

ABUSE AND HARASSMENT PREVENTION POLICY

Silver Lake Mennonite Camp

Reviewed and Approved: February 2003
Reviewed and Approved: November 2018

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ABUSE AND HARASSMENT PREVENTION POLICY

I. RATIONALE

We at Silver Lake Mennonite Camp believe that God calls us to live peaceably with one another, respecting and honouring one another. We believe we are to live a life that avoids the exploitation of vulnerable people through the use of any force or power. We at Silver Lake Mennonite Camp wish to provide all Campers, Staff, Volunteers and Visitors with a safe and comfortable camp environment in which they are able to experience the grace and mercy of God. This policy outlines how we will prevent various forms of abuse and how we will proceed if abuse is alleged or suspected.

II. DEFINITIONS

ABUSE constitutes *Child Sexual Abuse, Emotional Abuse, Physical Abuse, Physical Neglect, Sexual Assault* and *Sexual Harassment*, and includes physical, emotional or sexual harm as defined in the Child, Youth, and Family Services Act 2018, c. 6, Sched. 3, s. 4., as amended (see Appendix A for the Duty to Report section of the Child and Family Services Act downloaded October 19, 2018)

ASSISTANT DIRECTOR: One who has been hired by Silver Lake Mennonite Camp to carry out the duties of Assistant Director.

BULLYING is exploiting a power imbalance to hurt, scare or intimidate another person. Bullying may consist of one act or repetitive behavior. Bullying occurs in four main forms: verbal; social; physical or cyber.

CAMP refers specifically to Silver Lake Mennonite Camp.

CAMPER refers to anyone who is enrolled in the summer camp program of Silver Lake Mennonite Camp. This includes those enrolled in the outtripping program, the Camper in Leadership Training program (CILTs), and the Practicum program.

A CHILD (OR CHILDREN) constitutes anyone under the age of 18.

CHILD PROTECTIVE AGENCY includes either Family and Children's Services or the Ontario Provincial Police or any other police agency.

CHILD SEXUAL ABUSE occurs when anyone engages in sexual contact or sexualized behaviour with a child. It includes any form of physical contact for a sexual purpose or any other behaviour involving contact, physical or otherwise, which may be considered sexual behaviour directed towards a child. Child sexual abuse does not include non-sexual, affectionate behaviour towards children and excludes normal health and hygiene care.

CILTs refers to those Campers who are enrolled in the Camper In Leadership Training program or the Camper In Leadership Training Volunteer Practicum.

DIRECTOR includes any person hired by Silver Lake Mennonite Camp to carry out the duties of Director. This includes the Assistant Directors, the Executive Director, the Outdoor Education Director, and each of the Board members. In regards to this policy, any of these Directors may fulfill the role of Director, however generally these roles will fall upon the Executive Director and or one of the Assistant Directors.

EMOTIONAL ABUSE occurs when anyone directs derogatory language, threats, or intimidation to another person. Emotional abuse includes any behaviour that causes emotional harm.

EXECUTIVE DIRECTOR: One who has been hired by Silver Lake Mennonite Camp to carry out the duties of Executive Director.

PHYSICAL ABUSE incorporates any unwanted touching of a person, or use of physical force against a person, including threats of unwanted touching or physical force. Physical abuse does not include use of reasonable force by staff or directors in exigent circumstances to prevent harm.

PHYSICAL NEGLECT is a form of abuse. It is a failure to meet the physical needs of a child in one's care. It constitutes harm or threatened harm to a child's health or welfare by failing to provide adequate food, clothing, shelter, or medical care or failing to intervene to eliminate a risk when able to do so.

SEXUAL ASSAULT is a criminal offence any non-consensual touching of a sexual nature, for a sexual purpose, or that violates the victim's sexual integrity, including threats of any such contact. Consent to sexual touching cannot be obtained by fraud, or use of authority. Any sexual interaction between a camper/CILT and a Staff/Volunteer/Director, irrespective of whether the camper/CILT consents, will be considered a non-consensual sexual act.

SEXUAL HARASSMENT is any behaviour which subjects a person to unwanted verbal or physical attention of a sexual nature. Sexual harassment may involve one incident or a series of incidents. It may consist of any verbal, emotional, mental, or physical conduct. It includes a wide range of behaviour, such as innuendo, lewd comments, sexual jokes, and overt demands for sexual favors.

STAFF refers to anyone who is in the employ of the camp.

VISITOR refers to anyone who comes on to camp property who is neither a Staff or Volunteer.

VOLUNTEERS refers to anyone who has been accepted as a Volunteer at the camp.

III. RELATIONSHIP PROTOCOLS

GUIDELINES FOR EVERYONE

Silver Lake is built on relationships between all members of the camp community. All people at Silver Lake, regardless of who they are (e.g. Camper, Staff, Volunteer, Visitor, Director) have a right to experience Silver Lake as a safe place that is free from any form of harassment or abuse. Any form of abuse or harassment as defined in this policy will result in disciplinary action being taken. That disciplinary action may result in removal from camp and/or camp-sponsored activities and notification of other services (for example police services or Family and Children Services). A basic principle is that campers are always supervised by staff.

GUIDELINES FOR STAFF, VOLUNTEERS, VISITORS AND DIRECTORS RELATING TO CAMPERS/CILTS

Silver Lake is a place made up of people of various ages and positions. Those considered adults; Staff (including those on Staff under 18), and Volunteers and Visitors over the age of 18, hold considerable power over Campers. Such power can never be used to belittle, intimidate, threaten, hurt, exploit, or demean another person.

Staff Awareness and Responsibilities

- In every instance, campers are to be treated with respect. Insults, name calling or purposely belittling Campers is unacceptable.
- Staff are to be aware of Campers' health, hygiene and physical safety and emotional well being.
- Adults should never be alone with a Camper and should follow the three-person rule. In exceptional circumstances, when a second adult is unavailable, an adult should have at least two Campers with them. In exigent circumstances where a second adult or camper is unavailable, the adult should make efforts to find a second adult or camper as soon as possible and report the incident to a Director. This includes CILTs, practicums, outtrips, and sleeping arrangements. This policy must be relayed to Campers at the beginning of each session so know their rights and boundary expectations.
- Adults should also be mindful of how their conversations and interactions can be misinterpreted by Campers. Adults must avoid situations where their actions can be misinterpreted.
- Adults are not sex educators. Campers' questions about sexuality should be handled discreetly and without explicit detail.
- Sexually explicit conversations should be avoided. Though Campers may engage in such conversations, it is not the role of the Staff to contribute to these conversations or add to these discussions. Never tell the Campers jokes with sexual content or sexual innuendo. When such conversations occur, adults should try to divert the dialogue.

Discipline

- No adult should physically discipline a Camper. Discipline may not include any form of physical or emotional punishment, denial of needs (sleep, food, shelter, clothing), or verbal abuse. Any staff member reprimanding a Camper or imposing limits or consequences for misbehavior must do so in the presence of another Staff member.
- Whenever possible, adults should respect Campers' desire for privacy and Campers' personal boundaries.

Showing Affection

- Staff can and should show affection to all Campers in places where others can see. Staff should show affection so that campers feel included, cared for and safe.
- Touch children in safe places on their bodies, avoiding private places. The back, head and shoulders are acceptable. The buttocks, breasts, thighs and groin are not acceptable.

Special Circumstances

- Campers (this includes CILTs and Outtrippers) are to stay in cabins or tents with the same gender, including during any off-site activities. The only exception is for Campers who are non-binary or those who do not identify with their biological gender. These campers will be placed in the appropriate cabin according to their registration selection.
- During MacGyver Night (in the CILT program), groups of a minimum of three CILTs are required. At least two in the group must be female.
- Staff and Volunteers are not to enter into a physical/romantic relationship with any CILT while the CILT is in session, on practicum, or during the time that the Staff or Volunteer is a working member of camp. If a CILT and Staff/Volunteer are coming to camp already in a relationship, they must disclose the relationship to the Executive Director or an Assistant Director and refrain from inappropriate workplace physical contact at all times while the CILT is still participating at camp.

Reporting

- If anyone knows or suspects that any of the above guidelines have been broken, they must report such incidents immediately to the Executive Director or an Assistant Director.
- The Directors will follow the guidelines for response outlined on page 9 of the Abuse Prevention Policy, "Response To Accusations Of Abuse".

GUIDELINES FOR ADULTS RELATING TO OTHER ADULTS

- Every adult (Staff, Volunteer, Visitor) at camp, has the right to be in an environment free of harassment and abuse.
- For further information, see the Workplace Violence and Harassment Policy.

BULLYING

- Silver Lake Mennonite Camp has zero tolerance for bullying that applies to everyone. This rule will be reviewed with each cabin at the beginning of each camp. Campers should be encouraged to report any bullying that they are subjected to or witness.
- In the event of a report of bullying by a Camper or third-party member, Staff must complete an incident report and submit it to the Directors. If there is any physical or sexual abuse the Staff must report the incident to one of the Directors immediately who will then follow the procedures in Section V of this policy.
- Severe forms of bullying may result in a camper being sent home immediately. If the bullying is less severe the Staff will use a three-step response. The first step is a warning to the Camper. The second step is a call to the Camper's parent/guardian(s) to inform of the incident and seek input. The third step is a call home asking the parent/guardian(s) to come to camp and take their child home. No refunds are given to Campers who are sent home due to bullying or any other form of disruption. Staff members are to document any steps taken in the event of bullying.

IV. PREVENTATIVE MEASURES

Staff

- a) **Screening:** Every person seeking to become a Staff member of the camp must fill out an employment application form. The intent of this form includes obtaining descriptions of youth or child-related work and any other Volunteer work done in the previous five years. The applicant must also provide the camp with a current police record check, two references that may be contacted as well as a third written reference that must be returned to the camp office. The intent of the police record check is to obtain information regarding any prior criminal convictions (the information gathered from the police record check is confidential with only the Directors having access to such information). The intent of the references is to determine whether the applicant is suitable to work in a camp setting with Campers. The Directors will contact at least one of the two references and review the written reference, this information is expected to be documented and kept for an appropriate amount of time. The applicant must also participate in an interview (either in person or by phone) with at least one of the current camp Directors.
- b) **Staff Code of Behaviour** – Every Staff member must complete a Staff service agreement form where he/she agrees to adhere to all camp guidelines which includes this policy.
- c) **Staff Orientation Training** – Each Staff Orientation will have a session on issues of healthy relationships and boundaries at camp, including a review of the issues dealt with in this policy.

Campers

- a) **Relationship Protocol** (Page 5) - Staff are to model and teach this protocol.
- b) **Three-Person Rule** – Staff, CILTs, Volunteers, Visitors and Directors must follow the three-person rule, as stated in section III of this policy.
- c) **Releasing A Child** – No Camper will be released into the custody of someone other than their legal guardian unless it has been pre-arranged through the Directors.

CILTs

- a) **Screening** - Every individual interested in being in the CILT II volunteer practicum program must fill out a CILT II practicum application form. The intent of the application includes obtaining descriptions of youth or child related work and any other volunteer work done in the previous five years. The applicant to this program must also provide camp with a current police record check, two references that may be contacted and a third written reference. The intent of the police record check is to obtain information regarding any prior criminal convictions (information gathered from the police record check is confidential with only Directors having access to it). The intent of the references is to determine whether the applicant is suitable to work in a camp setting with campers. A Director will contact at least one of the two references and review the written reference, this information is expected to be documented and kept for an appropriate amount of time. The applicant to this program must also participate in an interview with at least one of the current Directors. This interview is done in-person or over the phone.
- b) **CILT II Practicum Agreement**- Every CILT involved in the CILT II practicum program must complete a Staff service agreement form where he/she agrees to adhere to all camp guidelines which includes this policy.
- c) **Training in the CILT Program** – The CILT I and II programs each offer a session dealing with issues of healthy relationships and boundaries at camp, including a review of issues dealt with in this policy.

Volunteers

Background Checks – The Volunteer applicant will be asked on the Volunteer application form to provide a current police records check to the camp.

Visitors

Notification- All Visitors to camp property must notify a Director that they are on property and must be accompanied by a Staff member at all times (excluding pickups and dropoffs). Service providers such as food services and maintenance workers., should make their presence at camp known in advance to a Director as well as upon arrival. Their location at camp should be known by the Director. Service providers should never be interacting with any Campers while a Staff member is not present.

V. DEALING WITH DISCLOSED OR SUSPECTED ABUSE

Our Responsibilities

As camp professionals we have an ethical responsibility to report **suspected** child abuse as part of our commitment to providing a nurturing and caring environment for children. Professionals who work closely with children (teachers, doctors, daycare workers, camp workers, etc.) also have a **legal responsibility** to report suspicions of child abuse. This means that according to the law we do not need certainty or direct knowledge that the abuse has occurred to make a report. We need only have a reasonable suspicion. It is important to remember we are not responsible to carry out an investigation of abuse. This is left up to child abuse authorities and the police. See relevant sections of the *Child, Youth and Family Services Act* in Appendix A.

If you suspect that one of your Campers has been abused it is important that you tell a Director **immediately**. It is also important that this report be dealt with **confidentially**--for the sake of the child and alleged abuser(s) involved. Upon hearing your suspicions, the Director will contact a Child Protective Agency and communicate their concerns. Whenever possible this role should fall to the Executive Director. They will act on the advice of the worker in determining if a formal report should be made.

Hearing or Witnessing Abuse

This section has been designed for disclosures given by a Camper, however a similar approach should be offered to adults in the same situation.

- a) **Give priority to the Camper's concerns:** Assure the Camper what they are telling you is very important and represents a legitimate problem.
- b) **Listen openly and calmly:** Although a Camper's disclosure of abuse will probably upset you very much, it is important to put your own feelings aside while you are with the Camper. Condemning the abuser is not acceptable because most abused children are the victims of a relative or close family friend, and therefore, despite the abuse, care deeply for their abuser. Also, if the Camper knows you are angry, he/she may not want to continue to open up to you. Be attentive to the Camper and actively listen to what he/she needs to say. Try not to ask any questions beyond *"Is there anything more you would like to tell me?"* The Camper will tell you what he/she wants to disclose. Any questions or suggestions on your part could end up hindering an official investigation.
- c) **Reassure the Camper:** Tell the Camper that he/she did the right thing in telling you. Also let the Camper know that you can't keep the disclosure a secret, but that you need to tell someone who is trained to help children with this type of problem. The three most important messages for the Camper are: "It's not your fault;" "You are not alone -- other children go through this also;" and "There are people who can help you."
- d) **Write down the facts:** As soon as possible after the Camper talks to you, record what was said. Do your best to record facts and not your interpretations or speculations. Record the date and place of the Camper's disclosure to you. Transfer this record to a *"Report of Suspected Child Abuse Form"* (Appendix C) making sure this record is kept confidential from other Staff and Campers. Give this form to a Director immediately. These reports will be placed in the Incident and Accident Report Book by one of the Directors which is kept confidential and in a safe place.
- e) **Report to the child abuse authorities immediately:** A Director will call Child Protective Agency (see Appendix B) to report the disclosure of abuse or suspicion of abuse (if the abuse happened away from camp, contact the Child Protective Agency in the area the abuse took place).

Response To Accusations Of Abuse or Harassment

The following are the steps to be taken in the event that an accusation is made by anyone on-site in regards to abuse against a Camper by a Staff member, Volunteer, Camper or Visitor. These steps are informed by the following principles: protection and safety of the person alleging abuse, confidentiality, fair process for the accused, compliance with the laws of Ontario. Note: if the Executive Director is the one being accused of abuse, their following roles will be given to the current Board Chair member.

1. The person receiving the report should make certain that the person alleging abuse is in a safe environment.
2. Staff who suspect or receive disclosure of abuse must report it IMMEDIATELY to the Executive Director (in the case that the Executive Director is off-site notify one of the Assistant Directors). The Director will guide the staff member to fill out a "*Report of Suspected Child Abuse or Neglect*" (Appendix C) which must then be submitted to the Executive Director. This disclosure is confidential.
3. The Executive Director will inform the local Child Protective Agency (see Appendix B) of the alleged abuse and follow instructions given by this agency.
4. The Executive Director will receive guidance from Child Protective Agency as to how the parents or guardians of the person alleging abuse should be contacted.
5. If the subject of the complaint is a Staff member, the Executive Director will take appropriate action, including imposing a form of employment probation, suspending them from their duties at camp, or dismissal.
6. If the subject of the complaint is the Executive Director, the Chair of the Board should be notified immediately. The Board Chair will take appropriate action, including imposing a form of employment probation, suspending the Executive Director from their duties at camp, or dismissal.
7. If the subject of the complaint is a Volunteer or Visitor, the Executive Director will take appropriate action, including providing a warning to the volunteer or removing the volunteer from camp property.
8. If the subject of the complaint is a Camper, the Executive Director will take appropriate action including disciplining the camper, designating and assisting staff in resolving the issue and disciplining the camper, or dismissing the camper from camp. If the Camper is sent home, the Executive Director will notify the camper's parent/guardians and ask them to come pick up their child. A Director must be present during the release of the Camper to their parent or legal guardian. Whenever possible this should be the Executive Director.
9. Any response to an allegation of abuse or harassment will be documented on a report sheet found in Appendix C. All documentation should be kept in the Incidents and Accidents Binder in a secure and confidential place.
10. The Executive Director will notify the Board chair, the insurance company and our lawyer when he/she deems it appropriate.
11. The Board Chair or designate is the media liaison and will be the only person expected to speak to the media in any situation.
12. The camp will not initiate an investigation but rather co-operate with the Child Protective Agency and any law enforcement agency in their investigation.
13. At any time, the Directors may consult those within the professional or church communities in how to deal with both the complainant and the subject of the complaint.
14. Provide follow-up or on-going support of the complainant and the subject of the complaint as appropriate with Christian ministry.
15. If the subject of a complaint is suspended or dismissed from camp, the suspension or dismissal remains in effect until a thorough assessment of camp safety is performed, and appropriate reconciliation efforts have been achieved. Any reconciliation process should involve the complainant or the complainant's input, to the extent possible and according to the complainant's wishes.

Appendix A: Child, Youth and Family Services Act

Child, Youth, and Family Services Act 2018, c. 6, Sched. 3, s. 4.

Duty to report child in need of protection

125 (1) Despite the provisions of any other Act, if a person, including a person who performs professional or official duties with respect to children, has reasonable grounds to suspect one of the following, the person shall immediately report the suspicion and the information on which it is based to a society:

1. The child has suffered physical harm inflicted by the person having charge of the child or caused by or resulting from that person's,
 - i. failure to adequately care for, provide for, supervise or protect the child, or
 - ii. pattern of neglect in caring for, providing for, supervising or protecting the child.
2. There is a risk that the child is likely to suffer physical harm inflicted by the person having charge of the child or caused by or resulting from that person's,
 - i. failure to adequately care for, provide for, supervise or protect the child, or
 - ii. pattern of neglect in caring for, providing for, supervising or protecting the child.
3. The child has been sexually abused or sexually exploited by the person having charge of the child or by another person where the person having charge of the child knows or should know of the possibility of sexual abuse or sexual exploitation and fails to protect the child.
4. There is a risk that the child is likely to be sexually abused or sexually exploited as described in paragraph 3.
5. The child requires treatment to cure, prevent or alleviate physical harm or suffering and the child's parent or the person having charge of the child does not provide the treatment or access to the treatment, or, where the child is incapable of consenting to the treatment under the Health Care Consent Act, 1996, refuses or is unavailable or unable to consent to, the treatment on the child's behalf.
6. The child has suffered emotional harm, demonstrated by serious,
 - i. anxiety,
 - ii. depression,
 - iii. withdrawal
 - iv. self-destructive or aggressive behaviour, or
 - v. delayed development
 and there are reasonable grounds to believe that the emotional harm suffered by the child results from the actions, failure to act or pattern of neglect on the part of the child's parent or the person having charge of the child.
7. The child has suffered emotional harm of the kind described in subparagraph 6 i, ii, iii, iv or v and the child's parent or the person having charge of the child does not provide services or treatment or access to services or treatment, or, where the child is incapable of consenting to treatment under the Health Care Consent Act, 1996, refuses or is unavailable or unable to consent to, treatment to remedy or alleviate the harm.
8. There is a risk that the child is likely to suffer emotional harm of the kind described in subparagraph 6 i, ii, iii, iv or v resulting from the actions, failure to act or pattern of neglect on the part of the child's parent or the person having charge of the child.

9. There is a risk that the child is likely to suffer emotional harm of the kind described in subparagraph 6 i, ii, iii, iv or v and the child's parent or the person having charge of the child does not provide services or treatment or access to services or treatment, or, where the child is incapable of consenting to treatment under the Health Care Consent Act, 1996, refuses or is unavailable or unable to consent to, treatment to prevent the harm.
10. The child suffers from a mental, emotional or developmental condition that, if not remedied, could seriously impair the child's development and the child's parent or the person having charge of the child does not provide the treatment or access to the treatment, or where the child is incapable of consenting to the treatment under the Health Care Consent Act, 1996, refuses or is unavailable or unable to consent to, treatment to remedy or alleviate the condition.
11. The child's parent has died or is unavailable to exercise custodial rights over the child and has not made adequate provision for the child's care and custody, or the child is in a residential placement and the parent refuses or is unable or unwilling to resume the child's care and custody.
12. The child is younger than 12 and has killed or seriously injured another person or caused serious damage to another person's property, services or treatment are necessary to prevent a recurrence and the child's parent or the person having charge of the child does not provide services or treatment or access to services or treatment, or, where the child is incapable of consenting to treatment under the Health Care Consent Act, 1996, refuses or is unavailable or unable to consent to treatment.
13. The child is younger than 12 and has on more than one occasion injured another person or caused loss or damage to another person's property, with the encouragement of the person having charge of the child or because of that person's failure or inability to supervise the child adequately

Appendix B: Important Contacts

Lawyer:

Tom Jutzi

403 Albert St,
Waterloo, ON N2L 3V2
(519)-885-6602 (home)
(519)-579-3661 x 355 (office)

Family and Children's Service:

Bruce Grey Child and Family Services

5 McGivern Street (POB 279)
Walkerton, ON N0G 2V0
Bus: (519) 881-1822
(800) 461-1993
Fax: (519) 881-0350
brucas@cas.gov.on.ca

Waterloo Family and Children's Services

200 Ardelt Avenue (at Hanson Ave)
Kitchener, ON N2C 2L9
Bus: (519) 576-0540
Fax: (519) 570-0160
fcswaterloo@golden.net

Insurance Company:

Josslin's Insurance

Kitchener location:

1082 Weber St. E.
Kitchener, ON N2A 1B8
Phone: 519-893-7008
Fax: 519-893-9058
T: 1-519-893-7008
C: 1-519-635-3865
E: dmacdonald@josslin.com

Ontario Provincial Police:

911

OR Warton Detachment for non-Emergencies
(519)-534-1323

Appendix C: Report Of Suspected Child Abuse Form
REPORT OF SUSPECTED CHILD ABUSE OR NEGLECT

Campers Name: _____ Age: _____ FEMALE MALE

Mother/Guardians Name: _____ Phone: _____

Address: _____

Father/Guardians Name: _____ Phone: _____

Address: _____

Reason for this report (give detailed description of evidence observed):	Dates
_____	_____
_____	_____
_____	_____

If Camper's explanation was sought or offered, five details, including what was said, where and when.	Dates
_____	_____
_____	_____
_____	_____
_____	_____
_____	_____

Have you spoken to anyone else about this? (who was spoken to, what was said, when)	Dates
_____	_____
_____	_____
_____	_____

Staff Member: _____ Date: _____

Give this form immediately to the Director.

Was Children's Aid Society notified? YES NO Society Contacted: _____

Person spoken to: _____ Date: _____ Time: _____ Phone: _____

Other comments: _____

Director's Name: _____ Date: _____

FOLLOW-UP ACTIONS TAKEN FOR REPORTED SUSPICIONS OF CHILD ABUSE OR NEGLECT

Date: _____ Staff Member: _____

Action Taken: _____

Comments: _____

Date: _____ Staff Member: _____

Action Taken: _____

Comments: _____

Date: _____ Staff Member: _____

Action Taken: _____

Comments: _____
