transportation of the Abuse Investigation Team to the affected community as well as any investigative travel to other countries or within the US.

The field entity will pay for all Preliminary Report Team expenses and for the Abuse Investigation Team lodging and meals on the field.

Sexual Assault Policy -- Int'l Personnel Manual

Sexual Assault Policy

Created: 09/04/2001 Updated: 06/08/2006

SEXUAL ASSAULT POLICY (Note: from SIL Crisis Management Policy 1994)

1. This type of crisis is handled differently from those in which the organization is involved in a broader way.
2. The policy on sexual assault is focused on assuring the victim and any significant others in their life of the concern and desire of SIL to provide adequate professional attention to physical, emotional and spiritual needs. At the same time it is intended to protect the victim from added trauma by limiting the number of administrators involved in the crisis management.
3. It is the policy of SIL that all cases of sexual assault where an SIL member or a member's dependent child is victimized should be reported to the entity director for his immediate attention who in turn will contact the International Vice President for Personnel.
4. No other information shall be given concerning the incident even to the E.C. or other administrators in a way that identifies the victim(s) without the permission of the victim or, in the case of a dependent child, the victim's parents.
5. In cases of sexual assault where the accused perpetrator is an SIL member or a member's dependent child, the reporting obligations are outlined in the Moral Conduct Standard Legislation.*
6. It is SIL policy to facilitate sexual assault victims' receiving adequate and appropriate professional medical attention (i.e., tests for AIDS, pregnancy, etc.) as well as professional counseling as soon as possible after the assault. A follow-up interview by a professional counselor no longer than six months later will be encouraged.
7. It is SIL policy that the entity Director encourages the development of adequate emotional and spiritual support locally within the confines of the victim's explicit permission and consent.

Note: The entity director or his appointee has the freedom to request appropriate funds and people (counselors) to help him carry out the above policy, and is encouraged to do so. This request should be directed to local entity resources first. If these are nonexistent or inadequate, then the request should be channeled to the International Vice President for Personnel, as he/she may be aware of other resources.

***Note: The victim's identity would need to be revealed here to enable perpetrator to be prosecuted.**

JAARS Code of Conduct Child Safety Policy **For all Members, Staff, Volunteers**

I, _____ agree to uphold the integrity of the children and youth that I serve with or come in contact with by recognizing that each child is precious in the eyes of God.

I acknowledge that I have received a copy of, read, and agree to abide by the SIL International Administrative Procedures Child Abuse Manual. I acknowledge that I am expected to know and be familiar with the contents. I understand that this policy may be updated from time to time and that I will be responsible for reading and complying with the updates.

- I understand the definition of "Child Abuse and Sexual Misconduct" set forth in this policy and the procedures for reporting reasonable suspicion of and/or allegations of misconduct.
- I confirm that I have not been accused of (to the best of my knowledge), been investigated for, or prosecuted for instances involving any form of abuse or inappropriate behavior with a minor.
- I agree not to engage in any such behaviors.
- I understand that child abuse and sexual misconduct are grounds for disciplinary action, including administrative leave, application of the moral conduct policy, or termination of employment.
- I further agree that as an individual who has engendered trust from a child I will not tolerate child abuse, neglect, or sexual misconduct.
- I agree to immediately report any reasonable suspicion of or disclosure of inappropriate behavior between adults and minors to the JAARS VP of Human Resources.
- I understand that if I commit child abuse, I acknowledge and understand my affiliation with JAARS will be terminated, and my sponsoring organization and/or church will be informed, including the reasons for termination.
- Additional communication to others with a need to know, as discussed in the SIL International Administrative Procedures Manual, will also be carried out.

Name

Date

Position

Assignment