

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

1.0 PURPOSE

1.1 SONSHINE FELLOWSHIP CHURCH is committed to the safety and well-being of children and vulnerable persons involved in its ministry work. This Child and Vulnerable Person Safeguarding Policy (the “Policy”) was developed to protect children and vulnerable persons from abuse, neglect and other forms of mistreatment in all aspects of SONSHINE FELLOWSHIP CHURCH’S ministry in the United States and overseas¹.

2.0 SCOPE

2.1 This Policy applies to SONSHINE FELLOWSHIP CHURCH and to all other SONSHINE FELLOWSHIP CHURCH Entities² (referred to collectively as “SONSHINE FELLOWSHIP CHURCH”) and to all elders, deacons, church members, directors, employees, missionaries, ministry partners, independent contractors and volunteers of SONSHINE FELLOWSHIP CHURCH.

2.2 This Policy applies to SONSHINE FELLOWSHIP CHURCH Members³ working both in the United States and overseas, including Church Members on assignment with SONSHINE FELLOWSHIP CHURCH Affiliates⁴ or other entities.

2.3 This Policy applies to each SONSHINE FELLOWSHIP CHURCH Affiliate unless a SONSHINE FELLOWSHIP CHURCH Affiliate has its own policy for the safeguarding of children and vulnerable persons and SONSHINE FELLOWSHIP CHURCH has agreed in writing that the SONSHINE FELLOWSHIP CHURCH Affiliate shall be allowed to follow its own policy instead of this Policy.

2.4 All SONSHINE FELLOWSHIP CHURCH Members are expected to understand and comply with all provisions of this Policy.

2.5 SONSHINE FELLOWSHIP CHURCH Members who have an assignment with a SONSHINE FELLOWSHIP CHURCH Affiliate are also expected to be familiar with and to comply with the child and vulnerable persons safeguarding and reporting policies of the SONSHINE FELLOWSHIP CHURCH Affiliate with which they work.

2.6 In some jurisdictions, SONSHINE FELLOWSHIP CHURCH Members may be subject to requirements and standards relating to child abuse and neglect and reporting that are more stringent than this Policy. Where more stringent requirements and standards exist, they will apply in place of the requirements and standards of this Policy.

¹ “overseas” includes any international travel for missionary activities, ministry work or personal travel.

² As used herein, the term “Sonshine Fellowship Church Entity” refers herein to each of the following: Sonshine Fellowship Church, Sonshine Christian Academy, and any ministry under Sonshine Fellowship Church.

³ “Church Member” includes employees who may not attend Sonshine Fellowship Church.

⁴ The term “Sonshine Fellowship Church Affiliate” means any nonprofit organization, missionary, or its equivalent organized and operated under the laws of another country that (a) was formed by Sonshine Fellowship Church, or an (b) autonomous ministry partner.

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

2.7 Appendix A of this Policy contains definitions of various terms used in this Policy.

3.0 EXPECTATIONS

3.1 SONSHINE FELLOWSHIP CHURCH expects all of its Church Members to understand and comply with this Policy. Questions about this Policy and its application in individual cases should be referred to SONSHINE FELLOWSHIP Elders/ Pastors, and/ or board members.

3.2 As will be explained in more detail below, we have identified in this Policy a number of behaviors toward children and other vulnerable persons that are prohibited, including physical abuse, sexual abuse, emotional, verbal and psychological abuse, neglect, criminal conduct, and poor boundaries and grooming. These behaviors are referred to in this Policy as “Prohibited Conduct.” This Policy prohibits Church Members from engaging in any Prohibited Conduct directed towards children.

3.3 This Policy also addresses situations in which SONSHINE FELLOWSHIP CHURCH members or staff dependents, participants in our ministry programs and work, vendors, and others involved in SONSHINE FELLOWSHIP CHURCH’s ministry engage in abuse or neglect of a child or vulnerable person or other Prohibited Conduct. This Policy also requires church member or staff dependents, participants, vendors and others involved in SONSHINE FELLOWSHIP CHURCH’s ministry work to avoid and not engage in Prohibited Conduct.

3.4 This Policy requires that all Church Members comply with the internal reporting procedures described in this Policy when they become aware or suspect that another Church Member has engaged in Prohibited Conduct. The Policy outlines additional internal reporting obligations that apply when a Church Member becomes aware or suspects that a church member or staff dependent, participant, vendor or other person involved in SONSHINE FELLOWSHIP CHURCH’s ministry work has engaged in Prohibited Conduct.

3.5 This Policy requires that Church Members comply with mandatory child and vulnerable person abuse and neglect reporting laws applicable to them when they become aware or suspect that a child or vulnerable person has suffered abuse or neglect.

3.6 Failure to abide by this Policy may result in immediate termination, suspension, reprimand, and/or other corrective action, in SONSHINE FELLOWSHIP CHURCH’s discretion.

4.0 Prohibited Conduct

4.1 All SONSHINE FELLOWSHIP CHURCH Members are prohibited from engaging in activities and behaviors that involve conduct prohibited by this Policy (“Prohibited Conduct”). Section 5.0 below identifies the forms of Prohibited Conduct covered by this Policy.

4.2 While the descriptions of Prohibited Conduct in this Policy refer to SONSHINE FELLOWSHIP CHURCH Members who engage in Prohibited Conduct, they are also intended to apply to

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

circumstances in which the perpetrator is another person involved with the ministry, such as a staff dependent, non-Church Member participant, ministry partner, vendor or other person involved in SONSHINE FELLOWSHIP CHURCH's ministry. Circumstances in which other persons, including a dependent of a SONSHINE FELLOWSHIP CHURCH Member, engage in Prohibited Conduct are addressed further in Section 6.0.

4.3 SONSHINE FELLOWSHIP CHURCH recognizes that, practices such as shared childcare or care of vulnerable persons may be common, and that certain behavior, such as full frontal hugs between parents and their children, and between parents and the children of friends, may be normal and accepted behavior. When reviewing a report of abuse, neglect, or other Prohibited Conduct, SONSHINE FELLOWSHIP CHURCH expects to take into account such circumstances.

5.0 FORMS OF PROHIBITED CONDUCT

5.1 PHYSICAL ABUSE

5.1.1 Except as provided otherwise below, SONSHINE FELLOWSHIP CHURCH Members, including parents, are prohibited from physical abuse of a child or vulnerable person, which includes making physical contact with a child or vulnerable person with the intent to cause pain, or causing the child or vulnerable person to engage in physical behavior intended to cause the child or vulnerable person pain, whether or not physical contact with the child or vulnerable person occurs, and whether or not the child or vulnerable person in fact experiences pain. Physical abuse includes causing bodily injury (which means substantial pain or impairment of physical condition), causing a reasonable likelihood of bodily injury, striking or hitting a child or vulnerable person, kicking, biting, burning, throwing, stabbing or cutting a child or vulnerable person in a manner that endangers a child or vulnerable person, unreasonably restraining or confining a child or vulnerable person, forcefully shaking a child or vulnerable person, interfering with a child's or vulnerable person's breathing, pushing a child or vulnerable person so that the child or vulnerable person falls or is thrown against a wall or object, injuring a child or vulnerable person with a weapon or a sharp or hot object or liquid, or grabbing or jerking the child or vulnerable person. Forcefully shaking, slapping, or otherwise striking a child under one year of age is prohibited. Causing physical neglect of a child or vulnerable person is prohibited (see Section 5.4 below). Acts which are performed for bona fide medical or first aid purposes and according to established standards of care will not normally be considered abuse.

5.1.2 As an exception to subsection 5.1.1, corporal punishment by parents as to their children over one year of age will not be considered physical abuse under this Policy, provided it involves reasonable force and is done for purposes of supervision, control or discipline of their children.

5.1.3 In addition, it shall not be considered physical abuse for SONSHINE FELLOWSHIP CHURCH Members, including parents responsible for a child's welfare, to use reasonable force for or against a child or vulnerable person, when:

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

- A. the use of reasonable force constitutes incidental, minor or reasonable physical contact with the child or vulnerable person or other actions that are designed to maintain order and control; or
- B. the use of reasonable force is necessary (i) to quell a disturbance or remove a child or vulnerable person from the scene of a disturbance that threatens physical injury to persons or damage to property; (ii) to prevent the child or vulnerable person from self-inflicted physical harm; (iii) for self-defense or the defense of another individual; or (iv) to obtain possession of weapons or other dangerous objects or controlled substances or paraphernalia that are on the child or vulnerable person or within the control of the child or vulnerable person.

5.1.4 If SONSHINE FELLOWSHIP CHURCH Members, including parents, live in a jurisdiction where they are subject to a more stringent legal requirement or standard relating to physical treatment of children or vulnerable persons, the more stringent requirement or standard will apply in place of the requirements and standards of this Policy.

5.2 SEXUAL ABUSE

5.2.1 SONSHINE FELLOWSHIP CHURCH Members are prohibited from engaging in sexual abuse of a child or vulnerable person. Sexual abuse includes sexual conduct or an advance, or other oral, written, visual, or physical activity of a sexual nature, directed toward a child or vulnerable person. Sexual abuse may include, but is not limited to:

- Engaging in sexual activity or communications with a child or vulnerable person;
- Engaging in sexually explicit language with a child or vulnerable person;
- Engaging in language with a child that comments upon the child's or vulnerable person's sexuality or sexual characteristics in a degrading or humiliating way;
- Engaging in a romantic, dating, or sexual relationship with a child or vulnerable person;
- Touching a child's or vulnerable person's genitals or the clothing over them;
- Touching or speaking to a child or vulnerable person in any way that provides sexual gratification to the perpetrator or that is intended to arouse the child or vulnerable person;
- Showing a child or vulnerable person photos or other images containing sexually explicit or nude images;
- Sending a child or vulnerable person messages or notes containing language or images of a sexual nature;

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

- Voyeurism;
- Taking or creating a pornographic photograph or image of a child or vulnerable person, or encouraging a child or vulnerable person to expose himself or herself or to make and/or send photos of himself with genitalia or other sensitive areas exposed;
- Indecent exposure or engaging in sexual gestures or acts in the presence of a child or vulnerable person;
- Engaging in relationships or activities with a child or vulnerable person that constitutes prostitution or sex trafficking, including paying a child or vulnerable person for sexual acts, or arranging for another person to engage in sexual activity with a child or vulnerable person, whether for compensation or not; and
- Engaging in any other behavior towards or in the presence of a child or vulnerable person that involves sexual meaning, language or references, that is otherwise inappropriate, including sexual jokes or references to the Church Member's or another person's sex life.

5.2.2 Acts that are part of normal caretaker responsibilities (such as dressing a younger child or vulnerable person who is unable to do this himself or herself), and acts performed for bona fide medical or first aid purposes and according to established standards of care, will not normally be considered misconduct.

5.2.3 SONSHINE FELLOWSHIP CHURCH prohibits any romantic or sexual relationship between a SONSHINE FELLOWSHIP CHURCH Member and a person 18 years of age or older, if that relationship began before the victim was 18 years of age.

5.2.4 Where a SONSHINE FELLOWSHIP CHURCH Member uses his or her position of power and authority as a SONSHINE FELLOWSHIP CHURCH Member in order to engage in any of the sexual activity described above with a person, such behavior is also considered a violation of this Policy.

5.3 EMOTIONAL, VERBAL OR PSYCHOLOGICAL ABUSE

5.3.1 SONSHINE FELLOWSHIP CHURCH Members are prohibited from engaging in emotional, verbal or psychological abuse of a child or vulnerable person. This includes behavior that is degrading or harassing of a child or vulnerable person or that otherwise constitutes behavior intended to cause a child or vulnerable person to feel demeaned, neglected, or unwanted, or that causes serious mental injury, including injury or impairment to the child's or vulnerable person's psychological or social capacity, functioning, or development. This type of abuse can involve verbal abuse, which is a pattern of using cruel, threatening, or excessively harsh language toward a child or vulnerable person. It can also include intentionally ignoring a child or vulnerable person, excluding a child or vulnerable person, or otherwise neglecting a child or vulnerable person to communicate to the child or vulnerable person that the child or vulnerable person is not wanted or "worth nothing."

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

5.3.2 Giving a child or vulnerable person firm and measured instruction or direction that is developmentally-appropriate and age-appropriate, and proportionate and otherwise reasonable non-physical punishment (such as imposing a “time out” of a reasonable duration and reasonable place of confinement), in instances when a child or vulnerable person has acted out or disobeyed, are excluded from the definition of emotional, verbal or psychological abuse.

5.3.3 If SONSHINE FELLOWSHIP CHURCH Members, including parents, live in a jurisdiction where they are subject to a more stringent legal requirement or standard relating to emotional/verbal/psychological treatment of children or vulnerable persons, the more stringent requirement or standard will apply in place of the requirements and standards of this Policy.

5.4 NEGLECT

SONSHINE FELLOWSHIP CHURCH Members are prohibited from engaging in neglect of a child or vulnerable person. Neglect includes denying a child or vulnerable person under their care basic needs and support, such as adequate food, clothing, shelter, medical care, or supervision in a manner that threatens the safety, health, or well-being of the child or vulnerable person. Circumstances of poverty, natural disasters, or family or community emergencies are ordinarily not the same as neglect.

5.5 CRIMINAL CONDUCT

5.5.1 Some forms of Prohibited Conduct may constitute a criminal offense against a child or vulnerable person, including sexual assault on a child or vulnerable person, exploitation, creation, possession or distribution of child pornography, or molestation, or other behavior against or involving a child or vulnerable person that constitutes a criminal violation in Maryland or the jurisdiction where the behavior occurred. As used in this Policy, the term “Prohibited Conduct” includes criminal offenses against a child or vulnerable person, although certain types of Prohibited Conduct may not be a criminal offense.

5.5.2 When a SONSHINE FELLOWSHIP CHURCH Member is charged with a criminal offense, or becomes the subject of a criminal investigation that concerns or includes an allegation of a criminal offense against a child or vulnerable person, or learns that another SONSHINE FELLOWSHIP CHURCH Member is the subject of such a charge or investigation, the Church Member shall report the matter immediately according to the internal reporting procedure in Section 7.0 below.

5.6 Poor boundaries and “grooming”⁵

SONSHINE FELLOWSHIP CHURCH Members are expected to maintain proper boundaries with children or vulnerable persons, and to avoid grooming behaviors. In some instances, adults may

⁵ This Section is not intended to apply to interactions between parents, guardians and other immediate family members who act as parents and their children in the course of ordinary care and upbringing of the children.

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

engage in physical touch or language with a child or vulnerable person that may not constitute sexual abuse, but that is nonetheless too familiar, crossing the lines of proper behavior for an adult Church Member, or that could cause misunderstanding or discomfort in the child or vulnerable person. Also, while not explicitly sexual in nature, certain behaviors are sometimes used by perpetrators with the intent of developing a relationship with a child or vulnerable person, and eventually engaging in sexual contact with a child or vulnerable person, and therefore constitute grooming. It is important that SONSHINE FELLOWSHIP CHURCH Members be aware of boundaries issues, and also signs of grooming, and report any behavior with or concerning a child or vulnerable person by another Church Member that they feel is inappropriate or suspicious. Grooming behaviors may include:

- Frequent or excessive hugging with children or vulnerable persons, especially “full frontal” hugs. However, some hugging with children or vulnerable persons, especially young children, can be appropriate. SONSHINE FELLOWSHIP CHURCH Members are encouraged, if a child or vulnerable person initiates a hug, to give the child or vulnerable person a side hug or one-armed hug. (Full frontal hugs with one’s own child is normal and is not prohibited.) SONSHINE FELLOWSHIP CHURCH Members should not initiate frequent hugs with children who are not their own, and should never hug a child or vulnerable person that does not wish to be hugged;
- Giving a child or vulnerable person backrubs or massages;
- Giving a child or vulnerable person excessive attention or privileges;
- Having a child or vulnerable person sit in one’s lap or between one’s legs;
- Meeting with a child or vulnerable person one-on-one in a secluded location or in a room with the door closed, or allowing one or more children or vulnerable persons to visit, sleep over, or stay at the Church Member’s home outside of a planned ministry activity with involvement of parents or other Church Members;
- Giving a child or vulnerable person gifts, meals, money, or other benefits, outside established intra-family and ministry gift-giving activities, and without the awareness of the child’s parent or vulnerable person’s guardian; and
- Transporting a child or vulnerable person without another adult present. Exceptions may be made in emergencies, such as where a child or vulnerable person has become sick and needs to be transported, and in these cases, SONSHINE FELLOWSHIP CHURCH Members should obtain consent from the parent or guardian of the child or vulnerable person, and alert a supervisor, before transporting a child or vulnerable person alone.

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

6.0 PROHIBITED CONDUCT BY DEPENDENTS, PARTICIPANTS SERVED BY THE MINISTRY, AND OTHERS

6.1 On occasion, there may be instances when a dependent of a SONSHINE FELLOWSHIP CHURCH Member or a non-Church Member participant in one of SONSHINE FELLOWSHIP CHURCH's programs engages in behavior that constitutes Prohibited Conduct as described above. The dependent may be an adult family member or child of a SONSHINE FELLOWSHIP CHURCH Member, who lives with the Church Member on a short-term or continuing basis. The participant may be an adult or a child served by SONSHINE FELLOWSHIP CHURCH's ministry. On rare occasions, another person, such as an employee of a vendor, or a member of the public who has access to SONSHINE FELLOWSHIP CHURCH's ministry activities, might engage in Prohibited Conduct.

6.2 SONSHINE FELLOWSHIP CHURCH prohibits SONSHINE FELLOWSHIP CHURCH members and staff dependents, participants, ministry partners, vendors, and others involved with SONSHINE FELLOWSHIP CHURCH's ministry from engaging in Prohibited Conduct. Dependents, participants and others may report Prohibited Conduct under Section 7.0.

6.3 SONSHINE FELLOWSHIP CHURCH Members are expected to be vigilant concerning possible violations of this Policy. SONSHINE FELLOWSHIP CHURCH Members who become aware of Prohibited Conduct committed by SONSHINE FELLOWSHIP CHURCH member and staff dependents or by others participating in or having access to our ministry activities shall report immediately according to the reporting procedure in Section 7.0 below. Church Members may also have mandatory abuse reporting obligations as described under Section 8.0.

6.4 When receiving and handling a report concerning a perpetrator who is a minor, including a dependent or participant child, SONSHINE FELLOWSHIP CHURCH may take into consideration, among other things, the ages, physical and emotional maturity, and mental capacity of the children involved, whether the behavior was consensual and involved age-appropriate sexual curiosity or experimentation (but no harmful or abusive behavior), and whether the alleged perpetrator was in a position of authority over the other child or responsible for the other child's welfare. In general, age-appropriate and non-harmful consensual sexual activity between two dependents or participants of the same age (where the age difference is two years or less) is not considered Prohibited Conduct nor is it reportable under this Policy, unless it constitutes a criminal offense in Maryland or the place where the activity occurred. However, any sexual interaction outside of marriage is prohibited and will be grounds for biblical church discipline. If one dependent is also a Church Member who has used his or her position as leverage or to exert power or influence in a sexual relationship or activity, or one child (not the initiator) is significantly less mature or is developmentally disabled, the matter is Prohibited Conduct and reportable.

6.5 In instances where a dependent child is the perpetrator, SONSHINE FELLOWSHIP CHURCH, at its discretion, may take action including, but not limited to: restricting the child's or family's

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

contact with the ministry, requiring counseling for the child (and possibly the family), and/or removal or suspension of the child (and possibly the family) from the church. In some circumstances, SONSHINE FELLOWSHIP CHURCH may ban the child, and possibly the family, from SONSHINE FELLOWSHIP CHURCH positions and volunteer work, property and events.

6.6 Several examples of Prohibited Conduct committed by dependents and others are attached at [Appendix B](#).

7.0 INTERNAL REPORTING TO SONSHINE FELLOWSHIP CHURCH

7.1 A SONSHINE FELLOWSHIP CHURCH Member shall immediately make a report to SONSHINE FELLOWSHIP CHURCH according to this Policy if he or she observes or has reason to believe that a SONSHINE FELLOWSHIP CHURCH Member (i) has engaged, or is engaging, in Prohibited Conduct (as defined below), whether in the United States or overseas; or (ii) has failed to make an internal report under this Policy when required. SONSHINE FELLOWSHIP CHURCH Members are expected to self-report their own Prohibited Conduct and failure to report under this Policy.

7.2 In addition, a SONSHINE FELLOWSHIP CHURCH Member shall immediately make a report to SONSHINE FELLOWSHIP CHURCH according to this Policy if the Church Member becomes aware or suspects that a dependent of a SONSHINE FELLOWSHIP CHURCH Member has engaged in Prohibited Conduct.

7.3 A SONSHINE FELLOWSHIP CHURCH Member shall immediately make a report to SONSHINE FELLOWSHIP CHURCH according to this Policy if the Church Member becomes aware or suspects that an adult participating in a SONSHINE FELLOWSHIP CHURCH ministry program of a SONSHINE FELLOWSHIP CHURCH entity or a SONSHINE FELLOWSHIP CHURCH Affiliate has engaged in Prohibited Conduct. In the case of an adult involved in ministry activities of a SONSHINE FELLOWSHIP CHURCH Affiliate, the Church Member shall also make a report according to the child safeguarding policy of the ministry program in which the child participates.

7.4 A SONSHINE FELLOWSHIP CHURCH Member who becomes aware or suspects that a child or vulnerable person served by a ministry program of a SONSHINE FELLOWSHIP CHURCH entity or a SONSHINE FELLOWSHIP CHURCH Affiliate has been subject to or engaged in Prohibited Conduct, in circumstances not covered by 7.1, 7.2 or 7.3, shall make a report under this Policy, and, in the case of a child involved with a SONSHINE FELLOWSHIP CHURCH Affiliate, shall also make a report according to the child safeguarding policy of the ministry program in which the child participates.

7.5 A SONSHINE FELLOWSHIP CHURCH Member who, in the course of performing his or her position with a SONSHINE FELLOWSHIP CHURCH ministry (including while on assignment to another organization), has reason to believe that any other child or vulnerable person has been subject to Prohibited Conduct, shall make a report under this Policy and, if applicable, under the policy of the program in which the child or vulnerable person participates.

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

7.6 Reporting of abuse or other Prohibited Conduct must be accomplished immediately and without delay. To make a report under this Policy, the SONSHINE FELLOWSHIP CHURCH Member shall notify SONSHINE FELLOWSHIP CHURCH's elders, deacon, and/ or board members.

7.7 Any SONSHINE FELLOWSHIP CHURCH Member who becomes aware of Prohibited Conduct or failure to report by another should not attempt to investigate or verify the alleged violation before making a report to the elders, deacon, and/ or board members. The report can be made orally or in writing. The report should be as detailed as possible in the circumstances.

7.8 Participants in SONSHINE FELLOWSHIP CHURCH and Affiliate activities, including members, employees, ministry partners, independent contractors, dependents, child participants, parents of a child participant, and other adults participating or involved in SONSHINE FELLOWSHIP CHURCH ministries, are requested to make a report under this Section if they become aware or suspect that a SONSHINE FELLOWSHIP CHURCH Member, dependent, or participant has engaged in Prohibited Conduct, or that a dependent or child participant has been subject to Prohibited Conduct.

8.0 REPORTING UNDER CHILD AND VULNERABLE PERSON ABUSE AND NEGLECT REPORTING LAWS

8.1 APPLICABLE LAW

All states in the United States have child abuse and neglect reporting laws and most have vulnerable persons abuse and neglect reporting laws. SONSHINE FELLOWSHIP CHURCH Members working in the United States may be mandatory reporters under the reporting laws of the state where they work. Mandatory reporters typically have a legal duty to report child and vulnerable persons abuse and neglect independent of and in addition to any obligations under this Policy. Also, some foreign countries have child and vulnerable persons abuse reporting laws.

8.2 MANDATORY REPORTERS

8.2.1 SONSHINE FELLOWSHIP CHURCH Members who are mandatory reporters are responsible for making reports under applicable law. Failure to make a required report can result in criminal penalties and in some states in the United States can result in civil liability for damages caused by the failure to report. SONSHINE FELLOWSHIP CHURCH seeks to support and assist SONSHINE FELLOWSHIP CHURCH Members with making reports under applicable law, but the responsibility for making the report ultimately rests with the Church Member if the Church Member is a mandatory reporter. SONSHINE FELLOWSHIP CHURCH Members who have questions or need help in determining whether they are mandatory reporters or about whether they should make a report under a mandatory reporting law should contact the elders/ pastors, or if they are unavailable, the deacons or board members, immediately.

8.2.2 Child and vulnerable persons abuse reporting laws often require mandatory reporters to make their reports within very short timeframes (e.g., within 48-72 hours). It is therefore critical

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

that persons who obtain, become aware of or suspect Prohibited Conduct act quickly to alert SONSHINE FELLOWSHIP CHURCH and to determine their abuse reporting responsibilities.

8.2.3 SONSHINE FELLOWSHIP CHURCH provides further information to SONSHINE FELLOWSHIP CHURCH Members about mandatory reporting laws through its child and vulnerable persons safety training program for staff.

9.0 RETALIATION

9.1 SONSHINE FELLOWSHIP CHURCH Members shall not engage in retaliation against a SONSHINE FELLOWSHIP CHURCH Member or other individual because that person has made a report pursuant to this Policy or cooperated in an investigation of a report by SONSHINE FELLOWSHIP CHURCH under this Policy, or an investigation by law enforcement or government authorities.

9.2 If a SONSHINE FELLOWSHIP CHURCH Member believes that he or she has experienced retaliation by any person for making a report under this Policy, or for cooperating in an investigation, the Church Member should make a report immediately to the elders/ pastors, deacons and/ or board members under Section 7.0 above.

9.3 This Section does not limit SONSHINE FELLOWSHIP CHURCH from taking personnel action or other action it deems appropriate with respect to a SONSHINE FELLOWSHIP CHURCH Member or other person who it determines has made an intentionally or knowingly false report or has engaged in Prohibited Conduct or other violations of its policies and procedures, including this Policy.

9.4 Retaliation can take many forms depending on the positions and circumstances of the people involved. In the context of employees, it can involve adverse personnel action against an employee that has a significant impact on the terms and conditions of an individual's employment, and that is causally connected to the report of abuse or cooperation in an investigation. As for a participant, it may involve exclusion from ministry activities or services for having made a report of abuse or cooperated in an investigation. If you have a question about whether certain treatment constitutes retaliation, please contact the elders/ pastors.

10.0 PROCEDURES

10.1 ADDRESSING THE REPORT

Upon receiving a report of Prohibited Conduct, or any other violation of this Policy, the elders/ pastors, in consultation and/or conjunction with the board members, should do the following, as they determine relevant to the circumstances:

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

- (a) Immediately determine whether the matter should be reported to the authorities under an applicable mandatory child and vulnerable persons abuse reporting law, and, if so, coordinate the report and/or assist the relevant Church Member to make a report (if not already done);
- (b) If there is no legal duty to report the matter to the authorities, consider immediately whether the matter should nonetheless be reported to the authorities (e.g., where a criminal violation appears to have occurred, or it is determined that a report should be made in the best interests of the child or vulnerable person for moral reasons);
- (c) Notify the rest of the church;
- (d) If the alleged perpetrator is a SONSHINE FELLOWSHIP CHURCH Member, coordinate initial personnel action and notifications to the alleged perpetrator, such as placement on administrative leave, removal from the church, and/or instructions to cease contact with the victim and the victim's family, SONSHINE FELLOWSHIP CHURCH personnel and/or partners;
- (e) Coordinate communications with the victim and victim's family, as appropriate, with focus on safeguarding, care, and support;
- (f) Consider whether additional investigation or information is needed and, if so, coordinate that investigation and information gathering; and
- (g) Consider whether other personnel action(s), corrective or remedial action, communications, and notices to the leadership, as applicable to the circumstances, may be advisable.

10.2 COMMUNICATIONS

If the report involves a SONSHINE FELLOWSHIP CHURCH Member, the report will be submitted to the elders/ pastors, deacons, and/ or board members. If the report involves SONSHINE FELLOWSHIP CHURCH Affiliate we must notify the leadership of that ministry.

11.0 CONSEQUENCES

11.1 SONSHINE FELLOWSHIP CHURCH Members who engage in Prohibited Conduct or other violations of this Policy may be subject to disciplinary action, in the discretion of SONSHINE FELLOWSHIP CHURCH. Such action may include, but is not limited to, any of the following: a warning or reprimand; corrective action and/or suspension of the perpetrator's employment, volunteer work, affiliation, or activity with SONSHINE FELLOWSHIP CHURCH; a ban on the perpetrator's affiliation with any SONSHINE FELLOWSHIP CHURCH entity; and/or a ban on the perpetrator's presence on SONSHINE FELLOWSHIP CHURCH property or at SONSHINE FELLOWSHIP CHURCH events.

11.2 The elders/pastors will determine whether notices should be made to SONSHINE FELLOWSHIP CHURCH Affiliates of the action taken and whether they will be requested to

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

implement disciplinary action similar to that imposed by SONSHINE FELLOWSHIP CHURCH. For example, if a perpetrator is banned from SONSHINE FELLOWSHIP CHURCH property and events, then SONSHINE FELLOWSHIP CHURCH may request that he or she should be banned from the property and events of all SONSHINE FELLOWSHIP CHURCH Affiliates.

12.0 SCREENING AND SELECTION

12.1 For all Church Members hired, engaged or employed by SONSHINE FELLOWSHIP CHURCH, SONSHINE FELLOWSHIP CHURCH conducts criminal history background screens for successful candidates. The results of the background screen may disqualify a person from working for or with SONSHINE FELLOWSHIP CHURCH, or participating in the activities of SONSHINE FELLOWSHIP CHURCH.

12.2 SONSHINE FELLOWSHIP CHURCH may conduct background screens for current SONSHINE FELLOWSHIP CHURCH Members, as well as additional follow-up and special background screens, at any time, in the discretion of SONSHINE FELLOWSHIP CHURCH. SONSHINE FELLOWSHIP CHURCH conducts background screens on all SONSHINE FELLOWSHIP CHURCH Members upon hiring.

12.3 If SONSHINE FELLOWSHIP CHURCH learns, either through a background screen, or through other sources, that a SONSHINE FELLOWSHIP CHURCH Member has engaged in conduct violating this Policy at any time, past or present, including prior to joining or working with SONSHINE FELLOWSHIP CHURCH, SONSHINE FELLOWSHIP CHURCH may terminate that person's relationship with SONSHINE FELLOWSHIP CHURCH or take other action in its discretion.

12.4 During the hiring or onboarding process for a position as a ministry leader, assistant or employee, all successful candidates are expected to sign a document affirming that they have read, understand, and agree with this Policy (as it may be amended from time to time). Church Members must strictly comply with this Policy regardless of whether they have reviewed, signed or agree with it.

13.0 TRAINING

During the hiring or onboarding process for a position as a ministry leader, assistant or employee, all successful candidates will be required to complete training concerning child and vulnerable person abuse, neglect, and other Prohibited Conduct and this Policy. Following hire, all ministry leaders, assistants or employees will be required to complete such training on a schedule determined by SONSHINE FELLOWSHIP CHURCH, and to sign a document affirming that they have read, understand, and agree with this Policy (as it may be amended from time to time).

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

14.0 SONSHINE FELLOWSHIP CHURCH AFFILIATES

SONSHINE FELLOWSHIP CHURCH intends to work with SONSHINE FELLOWSHIP CHURCH Affiliates to assist them in creating and implementing a child and vulnerable person safeguarding policy for each Affiliate that is substantially similar to this Policy and that is responsive to the particular culture and location of each Affiliate. SONSHINE FELLOWSHIP CHURCH requires that SONSHINE FELLOWSHIP CHURCH Affiliates will inform their employees, volunteers, and other staff of the SONSHINE FELLOWSHIP CHURCH Affiliate's child and vulnerable person safeguarding policy and reporting procedures.

15.0 NO EXPRESS OR IMPLIED CONTRACT

No part of this Policy constitutes an express or implied contract or a legally enforceable promise or representation by SONSHINE FELLOWSHIP CHURCH. SONSHINE FELLOWSHIP CHURCH reserves the right to modify this Policy at any time.

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

APPENDIX A

Definitions

SONSHINE FELLOWSHIP CHURCH – Sonshine Fellowship Church is a Reformed Baptist ministry located in Baltimore, Maryland. Our church is a congregation of people in community to know Jesus Christ and make Him known. We are a group of people who have been redeemed by the blood of Jesus Christ and we follow him. Our desire is to display and promote the glory of God in all things.

SONSHINE FELLOWSHIP CHURCH Affiliate – any ministry or nonprofit organization or its equivalent organized and operated under the laws of another country that either (i) was formed by SONSHINE FELLOWSHIP CHURCH Members, (ii) has a majority of board members who are SONSHINE FELLOWSHIP CHURCH Members, or (iii) has collaborated with SONSHINE FELLOWSHIP CHURCH.

SONSHINE FELLOWSHIP CHURCH Members – all church leadership, members, or church visitors including employees, independent contractors and volunteers of SONSHINE FELLOWSHIP CHURCH.

Child – an individual under 18 years of age.

Parent – a biological parent, an adoptive parent, or a legal guardian.

Vulnerable Persons – a person 18 years of age or older whose ability to perform the normal activities of daily living or to provide for his or her own care or safeguarding is impaired due to a mental, emotional, sensory, long-term physical, or developmental disability or dysfunction, or brain damage, or the infirmities of aging.

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

APPENDIX B

EXAMPLES	PROHIBITED CONDUCT?		REPORT?	
	YES	NO	YES	NO
A teenage dependent engages in sexual touching of a pre-school-aged dependent of another SONSHINE FELLOWSHIP CHURCH Church Member's family	✓		✓	
A 17-year-old teenage dependent (not a SONSHINE FELLOWSHIP CHURCH Member) engages in consensual kissing of another teenage dependent of the same age as the first dependent (assume no criminal conduct has occurred)		✓		✓
A teenage dependent sends an unwanted text with a sexually explicit photo to another teenage dependent	✓		✓	
A 17-year-old teenage dependent engages in consensual sexual activity with a 17-year-old minor involved in the ministry	✓		✓	
A dependent argues with and then physically attacks and injures another dependent or a child participating in a SONSHINE FELLOWSHIP CHURCH ministry program.	✓		✓	
A non-Church Member adult who participates in a SONSHINE FELLOWSHIP CHURCH ministry program sexually abuses a child in his/her family at home ⁶		✓	✓	
A teenage minor child participating in a SONSHINE FELLOWSHIP CHURCH ministry program engages in	✓		✓	

⁶ This scenario involves a case where a Church Member has heard or learned that a non-Church Member adult participant has abused a child in his own family in circumstances external to ministry activities. This type of behavior by a non-member adult participant is clearly contrary to Sonshine Fellowship Church's beliefs and standards, and, if the adult were a member of, it would be Prohibited Conduct under this Policy. Because this behavior was not committed by a Church Member or within our ministry activities, it is not "Prohibited Conduct" under this Policy, but, when Church Members become aware of this kind of behavior, such behavior must be reported immediately to the police and the church, out of concern for the well-being of the child and so that church can evaluate whether it should take steps to

SONSHINE FELLOWSHIP CHURCH

CHILD AND VULNERABLE PERSON SAFEGUARDING POLICY

EXAMPLES	PROHIBITED CONDUCT?		REPORT?	
sexual activity with a pre-school child served by the ministry program				
An independent contractor of a SONSHINE FELLOWSHIP CHURCH makes sexual advances to a child served by a SONSHINE FELLOWSHIP CHURCH ministry program who he met through the SONSHINE FELLOWSHIP CHURCH ministry program.	✓		✓	

protect others in the ministry programs from this adult. Also, this may be a matter that is required to be reported to authorities under a mandatory reporting law.