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CHRIST
UNITED METHODIST CHURCH

SAFE SANCTUARIES Policy Reducing the Risk of Abuse in the Church
February 2024

PREAMBLE

God has called us to make our ministries safe, protecting our children from abuse and exploitation. God also has called us to create communities of faith where children can be safe and grow strong.

Jesus taught, "Whoever welcomes one such child in my name welcomes me" (Mark 9:37 NRSV), and, "If any of you put a stumbling block before one of these little ones…it would be better for you if a great millstone were fastened around your neck, and you were drowned in the depth of the sea" (Matthew 18:6 NRSV).

The Social Principles of The United Methodist Church state "…children must be protected from economic, physical, and sexual exploitation and abuse" (Par. 162(D) *2012 Book of Discipline*).

At each child's baptism, we affirm our responsibility to their safety by our congregational response, pledging:

"With God's help, we will so order our lives after the example of Christ that this child, surrounded by steadfast love, may be established in the faith, and confirmed and strengthened in the way that leads to life eternal." (*The Book of Worship*, Baptismal Covenant, Congregational Pledge II)

Building on these foundations, we recognize that our faith calls us to offer hospitality and protection to all children, as well as to those who are committed to ministering to them as volunteers and employees. Often, abuse occurs in places where children feel safe – homes, schools, camps, and even churches. In over three-quarters of reported cases, the victim was related to or acquainted with the abuser.

In light of this disturbing reality, we at Christ United Methodist Church (CUMC), in covenant with all United Methodist congregations in the Eastern Pennsylvania Conference, adopt this policy to help to 1) prevent such abuse from happening in our church; 2) make our church a place where children can feel safer in disclosing abuse; and 3) protect the volunteers and employees that minister to our children.

We commit to being in compliance with all aspects of the Pennsylvania Child Protective Services Law (23 Pa C.S. 6301). In the event that the law conflicts with this policy, the law shall control.

DEFINITIONS

For the purposes of this policy, the following definitions shall apply:

Mandated Reporter:
Any worker (whether clergy or laity, paid or unpaid), involved in CUMC ministries. Reporting an allegation of abuse is required whenever there is "reasonable cause to suspect" that abuse has occurred, according to Pennsylvania Child Protective Services Law, (23 Pa. C.S. Chapter 63).

Reasonable cause to suspect abuse can occur:

- When any worker personally witnesses an incident or evidence of abuse;
- When an allegation of an event of abuse is made to a worker by a third party; and/or
- When a child or youth discloses abuse to a worker which meets the criteria of the above Pennsylvania law.

Child Abuse:
This term shall be defined under Pennsylvania Child Protective Services Law (23 Pa. C.S. 6303) and means *any* of the following:

1. Any recent act or failure to act by a perpetrator which causes non-accidental serious physical injury to a child.
2. An act or failure to act by a perpetrator, which causes non-accidental serious mental injury to or sexual abuse or exploitation of a child.
3. A recent act, failure to act, or series of acts or failures to act by a perpetrator which creates an imminent risk of serious physical injury to or sexual abuse or exploitation of a child.
4. Serious physical neglect by a perpetrator constituting prolonged or repeated lack of supervision or the failure to provide the essentials of life, including adequate medical care, which endangers a child's life or development or impairs the child's functioning.
5. A child will not be deemed to be physically or mentally abused based on injuries that result solely from environmental factors that are beyond the control of the parent or person responsible for the child's welfare, such as inadequate housing, furnishings, income, clothing and medical care.
6. If, upon investigation, the county agency determines that a child has not been provided needed medical or surgical care because of seriously held religious beliefs of the child's parents, guardian, or person responsible for the child's welfare, which beliefs are consistent with those of a bona fide religion,

the child will not be deemed to be physically or mentally abused. The county agency shall closely monitor the child and shall seek court-ordered medical intervention when the lack of medical or surgical care threatens the child's life or long-term health. In cases involving religious circumstances, all correspondence with a subject of the report and the records of the Department and the county agency may not reference "child abuse" and shall acknowledge the religious basis for the child's condition, and the family shall be referred for general protective services, under Subchapter C of the Child Protective Services Law (relating to general protective services), if appropriate.

SCREENING AND SELECTION OF STAFF AND VOLUNTEERS:

Screening Standards:

At CUMC, all applicants for employment and/or volunteer service in which that employee or volunteer shall have contact with children in a manner which, under Pennsylvania law currently in force and as enacted and amended in the future from time to time, requires the person to obtain background clearances shall complete the following prior to start of service:

1. A written application that includes references from 2 non-related persons whom the applicant has known for at least 3 years. These persons will be contacted
2. .Disclosure form that the applicant has been informed of and will comply with Pennsylvania law that requires them to inform CUMC in writing of any arrest, conviction or child abuse report that would prohibit them from working with children (23 Pa. C.S. 6344.3(g)(1)).
3. Background Checks:
    - All background checks (PA criminal record background, Child Line check, and FBI clearance) required by the laws of the Commonwealth of Pennsylvania currently in force and as enacted and amended from time to time which can be found at the time of this writing at https://www.dhs.pa.gov/KeepKidsSafe/Clearances/Pages/default.aspx will be conducted for all employees and volunteers.
    - The current law at the time of this writing requires that clearances must be resubmitted a minimum of 60 months (5 years) from the date of the first clearance.
    - In the case of FBI clearances, for volunteers only, an affidavit can be submitted if the person has been a resident of Pennsylvania for at least 10 consecutive years.
    - Every 5 years, clearances will be conducted for all employees and volunteers.
    - CUMC commits to absorb the cost associated with screenings and clearances, if necessary. Please contact Pastor Tawny Bernhardt for

current procedures (by phone at 215-855-1643 or by email at tawny.bernhardt@cumclansdale.org).

4. Relationship with CUMC: All prospective volunteer workers with children shall have an active relationship with CUMC for at least 6 months before being allowed to be in a supervisory role in activities for children. Alternatively, prospective volunteers will have had 24 months of good standing at their previous church (documented in a letter from the pastor of the previous church).
5. Records: All written records shall be confidential and shall be kept in a secure location with access restricted on a need-to-know basis, to the Pastor, Staff-Parish Relations Committee chair, and/or ministry leader. All files, including clearances, reference checks, training records, attendance, letters of recommendation from prior church, etc) shall be maintained for thirty (30) years after ministry ends with the individuals. Files can be digitized and kept in a permanent online secure environment.

TRAINING

All persons who have direct contact with children shall participate in training as required under the laws of the Commonwealth of Pennsylvania currently in force and as enacted and amended in the future from time to time. At the time of this writing, these laws are located at https://www.dhs.pa.gov/KeepKidsSafe/Pages/Trainings.aspx.

Initial Safe Sanctuaries training for anyone new to working with children or youth shall occur before the person begins working with children or youth. Every year, CUMC will provide some type of review training.
Persons working as ministry leads are to be fully trained and fully cleared before working with any children or youth. Assistants who are not ever placed in charge of the ministry may be in the process of training but must have all clearances before working with children and youth. Training must be completed within the first month of working with children and youth for any assistant.

SUPERVISION

Supervision procedures are designed to reduce the possibility of abuse or exploitation of children, and to protect employees and volunteers from unfounded accusations.

Supervision Standards:
Programs and ministries at CUMC that are licensed or accredited by a licensing or accreditation body or that have formally adopted supervision procedures, and that receive preapproval from the Conference Board of Trustees shall follow their established requirements for the supervision children.

All other programs and ministries of CUMC shall use the following standards for the supervision of children.

1. The 2-adult rule: Regardless of the group size, there will always be at least 2 adults present. This may include an adult ”roamer“ who moves in and out of rooms or ministry activities. These adults may not be related to one another.
2. At no time will any Safe Sanctuary–approved workers be permitted to be alone with a child or youth in an isolated situation (unless there is express written permission on file at CUMC from the child's/youth's legal parent or guardian stating otherwise for specific situations or programs).
3. No child will be left unsupervised while participating in a ministry activity/event.
4. All ministry activities should occur in an open view. Each room or space where ministry activities/events occur must be open to public view. For example, enclosed spaces such as classrooms shall have a viewing window, a glass panel in the door, a half-door configuration or an open door.
5. Anyone supervising children or youth must be aged 18 years or older *and* must be at least 5 years older than the children or youth being supervised.
6. events involving transportation shall require a written consent form signed by the parent or guardian of each participating child.
7. The ministry lead shall maintain completed registration forms that list allergies, medical issues, medications, permission to use photos, and any other relevant information pertaining to each child.

Online Standards:
The current policies and procedures as outlined here are relevant for any physical-distancing requirements or virtual ministry activities or events. We also recognize the need for best practices and how to apply our current policies in the virtual environment. During times Ministry of swift change that are unprecedented it can be easy to forget standing policies and procedures when working with children and youth. During times like these, it is even more important to be diligent and follow all of the screening policies, as they may be overlooked when someone offers help in virtual space.

Unfortunately, those who seek to abuse use times of confusion and change to their advantage. The following guidelines are not meant to prevent virtual ministry from happening but to ensure ministry occurs in safe ways in the virtual world.

1. Follow the 2-adult rule so that there is NEVER one-on-one contact. At no time should one adult be holding any one-on-one conversations with any child or youth without other adults being aware of the conversations. In addition, online meetings must begin with 2 adults, not from the same family, and then allow youth to join.
2. Follow all selection, screening, and training policies. In the virtual world and space, new volunteers who are untrained and lack clearances may not lead discussions.

Any online discussion should be considered no different than a face-to-face meeting. Volunteers must be screened and trained before taking on leadership roles.

3. Use “ministry-based” online platform accounts instead of personal accounts. CUMC owns an online account with access by several church leaders and/or staff members so there is accountability for meetings. If personal accounts must be used, pastoral staff must be notified.
4. Communicate with parents and youth about meetings including times and links to access the meeting. All participants and parents/guardians must know what is going on. Parents and guardians should be aware of the topic and purpose of the meetings.
5. If children do not have written permissions for picture/video sharing, do not share pictures/videos of virtual meetings. This includes tagging youth members in the virtual environment. If they do not have permission on file, do not post and tag them.

Parental Guidelines:
When children or youth are not participating in, or are released from, church-sponsored events, parents are responsible for knowing where their children are, whom they are with, and what they are doing at all times. All parents of children in sixth grade and under must complete a Christ’s Kids Arrival and Dismissal Policy form (see **Appendix I**). This form includes the names of other adults who can pick up a child second grade or younger from ministry activities, if the parents or guardians are not available.

Transportation:
Ministry events involving transportation shall require a written consent form signed by the parent or guardian of the child.

Drivers must have a valid driver’s license in order to drive on a church-sponsored activity. In addition, volunteers must have auto insurance coverage on the vehicle being used.

Drivers are responsible for ensuring that all children/youth wear seatbelts when being transported to and from activities. Each driver may transport no more passengers than the number of working seatbelts in the vehicle.. Buses not equipped with seatbelts are exempt from this rule. Children under 13 years old shall not sit in the front seat of vehicles with airbags. Child safety seat laws will be followed when traveling in a motor vehicle. Children/youth may not travel alone in a vehicle with only 1 adult unless it is their parent. When multiple vehicles are used for an event, a single worker may drive if all the vehicles travel together. Every effort should be made for all vehicles traveling together in this circumstance to stay within sight of one another. If possible, there should be a cell phone or some other way to communicate between vehicles.

REPORTING

Reporting of any allegation of child abuse shall be done in accordance with the laws of the Commonwealth of Pennsylvania currently in force and as enacted and amended in the future from time to time.

All volunteers and staff working with our children and youth are mandated reporters. They have a legal responsibility under the law to make a report directly to public child welfare officials any time they have reasonable cause to suspect abuse has occurred. Failure to comply with this requirement can lead to civil and/or criminal penalties for the employee or volunteer.

1. Reasonable cause to suspect abuse can occur:
   A. When any worker personally witnesses an incident or evidence of abuse;
   B. When an allegation of an event of abuse is made to a worker by a third party; and/or
   C. When a child or youth discloses abuse to a worker which meets the criteria of the above Pennsylvania law.
2. The Mandated Reporter observing the behavior or receiving the allegation/disclosure must immediately file the report with the Pennsylvania Child Abuse Hotline (24/7 service) at 1-800-932-0313. *A Mandated Reporter who fails to report or delays reporting may be charged with a misdemeanor or a felony, depending on whether the non-reporting is willful and how serious the abuse is.* Within 48 hours, the person filing the report must also complete a Report of Suspected Child Abuse (Form CY-47).
3. The Pastor and District Superintendent shall be notified if the alleged perpetrator is a staff person or volunteer of the church. If the alleged perpetrator is the Pastor, the Chair of SPRC should be notified immediately and will notify the District Superintendent.
4. In the event of an imminent threat, any worker with knowledge of or information about such abuse shall *immediately* contact 911 *and* another adult in order to remove the abused person to a safe place. Safety is the church's primary concern. In connection herewith, any needed emergency healthcare shall be provided, such as first aid, emergency services and/or transportation to a hospital emergency room. Should it be necessary to remove a person or persons from any activity, care should be taken to handle this in a discreet manner, with utmost respect to both parties, recognizing that an investigation is still being conducted.
5. Confidentiality is essential in this process. Releasing the identity of the worker making the report is *prohibited*. This applies to law enforcement, the child welfare workers, and the church. The worker making the report has immunity from civil and criminal liability. It is presumed that the report has been made in good faith. All workers are to refrain from speaking with or otherwise communicating to any form of media. Should it be deemed necessary, a

church representative along with the Eastern PA Conference of the United Methodist Church spokesperson will communicate to the media regarding any alleged accusation or abuse as defined in this policy.

In the event that a member of the clergy becomes aware of suspected child abuse as a result of confidential communication which is protected under 42 PA C.S. 5943 (relating to confidential communications to clergy), the conference legal counsel should immediately be consulted.

PASTORAL RESPONSES FOR REPORTS OF ALLEGATIONS OF ABUSE:

Any allegation of abuse requires a process to address responding to the victim, the alleged perpetrator, and the media. The response must be quick, compassionate, and unified. All allegations will be taken seriously.

Pastoral response is NOT an investigation of the alleged abuse. The investigation is the responsibility of public officials (child welfare and/or law enforcement). In all cases of reported abuse, there shall be cooperation with all official investigating agencies.

Response to Victims of Abuse:
In the instance of any allegation of abuse, the pastor shall reach out to the victim and the victim's family. Pastoral resources shall be offered, and the conference I-Care Team can be contacted to assist in providing this service. The care and safety of the victim is the first priority. Response to the victim and the victim's family shall be done in a positive and supportive manner.

The parents/guardians of the victim shall be notified, and the safety and well-being of the child shall be maintained until the parent(s)/guardian(s) arrive. However, if one or both of the parents is the alleged abuser, child welfare authorities should be consulted for direction concerning notification of others.

Response to All Alleged Perpetrators of Abuse:
The alleged perpetrator shall immediately, yet with dignity and respect for their sacred worth, be removed from further involvement with children and advised that there has been an allegation of abuse. Details of the allegations of the abuse shall not be discussed with the alleged perpetrator at the time of removal. Any removal of a staff member or volunteer from any activity/ministry should be handled with utmost discretion.

When an allegation of child abuse has been made against a member of the church staff or a volunteer, the staff member or volunteer shall be required to refrain from all ministry activities/events with children until the incident has been fully resolved by the appropriate state authorities and/or in accordance with the Book of Discipline. At that time, a meeting shall be held with the employee or volunteer to discuss the incident(s)

that led to the report being made. Even if the public agency determines the report to be unfounded, the church has the right to prohibit the volunteer or employee from resuming working in ministries with children based on the facts and circumstances available at that time.

In the instance of an allegation of abuse, pastoral resources shall be extended to the alleged perpetrator and the perpetrator's family. The conference I-Care Team can be contacted to assist in providing this service. Response to the alleged perpetrator and the family shall be done in a supportive way.

Response to the Media:
A consultation among the presiding bishop, the district superintendent, the conference director of communications, and pastor shall decide on a single spokesperson for contact with the public and/or media. All media requests for statements shall be directed to that spokesperson.

BUILDING USE AGREEMENTS

Any external group that enters into a building use agreement with CUMC and works with anyone under the age of 18 must:

1. Follow this Safe Sanctuary policy and complete all applications, training and background checks before being permitted to use the building, and comply with the policy during their use of the building .

or

2. Provide a safe sanctuary policy of the group that meets the minimum requirements of this policy and is approved by the UMC Board of Trustees and pastoral staff.

With either option the building use agreement shall identify which of the above options is chosen.

WORKER DISQUALIFICATION

Any person who has been convicted, or is currently under investigation of child abuse, will automatically be disqualified as a worker in CUMC activities. At the discretion of the designated church leader in charge, certain other offenses may disqualify a worker from participating in, providing leadership for, or supervising of any activities or programs with children or youth. (See **Appendix II** for a list of offenses until Pennsylvania Title 18.)

Moreover, if an applicant (worker or employee) has been named as the perpetrator in a founded child abuse report within the previous 5 years, they will not be permitted to serve as a volunteer or be hired as an employee.

APPENDIX I

Christ's Kids Arrival & Dismissal Policy
for all Children's Ministry Events Involving Children 6th Grade and Younger

All children must be escorted to their classroom by a parent or other responsible adult and dropped off with a teacher or assistant teacher. No child should be left in a classroom without an adult present. No child should arrive more than 5 minutes before a scheduled ministry activity.

Additionally, children will not be released to anyone other than a parent or approved person at the conclusion of each program.

You may write down the names of those adults who may pick up your child from ministry activities on the registration form. Teenagers (under 18) are permitted to pick up their siblings if they are included on the approved list and are the responsible driver for the child/ren. It is the responsibility of the parent/guardian to keep this list up to date. If other arrangements for pick up are necessary, the drop-off person must give written permission to the teacher, signed and dated by a parent/guardian.

If a child is not picked up, the child's teacher or a staff member can walk the child to their parent or guardian in the building. However, in consideration of our volunteer leaders, please be sure to collect your children promptly. Thank you for your consideration of our very generous volunteer leaders!

If all parents and guardians are serving during pick up time, written permission can be granted to children in third grade and above to meet their parents where they are serving. Please contact Pastor Tawny with any questions about this.

APPENDIX II

Worker Disqualification

If CUMC becomes concerned that anyone may pose an unreasonable risk of harm to others, then the designated church leader may deny, suspend, or terminate the involvement in any church activities/ministries of the person posing the unreasonable risk.

The following list (though not exhaustive) illustrates conduct which poses such an unreasonable risk that persons who have engaged therein may be disqualified from participating in church activities/ministries:

List of Offenses
This list of offenses rules out a person from working with children.

- Named in the central register as the perpetrator of a founded report of child abuse committed within the previous five (5) years.
- Been convicted of a felony offense under the Controlled Substance, Drug, Device and Cosmetic Act (P.L. 233, No. 64), committed within the previous five (5) years.
- Been convicted of one or more of the following offenses under Title 18 (related to crimes and offenses) or an equivalent crime under Federal law or the law of another state:

Chapter 25	Relating to criminal homicide
Section 2702	Relating to aggravated assault
Section 2709	Relating to harassment and stalking
Section 2901	Relating to kidnapping
Section 2902	Relating to unlawful restraint
Section 3121	Relating to rape
Section 3122.1	Relating to statutory sexual assault
Section 3123	Relating to involuntary deviate sexual intercourse
Section 3124.1	Relating to sexual assault
Section 3125	Relating to sexual aggravated indecent assault
Section 3126	Relating to indecent assault
Section 3127	Relating to indecent exposure
Section 4302	Relating to incest
Section 4303	Relating to concealing death of a child
Section 4304	Relating to endangering welfare of children
Section 4305	Relating to dealing in infant children
Section 5902(b)	Relating to prostitution and related offenses
Section 5903(c) or (d)	Relating to obscene and other sexual materials and performances
Section 6301	Relating to corruption of minors
Section 6312	Relating to sexual abuse of children

- The attempt, solicitation, or conspiracy to commit any of the offenses listed above

All charges for these crimes or charges or convictions for any other crimes **not listed** above will be reviewed by the designated church leader(s).

Christ UMC, Lansdale
Safe Sanctuaries
Vulnerable Adults and Older Adults Policy

Because the tragedy of abuse of Vulnerable Adults is a realty in our world, and because we recognize the spiritual imperative to provide a safe and protect environment, Christ UMC has developed this Vulnerable Adults and Older Adults Policy to realize our commitment to the safety and spiritual growth of Vulnerable and Older Adults in our activities.

The church, at all levels of its organization, is entrusted with the responsibility of providing an emotionally and physically safe, spiritually grounded, healthy environment for activities of Vulnerable and Older Adults, in which they are protected from abuse.

This policy includes two parts: one part specifically regards ministry with vulnerable adults and the second part specifically regards ministry with older adults.

Abuse means the willful infliction of physical pain or injury or mental anguish, unreasonable confinement, or the willful deprivation of services which are necessary to maintain a person's mental and physical health.

Exploitation means the act or process of illegally or improperly using a person or his resources for another person's profit or advantage.

Neglect means an act or failure to act which results in the inadequate provision of care or services necessary to maintain the physical and mental health of the Vulnerable Adult, and which places the Vulnerable Adult in a situation which can result in serious injury, or which is life-threatening.

Staff Person means any person employed by the Church who is responsible for overseeing organized activities of Vulnerable Adults. Throughout this document "Staff" will be interpreted to mean each staff person.

Volunteer means a person, eighteen (18) years of age or older, who assists in conducting organized activities of Vulnerable Adults.

Vulnerable Adult means a person, eighteen (18) years of age or older who has a physical or mental impairment that substantially limits one or more major life activities. (Adult Protective Services Act of 2010).

Older Adult means anyone 60 years of age or older.

Part 1: Ministry with Vulnerable Adults

Rules for Ministry with Vulnerable Adults

1. This policy – including reporting procedures – is mandatory for all staff and volunteers. Failure to comply with this policy may result in disciplinary action, up to and including termination. Each congregation shall ensure that all staff and volunteers are provided with a copy of this policy.
2. No staff person or volunteer may engage in any form of neglect, abuse, or exploitation of a Vulnerable Adult.
3. Persons leading any group containing Vulnerable Adults must be 18 years of age or older.
4. The two-adult rule – Regardless of the size group, there will always be at least two adults present. This may include the presence of an adult 'roamer' who moves in and out of rooms/ministry activities. These adults are to be non-related.
5. Attendance, including of staff person(s) and volunteers, should be taken at every church function where a Vulnerable Adult is present records of attendance should be retained for 30 years.

Volunteers and Staff Person(s) who work with Vulnerable Adults will undergo appropriate background checks:

- All background checks (PA criminal record background, Child Line check, and FBI clearance) required by the laws of the Commonwealth of Pennsylvania currently in force and as enacted and amended from time to time which can be found at the time of this writing at https://www.dhs.pa.gov/KeepKidsSafe/Clearances/Pages/default.aspx will be conducted for all employees and volunteers.
- The current law at the time of this writing requires that clearances must be resubmitted a minimum of 60 months (5 years) from the date of the first clearance.
- In the case of FBI clearances, for volunteers only, an affidavit can be submitted if the person has been a resident of Pennsylvania for at least 10 consecutive years.
- CUMC commits to absorb the cost associated with screenings and clearances, if necessary. Please contact Pastor Tawny Bernhardt for current procedures (by phone at 215-855-1643 or by email at tawny.bernhardt@cumclansdale.org).

No individual may serve as a volunteer or staff person if such individual has been convicted of an offense that would disqualify them from employment at a facility under the Older Adults Protective Services Act. See Appendix A. Note that this list differs from the list of disqualifying offenses for those who work with children so both lists need to be checked if volunteers and/or staff are working with both groups.

Reporting Procedures

Any staff person or volunteer who suspects incidents of Abuse, Neglect, or Exploitation of a Vulnerable Adult shall report to the Adult Protective Services hotline at 1-800-490-8505 and to the pastor, who shall notify the appropriate district superintendent. If the pastor is suspected to be involved in the abuse, neglect or exploitation, the staff person or volunteer shall report to the Adult Protective Services hotline and report to the SPRC chair, who shall be responsible for notifying the district superintendent.

Response Procedures

Staff or volunteers should not undertake an investigation of the incident themselves. This is the role of Adult Protective Services and various county protective agencies. However, in all cases of reported neglect, abuse, or exploitation of Vulnerable Adults, all staff persons and volunteers shall cooperate with all official investigating agencies.

Response to the Media

In consultation with the presiding bishop, the District Superintendent, the Conference Director of Communications, and pastor shall decide on a single spokesperson for contact with the public/media. All media requests for statements shall be directed to that spokesperson.

Part 2: Ministry with Older Adults

Rules for Ministry with Older Adults

When meetings and groups involve those persons 60 years or older, group leaders and committee chairs should use good practices such as meeting in rooms with open view and clear communication about times and locations of meetings.

When individuals 60 years or older experience abuse, neglect, or exploitation as defined above, we must follow the reporting and response procedures list in Part 1 above.

In those cases where ministry is occurring and there is increased risk of abuse, neglect or exploitation of an individual 60 years or older, the procedures in this policy is helpful to mitigate that risk.