



ARCHDIOCESE OF ST. LOUIS

OFFICE OF CHILD AND YOUTH PROTECTION
POLICY, PROCEDURE AND GUIDELINES

SAFE ENVIRONMENT PROGRAM

JULY 2018

INTRODUCTION

The following Policy and Guidelines (“Policy”) have been developed by the Archdiocese of St. Louis (“Archdiocese”) to give guidance to employees, volunteers, religious, priests and deacons of the Archdiocese on the subject of the prevention of abuse of minors and vulnerable adults. For the purposes of this Policy, any person under 18 years of age is considered a minor, however, this Policy and the term “minor” also apply to any person 18 years of age or older who is significantly impaired in the ability to, or otherwise unable to, protect his/her own rights and vital interests or to report abuse or neglect without assistance because of physical, mental or emotional impairment. Also for the purposes of this Policy, the Archdiocese of St. Louis includes schools, parishes and agencies of the Archdiocese (hereafter collectively referred to as “SPA”). The primary goal of the Archdiocese in this regard is to prevent the abuse of minors, and the primary method of prevention is education and care in the hiring and evaluation of employees and volunteers. This Policy specifically refers to the Safe Environment Program and all applicable prevention efforts of the Archdiocese. Since the possibility of abuse must be recognized, the *Policies and Procedures Regarding Cases of Sexual Abuse of Minors by Clergy or Other Church Personnel*, the *Child Abuse and Neglect Reports Policy*, and the *Registered Sex Offender Participation & Accountability Policy* also cover the investigation and reporting of incidents of abuse, as well as assistance to those affected by abuse.

POLICY

The Archdiocese is committed to the prevention of abuse of minors and vulnerable adults. For purposes of this Policy, abuse refers to physical and emotional abuse inflicted on a minor or vulnerable adult, other than by accidental means, as well as all forms of sexual abuse. All employees, volunteers, religious, priests and deacons working in the schools, parishes and agencies of the Archdiocese are expected to support this Policy and to comply with the guidelines developed to implement this Policy.

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The Archdiocese of St. Louis has developed the Safe Environment Program to ensure the safety of our minors, as required by the United States Conference of Catholic Bishops (“USCCB”) *Charter for the Protection of Children and Young People*. This program provides a framework for the Archdiocese to cooperate with parents, civil authorities, educators and community organizations to make and maintain a safe environment for children.

The Safe Environment Program has components for minors, parents, employees, volunteers, religious, priests, deacons and third-party contractors doing business with SPA. Each of these components is discussed in turn.

The Safe Environment Program in the Archdiocese is administered by the Office of Child and Youth Protection.

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I. PREVENTION OF ABUSE

Adults, for the purposes of this policy, include anyone who has turned 18 years old and who has graduated from high school or completed the equivalent education level.

I.1 **Safe Environment Program for Adult Employees, Volunteers, Religious, Priests and Deacons**

The program requires that all employees, volunteers, religious, priests and deacons who work with or near minors, who would participate in an overnight program with minors, or who would be on a list of persons eligible to work with minors, even if it is not known whether or how often he/she would actually be scheduled, must do the following:

- attend a *Protecting God's Children* workshop and agree to view online training updates every three years thereafter
- agree to undergo a national background screening that evaluates any history related to criminal charges, and agree to regular updates of the background screening every three months
- agree to provide a hard copy or electronic signature to the *Ethical Code of Conduct for Clergy, Employees and Volunteers Working in Ministry*

I.1.1 **Sexual Abuse Prevention Training for Adults** **—Protecting God's Children**

This program provides education regarding what signs to look for in the detection of abuse, both in circumstances and events which might indicate abuse as well as signs in the minors themselves. Training will be renewed online every three years.

Individuals who are victims of sexual abuse and who are required to be in compliance in order to work or volunteer in SPA are encouraged to contact the Executive Director of the Office of Child and Youth Protection (314-792-7271) to inquire about alternative educational materials.

I.1.2 **Background Screenings**

SELECTiON.COM is used by the Archdiocese to screen employees, volunteers, religious, priests and deacons. Screenings are done in order to review criminal history and an update is run every three months. The Archdiocese does not contact past employers or complete credit checks

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for Safe Environment purposes. Individuals must complete a worker registration form and have a background screening on file with the Archdiocese which is then applicable for all locations where they may work or volunteer. If a background screening is returned with findings related to a past offense allegedly committed by an employee, volunteer, religious, priest or deacon, the report is reviewed by appropriate Archdiocesan personnel to determine their eligibility to work with minors. Please note that when convicted of the offense of driving while intoxicated or driving under the influence, an individual is restricted from driving minors in a Church-related role for ten years from the date of the offense. If convicted of more than one DWI/DUI, an individual is permanently restricted from driving minors in a Church-related role.

A reference check may be requested from a prior SPA if an individual transfers locations.

1.1.3 Code of Ethical Conduct

Employees, volunteers, religious, priests and deacons who work with or near minors must read the *Code of Ethical Conduct for Clergy, Employees and Volunteers Working in Ministry* and sign the Commitment to Ethical Conduct. Signatures must be in hard copy form or done electronically online.

1.1.4 Continuing Education Requirement for Priests and Deacons of the Archdiocese of St. Louis

All active and retired priests and deacons of the Archdiocese who are working in ministry are required to complete ongoing education related to child protection issues. All priests and deacons must complete monthly bulletins through our online system. Accounts are monitored by the Vicar for Priests, the Director of the Permanent Diaconate, and the Executive Director of the Office of Child and Youth Protection. Regular reports are provided to the Archbishop for his review when this requirement is not met. Candidates for ordination are also required to comply. (*Compliance for seminary students will be monitored through the administration of Kenrick-Glennon Seminary.*)

Continuing education according to this Policy is required for active and retired priests and deacons who are providing any ministry with an SPA. Priests and deacons may, at times, be excused from certain requirements due to illness, aging or other compelling reasons. Exceptions for priests are granted by the Vicar for Priests in partnership with the Coordinator for Priest's Wellness and the Executive Director of the Office of Child and Youth Protection. Exceptions for deacons are granted by the Director of the Permanent Diaconate in partnership with the Office of Child and Youth Protection.

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Priests and deacons of the Archdiocese who fail to comply with the continuing education requirement may have their faculties rescinded at the discretion of the Archbishop.

1.2 **Safe Environment Program for Religious Order Priests and Brothers and Women Religious Serving in SPA**

Priests and brothers from religious orders and women religious who are in a position to work with or near minors in SPA must follow the same compliance regulations as other adults who work or volunteer with minors.

In addition to Safe Environment compliance, priests and brothers from religious communities require a letter from their superior upon their arrival to the Archdiocese stating there is nothing in their past that would prevent them from working with minors. Religious order priests assigned to be pastors, associate pastors, who provide ministry, or who live in residence at a parish in the Archdiocese are to be cleared through the Office of Priest Personnel in partnership with the Office of Child and Youth Protection. All background screenings will be updated every three months. Records will be maintained and updated by the Archdiocese.

1.2.1 **Child Protection Training & Continuing Education for Religious Order Priests**

The Safe Environment Program will accept alternative child protection training programs used by religious order communities only. Documentation must be provided naming the program and the date and location of attendance. To receive credit, documentation should be sent directly to the Executive Director of the Office of Child and Youth Protection. In addition, should the religious order community not provide child protection training, priests ministering in SPA will be required to utilize the curriculum offered by the Archdiocese. Priests will be required to attend *Protecting God's Children* and enroll with our online system in order to receive continuing education.

Compliance with Safe Environment Policy is required for active and retired priests who are providing any ministry within SPA. Priests may, at times, be excused from certain requirements due to illness, aging, or another compelling reason. Exceptions are approved by the Vicar for Priests in partnership with the local superior and the Executive Director of the Office of Child and Youth Protection. Exceptions are made case by case and may be temporary or permanent depending on the situation. Religious men who fail to comply with the continuing education requirement may have their faculties rescinded at the discretion of the Archbishop.

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1.3 Safe Environment Program for Contactors

Contractors are those individuals who work in SPA who are in a position to have contact with minors but who are not directly employed by the SPA. These individuals could be working for a company or group contracted to provide specific services (e.g. food service, maintenance providers, or after-school care).

1.3.1 Background Screening

It is important to make sure that contracted individuals are screened for any past criminal history. The responsibility for such screening rests with the employer, not with the administrator of the SPA. The administrator is responsible for ensuring that the contracted firm completes the screening at the appropriate time. Administrators must require evidence that the background screening has been completed. Contracted firms should provide a letter stating the date the individual was screened as well as a statement indicating that the individual has nothing in his or her history that would prevent them from working with or near minors. Contracted firms may also supply a copy of the employee's screening form from the State of Missouri. If a firm does not cooperate in this screening effort, another firm should be sought. The Office of Child and Youth Protection will assist the firm in setting up an account with potential screening providers if necessary.

There should be an ongoing evaluation of independent contractor personnel who are working with or who are in a position to have contact with children.

1.3.2 Code of Ethical Conduct

The Safe Environment Program also requires that all contractors working with the Archdiocese who may have contact with minors sign a Code of Ethical Conduct for third-party contractors. Certain types of contractors may be exempt while others are not.

1.4 Safe Environment Compliance for Undocumented Volunteers

Undocumented volunteers, who by the nature of their presence in the Archdiocese cannot be subject to the same required background checks performed on other adults in the Archdiocese, must adhere to the following guidelines if they intend to volunteer with or near children:

- Every effort must be made to determine whether there is or is not documentation for the individual.
- The individual must be a registered member of the parish or school for a minimum of six months before the individual can apply to volunteer.

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- The volunteer service must be performed in the presence of another adult who is in full compliance with the Safe Environment Program. The individual may not volunteer with or near children independently.
- The individual must provide two reference letters from those who can attest to their character. Reference letters should not be completed by family members or Archdiocesan personnel.
- The individual must attend a Protecting God's Children workshop.
- The individual must agree to and sign the *Code of Ethical Conduct for Employees, Clergy and Volunteers Working in Ministry*.

II. SAFE ENVIRONMENT COMPLIANCE FOR YOUTH

2.1 **Sexual Abuse Prevention Training for Children & Youth —Safe Touch Curriculum**

Students in Archdiocesan day schools and parish schools of religion (grades K-9) receive an age-appropriate curriculum annually. The Safe Touch curriculum has been approved by the Archdiocesan Child Safety Committee and was developed in partnership with professionals from various backgrounds including education, psychology and religious. The curriculum aims to teach children about healthy and appropriate boundaries, how to identify safe adults in whom they can confide, and teaches applicable steps they can take if they find themselves in an uncomfortable situation.

Parents or guardians are encouraged to view the curriculum in advance and reinforce key concepts at home. If a parent or guardian has concerns or objections about such material, these are to be addressed at the school and/or parish level, as appropriate.

Child(ren) may be excused from the curriculum at the request of their parent or guardian. If the parent or guardian does request that their child be excused, they will be provided with the curriculum to teach at home. If a parent or guardian declines and chooses not to provide the curriculum at home, they will be asked to complete and sign the "opt out" form provided by the school. Should the parent or guardian decline to sign the "opt out" form this should be noted on the student's form completed by the "lead teacher." The Safe Touch Program for Children and Youth will be coordinated and taught by a lead teacher designated by the principal or pastor and trained by Safe Environment Program staff.

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2.2 **Safe Environment Program for Student Employees & Volunteers**

For the purposes of this Policy, students include anyone who has not turned 18 years old and/or who has turned 18 years old but has not graduated from high school or completed the equivalent education level.

2.2.1 **Code of Ethical Conduct for Minors Volunteering or Working with Younger Children**

Young people who volunteer or work with or near minors as part of a high school service project or any other parish program or activity must sign the *Code of Ethical Conduct for Minors Volunteering or Working with Younger Children*. Parents or guardians must also sign this form and attest that the young person has nothing in his or her history that would prevent them from working with or near minors.

2.2.2 **Minimum Age for Lead Chaperones for Events Involving Minors**

For purposes of compliance, someone who is 18 years old and out of high school is considered an adult. However, when someone is serving as the lead chaperone for an event involving minors, he or she must be at least 21 years old, and his or her fitness must be determined by the SPA sponsoring the youth event.

III. SAFE ENVIRONMENT COMPLIANCE FOR OTHERS

3.1 **Safe Environment Compliance for Non-Archdiocesan or Private Groups**

Often SPA enter into agreements with outside affiliates who wish to utilize space at their location. Some examples include, but are not limited to:

- Sports-related camps
- Sports recreational leagues
- Home-school groups
- Support groups
- Private parties
- Scouts (that are not chartered through the school or parish)
- Non-profit organizations

Compliance requirements should be discussed, agreed upon, and documentation required prior to entering into any agreement with an outside affiliate, non-Archdiocesan program, or private group. Risk Management should be notified when allowing any private group to utilize space on any archdiocesan campus.

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SPA should consult with the Safe Environment Program to determine appropriate compliance measures for each individual group utilizing space. In some cases compliance requirements may be waived and in other cases may be required. Groups falling into the former category will not be subject to the audit and parents should be educated on the difference between a parish-sponsored ministry where compliance is mandated and an outside affiliate where compliance may be waved.

Parents should make every effort to ensure that they are placing their children in the care of safe adults, and direct any questions regarding the child protection policies of the private group directly to the administrator of that group. If any potential concerns related to child protection arise between a parent and the private group, the SPA should be notified immediately and the contract should be reviewed and potentially terminated.

3.2 **Safe Environment Compliance for Visiting Lay Ministers**

Individuals who plan to visit the Archdiocese to provide temporary ministry for SPA and who may come into contact or work directly with minors must provide written documentation from their home diocese of meeting all applicable compliance requirements. The individual should provide a letter outlining information by their local Safe Environment Program on letterhead. This letter should include a signature from Safe Environment personnel.

Visiting lay ministers must have an up-to-date background screening on file within the last 12 months, must have attended the appropriate child protection training offered by their home diocese, and must have agreed to the ethical guidelines established by their home diocese.

Visiting lay ministers should also be educated by the sponsoring location on the expectations of the Archdiocese when working with or near minors.

Visiting lay ministers may rely on compliance from their home diocese as long as residency has not been established in Missouri and/or the St. Louis metro area, there is no intent of establishing residency in Missouri, and the ministry would be considered temporary for a single semester or a single event. The Office of Child and Youth Protection is happy to assist with this process. All necessary paperwork must be on file and held at the sponsoring location prior to the individual beginning his or her service.

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IV. SAFE ENVIRONMENT COMPLIANCE FOR PARISH/SCHOOL EVENTS

4.1 **Safe Environment Compliance for Parish/School Family Annual Events**

Many, if not all, SPA host annual fundraising and/or family events where children attend but remain in the care and control of their parents or guardians. Examples of such events include but are not limited to parish picnics, fish fry dinners, breakfast with Santa, etc. Such events are considered family events and the SPA is not the primary caretaker for the minors in attendance.

It may be necessary to require certain employees or volunteers to be in compliance while others may be excused. An example is an individual supervising service hours for students who are dropped off by their parents or “Santa” who would have direct contact with many children.

Compliance for these events will be determined by the pastor or administrator of the SPA.

As with any program or event, the SPA should consider Safe Environment compliance and determine what steps may be necessary to ensure the event is safe for minors to attend. This can be accomplished in a variety of ways without requiring all volunteers to be in full compliance.

V. MONITORING SAFE ENVIRONMENT COMPLIANCE

5.1 **Internal Parish Audits and Archdiocesan Audit**

The Office of Child and Youth Protection as well as independent auditors hired by the United States Conference of Catholic Bishops will audit parishes and the Archdiocese, respectively, on a regular basis to determine whether and to ensure that all requirements of the *Charter for the Protection of Young People* have been met. While all SPA are accountable for ensuring that Charter requirements have been met, not all locations will be subjected to the audit process.

5.2 **Background Check Result with Criminal History: Suitability Determination and Appeal Process**

When the results from SELECTiON.COM are returned with criminal history attached, a committee reviews the results to determine if the individual is suitable to work with or near minors. If the determination is that the individual may not

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volunteer or may volunteer with limitations, the SPA safety coordinator will be notified and asked to inform the individual of his or her status. The determination for an individual will apply at all SPA. Possible outcomes are listed below:

- may be allowed to work with or near minors without limitations
- may be allowed to work with or near minors with limitations and/or supervision—in such cases the individual will receive a letter of determination from the SPA
- may be prohibited from working with or near minors; in such cases the individual will receive a letter of determination from the SPA

5.2.1 **Process for Appeal Regarding a Letter of Determination**

An individual may file an appeal in the event that he or she has been informed of his or her ineligibility to work or volunteer based on the results of their background screening. In order to request an appeal, they must have the full support of the pastor and/or administrator of the SPA. Appeals will only be considered for registered members of the parish or school, or for those who are otherwise known by the pastor or administrator. Information regarding how to begin the appeal process will be included in the letter of determination. All information related to criminal history is considered confidential and will only be available to individuals who are responsible for safe environment and/or administrative responsibilities to ensure that the SPA is following the *Charter for the Protection of Children and Young People*.

The individual must be prepared to provide required information regarding criminal history such as police reports and official court documents specifically related to all charges. The Office of Child and Youth Protection will not accept letters of reference, communications from third parties, or the individual's verbal or written explanation of the events in question. Exceptions may be made if the offense date does not allow for those documents to be retrieved.

The appeal process does not guarantee that a change in the original determination will take place. The Archdiocese reserves the right to deny volunteer positions to any person in order to maintain a safe environment for all of God's children.

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VI. COMMUNICATION OF REPORTING INFORMATION

- 6.1 All SPA in the Archdiocese must make Safe Environment compliance requirements and the following information readily available to employees, volunteers and all other individuals. SPA should have posters with the following information displayed in public areas and have brochures displayed and available. To request materials, please contact the Office of Child and Youth Protection.

**MISSOURI DEPARTMENT OF SOCIAL SERVICES
CHILD ABUSE AND NEGLECT HOTLINE NUMBER
1-800-392-3738 (for Missouri residents)
1-573-751-3448 (for those outside Missouri)**

To report old or current allegations of sexual abuse by a member of the clergy or by lay employees or volunteers of the Archdiocese, contact:

Sandra Price, Executive Director of the Office of Child and Youth Protection
314-792-7704 or sandraprice@archstl.org

Revised July 2018

Previous revision January 2015