



# Diocese of Grand Island

# Safe Environment Program

## Procedures

### Parish Safe Environment Coordinators

Parishes, Schools, and Programs in the Diocese of Grand Island are asked to identify a Safe Environment Coordinator. The Safe Environment Coordinator serves as the primary contact person for communication with the Office of Child Protection. Their responsibilities include implementing Safe Environment Programming in their parish, school, or program; submitting data regarding implementation of mandated programs to the Diocese of Grand Island Child Protection Office, attending Safe Environment Coordinator Training, and maintaining communication with the Diocesan Office of Child Protection.

The Safe Environment Coordinator implements Safe Environment Programming through:

- Requesting and documenting background screening of all staff and all volunteers who have regular contact with children and youth.
- Training all volunteers and staff who have regular contact with children and youth in Safe Environment Principles.
- Maintaining personnel files for all volunteers and staff who have regular contact with children and youth.
- Assisting religious educators and other program volunteers in providing education to children and youth regarding abuse prevention and right relationships.
- Documenting implementation of abuse prevention / right relationship education programs for children and youth.
- Participating in evaluation procedures mandated by the Diocesan Child Protection Office and the United States Conference of Catholic Bishops.

The Safe Environment Coordinator is under direct supervision of the local Pastor, School Administrator, or Program Director who appointed them. Consultation, guidance, professional support and training is provided to the Safe Environment Coordinator by the Diocesan Office of Child Protection.

### Safe Environment Strategies

#### Code of Conduct

“A safe environment program begins with a "code of conduct" for all adults who work with youth on a regular basis. A "code of conduct" establishes acceptable behavior that is legal, professional, and responsible and it must include standards of conduct with regard to sexual abuse and harassment. Written copies are to be provided to each employee/volunteer who must acknowledge in writing that they understand and must abide by it.”

- OCYP: Guidelines for Implementation of Safe Environment Programs

**The Diocesan Code of Pastoral Conduct** incorporates the safe environment code of conduct form. The Diocesan Code of Pastoral Conduct is to be reviewed and signed by all diocesan and parish volunteers and employees. The safe environment code of conduct form entitled "Volunteer Code of Conduct" found on the last page of the document is to be reviewed and signed annually by individuals working with children and youth. The Code of Pastoral Conduct can be found in the master forms section of the Diocesan Child Protection Policy Manual as well as the general Diocesan Policy Manual.

**Code of Conduct Violations** are to be documented on an incident report form. Forms can be found in the "Recognizing, Responding, Reporting" section of the Child Protection Policy Manual. Incident report forms should be completed any time a violation of the code of conduct is noted, or the code of conduct cannot be followed (e.g. an adult finds a child waiting outside the building for an absent parent and waits with them to insure their safety). In the event of a code of conduct violation, the individual shall meet with the safe environment coordinator, pastor or administrator to provide the context of the incident and problem solve strategies to prevent future incidents. Some code of conduct violations may warrant redirection and monitoring / supervision of the individual (e.g. potential boundary violations), and others may warrant termination of employment or volunteerism (e.g. sexual behavior with children / youth, use of alcohol / controlled substances while supervising youth, etc).

### **Supervision of Minors**

Adults are to utilize a team approach when dealing with children and youth. A staff to youth ratio of one adult for every ten youth is recommended. Higher ratios are recommended for younger children. Adults are not to meet alone with children / youth. The presence of at least two adults is recommended. It may be permissible in some cases for a teacher to work alone with a group of children and youth (e.g. in a classroom setting where visual observation by other classes and / or a DRE / Administrator).

**Events and trips** which include both male and female children / youth should include both male and female adult sponsors. Clergy should not allow individual young people to stay overnight in the cleric's private accommodations or residence. Staff and volunteers should not provide shared, private, overnight accommodation for individual young people including, but not limited to, accommodations in any Church owned facility, private residence, hotel room, or any other place where there is no other adult supervision present. Adults should avoid being alone with youth in a vehicle.

**Situations that require one on one meetings** with youth (e.g. counseling sessions, etc.) should take place in a facility accessible to the public and should be formally scheduled. Under normal circumstances, an adult meeting in isolation with a single child / young person is considered a code of conduct violation and the procedure for documenting code of conduct violations should be followed.

### **Boundaries**

Adults shall maintain clear boundaries when working with children and youth. This includes avoiding any overt or covert sexual behavior or communications, any physical contact that might be misinterpreted or misconstrued, and any exposure to inappropriate media. Adults are responsible not only to demonstrate clear and appropriate boundaries, but also to respond to inappropriate boundaries exhibited by youth with appropriate redirection.

**Physical contact with youth** should occur (a) only when completely nonsexual and otherwise appropriate, and (b) never in private.

### **Maintaining Good Judgment**

Adults are expected to utilize their best judgment in dealing with children and youth and to take measures to protect good judgment. Clergy, staff, and volunteers have the duty to be responsible for their own spiritual, physical, mental, and emotional health.

**Adults should refrain from** (a) the illegal possession and/or illegal use of drugs and/or alcohol at all times, and (b) the use of alcohol when working with youth.

### **Conflicts of Interest / Dual Relationships**

Clergy, staff, and volunteers should avoid situations that might present a conflict of interest / dual relationship with children and youth. Adults shall avoid singling out children / youth with privileges, gifts, or behavioral consequences.

**Pre-existing relationships** (e.g. family, employment, neighborhood / family friendships, etc) do not preclude working in supervisory roles with children and youth, but should be disclosed to supervisor / colleagues and the potential conflicts in such dual relationships should be discussed.

**Reasonable and appropriate rules / expectations and consequences** for child / youth, are to be identified and implemented consistently. Rules / expectations and consequences should be presented to children / youth and parents in writing. Adults should make efforts to utilize descriptive praise and redirection and logical consequences in dealing with children and youth, avoiding both excessive flattery and punitive actions.

**The giving or accepting of gifts** should be discussed with a supervisor or team. Expensive gifts shall not be offered or accepted without prior written approval from the pastor or administrator.

### **Accountability**

Clergy, staff, and volunteers must hold each other accountable for maintaining the highest ethical and professional standards. Clergy, staff, and volunteers have a duty to report their own ethical or professional misconduct and the misconduct of others.

**Illegal actions by clergy, staff, or volunteers**, should be reported to the proper civil authorities immediately. Also notify the Pastor and/or Chancery Office immediately.

**Code of conduct violations** shall be reported to the individual's immediate supervisor. When an uncertainty exists about whether a situation or course of conduct violates this *Code of Pastoral Conduct* or other religious, moral, or ethical principles, consult with:

- Peers,
- Others knowledgeable about ethical issues, or
- The Chancery / Office of Child Protection.

### **Open Communication**

Open communication between volunteers / staff and supervisors, parents, and children / youth is to be encouraged. Children / youth and parents shall be informed of the Diocesan Child Protection Policy, parish safe environment procedures, and the Diocesan Code of Pastoral Conduct. Children / youth and parents shall be encouraged to approach volunteers / staff with any questions or concerns. Concerns identified by children / youth, parents, volunteers / staff shall be met with active listening, empathy, and a problem-solving approach.

**Confidentially** shall be maintained, disclosing information provided by children / youth and parents on a "need to know" basis only. Children / youth and parents shall be informed of the limits of confidentiality and that information indicating abuse of a minor and / or other potential harm to a minor will be reported as necessary to prevent harm. All suspicions of abuse will be reported to legal authorities, as per Nebraska law.

**Privacy** shall be encouraged, discouraging gossip and unnecessary communication of others' personal information. **Secrecy** shall be discouraged, communicating to children and youth that any information provided to them by staff and volunteers may always be shared with parents and other concerned adults. Children / youth shall be encouraged to share any concerns they have regarding their well-being or the well-being of others with a trusted adult.

**Online Communication with Minors** is cautioned. Staff and volunteers are encouraged to follow the same code of conduct and utilize the same safe environment strategies that are recommended for face to face interactions. They are encouraged to make all communications available to supervision and monitoring by other adults and to avoid private / personal communications.

### **Safe Environment Training**

As mandated by the USCCB Charter for the Protection of Children and Young People:

**Article 12.** Dioceses / eparchies are to maintain safe environment programs which the diocesan / eparchial bishop deems to be in accord with Catholic moral principles. They are to be conducted cooperatively with parents, civil authorities, educators, and community organizations to **provide education and training for children, youth, parents, ministers, educators, volunteers and others about ways to make and maintain a safe environment for children and young people.** Dioceses / eparchies are to make clear to clergy and all members of the community the standards of conduct for clergy and other persons in positions of trust with regard to children.

### **Initial Safe Environment Training**

Individuals are required to participate in initial training prior to working with children and youth as a volunteer or employee. All individuals having regular contact or who are in a supervisory role with children and youth are required to complete training. Other individuals may be required to participate in training as necessary to reduce risk in a higher risk event (e.g. adults interacting with youth in a one-time activity or event where parents are not present, etc).

**Initial training** for staff and volunteers shall include a number of central components:

Defining Abuse

Reducing Risk – Safe Environment Strategies

Recognizing Signs of Abuse and Red Flags in Relationships

Responding to Signs

Reporting Abuse

Power point slides and presenter notes are available in the Safe Environment Coordinator's manual and through the Diocesan Child Protection Office.

**Facilitators** are encouraged to administer a pre-test to assess general knowledge base prior to training. Participants are to complete a post-training review following completion of training. A copy of the post-training review is to be sent to the Diocesan Child Protection Office as evidence of completion of training. A copy may also be kept in the individual's personnel file. Facilitators are also encouraged to keep a roster of individuals present for training. This may serve as their record of completed trainings.

Training dates from post-training reviews submitted to the Diocesan Protection Office will be entered into the database and maintained for each individual.

### **Continuing Education**

Continuing education is offered to all volunteers and employees on an annual basis. Continuing education topics, notes, and post training reviews are provided by the Office of Child Protection. Parishes / Schools / Programs may also choose to offer a program based on their specific needs on a given year. Examples of continuing education programs include: Adequate Supervision of Children and Youth; Promoting Safe Environments Through Education; The Sexual Abuse of Children: Throughout our Country and within the Church; If We Build It – They Will Come: Responding to Disclosures of Abuse.

## **Background Screening**

The background of all volunteers who will have regular and / or supervisory contact with children and youth and all parish and diocesan employees shall be screened.

## **References**

References are requested as part of the volunteer and employee application process for parishes, schools, and diocesan programs. A Volunteer Application and Volunteer Reference Form is provided by the Diocesan Child Protection Office and can be found in the master forms section of the policy manual and on the Diocesan website.

## **Criminal History Checks**

Criminal history checks must be completed for all individuals who will have regular contact or serve in a supervisory role with children and youth. The check is to be completed prior to the individual's involvement with children and youth. Criminal history checks are completed by the Diocesan Vice Chancellor through a contracted screening company. The current company utilized is Choice Point, a Lexus Nexus Company.

**Background Authorization, Background Questionnaire, and Background Verification Disclosure Forms** are available in the master forms section of the Child Protection Policy Manual and on the diocesan website. The Background Authorization Form and Background Questionnaire are to be completed and signed by the individual and submitted to the Chancery Office (P.O. Box 1531, Grand Island, Nebraska 68802). A copy of the Background Questionnaire may be retained for the individual's personnel file, but no copies of the Background Authorization form should be retained outside of the Chancery office file, as this form contains identifying information, including social security number.

**Individuals for whom a criminal history is found** will be contacted directly by Choice Point / Lexus Nexus. If the record is in error, they will be provided with guidance and direction in correcting the erroneous record. Results of criminal history screens will be reviewed by the Director of Child Protection. Results that may impact work with children / youth will be discussed with the individual in a pastoral setting (pastor, administrator, or safe environment coordinator) to gather information regarding context and discuss potential limitations.

**Rescreening** of individuals' criminal history shall be completed every three years. (With one exception; diocesan, school and parish employees who are screened as a function of holding a professional license or certification for their current position may be rescreened every 5 years.) Individuals are asked to provide informed consent, as documented by their signature on Background Authorization and Background Questionnaire forms.

## **Child / Youth Education**

"Training programs for *children and young people* should include age appropriate materials pertaining to personal safety. This includes information about improper touching and relationships. Children are not expected to be fully knowledgeable about child abuse or of the laws governing care of children but they need to know when they should seek assistance from a trusted adult."

-OCYP: Guidelines for Implementation of Safe Environment Programs

### **Child / Youth Curriculum**

In the Diocese of Grand Island, personal safety information is presented in the context of “Right Relationship Rules.” A list of the “Rules for Adult / Child Interactions” is available on the Diocesan website and is posted in most parishes and schools. A single session curriculum is the basis of this education and is supplemented by curriculum components, designed to be integrated into the religious education curriculum of parishes and schools.

**“Know the Rules for Adult / Child Interactions”** is a single session curriculum designed to educate children and youth in the adult code of conduct. Materials are presented in age appropriate terms in the context of a general discussion of rules, “God’s rules”, gospel rules, and the establishment of classroom rules. Children and youth are instructed to tell a trusted adult whenever they feel pressured to break the rules. “Know the Rules for Adult / Child Interactions” is included in the Safe Environment Coordinators Manual and is available on the diocesan website.

**Curriculum Component Resources** are available to catechists and youth volunteers to integrate personal safety and right relationship concepts into their ongoing interactions with children / youth. Resources include discussion points and activities that can be integrated into existing religious education curriculum and youth activities. Copies of the resource sheets are included in the Safe Environment Coordinators Manual and are available on the diocesan website.

**Enrollment / sign in sheets** documenting child / youth attendance at “Know the Rules” sessions and total enrollment of children and youth in each parish / school / program are to be submitted to the Office of Child Protection within 30 days of completion of “Know the Rules” sessions.

## **Documentation**

### **Child Protection Database**

The Diocesan Child Protection Office shall maintain a database of all diocesan, school and parish staff and all active child / youth volunteers. Parishes, schools, and programs shall submit criminal background screening paperwork and post-training reviews and / or training rosters as new volunteers and staff are appointed. Beginning in 2009, parishes / schools / programs shall submit a list of all active volunteers and staff twice annually (November 15 and March 15).

### **Criminal Background Screening**

Completed Background Authorization and Background Questionnaire forms and results of criminal background screening shall be maintained in locked / confidential storage by the Vice-Chancellor of the diocese. The Vice-Chancellor shall notify parishes / schools / programs when screens have been completed documentation of this notification shall be maintained by the individual parish / program / school.

### **Volunteer / Staff Training**

Individual parishes / schools / programs shall maintain documentation of training programs, in the form of sign-in sheet / training rosters, and / or individual post-training reviews. Original post-training reviews may be submitted to the Child Protection Office for data management and storage

### **Personnel Files**

Personnel files for all volunteers and employees shall be maintained by the parish / school / program where the individual was hired / appointed. Personnel files shall include a volunteer or employee application, including references; documentation of completed screening and training; and signed acknowledgement of receipt of policy and Volunteer Code of Conduct (signed annually).

### **Child / Youth Education**

Parishes / Schools / Programs are to maintain records of the number of children enrolled in their programs and the number of children / youth who participated in "Know the Rules for Adult / Child Interactions" sessions. Enrollment and attendance data shall be submitted to the Diocesan Child Protection Office within 30 days of the completed session.

## **Evaluation**

### **Adult Training**

**Pre-Training Assessments and Post-Training Reviews** are to be administered at the time of Initial Safe Environment training to assess effectiveness of training in teaching key concepts. Safe environment coordinators are encouraged to administer a **retention assessment** (one per individual) at various intervals. Results will be analyzed to assess the retention of training content over time.

**Surveys** are to be distributed on an annual basis to gather feedback regarding training format, content, and presentation.

### **Child / Youth Education**

Measures to assess child / youth education effectiveness will be implemented in a sample of parishes / schools / programs, beginning in the Fall of 2009.

**"What do you know about Rules for Adult / Child Interactions?"** questionnaires are to be distributed to parents at the time of initial parish / school / program enrollment. Completed questionnaires are to be returned to the Child Protection Office to be used as a baseline measure of children's knowledge prior to participation in safe environment programming.

**"What do you remember about Rules for Adult / Child Interactions?"** coloring pages and / or **"Rules and Reasons"** activity sheets are to be distributed at the beginning of annual **"Know the Rules for Adult / Child Interactions"** session, beginning in first grade. Activity sheets are to be returned to the Child Protection Office as a measure of retention of information at each grade level.



### **Safe Environment Programming**

Surveys shall be collected periodically to gather feedback and assess effectiveness of safe environment strategies and reporting procedures.

## **Recognizing Warning Signs, Responding to Distress, Reporting Abuse**

### **Recognizing Warning Signs**

Volunteers and staff shall be aware of warning signs in adult / child interactions and respond to such signs through appropriate intervention. Observation of warning signs shall be reported to an immediate supervisor. Supervisors shall respond with monitoring of the situation, pastoral confrontation of the adult in question, redirection, and problem-solving. If the individual in question fails to respond to redirection or problem-solving, or if monitoring reveals additional concerns, they may be removed from their current position with children and youth. If at any point, the observing volunteer / staff person or supervisor suspects that abuse of a minor has occurred or is occurring, observations shall be reported immediately to legal authorities, as per Nebraska law.

### **Responding to Distress**

Volunteers and staff shall be aware of signs of distress in children and youth and respond in an active and empathic manner. Parents shall be notified regarding signs of distress observed in their child and offered support and information / resources. Diocesan Victim Assistance Coordinators may be utilized as a source of information, even if there is no identified abuse. Contact numbers may be provided to parents at anytime.

**When abuse of a minor is suspected** defer to the flow chart for responding to disclosures of abuse below. In the case of suspected abuse, legal authorities shall be notified prior to contact or communication with parents. Communication with parents shall occur only after approval of the investigating authority.

### **Reporting Abuse**

When abuse of a minor is suspected, follow the procedure for responding to disclosures of abuse below. It is recommended that volunteers / staff contact their immediate supervisor for guidance / support in making the report, but not if seeking such contact delays reporting to legal authorities. Reports may be made to the Child Abuse / Neglect Hotline, Nebraska State Patrol, or Local Law enforcement.

**Witnessing abuse** requires immediate action. If an employee or volunteer observes directly the abuse of a minor (or physical harm of a minor by peers) they shall take reasonable action to stop the incident (without placing themselves or others in harms way) and call 911 for immediate assistance.

**When a child discloses abuse** volunteers and staff shall take care to avoid acting in an investigative role, but rather, listen actively, document, and report what the child says and any additional observations that may be pertinent to the situation. Volunteers and staff shall not place the child at increased risk by asking intrusive or leading questions, but shall restrict any queries to minimal facts (e.g. “What happened?”; “Where?”; “When?” ; “With whom?”; and “Are you ok? / Do you need medical assistance?”). Information disclosed by the child shall be reported directly to authorities by the individual to whom the child disclosed and information regarding the child’s report shall be shared with others on a need to know basis only.

