

STAR ISLAND CORPORATION

Safe Community Policy

Policy Statement

Star Island Corporation (SIC) recognizes that violence and physical abuse are realities in our society. This policy is intended to provide a responsible means of addressing this issue, and to reflect our commitment to provide a safe community for all guests (minors and adults), including but not limited to conferees, conference and staff overnight guests, personal retreaters, and day visitors/boaters, as well as staff, contractors and volunteers visiting and/or working on Star Island or off island for Star Island business.

To achieve these goals we will:

- Treat all persons with dignity and respect.
- Conduct background checks of SIC staff and volunteers who work with children.
- Implement supporting policies including anti-harassment, anti-discrimination, and child abuse prevention (hereafter referred to as “Supporting Policies”).
- Emphasize the importance of this Policy and Supporting Policies with conference leadership, including strongly recommending that each conference adopt and implement this Policy and Supporting Policies as its conference policies.
- Require conferences which offer youth programming to conduct sex offender registry information (SORI) checks on all volunteers or employees working with minors, and to attest, in writing, that they have done so. Strongly recommend that conferences which offer youth programming conduct criminal background checks on all volunteers or employees working with minors.
- Provide a specific process by which allegations of abuse are reported to the appropriate senior SIC staff person for initial inquiry and, when abuse is suspected, reported to appropriate agencies pursuant to state law.
- Make the community aware of this Policy and Supporting Policies through publication (on our website, Program Catalog, and Better Living on Star Island), through conference leadership, and by inclusion in the Personnel Handbook.

While much of this Policy and the Supporting Policies focus upon those directly working with children and youth, all members of Star Island are responsible to work toward a safe and caring community in which all individuals:

- Are respected and their self-worth affirmed,
- Are encouraged in their spiritual, social, and intellectual growth.

We will stress in our actions the care of all individuals, safety for our volunteers and staff, and the principles of fairness, kindness, and forgiveness that have long been part of our tradition.

Policy Scope

1.1. SIC Business Related Activities

1.1.1. Location

This policy applies to all SIC business related activities either taking place at Star Island or off site including virtual events on the internet.

1.1.2. Activities

This policy applies to the entire Star Island Community as defined in 1.2. while in the course of performing SIC business-related activities.

1.2. Star Island Community

This policy applies to all constituency groups, including:

1.2.1 Guests

In this document, “guests” shall mean anyone visiting Star Island, or its offices, including but not limited to conferees, conference and staff overnight guests, personal retreaters, and day visitors/boaters.

1.2.2 Staff

In this document, “staff” shall mean anyone employed by SIC.

1.2.3 Volunteers

In this document, “volunteers” shall mean anyone then enrolled by SIC as a service volunteer.

1.2.4 Contractors

In this document, “contractors” shall mean anyone then under contract with SIC, including consultants.

1.2.5 Minors

In this document, “minor” and “minors” shall mean anyone less than 18 years of age.

1.3. Protective Care of Minors

This Policy considers the necessary precautions and procedures for the overall protective care of minors. It details policies under which SIC volunteers or staff shall have Access to Minors and all policies under which SIC volunteers or staff may Supervise Minors.

1.3.1 Access to Minors

Staff and volunteers who have access to privileged information or work with families or minors in the course of SIC business related activities are considered to have Access to Minors. Except in cases where no screened individuals are available and adult access to minors is necessary, such access should be limited to individuals for whom background checks have been conducted according to the policies outlined below.

1.3.2 Supervision of Minors

For SIC business related activities where parents or guardians are not present and it is explicitly understood that minors are in the care of volunteers or staff, said volunteers or staff are considered to be Supervising Minors. Except in cases where no screened individuals are available and access to minors is necessary for emergency or critical purposes, such a responsibility should be limited to individuals for whom background checks have been conducted according to the policies outlined below.

1.4. Protective Care of Community Members

This policy considers the necessary precautions and procedures for the overall protective care of community members. It addresses circumstances under which various parts of our constituencies may assist community members in need, including, but not limited to, elders requiring personal care attendants.

Policy Administration

This Policy is in effect year-round. Due to the potential disclosure of confidential information in connection with the administration of this Policy and Supporting Policies, responsibility for such administration must lie with a senior member of SIC’s staff. This Policy and Supporting Policies presume and

make reference to a Grievance Officer. Broadly, the Grievance Officer is responsible to manage and oversee the application of the Supporting Policies below and where noted perform specific tasks required by these policies.

The Chief Executive Officer will annually be designated as the Grievance Officer and/or appoint a senior staff person of the Star Island Corporation as the Grievance Officer(s).

Policy and Procedure Addressing Discrimination, Sexual Harassment (including Sexual Violence), and Other Harassment

Note: This policy will be distributed and reviewed at both a meeting of the Board of Directors and a year-round staff meeting during the first quarter of each calendar year. Through the Personnel Handbook, it will be distributed to and reviewed with all new staff at the time of hire. It will be included in new Board member briefing materials. It will be publicized on our website, in our Program Catalog, and in Better Living on Star Island, as well as through conference leadership.

Preface: The SIC shall at all times endeavor to maintain an environment in which all persons are free from sexual or other harassment. **All persons** associated with the Star Island Corporation, including, but not necessarily limited to, the employees (Pelicans and other staff), the management team, contractors, consultants, volunteer workers, and conferees, **are expected to conduct themselves at all times (during work and while living in the community; in person or online) so as to provide an atmosphere free from discrimination and harassment. Discrimination, sexual harassment (including sexual violence), and other harassment will not be tolerated.** Any person who engages in these behaviors while a member of the Star Island community will be in violation of this policy. Further, retaliation against an individual for filing a complaint or assisting in an investigation pursuant to this policy is unlawful and will not be tolerated.

1. Harassment refers to unreasonable conduct or behavior, which is personally offensive or threatening, impairs morale, or interferes with the work effectiveness of employees and relates to *race, color, religion, sex, gender identity or expression, age, marital status, sexual orientation, genetic information, veteran status, physical or mental disability, national origin, or ancestry* or other protected category. Examples of harassment include conduct or comments that threaten physical violence; offensive, unsolicited remarks; unwelcome gestures or physical contact; display or circulation of written materials, items or pictures degrading to any members of the above-mentioned groups; and/or verbal abuse or insults about or directed at any individual because of their relationship in any of the groups listed above which has the purpose or effect of unnecessarily interfering with an individual's employment or participation in retreat, educational or other activities or creating an intimidating, hostile or offensive environment. Sexual harassment is defined as unwelcome sexual advances; requests for sexual favors; or other verbal or physical conduct of a sexual nature, where:

- 1.1. Submission to such conduct is made either explicitly or implicitly a term or condition of a person's employment or participation in retreat, educational, or other activities sponsored or hosted by the SIC.
- 1.2. Submission to, or rejection of such conduct by an individual is used as the basis for decisions affecting employment or participation in retreat, educational, or other activities.
- 1.3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work or participation in SIC activities or creating an intimidating, hostile or offensive working, educational, or retreat environment.
- 1.4. The following unwelcome conduct may also constitute sexual harassment, whether intended or not:
 - 1.4.1. use of sexual epithets, jokes, written or oral references to sexual conduct, gossip regarding one's own or another's sex life, comments on an individual's body, comments about an individual's sexual activity, deficiencies, or prowess;
 - 1.4.2. displaying and/or circulating sexually suggestive objects, printed or electronic materials (including social media, direct messages, etc.), pictures, or cartoons
 - 1.4.3. unwelcome leering, whistling, brushing against the body, sexual gestures, suggestive or insulting comments;
 - 1.4.4. inquiries into one's sexual experience; and
 - 1.4.5 discussion of one's sexual activities.
2. The Grievance Officer: The Chief Executive Officer will annually designate themselves or appoint a senior staff person of the Star Island Corporation as the Grievance Officer who will be vested with the authority and responsibility of processing all discrimination and harassment complaints. Alternate Grievance Officer(s) may also be designated. In the event the complaint is against the Grievance Officer when not the Chief Executive Officer, the complaint will be heard by the Chief Executive Officer. In the event the complaint is against the Chief Executive Officer, the complaint shall be heard by the President of the SIC Board of Directors or their designee.
 - 2.1. Any member of the Star Island community who believes that they have been subjected to discrimination or harassment should report the incident(s) to the Grievance Officer.* A parent, guardian, or any person

who believes that a child has been subjected to harassment of any kind may file a complaint on behalf of the child. Anyone (employees, conferees, etc.) can raise concerns and make reports of discrimination or harassment without fear of reprisal.

Any employee who becomes aware of possible discrimination or harassment must promptly advise the Grievance Officer who will handle the matter in a timely and confidential manner, to the greatest extent possible.

2.2. When a complaint is made, the following process will be used to reach a disposition which balances the interests of all parties with the primary goal of protecting the safety of all while on Star Island, in the SIC office, or doing the business of the Star Island Corporation. If the Grievance Officer or the Chief Executive Officer believes the circumstances require investigation by an independent outside investigator, they may delegate the responsibility for investigation to such an individual, provided they inform the Board President or, when they are unavailable, the Board Vice President of their intention to do so.

The Grievance Officer will investigate the matter through the following process:

2.2.1. When the aggrieved is a minor and there is an allegation of child abuse, the Grievance Officer will guide the reporting party through the process of making an oral report of the child abuse or the Grievance Officer will themselves make such report to the Bureau of Children, Division for Children, Youth, and Families, Department of Health and Human Services in accordance with NHRSA 169-C:29 which states "any...person having reason to suspect that a child has been abused or neglected shall report the same..." and NHRSA 169-C:30 which states "An oral report shall be made immediately by telephone or otherwise, and followed within 48 hours by a report in writing, if so requested, to the bureau."

2.2.2. When the aggrieved is an adult, the Grievance Officer will confer with the affected party in order to obtain a clear understanding of that party's statement of the facts.

2.2.3. The Grievance officer will also meet with the accused party in order to obtain their response to the complaint.

2.2.4. The Grievance Officer will use their discretion in determining whether there are other witnesses who should be interviewed, the

order in which such interviews should occur, and to conduct said interviews for the purpose of gathering facts and reaching factual conclusions.

2.2.5. Privacy and confidentiality: In the course of taking any action, the Grievance Officer shall maintain the highest degree of privacy and confidentiality as possible under the circumstances. Under no circumstances will the Grievance Officer promise confidentiality.

2.2.6. The Grievance Officer will keep a written record of information gathered throughout the process of investigating the complaint and shall complete a written record of their findings.

2.2.7. The Grievance Officer, if someone other than the Chief Executive Officer, shall provide a written record of findings to the Chief Executive Officer, or, if appropriate, the President of the Board of Directors.

2.3. After reviewing the record, the Grievance Officer will decide the next appropriate action. The Grievance Officer may gather additional information as deemed necessary to resolve the matter formally or informally. With the consent of the reporting party, the Grievance Officer may mediate a resolution between or among the parties.

Thereafter the Grievance Officer, in consultation with the Chief Executive Officer, shall impose any sanctions deemed appropriate. If a staff member is found to have violated this policy, the Grievance Officer may, without limitation, impose a warning, suspension, or termination.

If a volunteer or guest is found to have engaged in conduct or activities contrary to this policy, the Grievance Officer may, in consultation with the Chief Executive Officer, impose any sanctions deemed appropriate, including but not limited to, barring that person from further involvement with the Star Island Corporation and/or being present on the island, either permanently or for a period of time.

3. Retaliation: Retaliation is any form of intimidation, reprisal, or harassment directed against a person who reports discrimination or harassment or provides information during an investigation of such behavior or witnesses or has reliable information about such behavior.
4. Retaliation against any person who has filed a complaint of discrimination or harassment or cooperated in an investigation regarding a complaint for discrimination or harassment is unlawful and will not be tolerated. Complaints of retaliation will be separately investigated and appropriate remedial action will be taken.

5. Policy Dissemination: This policy shall be given to all new staff upon appointment via the Personnel Handbook and shall be distributed annually to all staff and conference chairs/leaders for communication to conferees.
 6. Annual Review: This policy shall be reviewed annually by the SIC Board of Directors.
 7. Copies of this policy shall be referenced on our website, in our Program Catalog, and in Better Living on Star Island; included in the Personnel Handbook; and promoted through conference leadership.
- * The CEO has appointed the Island Manager as the Sexual Harassment Grievance Officer, and the Back-up Island Manager as the Alternate Grievance Officer. The Grievance Officer or Alternates may be reached through SIC's Portsmouth Office (telephone: 603-430-6272; email: office@starisland.org; mail: 30 Middle Street, Portsmouth, NH 03801).

Policy and Procedure Addressing Child Abuse

Note: This policy will be distributed and reviewed at both a meeting of the Board of Directors and a year-round staff meeting during the first quarter of each calendar year. Through the Personnel Handbook, it will be distributed to and reviewed with all new staff at the time of hire. It will be included in new Board member briefing materials. It will be publicized on our website, in our Program Catalog, and in Better Living on Star Island, as well as through conference leadership.

Preface: The SIC shall endeavor at all times to maintain an environment in which all children are free from child abuse. **All persons** associated with the Star Island Corporation, including, but not necessarily limited to, the employees (Pelicans and other staff), the management team, contractors, consultants, volunteer workers, and conferees, **are expected to conduct themselves at all times so as to provide a safe and nurturing atmosphere for children and adolescents. Child abuse is unlawful and will not be tolerated.** Any person who engages in behaviors that are defined as child abuse while acting as a member of the Star Island community will be in violation of this policy as held by state and federal laws. Further, retaliation against an individual for filing a complaint or assisting in the initial inquiry pursuant to this policy is unlawful and will not be tolerated.

1. Child abuse shall be defined as in NH RSA 169-C: 3, the New Hampshire Child Protection Act, II and XXVII. [Title 12, Chapter 169-C, New Hampshire Revised Statutes]:

“ ‘Abused child’ means any child who has been:

- (a) Sexually abused; or
- (b) Intentionally physically injured; or
- (c) Psychologically injured so that said child exhibits symptoms of emotional problems generally recognized to result from consistent mistreatment or neglect; or
- (d) Physically injured by other than accidental means.”

“ ‘Sexual abuse’ means the following activities under circumstances which indicate that the child’s health or welfare is harmed or threatened with harm: the employment, use, persuasion, inducement, enticement, or coercion of any child to engage in, or having a child assist any other person to engage in, any sexually explicit conduct or any simulation of such conduct for the purpose of producing any visual depiction of such conduct; or the rape, molestation, prostitution, or other form of sexual exploitation

of children, or incest with children. With respect to the definition of sexual abuse, the term ‘child’ or ‘children’ means any individual who is under the age of 18 years.”

1.1.NH law defines a child as any person who has not reached their eighteenth birthday [Chapter 169-C: 3]

1.2.Under NH law not only professional care givers of children but also “...any other person having reason to suspect that a child has been abused or neglected shall report the same...” [Chapter 169-C: 29]

1.2.1. Responsibilities: As care providers and the host of care providers for children, the staff and volunteers of the SIC have a very serious responsibility for the health and well being of children. If any staff member or volunteer suspects that a child has been or is in danger of being abused, it is their responsibility to immediately discuss concerns with the Grievance Officer. This applies if the abuse appears to come from another child, from a parent, guardian, or other person responsible for the welfare of the child while on Star Island, or from any person not responsible for the welfare of the child. If the Grievance Officer is not available, the staff member or volunteer shall contact the Alternate Grievance Officer.

1.2.2. Discipline: Staff members and volunteers shall never discipline a child by the use of any physical method including shaking, spanking, and slapping. Verbal reprimands shall be calm, yet firm, and shall not include destructive criticism. If a child is disruptive, a parent, guardian, or other person responsible for the welfare of the child while on Star Island shall be informed immediately.

1.2.3. Reporting: Any person on Star Island who suspects physical or sexual abuse of a child must report it immediately to the Grievance Officer and/or the Alternate Grievance Officer **and, by law**, the Bureau of Children, Division for Children, Youth, and Families, Department of Health and Human Services in accordance with NHRSA 169-C:29. When the child suspected of being the victim of physical or sexual abuse is a conference guest, the Grievance Officer shall determine if the circumstances merit informing the conference leadership of the suspected abuse.

2. The Grievance Officer: The Chief Executive Officer will annually designate themselves or appoint a senior staff person of the Star Island Corporation as the Child Abuse Grievance Officer who will be vested with the authority and responsibility of processing all child abuse complaints. In the event the complaint is against a Grievance Officer appointed by the Chief Executive Officer, the complaint will be processed by the Chief Executive Officer. In the event the complaint is against the Chief Executive Officer, the complaint shall be processed by the President of the SIC Board of Directors or their designee.

2.1. Anybody on Star Island who believes that a child or adolescent has been subjected to child abuse must report the incident(s) to the Grievance Officer* and file a report on behalf of the child with the Bureau of Children, Division for Children, Youth, and Families, Department of Health and Human Services in accordance with NHRSA 169-C:29. The Grievance Officer may consult on whether reporting is required and/or assist the reporting party in filing such a report (as per 2.2.1.). If the Grievance Officer suspects that the reporting party is unwilling or unable to file the oral report, the Grievance Officer will file such report. Anyone (employees, volunteers, conferees, etc.) can raise concerns and make reports without fear of reprisal.

Any employee, supervisor, staff, or other person who becomes aware of possible child abuse shall promptly advise the Grievance Officer who will assure that the matter is appropriately referred to the authorities.

The following process will be used to protect the safety of all while on Star Island, at the SIC office, or doing the business of the Star Island Corporation when a charge is made. At the same time, state reporting requirements and using the child protection services of the State of New Hampshire will be complied with so that the child in question is subjected to the least amount of interviewing or other interventions as possible.

2.2 The Grievance Officer will ensure an initial inquiry is conducted according to the following process:

2.2.1 The Grievance Officer will guide the reporting party through the process of making an oral report of the child abuse, and the Grievance Officer will offer to assist the reporting party in filing such report to the Bureau of Children, Division for Children, Youth, and Families,

Department of Health and Human Services in accordance with NHRSA 169-C:29 which states “**any...person having reason to suspect that a child has been abused or neglected shall report the same...**”; and NHRSA 169-C:30 states “An oral report shall be made immediately by telephone or otherwise, and followed within 48 hours by a report in writing, if so requested, to the bureau.” If the Grievance Officer suspects that the reporting party is unwilling or unable to file the oral report, the Grievance Officer will file such report.

2.2.2 The Grievance Officer will take actions that are reasonably necessary to ensure the child's safety and they will guard against subjecting the child to multiple interviews, to the extent possible.

2.2.3 Privacy and confidentiality: In the course of taking any action, the greatest degree of privacy and confidentiality possible under the circumstances shall be maintained.

2.3 The Grievance Officer may gather additional information as deemed necessary to protect the welfare of the child and ensure their safety and that of other children and adults. The Grievance Officer shall impose any sanctions deemed appropriate. If a staff member is found to have engaged in conduct or activities contrary to this policy, the Grievance Officer may, in consultation with the Chief Executive Officer, impose a warning, suspension, or termination. If a volunteer or guest is found to have engaged in conduct or activities contrary to this policy, the Grievance Officer, in consultation with the Chief Executive Officer may, in their discretion, impose any sanctions deemed appropriate, including but not limited to barring that person from further involvement with the Star Island Corporation and/or being present on the island, either permanently or for a period of time.

3. Retaliation: Retaliation is any form of intimidation, reprisal, or harassment directed against a person who reports discrimination or harassment or provides information during an investigation of such behavior or witnesses or has reliable information about such behavior
4. Retaliation against any person who has filed a complaint of child abuse or cooperated in an initial inquiry or investigation regarding a complaint of child abuse is unlawful and will not be tolerated.

5. Policy Dissemination: This policy shall be given to all new staff upon appointment via the Personnel Handbook and shall be distributed annually to all staff and conference chairs/leaders for communication to conferees.
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