

Diocese of Buffalo

Safe Environment Office

Subject: Safe Environment Program Policies

March 20, 2024

In June 2002, the United States Conference Catholic Bishops (U.S.C.C.B.) mandated certain policies for individuals across the country who work with youth. The Charter for the Protection of Children and Young People (The Charter), which can be found on the U.S.C.C.B. (<https://www.usccb.org/offices/child-and-youth-protection/charter-protection-children-and-young-people/>), recognized the problem of child sexual abuse as a significant problem world-wide and that as a Catholic community; we have a responsibility to protect children from sexual predators.

In simple terms, The Charter outlined standards for:

- Training for identified categories of adults and screening of individuals who work with youth or vulnerable persons
- Training for children
- Outreach and support to victims of clergy abuse

The main emphasis of the document is that ALL active clergy, and adult employees and volunteers are to be trained to recognize the warning signs of abuse and what to do when they have a concern. This includes notifying the proper police and Church authorities.

Dioceses are to develop a Code of Conduct which describes appropriate and inappropriate behavior when working with youth.

The Charter mandates that proper applicant screening be conducted on adults who work with youth or vulnerable persons. The screening must include reference checks and a criminal background check.

In addition to the training requirements for adult volunteers and employees, The Charter mandates that dioceses offer training to parents, and that children in Catholic schools and religious education programs for Grades K-12 are to be provided training.

As a separate and equally important component, The Charter includes requirements for outreach and care for victims of clergy abuse.

The Diocese of Buffalo has provided a specific response to The Charter which includes the policies listed below:

A Safe Environment Office was created at the Catholic Center to ensure that the policies of the Diocese are fully communicated and implemented. At the local level, each parish, school and Catholic organization has a Local Safe Environment Coordinator. The local coordinator is generally the pastor or administrator of a parish and the principal and canonical administrator of a school. Additional administrators may also be appointed. Administrators have special privileges on the Virtus website to run reports to monitor participant compliance as well as update records and record training as complete.

All forms and updates to policy are published on the www.virtus.org website under the "My Diocese" tab in the "My Forms" section for "local coordinators" to view or download.

For ALL EMPLOYEES:

1. Pre-hire: A completed **employment application** should already be on file at the location of the hiring entity (parish, school or organization).
2. During the hiring process, at least **2 references** must be checked and documented by the hiring supervisor. References should not include a relative. References should include former supervisors. If the employee has regular contact with children, references should be told that the applicant may be working regularly with children. The reference should be asked if they would have any concerns about the applicant working alone with or around children. Other questions in the reference check should include a discussion about character and competency to perform the job for which they are being hired.
3. All employees must sign the **Code of Conduct** - to be maintained in a file for the employee at the local entity's facility.
4. All employees must submit to a **criminal background check**. These checks are conducted by the Diocese in cooperation with information provided by the schools, parishes and organizations.

ALL VOLUNTEERS:

1. Must complete a **Volunteer Questionnaire** which should be maintained in a file at the location of the hiring entity (parish, school or organization). Note that the Volunteer Questionnaire does not specifically provide space for phone numbers of volunteer references. However, it is necessary to collect contact names and phone numbers in order to conduct the reference checks. Be sure to collect that information. Volunteer references do not need to be employment references.
2. **Reference checks.** At least 2 references should be checked and documented for all regular volunteers. Reference checks should be performed by an assigned "employee" of the school or parish, or diocesan organization. Preferred references are from persons who have worked with the individual in volunteer or other activities. Relatives of the applicant may not be used a reference. If the volunteer has regular contact with children, references should be told that the applicant may be working regularly with children. The reference should be asked if they would have any concerns about the applicant working alone with or around children. Reference checks should be conducted in person or by phone. A form letter is not an appropriate method of conducting a check of references.
3. Sign the **Code of Conduct** - to be maintained in a file for the volunteer at the local entity's facility. Note that the signature on the back of the code of Conduct form authorizes the diocese to conduct a criminal background check.
4. Volunteers that work with children must go through a **criminal background check**. These are conducted by the Diocese with information provided by the individual through the school, parish or diocesan affiliate. There are no exemptions for those who may have a background check as a result of prior employment background checks. This includes all categories of employees and volunteers including teachers.

Protecting God's Children™ Workshop and Ongoing Training:

The Protecting God's Children™ workshop is required for those individuals (employees and volunteers) who have regular contact with children or vulnerable persons. The main purpose of the initial training is to help the community become aware of the extent of the problem of child sexual abuse in society, and provide solutions to prevent abuse from occurring. Additionally, monthly training bulletins and periodic re-certifications are required as follow-up for anyone who is required to attend the workshop. Pre-registration for the Protecting God's Children™ workshop is encouraged at www.virtus.org.

New employees and volunteers who are required to attend the workshop are required to attend within 90 days of their start date. The local organization may grant a thirty (30) day extension. However, NO adult can be alone with a minor or vulnerable adult if they have not been trained, and screen through reference checking and a criminal background check.

Who needs to attend? All adults over the age of eighteen (18) who have regular contact with youth under the age of eighteen (18) or vulnerable persons are required to attend. Minors, those individuals that are under the age of eighteen, are specifically discouraged from attending this program, as it is geared for adults. Seventeen year olds may attend with a parent or guardian, however they are NOT required. The final decision on specific job functions that require attendance may be made at the local school or parish level. Some guidelines are listed below to clarify the intent. In the examples below, we are **always referring to adults**.

In the parish: All clergy (priests and deacons), youth ministers, religious education coordinators should attend. All staff or volunteers involved with music, spiritual or sports programs (where youth or vulnerable persons may be involved) should attend. This includes coaches. Eucharistic Ministers who take the Eucharist to homes where youth or vulnerable persons may be present should attend. All adult catechists should attend. Facilitators for the Children's Liturgy of the Word should attend. The parish secretary should attend as they may be in regular contact with youth.

In the school: All clergy (priests and deacons), priests, deacons, administration, secretaries, guidance counselors, teachers, aides, nurses, cafeteria workers, coaches and maintenance personnel should attend. School secretaries and administrative staff are required to attend the training. All employees and volunteers who have regular contact with children or vulnerable persons including lunch monitors and all parent or community volunteers who encounter youth or vulnerable persons through school programs should attend the training. Volunteers who accompany children or vulnerable persons on field trips or other school activities should attend. Individuals who are certified social workers or state mandated reporters are NOT exempted.

Scout Leaders. Scout leaders who go through scout training on child sexual abuse prevention are granted an exemption from the diocesan live training, Code of Conduct, Volunteer Questionnaire and criminal background check IF their work is limited to the Scouts. This presumes that those individuals receive their training and clearance through the scout program. If these leaders work in another ministry in the Diocese, they should participate in the Protecting God's Children™ training.

Ongoing Training Requirement. Monthly training bulletins and periodic re-certifications are an integral part of the training mandate for everyone who has had Safe Environment training. The Protecting God's Children Workshop provides only an overview of the training program and diocesan policies. Thus, ongoing training is an important component of the complete training required for the protection of youth. Individuals who do not comply with the ongoing training requirement will be required to re-take the Protecting God's Children Workshop and continue with the ongoing training components or risk losing their "compliance" in the diocese.

SAFE ENVIRONMENT TRAINING FOR YOUTH in Schools and Parish Programs

The Diocese of Buffalo requires age-appropriate Safe Environment training for all youth in schools (K-12) and in parish-base faith formation programs. The training is to be provided on an annual basis. The Diocese implemented the Virtus "Empowering God's Children" program as the recommended option for this training. Materials are available on the Virtus website and included videos, lesson plans and activities. Included also are options for home-based training.

Other organizations which rent space may be subject to different rules, including providing evidence of liability insurance and sexual misconduct insurance, child protection training and background checks. These include before and after school programs, other youth programs and adult programs that may be present while youth or vulnerable persons are present. These cases will be evaluated on a case-by-case basis.

Note on Privacy:

Collection of personal information is necessary in order to conduct criminal background checks and reference checks. According to counsel, it is entirely legal and appropriate to request this type of information from all volunteers and employees. In many cases, our volunteers have not been asked previously to provide their personal information as a condition of their ministry. Note that anyone seeking employment will always provide their Social Security Number to their employer. Likewise, it is now necessary for our volunteers to provide this information so that we can protect the safety of our children through criminal background checks. All personal information must be maintained in the parish or school in a secure and locked location so that this information is not available for inappropriate use. Appropriate measures should also be taken to maintain confidentiality of information kept on computers and computer networks. For those instances where information is to be transmitted over the Internet, secure technology, encryption and password protection should be utilized to maintain security. This same level of confidentiality will be maintained at the diocesan level.