

Inter-Faith Food Shuttle Abuse & Molestation Policies

Policy Prohibiting the Abuse or Mistreatment of Consumers

Inter-Faith Food Shuttle has **zero tolerance** for abuse and will not tolerate the mistreatment or abuse of consumers in its programs. Any mistreatment or abuse by an employee, contractor, or volunteer will result in disciplinary action, up to and including termination of employment, contracting, or volunteer service. Further, Inter-Faith Food Shuttle will fully cooperate with law enforcement and child protective services throughout the investigation and resolution of mistreatment or abuse incidents.

Policy Prohibiting the Abuse or Mistreatment of One Consumer by Another Consumer

Inter-Faith Food Shuttle has **zero tolerance** for abuse, mistreatment, or sexual activity among consumers within Inter-Faith Food Shuttle. Inter-Faith Food Shuttle is committed to providing all consumers with a safe environment and will not tolerate the mistreatment or abuse of one consumer by another consumer. Conduct by consumers that rises to the level of abuse, mistreatment, or sexual activity will result in intervention or disciplinary action, up to and including, dismissal from the program.

In addition, Inter-Faith Food Shuttle will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, Inter-Faith Food Shuttle will take the necessary steps to eliminate such behavior.

Language Defining Abuse

The topic of abuse, neglect and mistreatment of a child can not only be disturbing but can also be confusing. Abuse exists when there is endangerment of a Consumer's physical or mental health due to injury by act or omission. Abuse and neglect include the following:

- (a) **Neglect** includes failure, refusal, or inability on the part of a caregiver, for reasons other than poverty, to provide necessary care, food, water, clothing, medical or dental care or shelter to seriously endanger the physical health of the consumer.
- (b) **Physical Abuse** includes physical injury inflicted on a consumer by other than accidental means. Physical injury includes, but is not limited to, lacerations, fractured bones, burns, internal injuries, severe or frequent bruising, or great bodily harm. Conduct qualifying as Physical Abuse may include, but is not limited to, hitting, spanking, shaking, slapping, unnecessary restraints, pushing, or other forceful physical contact.
- (c) **Verbal Abuse** includes language that is degrading or threatening, and includes verbal interactions such as name calling, insults, cursing, derogatory remarks, belittling, and shaming.
- (d) **Sexual Abuse** includes a wide spectrum of interactions with consumers including rape, certain physical assault, sexual battery, physical sexual contact,

sexually explicit or offensive verbal communication, verbal sexual harassment, voyeurism, sexually oriented conversations, sexual intercourse or sexual touching of a consumer, sexual exploitation, exposing of genitalia, viewing of sexual activity, or permitting, allowing or encouraging a consumer to engage in prostitution.

(e) **Emotional Abuse** includes conduct that reasonably causes harm to a consumer's psychological or intellectual functioning, which is exhibited by emotional damage such as severe anxiety, depression, withdrawal, or aggression. Emotional damage may be demonstrated by substantial and observable changes in behavior, emotional response, or learning, which are incompatible with the consumer's age or stage of development. Emotional Abuse includes the following conduct: shaming, humiliation, and cruelty."

(f) **Consumer** includes a person who receives services or care from the Inter-Faith Food Shuttle or an individual representing the Inter-Faith Food Shuttle. This can include clients or anyone who is under the care, custody, or control of the Inter-Faith Food Shuttle.

Policy Requiring Adherence to Inter-Faith Food Shuttle Policies

Inter-Faith Food Shuttle requires all employees, contractors, and volunteers to sign a statement of acknowledgement and compliance with all organizational policies upon hire and repeated annually.

Acknowledgement of Policies, Code of Conduct, or Standards

All employees, contractors, and volunteers shall confirm that they have read and agree to comply with the organization's abuse prevention policies, Code of Conduct, and consumer protection standards by signing a written acknowledgment upon hire and annually thereafter. Inter-Faith Food Shuttle shall ensure that all employees, contractors, and volunteers have signed a written acknowledgment upon hire and annually thereafter by keeping signed acknowledgement forms in personnel files or in electronic personnel files.

Policy Defining Appropriate and Inappropriate Physical Contact

Inter-Faith Food Shuttle's physical contact policy promotes a positive, nurturing environment while protecting consumers, contractors, employees, and volunteers. Inter-Faith Food Shuttle encourages appropriate physical contact with consumers and prohibits inappropriate displays of physical contact.

Any inappropriate physical contact by employees, contractors, or volunteers towards consumers will result in disciplinary action, up to and including termination.

Inter-Faith Food Shuttle's policies for appropriate and inappropriate physical interactions include but are not limited to:

<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
Contact initiated by the consumer such as: • Side hugs • Shoulder-to-shoulder or “temple” hugs • Pats on the shoulder or back • Handshakes • High-fives and fist bumps • Pats on the head when culturally appropriate • Touching hands, shoulders, and arms • Arms around shoulders • Holding hands (with young children in escorting situations) • Asking for permission before touching or guiding in how to do an activity (such as fastening safety equipment or showing how to swing a golf club)	• Full-frontal hugs • Kisses • Showing affection in isolated areas or while one-on-one • Lap sitting • Wrestling • Piggyback rides • Tickling • Giving gifts or money • Allowing a consumer to cling to an employee’s or volunteer’s leg • Allowing consumers, older than kindergarten, to sit on an employee or volunteer’s lap • Any type of massage given by or to a consumer outside of accepted and documented medical treatment • Any form of affection that is unwanted by the consumer or the employee or volunteer • Touching bottom, chest, or genital areas that is outside authorized and documented personal care assistance

Policy Defining Appropriate and Inappropriate Verbal Interactions

Employees, contractors, and volunteers are prohibited from speaking to consumers in a way that is or could be construed by any observer as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.

Employees, contractors, and volunteers must not initiate sexually oriented conversations with consumers. Employees, contractors, and volunteers are not permitted to discuss their own sexual activities with consumers.

Inter-Faith Food Shuttle’s policies for appropriate and inappropriate verbal interactions include, but are not limited to:

<i>Appropriate Verbal Interactions</i>	<i>Inappropriate Verbal Interactions</i>
• Positive reinforcement • Appropriate jokes • Encouragement • Praise • Strength-based conversations • Self-disclosure as a supervised therapeutic tool by licensed clinicians, medical professionals, and pastoral counseling	• Name-calling • Discussing sexual encounters or showing sexual materials • Involving consumers in the personal problems or issues of employees and volunteers • Flirting • Secrets • Cursing • Off-color or sexual jokes • Shaming, belittling • Oversharing personal history • Derogatory or discriminatory remarks • Harsh language that may frighten, threaten or humiliate consumers • Derogatory remarks about the consumer or their family • Compliments relating to physique or body development

Policy for Managing One-on-One Interactions Between Employees, Volunteers, and Consumers

One-on-one interactions with consumers should only occur during programming under authorized circumstances. The purpose of this policy is to ensure Inter-Faith Food Shuttle clearly communicates expectations for employees and volunteers and gives examples of appropriate behavior when authorized one-on-one interactions occur. In those situations where one-on-one interactions are authorized, employees, contractors, and volunteers should observe the following guidelines to limit the risk of abuse or false allegations of abuse:

- Meet consumers in a public place where you are in full view of others.
- Avoid physical interactions and/or affection during one-on-one interactions at all costs. If physical interactions occur, ensure appropriate physical and verbal interactions align with

Inter-Faith Food Shuttle's established policies and are limited to the task at hand.

Immediately share the nature and extent of physical interactions that occurred during the one-on-one interaction with your supervisor after the interaction has ended.

- If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by.
- Inform other employees, contractors, volunteers, and/or parents/guardians that you are alone with a consumer and encourage them to randomly drop in or pass by the interaction.
- To the extent possible, ensure one-on-one interactions occurring behind closed doors are scheduled in advance, take place in a room with windows or glass in the door, and/or are communicated to your supervisor.
- Ensure one-on-one interactions are documented, especially if behind closed doors. Keep documentation of these meetings (such as in shared calendar, case notes, etc.) and share with your supervisor.
- Document and immediately report any unusual incidents, including physical interactions, disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted or that made you uncomfortable.

Information for Consumers:

- Ensure that all consumers receive age- and cognitive level-appropriate information about boundaries.
- Ensure all consumers know how to report any concerns.
- Ensure all consumers know which staff they can talk to about safety concerns or reports of abuse.
- Ensure all consumers are aware of one-on-one interactions policy and understand appropriate and inappropriate forms of physical and verbal interactions from employees and volunteers.
- Information for Parents or Guardians:
- Provide parents or guardians with a Code of Conduct that includes policies regarding appropriate and inappropriate employee and volunteer interactions with consumers, behavioral expectations for consumers, and ways to report concerns or Code of Conduct violations.

Policy for Managing One-on-One Interactions Between Employees, Volunteers, and Consumers in Virtual Programming

One-on-one interactions with consumers in virtual programming should only occur during programming under authorized circumstances. The purpose of this policy is to ensure the organization clearly communicates expectations for employees, contractors, and volunteers engaging in one-on-one interactions that occur in virtual programming and gives examples of appropriate behavior when authorized one-on-one interactions do occur. In those situations where one-on-one interactions are authorized, employees, contractors, and volunteers should observe the following guidelines to limit the risk of abuse or false allegations of abuse:

- Ensure one-on-one interactions in virtual programming are scheduled in advance and communicated with your supervisor. Links and passwords to virtual sessions should be shared with your supervisor.
- Ensure one-on-one interactions in virtual programming are documented. Keep

documentation of these meetings (such as in shared calendar, case notes, etc.) and share with your supervisor.

- Document and immediately report any unusual incidents, including disclosures of abuse or maltreatment, observations of abusive or neglectful conditions, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted or that made you uncomfortable.
- Invite a parent or supervisor to join the meeting.
- Require supervisory staff to frequently monitor all virtual activities to ensure organizational policies are observed by all employees, volunteers, and consumers.
- Develop a written virtual supervision and monitoring procedure for the supervisory staff.
 - Specify how often virtual supervisory visits must occur (ensure visits occur at various times and do not establish predictable routines);
 - Require routine, unannounced supervisory visits to virtual programs; and
 - Require documentation of virtual supervisory visits.

Information for Consumers:

- Ensure that all consumers receive age- and cognitive level-appropriate information about boundaries.
- Ensure all consumers know how to report any concerns.
- Ensure all consumers know which staff they can talk to about safety concerns or reports of abuse.
- Ensure all consumers are aware of electronic communication and virtual programming policy and understand appropriate and inappropriate forms of communication from employees and volunteers.
- Information for Parents or Guardians:
 - Provide parents or guardians with a Code of Conduct that includes policies regarding appropriate and inappropriate online employee, contractor, and volunteer interactions with consumers, behavioral expectations for consumers in virtual programming, and ways to report concerns or Code of Conduct violations.

Policy for Managing Interactions between Employees, Contractors, Volunteers, and Consumers Outside Inter-Faith Food Shuttle

Research shows many cases of organizational abuse occur off-site and outside regularly scheduled activities. Allowing contact outside of regularly scheduled activities may put employees, volunteers, consumers, and Inter-Faith Food Shuttle at increased risk. This document offers various options for managing the risk of abuse and false accusations arising from contact outside Inter-Faith Food Shuttle's regularly scheduled programming.

Examples of contact outside of regularly scheduled program activities:

- Babysitting arrangements
- Tutoring
- Private lessons/coaching
- Mentorship
- Social interactions between employee's or volunteer's children and children served by Inter-Faith Food Shuttle:

- Playdates and birthday parties
- Sleepovers
- Overnight trips and vacations
- Rides to/from organization or extracurricular activities and events
- Attending public events in a shared community (like graduation, sports events, religious ceremonies)
- Continued contact with consumer after a consumer's participation in a program has ended

Outside Contact with Consumers:

Inter-Faith Food Shuttle strongly encourages employees and volunteers to refrain from outside contact with consumers with which they do not have a pre-existing familial or social relationship (i.e., children are friends at school, families attend same religious institution, etc.). However, if interactions with consumers outside of regularly scheduled program activities are unavoidable due to the above factors, Inter-Faith Food Shuttle offers the following guidelines:

- If there is a pre-existing social or familial relationship, ensure proper boundaries are drawn by the employee or volunteer while in organization programming.
 - For example, if Emily Employee is best friends with Consumer Charlie's mom such that Consumer Charlie calls Emily by her first name in social settings, ensure Emily communicates to Consumer Charlie that while in organization programming Consumer Charlie needs to call Emily, Ms. Employee. This helps reinforce the boundary and makes clear that Emily's role as an employee or volunteer is different than her role as Consumer Charlie's mom's best friend and the relationship should reflect that.
 - if Emily has children that are friends with Consumer Charlie, she can give Consumer Charlie a ride if her children are also in the car. Even in that interaction, make sure Consumer Charlie is sitting in the back seat. The same rules apply for trips to McDonald's/the park/etc. that are occurring as part of the preexisting social relationship.
 - to increase transparency, consider texting or emailing an administrator when interactions like transportation and social outings occur.
 - if Emily allows other young consumers to spend the night with her children at her house, ensure administrators are notified to increase transparency and consider keeping the number of consumers at the gathering small (2-3). Ensure that rules prohibiting one-on-one interactions apply in this setting and that consumers are not going into Emily's bedroom or vice versa.
 - if consumers are going to join Emily and her children on a vacation or other trip, make sure the Rule of Three applies so there are no one-on-one interactions. Consider requiring Emily to get some sort of written confirmation from the consumer's parents/guardians that they have allowed their child to go (can be as simple as a text).
- Consider utilizing a preexisting relationship form (i.e., if someone has a familial or social relationship with a consumer or will be hiring them to babysit/housesit/tutor/etc.) have them notify Inter-Faith Food Shuttle ahead of time. This

helps ensure transparency and protects the employee or volunteer from rumors. For example, if Coach Jones has hired Morgan to babysit and someone sees Morgan leaving Coach Jones' house at 10pm on a Friday night, it is much easier for the employee or volunteer and organizational leadership to respond to those concerns if they have been notified that interaction was going to take place. It is not a foolproof system, as abuse can certainly still happen in the situation given, but it adds an extra layer of protection for employees, volunteers, and consumers.

Content Points for Responding to Red Flag Behaviors and Incidents of Abuse

Responding to Suspicious or Inappropriate Behaviors

Creating a safe environment and responding to suspicious or inappropriate behaviors is an organization's first line of defense against abuse. Suspicious or inappropriate behaviors can include policy violations, boundary violations, and red flag behaviors that mimic the way an offender typically interacts with consumers.

Training should include information on how to respond to suspicious or inappropriate behaviors within Inter-Faith Food Shuttle, including:

- Definitions of appropriate and inappropriate boundaries;
- How to recognize red flags and boundary violations;
- High-risk circumstances for boundary violations;
- Steps for how employees and volunteers should respond to boundary violations, suspicious or inappropriate interactions, or policy violations;
- How to prevent false allegations; and
- Recognition of how consumers display trauma, distress, or signs of abuse

Responding to Allegations or Incidents of Abuse

Training should include information on how to respond to allegations or incidents of abuse within Inter-Faith Food Shuttle, including:

- Why reporting suspected abuse or neglect is critical.
- Who is a mandated reporter of suspected abuse and neglect.
- What types of conduct must be reported.
- The responsibilities of a mandated reporter.
- How to respond if a consumer discloses abuse or neglect.
- Concepts of abuse as trauma and how trauma is displayed in consumers.