

West Virginia Conference Safe Sanctuaries Policy

Introduction

Heeding Christ's call to love and serve one another (John 13:15,34); to care for those most vulnerable in his name, particularly the "least of these" (Matthew 25:40); and to welcome children and youth in Christ's name (Matthew 18:5), the West Virginia Conference of the United Methodist Church has developed this *Safe Sanctuaries¹ Policy* with accompanying procedures to reduce the risk of abuse to children, youth and vulnerable adults in the ministries of the local churches and the annual conference.

"People were bringing little children to him in order that he might touch them, and the disciples spoke sternly to them. But when Jesus saw this, he was indignant and said to them, 'Let the little children come to me; do not stop them; for it is to such as these that the kingdom of God belongs. Truly, I tell you, whoever does not receive the kingdom of God as a little child will never enter it.' And he took them in his arms, laid his hands on them, and blessed them." (Mark 10:13-16)

Our Christian faith calls us to offer both hospitality and protection to children. The Social Principles of The United Methodist Church state that "children must be protected from economic, physical and sexual exploitation and abuse." Tragically, churches have not always been safe places for children. Child sexual abuse, exploitation, and ritual abuse occur in churches, both large and small, urban and rural. The problem cuts across all economic, cultural and racial lines. Such incidents are devastating to all who are involved: the child, the family, the local church and its leaders. God calls us to make churches safe places, protecting children and other vulnerable persons from abuse. God calls us to create communities of faith where children and adults grow safe and strong.

In light of this, the West Virginia Conference of the United Methodist Church is committed to creating policy and procedures that can 1) prevent such abuse from happening in our churches; 2) be a place where children can feel safe in disclosing abuse; and 3) protect the loyal volunteers and employees that minister to our children, youth and vulnerable adults.

This policy sets forth the **mandatory** requirements in the areas of:

- Screening Staff and Volunteers
- Supervision
- Cyber Policy
- Reporting Abuse and Responding

The policies that follow provide minimum standards and procedures for local churches and the annual conference that are in keeping with the Book of Discipline and General Conference resolutions (*endnote: 1996 General Conference Safe Sanctuaries resolution, which was reaffirmed in 2004 and 2008, expanded to include abuse risk reduction for vulnerable adults and cyber safety considerations*).

The West Virginia Conference shall:

- develop safety and risk-reducing policies and procedures for Conference-sponsored events such as camps, retreats, youth gatherings, childcare at conference events, mission trips, and other events for which the Conference or its agency or program is the sponsor;

¹ Melton, Joy Thornburg. Safe Sanctuaries, Reducing the Risk of Abuse in the Church. 2008. Discipleship Resources: Nashville, TN

- approve and maintain a Safe Sanctuaries Policy and assign the Sexual Ethics Team for implementation. The Conference Safe Sanctuaries Policy shall be posted on the Conference website, circulated in Conference publications, and shared with lay professional and clergy at district or Conference seminars; and
- develop training opportunities to assist local church leaders in the creation of local church policies and in their implementation.

Local churches should:

- develop a Safe Sanctuaries Policy for their church;
- be familiar with Annual Conference and other church policies regarding clergy and lay leader sexual misconduct; and
- designate a Safe Sanctuaries coordinator and/or team within the local church to ensure policies and procedures are followed.
- adopt screening procedures (use of application forms, interviews, reference checks, background clearances, and so forth) for staff, volunteers, employees, and helpers (paid and unpaid) directly or indirectly involved in the care of children, youth, and vulnerable adults;
- develop and implement procedures for church activities (see Supervision Section)
- become informed as to who are mandatory reporters
- carry liability insurance that includes sexual abuse coverage;
- develop and implement an ongoing education plan for the congregation and its leaders on the reality of child abuse, risk factors leading to child abuse, and strategies for prevention;

The West Virginia Conference Safe Sanctuaries Policy, with its minimum standards and recommended procedures, seeks to assist local churches and conference ministries in their covenant commitments to reduce the risk of abuse in ministries with children, youth, and vulnerable adults.

Cyber Space and Cyber Safety

While ministries and activities take place in a variety of venues, new forms of communication via the Internet and cell-phones and other hand-held devices constitute a new space for ministry and activities for children, youth, and vulnerable adults. Cyber Space includes: communications via email, instant messaging, and cell phone (speaking and texting), and other devices; communicating on social networking sites such as Facebook.; web-surfing and downloading of materials from the Internet; and gaming. Cyber Space is a fluid space which changes more and more as communications become more portable and websites change with increasing frequency. The dangers of direct access to age-inappropriate content, risky social contacts, intimidation, threats, bullying, remade and/or inappropriate photos, information that could increase risks for abuse, and more in Cyber Space make Cyber Safety an important part of *Safe Sanctuaries*.

Definitions

What is Safe Sanctuaries?

In 1996, the General Conference of the United Methodist Church adopted the resolution, Reducing the Risk of Child Abuse in the Church. This resolution, reaffirmed at every General Conference since then, became the impetus for annual conferences and congregations to develop and implement abuse risk reduction policies. Discipleship Ministries has identified ***Safe Sanctuaries*** as “*reducing the risk of abuse in the church for children, youth, and vulnerable adults.*”

What is abuse?

Child abuse is a broad term encompassing a variety of acts perpetrated against a child (under 18) by an adult or significantly older or more powerful child that results in harm to the child, or that endangers a child’s/youth’s health,

safety or welfare. The child or youth is never capable of consenting to abusive behavior, either legally or morally. In all circumstances, child abuse is morally wrong and the child shares no responsibility for the abuse

The Code of Maryland and the West Virginia Code provide legal definitions of acts constituting criminal child abuse.² While we find these definitions informative, we believe the Church must hold itself to a higher standard. Our churches must be the safest and holiest of places for all of God's children/youth if we are to succeed in our efforts to live and serve as the Body of Christ in the world.

Types of abuse

Physical Abuse³—a person deliberately and intentionally causes bodily harm to a child. Examples may include violent battery with a weapon (knife, belt, strap, etc), burning, shaking, kicking, choking, fracturing bones, and any of a wide variety of non-accidental injuries to a child's body. (pages 29-30)

Emotional Abuse—abuse in which a person exposes a child to spoken and/or unspoken violence or emotional cruelty. Emotional abuse sends a message to the child of worthlessness, badness, and being not only unloved but undeserving of love and care. Children exposed to emotional abuse may have experienced being locked in a closet, being deprived of any sign of parental affection, being constantly told they are bad or stupid, or being allowed or forced to abuse alcohol or drugs. Emotional abuse is often very difficult to prove and devastating to the victim. (page 30)

Neglect—abuse in which a person endangers a child's health, safety, or welfare through negligence. Neglect may include withholding food, clothing, medical care, education, and even affection and affirmation of the child's self-worth. (page 30) If a parent cannot provide adequate care for a child due to poverty, infirmity, or other disability, their negligence is not legally categorized as abuse, although the child still needs care.

Sexual Abuse—child sexual abuse is a criminal act perpetrated by an adult (or an older and more powerful youth) that exploits and harms children/youth by exposing them to or involving them in sexual behavior for which they are unprepared, to which they cannot consent (either morally or legally), and from which they are unable to protect themselves. The child/youth is never capable of consenting to sexually abusive behavior and cannot be blamed for the sexual abuse regardless of the child's/youth's conduct. Examples of sexual abuse may include fondling, intercourse, incest, and the exploitation of the child/youth for the purpose of or exposure of the child/youth to pornography or prostitution. (page 30)

Ritual Abuse—abuse in which physical, sexual, or psychological violations of a child are inflicted regularly, intentionally, and in a stylized way by a person or persons responsible for the child's welfare. The abuser may appeal to some higher authority or power to justify the abuse. The abuse may include cruel treatment of animals or repeated threats of harm to the child, other persons, and animals. Reports of ritual abuse are often extremely horrifying and may seem too grim to be true. Children making such reports must not be ignored. (page 30)

Hazing/Initiations/Bullying—abuse that occurs when the child/youth is subjected to ridicule, harassment, or other emotional or physical harm as part of a rite of passage, initiation, punishment, or for the enjoyment of the participants or other bystanders. This type of abuse may be perpetrated by adults or by older or more powerful children or youth. While this type of abuse may not always constitute a crime, it serves no purpose in the Body of Christ and is not acceptable in our church.

² W.Va. Code, §§49-1-3 and 61-8D-1 through 61-8D-6; Maryland Code, §§3-601 through 3-607, 11-203 and 11209.

³ All definitions are from Melton, Joy Thornburg. *Safe Sanctuaries. Reducing the Risk of Abuse in the Church*. 2008. Discipleship Resources: Nashville, TN

West Virginia Conference Policy Definitions

1. A child is anyone under the age of 18 years.
2. A youth is a child in the age range of 12 to 18 years, and is a colloquial term used in ministries to mean middle and high school age groups.
3. A vulnerable adult is any person, 18 years and older, who because of physical or mental infirmity or emotional disability or other physical, mental, or emotional dysfunction may be vulnerable to maltreatment.
4. Employee – a paid person engaged in ministry to children, youth, or vulnerable adults through the Conference or Local Church who: has been screened and trained in *Safe Sanctuaries Policies*; performs tasks specified in a mutually agreed upon job description; and, is accountable to a supervisor for work habits and products.
5. Helper – a person engaged in ministry to children, youth, or vulnerable adults through the Conference or Local Church who has been screened and trained in *Safe Sanctuaries Policies*, who serves under the supervision of a staff person.
6. Volunteer – a person who works in ministry to children, youth, or vulnerable adults who has been screened and trained in *Safe Sanctuary Policies* either as a supervisor or a helper without compensation.
7. Dean of the event – a person in charge of an activity or event or the Site Director at any of the camping sites the conference owns
8. Conference Response Team – a group of people trained in handling situations of abuse. They assist congregations, camps, and events in dealing with the recovery process.
9. Mandated Reporter - All members of the clergy, employees, child care workers, youth camp administrators or counselors, and volunteers who work with children/youth are mandated reporters (WV Code §49-2-803, 2018)
10. The Conference - the West Virginia Conference of the United Methodist Church
11. Ministries or activities- any ministries to children, youth, and/or vulnerable adults that include any programming or activities in which children, youth, and/or vulnerable adults are under the supervision of the Conference through its staff persons or volunteers.

Screening

Every ministry of the West Virginia Conference that relates to children, youth, and vulnerable adults in its programming or oversight shall create procedures for implementing the Conference *Safe Sanctuaries Policies*. Administrative teams of Local Churches and Conference ministries and programs who give oversight to these ministries shall be responsible for implementing and monitoring the compliance of these minimum standard policies and its related procedures.

1. Every ministry and/or program of the West Virginia Conference that relates to children, youth, or vulnerable adults shall have a *Safe Sanctuaries Policies*. These policies and procedures are required for Annual Conference ministries and shall include:
 - a. Reasonable safety measures and procedures in the selection and recruitment of both paid and volunteer workers who come in contact with children, youth, and/or vulnerable adults, which shall include:
 - Written application (sample provided).
 - Experience and qualification for the position.
 - Voluntary disclosure of past criminal history, allegations of criminal history, and driver history.
 - Waiver of confidentiality allowing the conference to secure the background checks necessary for the position being applied for.
 - Listing of three non-related references. This list shall have complete contact information for all references. This portion of the application process is considered incomplete if full contact information for the references is not provided.
 - An interview processes.

- All employees and volunteers need to complete the following background screening including:
 - o West Virginia State Police Criminal Background Clearance
 - o National Criminal with Sex Offender OFAC
 - Background clearances are valid for 60 months and must be obtained again after every 60 months.
 - A current driver's license, registration, insurance, and completed West Virginia/Maryland or state of residency, driving record, when transporting children, youth, and/or vulnerable adults.
 - Demonstration of an active relationship with a local church of at least six (6) months before being allowed to be in a supervisory role in children, youth, and/or vulnerable adult activities.
 - Use of age and developmentally appropriate language in educating children, youth, and vulnerable adults regarding definitions of abuse and procedures for reporting.
- b. All forms and reference reports shall be kept as a part of the person's file.
 - c. There shall be a specific person designated to be responsible for reviewing and following up on each application prior to service. All applications and related forms must be completed.
 - d. In the event that a reference follow-up is accomplished by phone, use of the Reference Check Form is recommended and should be included in the persons file.
 - e. All records shall be kept in a locked file within the Conference Office. Access will be authorized by the chairs of the Response Team, Sexual Ethics Team, and the Cabinet. *All records should be securely kept, with confidential access.*
 - f. When the Conference is hosting an event for which the local church is responsible for chaperones, the church shall provide the necessary paperwork listed above.
 - g. A method for reporting incidents of child, youth, and vulnerable adult abuse in accordance with the State Laws of West Virginia and Maryland; the written guidelines of the West Virginia Conference, and the written guidelines of the local United Methodist Church.
 - h. Measures to deal with the safety, protection, and ongoing emotional support of those who may have been abused.
 - i. Guidelines for communication with family members, the congregation, the district, the conference, and the public media.
 - j. Persons responsible for implementing, monitoring, and reviewing local church policies include but are not limited to: Pastor; Representative of Staff Parish, Representative of Trustees, Youth Leader, Children's Leader, Nursery Leader, Child Protection Coordinator.
 - k. A copy of Local Church *Safe Sanctuaries Policies* shall be on file in the appropriate District Office or the Conference Office.
 - l. If a local church does not act on creating their own Safe Sanctuaries policy, the Conference policy serves as the policy for the church.
 - m. The Conference Sexual Ethics Team shall be responsible for training and resourcing the ministries and local churches covered by their *Safe Sanctuaries Policies*.
 - n. *Safe Sanctuaries* training is required of all persons serving congregations within six months of their first appointment or assignment in the annual conference. The report of completion of this training shall be included with Charge Conference reports.
 - o. Clergy and lay persons serving congregations are required to attend *Safe Sanctuaries* training events mandated by the conference at least every 60 months (five years.)

Supervision

Every ministry or event of the West Virginia Conference that relates to children, youth, and/or vulnerable adults shall follow these standards for supervision. These procedures are designed to reduce the risk of abuse to children, youth, and/or vulnerable adults, and to protect the staff persons and volunteers from unwarranted accusations. These are the MINIMUM standards, and each event may adopt more stringent requirements as deemed reasonably appropriate.

1. **Two non-related Adult Rule** –No matter the size of the group, a minimum of two nonrelated adults age 18 or older (defined as two adults not residing in the same household) shall be present with participants at all times. These adults shall have completed the screening process. One of the two adults may be a “roamer” who moves in and out of the rooms.
2. **Five-Years-Older Rule** – Every adult responsible for supervision shall be at least 18 years of age and at least five years older than the oldest child or youth event participant.
3. **No child, youth, or vulnerable adult will be left unsupervised** while attending a West Virginia Conference sponsored event. In the event that child care/supervision services are not provided by the conference for a conference sponsored ministry or event (i.e. retreats, small groups, worship services, etc.), the parent or legal guardian shall be fully responsible for their child(ren) during the event.
4. **All activities should occur in open view.** Each room or space where activities involving children, youth or vulnerable adults occur shall have visibility from an interior hallway or a connecting room by means of a window, a door with an uncovered window, or an open door. Parents, volunteers, or local church staff may visit and observe any part of any program at any time.
5. **Bathroom Needs.** When possible, children will be encouraged to take care of their own bathroom needs, but should a child require assistance, the outer bathroom door will remain open while a volunteer or staff person assists the child, with an additional volunteer being present. It is recommended that youth use a buddy system to ensure safety.
6. **Event records** are required for activities in which participants are outside of the direct supervision of their parents/legal guardians.
7. **Media** – Written permission must be obtained from a parent/legal guardian prior to posting photos of children, youth, or vulnerable adults on a website or in other public locations, and names will not be included.
8. **Overnight Events-** For overnight children/youth/vulnerable adult events:
 - i. There will be separate sleeping areas for males and females.
 - ii. At least two adults will be present in each sleeping area and will be of the same gender as the children/youth/vulnerable adult in that area.
 - iii. Sleeping areas should be pre-arranged by staff person or event coordinator prior to event.
 - iv. Random and regular rounds will be conducted by two (2) adult leaders throughout the nighttime sleeping hours of all sleeping areas.
 - v. Separate shower and bathrooms facilities are highly encouraged. When separate facilities are not possible, procedures for use of the facility will be conveyed to all event participants by the staff person or event coordinator.

Adults must respect the privacy of children/youth/vulnerable adult, during such situations as changing, showering, etc., and should intrude only to the extent that health or safety may require. Adults must protect their own privacy in similar situations as well.

Cyber Safety Electronic Communication Recommendations

The internet, apps, social media and portable devices allow people to stay in contact with each other more easily than at any other time in the history of civilization. Excellent ministry can take place using modern technology, but as with all forms of ministry, there are inherent risks involved with the use of electronic communications. **Assume anything and everything in cyberspace is public information.** Here are some recommendations.

- **Obtain advance written parent/legal guardian permission.** In addition to general permission to participate in a conference ministry or event, obtain written advance parent/legal guardian permission for children and youths, and personal permission from vulnerable adults or their guardian if applicable, for:
 1. Taking and using photos or videos of participants, for example, posting on sites, sending by e-mail or by cell phone, reproducing photos in brochures, posters or newspapers.
 2. Communicating or transmitting data electronically with children, youths or vulnerable adults sharing any full name or contact information.

- **Never post identifiable information. For example:**
 1. Do not use “broadcast” emails. Use the “Bcc” option (blind carbon copy) so that each recipient sees only his or her address when a message is received.
 2. Be cautious when transmitting easily identifiable information such as event dates, times, locations, or participants.
 3. Limit what is communicated in prayer requests. When placing a child, youth, or vulnerable adult on a prayer list, use only first names and only if you think a name is necessary.

- **Use caution when sharing photos.**
 3. Consider using stock or purchased photos.
 4. Obtain all necessary legal permission to use photos or other content (poems, songs, etc.).
 5. If sharing photos, refrain from using names, and never use last names or other personally identifiable information.
 6. Check photos for vulnerable/compromising situations and to make sure they uphold your mission.
 7. Check to make sure nametags are not distinguishable.
 8. Block "save photo as" options on websites.
 9. Limit access to photos by employing the use of a password.

- **Social media sites (Facebook, Blogs etc.)** Do not use your personal social media presence for ministry. Use a group social media site that is monitored by senior leadership, for example a Facebook site for the specific group.
 10. Include a code of conduct/terms and conditions for the site that expressly states expectations for posts and a clear expression of how violations, offensive and objectionable material will be addressed.
 11. Monitor the site and remove inappropriate comments, photos, links, etc.
 12. Restrict who can be a friend.
 13. Do not post anything that you would not want printed in the newspaper, church newsletter or bulletin.
 14. Be familiar with, and comply with, social media provider policies, restrictions and terms and conditions. For example, according to Facebook’s own terms, children under 13 years of age may not sign up for a Facebook account.
 15. Encourage children, youths, and vulnerable adults to follow these same guidelines as appropriate.

- **Do not collect online, or allow third parties to collect online, personal information from children under the age of 13. See Children’s Online Privacy Protection Act (“COPPA”) and Federal Trade Commission Rules implementing COPPA (the "Rule").** COPPA and the Rule require specific permissions and privacy policies if a website or online service collects, or allows third parties to collect, personal information if the service is directed to children under the age of 13. Restrictions also apply if the site is directed to a general audience and the organization has actual knowledge that it collects personal information from children under 13 years of age.

Responding To and Reporting Abuse

A quick, compassionate, and unified response to an alleged or actual incident of abuse is necessary and expected. All allegations are to be taken seriously. In all cases of reported or observed abuse in a ministry event, the entire staff of that event, paid and/or volunteer, shall be at the service of all official investigating agencies.

A mandated reporter must make a report of suspected child abuse. All members of the clergy, employees, child care workers, youth camp administrators or counselors, and volunteers who work with children/youth are mandated reporters.

The goal of an immediate response to alleged or known incidents of abuse will be to ensure the safety of the victim and any additional potential victims. In all cases of alleged or actual abuse, professional support is obtained by informing the Department of Human Resources- Bureau for Children and Families at 1-800-352-6513 **not more than 24 hours after suspecting this abuse or neglect. In any case where the reporter believes that the child suffered serious physical abuse or sexual abuse or sexual assault, the reporter shall also immediately report to the State Police and any law-enforcement agency having jurisdiction to investigate.** The parents/legal guardians of the victim will be notified unless they have been named as the alleged perpetrator of the abuse. Pastoral support is sought by following the conference policy which is:

If the allegation or incident concerns events or persons outside any relationship to a conference and/or local church related event, it is the responsibility of the person who heard the abuse to make the initial report to the Department of Human Resources- Bureau for Children and Families. The procedures outlined in this section will provide guidance for responses and reporting.

Example: Child, youth, or vulnerable adult telling a camp counselor about abuse by a relative during the prior year. If this report were made to the counselor in the course of his/her duties as a camp counselor, then it is the responsibility of the camp counselor to make the call to report. The camp counselor may talk with the Camp Dean or Site Director before making the call, asking for support.

An incident report should be filed with the Site Director as a part of the reporting process.

If the allegation is against or involves a conference staff person, pastor, helper or volunteer, or if it occurred in the course of a conference ministry event, the person in charge of the event, shall contact the Assistant to the Bishop. Procedures for responding to and reporting the abuse are contained herein.

The Director of Communications of the West Virginia Conference or his/her designee is the only person/s authorized to make statements to representatives of the media. All requests for statements shall be directed to the Director of Communications. Staff persons and volunteers are to be trained in how to handle media requests by referring them to the Director of Communications.

How to respond to allegations of abuse

Care for the alleged victim's safety. Once a child, youth, or vulnerable adult has disclosed alleged abuse, the one to whom the disclosure has been made should reassure the alleged victim of a concern for his or her safety and well-being. They will then make the call to Department of Human Resources- Bureau for Children and Families. The alleged victim (and any other potential victims if the abuse has allegedly taken place onsite) should be calmly moved to another safe place onsite in view of at least two other non-related adults. Someone safe and familiar should stay with the victim at all times.

Persons who are accused of abuse, if on site, will be immediately and discreetly removed from the ministry setting (both the accused and the victim to separate locations or areas) until the situation is resolved. This is to protect all persons involved, including the accused. The person to whom the disclosure was made should inform the victim in an age appropriate way that a report will be made to appropriate legal authorities.

Should the victim be in need of immediate medical attention, a call should be made for medical transport by ambulance. The parents/legal guardians of any victim under the age of 18 should be notified. It may not be

appropriate to contact the parents/legal guardians if they are the alleged perpetrators of the abuse, in which event the person designated as the reporter should be contacted and should handle contacting the parents/legal guardians when appropriate.

Report the allegations of abuse. The mandated reporter will obtain the information needed for the filing of reports, including, but not limited to, the victim’s name and age, the name of the alleged perpetrator, the alleged facts of the abuse, and physical home addresses for the victim and the perpetrator. It is important to let the victim verbalize the allegations in his or her own words, being careful to limit questions asked of children or youth under the age of 18, or to vulnerable adults. If abuse is suspected a report should be made immediately (**not more than 24 hours after suspecting this abuse or neglect**) to Department of Human Resources- Bureau for Children and Families at 1-800-352-6513. **In any case where the reporter believes that the child suffered serious physical abuse or sexual abuse or sexual assault, the reporter shall also immediately report to the State Police and any law-enforcement agency having jurisdiction to investigate.** It is the responsibility of the mandated reporter to handle these matters in a professional and caring manner. Once the call is made the mandated reporter needs to immediately notify the person in charge of the event who will notify the Director of Youth and Outdoor Ministries who will notify the Assistant to the Bishop.

Maintain confidentiality. Allegations are to be discussed only on a need-to-know basis. The person(s) to whom the allegations were disclosed should immediately contact Department of Human Resources- Bureau for Children and Families giving the details to that person. Other adults onsite should be alerted to stay with the alleged victim and other potential victims. Once the allegations have been reported, the person to whom the allegations were made should not discuss the matter with other persons except law enforcement or designated state investigators. To do so could cause irreparable harm to the victims, their families, and the community.

Response Team.

As directed by the Office of the Bishop, the Conference Response Team may be called upon to assist in a given situation.

Handling calls and questions from the media. If a member of the media – newspaper, TV station, Radio station, Magazine – calls or approaches a staff or volunteer in person and asks about the situation, that person should get their name and phone number and respectfully tell them that the Director of Communications will get back to them with the answer as soon as possible. The following “hold response” can be used:

“I want to make sure we give you the most accurate and up-to-date information. The Director of Communications can best help you. If you give me your contact information, deadline and topic you are calling about, I will have them return your call as soon as possible.” or, “Here is the phone number/email of the Director of Communications...”

No staff person should answer any questions. The staff person should be polite, but firm. A staff person should **never** simply tell a reporter, “*No Comment*,” as this response raises concern that the incident (alleged or known) is not being dealt with or taken seriously by the church. Nothing is assured to be “off the record” when talking to the media. A staff person/volunteer should realize that any statement made to the media can be used publicly, even if the reporter says it is “off the record.”