

FIRST PRESBYTERIAN CHURCH OF HADDONFIELD

ANTI-HARASSMENT AND RESPECTFUL CONDUCT POLICY

Draft for Review

September 2026

FOREWORD

First Presbyterian Church of Haddonfield (“FPCH”) is committed to maintaining a safe and welcoming environment in which all persons can join together for worship, fellowship, service and education in the name of Jesus Christ.

We believe that all persons are created in the image of God and possess inherent dignity and worth. Consistent with our baptismal promises and our calling as a Christian community, we seek to treat one another with respect, compassion, fairness and dignity.

Harassment, discrimination, sexual misconduct, intimidation, retaliation, abuse and other forms of harmful or disrespectful conduct have no place in our church community.

FPCH therefore establishes this Anti-Harassment and Respectful Conduct Policy (“Policy”) to:

- establish clear expectations for respectful conduct;
- prohibit harassment and discrimination;
- provide safe and accessible avenues for reporting concerns;
- establish a fair and impartial process for responding to complaints;
- protect individuals who make good-faith reports or participate in an investigation from retaliation; and
- provide church leaders with clear responsibilities for responding to concerns.

This Policy is intended to establish standards of conduct for the FPCH community that may be broader than the minimum standards required by applicable law. Nothing in this Policy is intended to create rights or obligations inconsistent with applicable federal, state or local law, the Constitution and Book of Order of the Presbyterian Church (U.S.A.), or applicable Presbytery policies and procedures.

FPCH will seek to prevent, address and appropriately respond to conduct that violates this Policy.

The Personnel Committee has responsibility for oversight and periodic review of this Policy, subject to the authority of Session and applicable requirements of the Presbyterian Church (U.S.A.).

I. INTRODUCTION

A. Our Commitment

FPCH is committed to an environment characterized by mutual trust, dignity and respect and free from harassment, discrimination, intimidation, oppression, exploitation and retaliation.

This commitment applies to interactions occurring in connection with the life and ministry of FPCH, including worship, educational activities, meetings, employment, volunteer service, church-sponsored activities, events, communications and other activities conducted under the auspices of the church.

B. Scope

This Policy applies to:

- employees and clergy serving FPCH;
- members of FPCH;
- elders, deacons and trustees;
- volunteers;
- independent contractors;
- interns and temporary workers; and
- other persons participating in or conducting activities on behalf of FPCH, to the extent applicable.

This Policy applies to conduct occurring on church property, at church-sponsored activities and events, and through church-related electronic or other communications. Conduct occurring away from church property may also fall within this Policy when it is sufficiently connected to employment, church activities, church leadership or another FPCH relationship.

This Policy is intended primarily to address conduct involving adults age 18 and older. It complements, and does not replace, FPCH policies and procedures concerning children and youth, vulnerable adults, sexual misconduct, abuse, safeguarding and other matters addressed by separate church or Presbytery policies.

When conduct may fall under more than one policy, FPCH will determine which procedures apply and may address the matter under more than one applicable policy.

C. Church Standards and Legal Standards

FPCH's commitment to respectful conduct is broader than the legal definition of unlawful harassment.

Conduct may violate this Policy even when it does not constitute unlawful harassment or discrimination under applicable law.

At the same time, not every disagreement, interpersonal conflict, theological disagreement, performance concern, criticism or unpleasant interaction constitutes harassment.

The church will consider the nature, context, frequency, severity, intent and effect of conduct, as well as applicable law and church standards, when determining whether conduct violates this Policy.

Nothing in this Policy prohibits appropriate:

- performance feedback;
- supervision or management;
- pastoral care;
- accountability;
- theological discussion or disagreement;
- expression of religious beliefs;
- constructive criticism; or
- other legitimate church or employment activities.

Such activities must nevertheless be conducted respectfully and without unlawful discrimination, harassment, intimidation, threats or retaliation.

II. PROHIBITED CONDUCT

A. Harassment

FPCH prohibits harassment of any kind.

For purposes of this Policy, harassment includes unwelcome verbal, nonverbal, visual, electronic or physical conduct that:

1. targets an individual or group because of a protected or otherwise relevant characteristic;
2. threatens, intimidates, coerces, humiliates or degrades another person;
3. is sufficiently severe, pervasive or persistent that it interferes with a person's ability to participate in employment or church activities; or
4. otherwise violates FPCH's standards of respectful conduct.

Harassment may occur between people of the same or different genders and may be committed by a supervisor, employee, member, volunteer, elder, deacon, contractor, visitor or other person covered by this Policy.

A single incident may violate this Policy when the conduct is sufficiently serious.

B. Harassment Based on Protected Characteristics

Harassment based on a person's protected or otherwise relevant characteristic is prohibited.

Examples include conduct directed toward a person because of:

- race or color;
- national origin or ancestry;
- religion;
- sex or gender;
- pregnancy or related conditions;
- sexual orientation;
- gender identity;
- age;
- disability;
- marital or family status, where applicable;
- or another status protected by applicable law.

Examples of prohibited conduct may include slurs, derogatory comments, offensive stereotypes, threatening behavior, inappropriate jokes, degrading images, or other conduct directed toward an individual or group because of such a characteristic.

Examples are illustrative and are not intended to be exhaustive.

C. Sexual Harassment

Sexual harassment is prohibited.

Sexual harassment includes unwelcome sexual advances, requests for sexual favors, or other unwelcome verbal, visual, electronic or physical conduct of a sexual nature.

Sexual harassment may also include unwelcome conduct directed at a person because of sex, gender, sexual orientation or gender identity.

Examples include, but are not limited to:

1. Verbal Conduct

- sexual propositions or requests for sexual favors;
- unwelcome comments about a person's body or appearance;
- repeated unwelcome requests for dates;
- sexual jokes, comments or innuendo;
- sexually explicit or degrading comments;
- sexually oriented teasing;
- sexually explicit text messages or electronic communications.

2. Nonverbal or Visual Conduct

- displaying or distributing sexually explicit or sexually suggestive materials;

- sexually suggestive gestures;
- leering or persistent unwanted staring;
- sexually explicit photographs, cartoons or images;
- inappropriate electronic or social-media communications;
- sharing an intimate image of another person without that person's consent.

3. Physical Conduct

- unwelcome touching;
- unwanted hugging or kissing;
- pinching, patting or brushing against another person;
- blocking or cornering another person;
- other unwelcome physical contact of a sexual nature; or
- sexual assault or other criminal conduct.

4. Employment-Related Coercion

Sexual conduct is particularly serious when submission to or rejection of the conduct is used, explicitly or implicitly, as a basis for employment, volunteer placement, leadership opportunities, compensation, scheduling, promotion, evaluation or another church or employment decision.

Sexual harassment may be committed by a supervisor, employee, member, volunteer, contractor or other person covered by this Policy.

Consensual and mutually respectful interactions are not, by themselves, harassment. However, consent to one interaction does not constitute consent to subsequent conduct.

D. Bullying, Intimidation and Abusive Conduct

FPCH expects all persons covered by this Policy to communicate and interact respectfully.

Repeated or serious conduct that humiliates, threatens, intimidates, coerces, bullies or abusively targets another person may violate this Policy even when the conduct does not constitute unlawful harassment.

Examples may include:

- repeated yelling or threatening behavior;
- deliberate humiliation;
- repeated personal attacks;
- threatening or intimidating communications;
- abusive or degrading language;
- deliberate efforts to isolate or undermine another person; or
- repeated conduct intended to make another person fearful or unable to participate safely in church or employment activities.

Legitimate disagreement, constructive criticism, accountability and appropriate supervision do not constitute bullying merely because they are difficult or unwelcome.

E. Religious Expression and Theological Disagreement

FPCH is a religious organization, and discussion and expression of Christian beliefs are fundamental to its mission.

Respectful theological disagreement, discussion of religious beliefs, teaching, preaching, pastoral care and other appropriate religious expression do not constitute harassment merely because another person disagrees with the viewpoint expressed.

Religious expression may nevertheless violate this Policy when it becomes threatening, abusive, discriminatory, coercive, humiliating or otherwise harassing.

F. Retaliation

Retaliation is prohibited.

No person may retaliate against another person because that person:

- made a good-faith complaint or report;
- opposed conduct they reasonably believed violated this Policy or applicable law;
- participated as a witness;
- provided information during an investigation;
- served as an investigator or otherwise assisted in addressing a complaint; or
- exercised a right protected by applicable law or church policy.

Retaliation includes adverse employment or church-related action, threats, intimidation, exclusion, loss of benefits or opportunities, or other hardship imposed because a person engaged in protected activity.

Retaliation is a separate violation of this Policy and should be reported promptly.

III. EDUCATION AND TRAINING

FPCH will provide appropriate education and training concerning this Policy.

Training and education may include:

1. Providing this Policy to employees, clergy, elders, deacons, trustees, volunteers and other persons covered by the Policy, as appropriate.
2. Making the Policy available through FPCH's physical and online resources.

3. Providing training to pastors, staff and appropriate church leaders concerning harassment, sexual misconduct, respectful conduct, retaliation, reporting responsibilities and appropriate response to complaints.
4. Including this Policy in regular training for newly elected or ordained elders, deacons and trustees.
5. Providing returning officers with the Policy and reminding them of their obligations.
6. Providing information to the congregation concerning the purpose of the Policy and methods for reporting concerns.

FPCH will determine the frequency and format of required training and will maintain appropriate records of completion.

Church leaders who receive a complaint or otherwise become aware of conduct that may violate this Policy will receive guidance concerning their responsibilities and will not be expected to conduct an independent investigation unless specifically authorized to do so.

IV. REPORTING AN ALLEGED VIOLATION

A. Who May Report

Any person who believes they have experienced harassment, discrimination, retaliation or other conduct prohibited by this Policy may make a report.

A person who witnesses conduct that may violate this Policy may also make a report.

A person is not required to confront the individual whose conduct is in question before making a report.

B. Reporting Options

A person may report a concern to any of the following:

- their immediate supervisor;
- the Head of Staff;
- the Chair of the Personnel Committee;
- the Clerk of Session; or
- another designated FPCH official identified by the church for receiving complaints.

A person may choose any reporting avenue that feels appropriate.

If the complaint concerns one of these individuals, that person should not receive the complaint or participate in the investigation. An alternate person or body will be designated in accordance with the procedures in Section V.

Employees are not required to report a concern through their normal chain of supervision when doing so would be uncomfortable, inappropriate or impractical.

C. Reports Involving Possible Abuse or Criminal Conduct

Nothing in this Policy prevents or delays a report to law enforcement, child protective services, adult protective services, Presbytery or another appropriate authority when such reporting is required or appropriate.

When a report involves suspected child abuse, abuse of a vulnerable adult, sexual assault, physical assault, threats of violence, stalking or other potentially criminal conduct, FPCH will follow applicable reporting requirements and relevant FPCH and Presbytery policies.

Internal church procedures are not intended to replace or interfere with required reporting to civil authorities.

D. Good-Faith Reporting

Reports should be made in good faith.

A person who makes a good-faith report will not be subject to discipline merely because the investigation does not substantiate the allegation.

A person who knowingly makes a false accusation or makes a report maliciously may be subject to appropriate corrective action.

The distinction between an unsubstantiated complaint and a knowingly false or malicious complaint will be respected.

E. Initial Response

A person receiving a complaint should:

1. listen respectfully;
2. avoid making promises about the outcome;
3. avoid attempting to determine whether the allegation is true or false;
4. document the information received as accurately as reasonably possible;
5. promptly refer the matter to the appropriate person or body; and
6. take reasonable steps to protect the person from retaliation.

The person receiving a complaint should not conduct an independent investigation unless specifically authorized to do so.

F. Timing

Reports should be made as soon as reasonably possible.

FPCH will acknowledge receipt of a complaint promptly and will seek to determine the appropriate response and investigator without unreasonable delay.

The timing of an investigation may depend on the nature and complexity of the matter, availability of witnesses and documents, involvement of Presbytery or civil authorities, and other relevant circumstances.

V. ADDRESSING COMPLAINTS

A. General Principles

FPCH will respond promptly, fairly and appropriately to allegations under this Policy.

Investigations will be conducted, when appropriate, in a manner that is:

- impartial;
- reasonably thorough;
- respectful of the dignity of all involved;
- appropriately confidential;
- free from conflicts of interest; and
- consistent with applicable law and church governance.

The purpose of an investigation is to determine, based on the information reasonably available, whether conduct violated this Policy and what response, if any, is appropriate.

B. Determining Who Will Investigate

The appropriate investigating body will depend on the status of the person accused and the nature of the allegation.

1. Ordained Staff or Persons Subject to Presbytery Process

When the accused is an ordained staff member or another person whose conduct is subject to the jurisdiction of Presbytery, FPCH will consult with Presbytery and follow applicable Presbyterian Church (U.S.A.) and Presbytery procedures.

2. Church Members or Officers

When the accused is a church member, elder, deacon or trustee, Session will determine the appropriate process, subject to the Constitution of the Presbyterian Church (U.S.A.) and applicable Presbytery procedures.

3. Employees, Volunteers or Contractors

When the accused is a non-member employee, volunteer or independent contractor, the Personnel Committee or an investigator designated by the Personnel Committee will oversee the investigation, subject to the authority of Session and applicable law.

4. Conflicts of Interest

No person may participate in receiving, investigating or deciding a complaint when that person's impartiality could reasonably be questioned.

A person must recuse themselves when:

- they are the subject of the complaint;
- they have a close personal, family or financial relationship with a party;
- they are a material witness;
- they have a significant personal interest in the outcome; or
- another circumstance creates a reasonable appearance of bias.

When recusal is necessary, the appropriate governing body will designate an alternate investigator or decision-maker.

If an entire governing body has a conflict of interest, FPCH will consult with Presbytery and/or appropriate outside counsel concerning an alternative process.

C. Use of an Outside Investigator

FPCH may retain an independent outside investigator when appropriate, including when:

- the allegations are particularly serious or complex;
- a conflict of interest exists;
- the allegations involve senior leadership;
- an internal investigation would reasonably be perceived as lacking impartiality; or
- legal counsel, the church's insurer or Presbytery recommends an outside investigation.

D. Interim Measures

When appropriate, FPCH may take reasonable interim measures while an investigation is pending.

Depending upon the circumstances, interim measures may include:

- changing reporting or supervisory arrangements;
- separating individuals in the workplace or church setting;
- temporarily modifying schedules or assignments;
- restricting participation in particular activities;
- placing an employee on leave when appropriate;
- limiting contact between individuals; or
- taking other reasonable steps to protect individuals and preserve a safe environment.

Interim measures are not findings of wrongdoing and should not be punitive merely because a person has made a complaint.

FPCH will seek to avoid unnecessary adverse impact on the person who made the complaint while maintaining a safe environment for everyone involved.

E. Investigation Process

The investigator may interview:

- the person making the complaint;
- the person accused;
- witnesses;
- supervisors or church leaders with relevant information; and
- other persons reasonably believed to have relevant information.

The investigator may also review relevant documents, electronic communications, photographs, recordings or other materials.

Persons participating in an investigation are expected to provide truthful and complete information to the best of their knowledge.

The person accused will be given a reasonable opportunity to respond to the allegations.

No person will be required to prove a complaint solely through direct evidence; the investigator may consider all relevant information reasonably available.

F. Privacy and Confidentiality

FPCH will respect the privacy and dignity of all persons involved.

Information concerning a complaint will be shared only with persons who have a legitimate need to know in order to receive, investigate, respond to or resolve the complaint, or as otherwise required by law, church governance, Presbytery procedure, insurance requirements or other applicable obligations.

FPCH cannot guarantee absolute confidentiality.

All persons involved in a complaint are expected to respect the privacy of others and avoid unnecessary discussion of the matter.

G. Documentation and Records

FPCH will maintain appropriate records concerning complaints and investigations.

Records will be maintained securely and access will be limited to persons with a legitimate need to know.

Investigation records should be maintained separately from an employee's personnel file unless there is a legitimate reason for information to be included in the personnel file.

Records will be retained in accordance with FPCH's record-retention practices, applicable legal requirements, insurance requirements and Presbyterian Church (U.S.A.) or Presbytery requirements.

H. Findings

At the conclusion of an investigation, the investigator or appropriate governing body will determine whether:

1. the available information supports a finding that the Policy was violated;
2. the available information does not support a finding that the Policy was violated; or
3. the matter remains inconclusive.

A finding that an allegation is unsubstantiated or inconclusive does not mean that the person making the report acted improperly.

A good-faith complaint will not result in discipline solely because it cannot be substantiated.

I. Corrective Action

When a violation of this Policy is determined to have occurred, FPCH may take corrective or disciplinary action appropriate to the circumstances.

Possible actions may include:

- counseling;
- education or training;
- verbal or written warning;
- changes in responsibilities;
- removal from a volunteer or leadership position;
- suspension;
- termination of employment;
- termination of a contract;
- restrictions on participation in church activities; or
- other appropriate corrective measures.

The response will take into account the seriousness and circumstances of the conduct, prior relevant conduct, the person's role within the church, applicable employment requirements, the Book of Order, Presbytery procedures and other applicable considerations.

When a person is subject to the disciplinary authority of the Presbyterian Church (U.S.A.), FPCH will follow applicable ecclesiastical processes in addition to, or instead of, employment or church-community consequences as appropriate.

J. Communication of the Outcome

To the extent reasonably possible and consistent with privacy obligations, the person who made the complaint will be informed that the matter has been addressed and whether the church determined that corrective action was appropriate.

The person accused will also be informed of the outcome to the extent appropriate.

FPCH will not disclose confidential personnel or disciplinary information beyond what is reasonably necessary.

K. Review of the Process

There is no automatic right to a rehearing of every investigation.

However, a person may request review when they believe there was:

- a significant conflict of interest;
- a material procedural error;
- significant relevant information that was not reasonably considered; or
- retaliation or another serious concern regarding the process.

The request should be made to the governing body responsible for the investigation or to the alternative authority identified when that body has a conflict.

The reviewing body may affirm the determination, request additional review or take other appropriate action.

VI. RESPONSIBILITIES OF CHURCH LEADERS

Anyone serving in a supervisory, pastoral, personnel, Session or other church leadership role has an increased responsibility to respond appropriately when they become aware of conduct that may violate this Policy.

Church leaders should not ignore, minimize or attempt to resolve serious allegations informally without first determining whether formal reporting or investigation is required.

A leader who receives a complaint should follow Section IV.E of this Policy and promptly refer the matter to the appropriate person or governing body.

No elder, supervisor, Personnel Committee member or other leader should conduct an independent investigation unless specifically authorized to do so.

Leaders are also responsible for protecting individuals from retaliation and for maintaining appropriate privacy.

VII. RELATIONSHIP TO OTHER POLICIES AND GOVERNING AUTHORITIES

This Policy should be read together with:

- FPCH sexual-misconduct policies;
- child and youth protection policies;
- vulnerable-adult protection policies;
- personnel policies;
- employee grievance procedures;
- applicable Session policies;
- the Constitution and Book of Order of the Presbyterian Church (U.S.A.);
- applicable Presbytery policies and procedures; and
- applicable federal, state and local laws.

When two or more policies may apply to the same conduct, FPCH will determine which procedures should be followed and may address the conduct under more than one policy.

Nothing in this Policy limits the authority of Presbytery or another governing body under the Constitution of the Presbyterian Church (U.S.A.).

Nothing in this Policy prevents an individual from contacting an appropriate civil or governmental authority.

VIII. TRAINING, IMPLEMENTATION AND COMMUNICATION

The Personnel Committee will oversee implementation of this Policy subject to the authority of Session.

FPCH will:

- provide the Policy to employees;
- make the Policy available to appropriate church leaders and volunteers;
- communicate the Policy to the congregation;
- provide appropriate training to staff and church leaders;
- maintain documentation of required training; and
- periodically evaluate whether additional training is needed.

The Personnel Committee will establish an implementation plan following adoption of the Policy.

IX. POLICY REVIEW AND REVISION

The Personnel Committee will review this Policy periodically and recommend revisions to Session as appropriate.

The Policy should be reviewed particularly when:

- applicable law changes;
- Presbyterian Church (U.S.A.) or Presbytery requirements change;
- FPCH adopts related policies;
- an investigation identifies a procedural weakness; or
- experience indicates that clarification is needed.

Substantive revisions to the Policy should be approved by Session.

X. EMPLOYEE ACKNOWLEDGMENT

Acknowledgment of Receipt

I acknowledge that I have received and reviewed a copy of the First Presbyterian Church of Haddonfield Anti-Harassment and Respectful Conduct Policy.

I understand that I am expected to comply with the Policy and that I may raise questions regarding the Policy with my supervisor, the Head of Staff, the Chair of the Personnel Committee, the Clerk of Session or another designated church official.

I understand that retaliation for making a good-faith report or participating in an investigation is prohibited.

Employee Name: _____

Signature: _____

Date: _____

Received by: _____

Date: _____