Safeguarding God's People:

Safe-Church Policy of the Episcopal Diocese of Pennsylvania
for Vulnerable Adults

I.   THEOLOGICAL AND ETHICAL FOUNDATIONS

"And the Word became flesh and dwelt among us, full of grace and truth; we have beheld the Word's glory, glory as of the only Child from God."

— John 1:14 (*An Inclusive Language Lectionary*)

God expressed the fullness of humanity in Jesus of Nazareth, whom we worship as the Word made flesh. To be human is to live with God and the whole of creation in the fullness of freedom and the challenge of responsibility. The pattern of Jesus' life, death, and resurrection resonates unreservedly with God's call to perfect freedom and responsibility. In baptism, God, speaking through the Church, claims us in Christ. We become, in Christ, the community of God's final purpose: justice and peace, love and plenty for the whole creation. This new community lives in Eucharistic fellowship with God and Creation, as a sign and instrument of God's reconciling purpose in the world.

The Church is called to embody and advance God's mission. Ministry is the vocation of the whole community: laypersons, deacons, priests, and bishops who together represent Christ and the Church in the world.

The obligation to seek and serve Christ in all persons and to respect the dignity of every human being is binding for all the baptized. The authority with which *leaders* — ordained persons and adults who minister with minors *(vulnerable adults),* and youth in leadership roles — are entrusted, creates an inherent power imbalance in the *pastoral relationship*. This power imbalance derives from the leadership role and, in the case of clergy, the symbolic authority of an ordained person. Christian leadership is intended to provide occasions for guidance and grace, and its abuse is always and unequivocally wrong.

Ministry involves a necessary tension between a Gospel-based integrity and a Gospel-based intimacy as modeled by the life of Christ. A rigid adherence to a system of rules leads to an unproductive legalism. Yet, without the framework of the law, the intimate relationships into which Christ calls us risk distortion and harm. All the people of God are called to minister attentively within this tension. These model policies are intended to provide a pattern for attentive practice of ministry.

- This document is a statement for the Episcopal Church, setting forth expectations for its leaders in their relationships with vulnerable adults. The purpose of these model policies is to foster the highest standards of behavior in ministry settings. The document includes:

- *Screening and Training Protocols* (Appendix A), which explains the level of screening and training required before engaging in ministry with vulnerable adults;

- A description of requisite training that is specialized and tailored to ministry role and function;

- Behavioral standards designed to ensure that vulnerable adults and all who engage in ministry with them are treated with dignity and respect in all settings; and

- ***Practices and Guidelines for Social Media and Electronic Communications for Vulnerable Adults*** (Appendix B) which contains recommended Practices and Guidelines.

II. EXPECTATIONS AND LOCAL IMPLEMENTATION

This policy sets forth statements of general expectations and guidelines of behavior for ordained and lay people in the church when engaged in ministry with vulnerable adults. This policy is mandated for all such activities sponsored by every congregation, institution, organization, school and agency in this diocese. The purpose of this policy is to create safe and welcoming space for vulnerable adults and those engaged in ministry with vulnerable adults, and to prevent sexual abuse.

This policy presents best practices for creating safe space. Circumstances in some situations may make some of these best practices difficult to implement or even unworkable. As a result, local entities may make additions or revisions in developing policy as long as they meet or exceed the requirement of this policy. This requires that local leadership understand this policy thoroughly enough to make appropriate judgments about local circumstances. Any such additions or revisions must be submitted in writing for the approval of the Bishop. No provisions may be omitted from this policy.

Church governing bodies and all leaders should understand this policy and all local requirements thoroughly enough to make appropriate judgments, and should consult with the Offices of the Diocese when unanticipated situations arise.

No policy can foresee every possible circumstance to which it may be applied. Whenever applicable, questions of civil, criminal, and/or ecclesiastical discipline and employment offenses should be addressed with the relevant authorities immediately. Please contact the Office of the Bishop for consultation and resources if assistance is needed.

III. DEFINITIONS

NOTE: These definitions reflect our understanding of terms describing gender identity and sexuality, which are evolving as these model policies are being written.

Adult: Anyone who is 18 years or older and not in high school.

Bullying: Behavior that intimidates, humiliates, offends, degrades, or harms another person, whether verbal, psychological, social, physical, or otherwise.

Cisgender: An adjective describing a person whose sense of personal identity and gender corresponds with their gender or sex assigned at birth.

Gender Non-Binary: An umbrella term for people who identify their gender as neither male nor female. These people might identify as both ("bigender"), neither ("agender"), a mix between the two ("genderfluid"), or they can be unsure of their gender ("genderqueer"). This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.

Intake Officer: The person(s) designated by each diocese to receive information regarding an offense for which a member of the clergy may be held accountable under *Title IV of the Constitution and Canons of The Episcopal Church,* which sets out the disciplinary process for clergy. Anyone may contact an Intake Officer to report concerns.

Leader: A person, adult or youth, who, for the benefit of another, engages in ministry without responsibility for oversight of others engaged in that same ministry. Examples include Sunday school teachers, camp counselors, and program team.

LGBTQ+: An acronym for Lesbian, Gay, Bisexual, Transgender, Queer/Questioning, and others. It refers to people whose gender identities vary from their gender or sex assigned at birth, or whose sexual orientations differ from the heterosexual majority. The "+" is an effort to include additional gender identities. This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.

Mandated Reporter: The persons who are required to be Mandated Reporters in the Commonwealth of Pennsylvania per Consolidated Statute Annotated Title 23 §6311 is found here. *Free Mandated Reporter training is accessible through the University of Pittsburgh.*

Off-Site: Any location other than the sponsoring Episcopal Church, institution, facility, or campus.

Organizations: All institutions for which the diocese or congregations have legal or fiduciary responsibility (examples: diocesan departments, commissions, conference & retreat centers, adult day care centers, retirement communities, religious orders, congregations, schools, etc.).

Overnight: Any event that starts on one calendar day and ends on a different calendar day.

Pastoral Relationship: Any relationship (1) between a Member of the Clergy and any person to whom the Member of the Clergy provides or has provided counseling, pastoral care, spiritual direction or spiritual guidance, or from whom such Member of the Clergy has received information within the Rite of Reconciliation of a Penitent, or (2) between a lay minister and any person to whom the lay minister is offering prayer, ministry, and/or any person from whom the lay minister has received sensitive, personal, or confidential information in the course of offering ministry.

Programs: Official activities and programs sponsored by The Episcopal Church and its provinces, dioceses, and congregations.

Public Records Check: See **Section IV. Applications and Screening** for specifics.

Residential Facility: Any institutional or group home setting where a vulnerable adult resides on a permanent or temporary basis such as a nursing home, rehabilitation center, assisted living facility, treatment center, or memory care facility.

Responsible Person: The person designated as being accountable for compliance with this policy for an event or program.

Sacramental Use: Consecrated or unconsecrated wine used in the setting of Eucharist.

Sexual misconduct: Any behavior of a sexual nature that is committed without consent or capacity for consent or by force, intimidation, coercion, or manipulation. Sexual misconduct can be committed by a person of any gender, and it can occur between people of the same or different gender.

Supervisor: A person who has oversight responsibilities for a ministry program and/or Leaders in a ministry program.

Title IV: A section of the *Constitution and Canons of The Episcopal Church* pertaining to clergy professional standards, accountability and ecclesiastical discipline.

Transgender: An adjective describing a person whose sense of personal identity and gender does not correspond with the gender or sex assigned to them at birth.   This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.

Training: Organized activity designed to provide information and/or instructions to strengthen and enhance the recipient's understanding, capacity, and exercise of ministry.

- **Universal Training**: A standard of training that will foster a culture of safety and inclusion for all people that includes a broad overview of issues of vulnerability, power, and healthy boundaries. This training is designed to equip all people to live out their Baptismal Covenant.

- **Specialized Training**: A standard of additional training that equips people who participate in or have oversight responsibility for ministries. In addition to Universal Training, a person will have access to training that is specialized and tailored to their role and ministry function.

Vulnerable Adult:

- Any adult at or older the age designated as an elder;

- Any adult who is infirm or diminished in capacity due to age, illness, or disability;

- Any adult who is ministered to in their home (by Eucharistic Visitors, Pastoral Care Visitors, Stephen Ministers, or others);

- Any adult who is wholly or partially dependent upon one or more other persons for emotional, psychological, or physical care or support, including when such dependency is temporary as in the case of an accident, illness, or birth of a child;

- Any adult who by virtue of a crisis, experiences vulnerability leading to dependency on another or lacks agency in a pastoral relationship as in the wake of death of a family member or job loss.

- See [Pennsylvania Act 70, Adult Protective Services](#), for more details

IV.   APPLICATION AND SCREENING

Dioceses, congregations, and other organizations are required to screen all persons according to the standards in the ***Screening and Training Protocols*** ([Appendix A: Screening and Training Protocols](#)). For some positions, screening consists only of a Public Records Check. For other positions there are additional screening requirements of a written application, interview, and reference verification.

A.   Public Records Checks

The clearances required every five years are

- [Pennsylvania State Police Criminal Record Check](#)
  (https://epatch.state.pa.us/Home.jsp)

- [Federal Bureau of Investigation Criminal Background Check](#)
  (https://www.identogo.com/)

  > Fingerprinting is applicable to *employees* who have not lived in PA past 10 years; *volunteers* who have not lived in PA 10 years, may submit an affidavit. (See Appendix C: [Application for Exemption from FBI Background Check for Volunteers](#))

- [Megan's Law Sex Offender Check](#)

- A credit check is required of treasurer and those with check signing authority

B.   Additional Screening Requirements

Written application, interview, and reference verification are required before serving in certain roles and ministries as specified in the ***Screening and Training Protocols*** ([Appendix A](#)) Where required, these components are generally conducted in the following order:

- Submission of a completed written application to serve in a specified role with a clearly defined, written "job description." The application includes verifiable personal information;

- Personal interview;

- Reference verification conducted by congregations and other organizations to verify personal information and check references listed in the application (people who know but are not related to the applicant); and

- Maintenance of these records as described below.

Potential leaders or supervisors must be known and active in the congregation for at least six months before engaging in ministry with vulnerable adults unless they are required to have public records checks and reference checks pursuant ***Screening and Training Protocols*** ([Appendix A](#)).

The Offices of the Diocese will keep and maintain all application and screening records secure and confidential. This includes a signature by each applicant verifying receipt of a copy of this policy.

V.   EDUCATION AND TRAINING

Training shall be appropriate to each person's function according to the ***Screening and Training Protocols*** ([Appendix A](#)).

All Leaders shall have Universal Training that fosters a culture of safety and inclusion for all people and covers a broad overview of issues of vulnerability, power, and healthy boundaries. Universal Training is designed to equip all people to live out their Baptismal Covenant. All members of the Episcopal Church shall have access to this training.

In addition to Universal Training, all Supervisors and those with oversight responsibilities for ministry programs and/or other adults who engage in ministry with Vulnerable Adults shall have Specialized Training that is tailored to their role and ministry function.

Depending on role and responsibility, Specialized Training should include:

- Prevention, identification, and response to all forms of abuse and neglect including financial exploitation;
- Mandated and voluntary reporting of suspected abuse, neglect, and exploitation of vulnerable adults;
- Vulnerability with the pastoral relationship;
- An introduction to gender non-binary;
- The needs of LGBTQ+ individuals who often struggle to find care or residential facilities adequately equipped to meet their needs;
- The ways that vulnerable adults can engage in self-advocacy.

Certification of Safe Church training shall be renewed every three years.

The Offices of the Diocese shall keep records sufficient to evidence compliance with this policy.

VI.   MONITORING AND SUPERVISION OF PROGRAMS

All people who minister to vulnerable adults and/or have pastoral relationships with others must have ongoing supervision. Ongoing supervision should consist of regular check-ins by the Supervisor who may be parish clergy or a team leader. Such supervision shall review the scope, accountability, and responsibly of the ministry with the person engaged in the ministry. Each person engaged in such ministry should know who supervises their ministry and how to contact the Supervisor at all times.

The Offices of the Diocese shall ensure that all people who minister to vulnerable adults receive prior training as to the scope, accountability, and responsibility of the ministry.

The Offices of the Diocese shall maintain an up-to-date list of persons with their contact information approved to minister to vulnerable adults and/or engage in pastoral relationships with others. This list shall be kept in the Offices of the Diocese.

It is best practice for those ministering to vulnerable adults to document their visits, including time, place, and any observations or concerns. Such documentation is review by the Supervisor.   Confidentiality among clergy and lay ministers is required and all documentation is kept confidential. This documentation promotes continuity of care and transparency in ministry.

All new activities that include pastoral relationships and/or ministry to vulnerable adults shall have a Responsible Person to monitor and supervise all events to ensure appropriate behavior and healthy boundaries.

A.   Presence of Unrelated Adults Suggested

While not required, it is a best practice for those administering to vulnerable adults, or on the homes of others, to do so with another trained adult minister present. Those engaged in such ministries should minister in pairs.

It is recommended that there be two unrelated adults presents. If circumstances result in a minister being alone with a vulnerable adult, that minister shall report this to the Supervisor, clergy, senior warden, or Responsible Person as soon as possible.

B.   Creating Safe Space for Pastoral Relationships and/or Ministry with Vulnerable Adults

To create a safe space, it is necessary to anticipate and avoid circumstances in exposure of vulnerable adults to undue influence or exploitation. Onsite and Off-site settings for ministry with vulnerable adults and pastoral relationships and conversations should:

- Be in places where casual monitoring by other is convenient; and
- Convey safety and comfort.

C. Inclusiveness

No one shall be denied rights, status or access to an equal place in the life, worship, and governance of any program or activity because of race, color, ethnic origin, national origin, marital status, sex, sexual orientation, gender identity and expression, differing abilities, or socio-economic class. To the extent possible, all spaces and settings for programs, activities, and ministry shall be accessible.

The Episcopal Church seeks to support all persons by providing reasonable alternative arrangements regardless of state law to address safety and comfort.

Transgender, genderqueer, or gender non-binary adults who express the need or desire for increased privacy should be provided with reasonable alternative arrangements. Reasonable alternative arrangements may include the use of a private area, or a separate changing schedule, or use of a single stall restroom. Any alternative arrangement should be provided in a way that protects the adult's ability to keep their transgender status confidential, if they so desire.

Transgender, genderqueer, or gender non-binary adults should not be required to use a locker room or restroom that conflicts with their gender identity. Safe bathroom/shower facilities will be provided by gender (or specific times will be assigned to the use of a single facility).

D. Violence

- No one is to strike, hit, or otherwise physically threaten or harm anyone at any time.

- No one is to control or attempt to control another by bullying, intimidation, threats, verbal/emotional abuse, or isolation form others. Bullying of any kind by anyone is prohibited.

- Report suspected violations immediately. See ***Suspected Violations of this Policy*** (Section VII, B of this policy).

E. Behavioral Standards for Adults in Ministry with Vulnerable Adults

All who work with vulnerable adults are expected to model the patterns of healthy relationships in all settings. To this end, lay and ordained minsters working with vulnerable adults shall:

- Take care not to unduly influence a person whom they minister;

- Accept only token gifts from those to whom they minister. Ministers given gifts shall report those gifts in writing to their Supervisor, clergy, senior warden, or Responsible Person;

- Decline to accept loans of any kind from those to whom they minister;

- Decline to agree to be named as a beneficiary or to act as an administrator of executor in a will of anyone to whom they minister; and

- Inform Supervisor, clergy, senior warden, or Responsible Person of anything that causes concern for the safety or wellbeing of those to whom they minister.

DOs

All who minister to vulnerable adults are encouraged to:

- Have ongoing spiritual practices, which might include: daily prayer, regular participation in corporate worship, and Bible study;

- Spend time with and listen to vulnerable adults, and advocate for their ministry within the Body of Christ;

- Offer appropriate physical expressions of care, which may include:

  - brief hugs and arms around shoulders;

  - handshakes;

  - pats on the shoulder or back;

  - "laying on of hands" under appropriate pastoral supervision;

  - holding hands during prayer; and

- Maintain healthy boundaries when sharing personal information.

DON'Ts

Adults shall not under any circumstances:

- Provide vulnerable adults with non-sacramental alcohol, marijuana, drugs, cigarettes, tobacco products, e-cigarettes, vapes, or pornography;

- Arrive under the influence of alcohol, illegal drugs, or misused legal drugs at any children's or youth event, or become intoxicated at an event, when they are responsible for, or ministering to a vulnerable adult;

- Consume non-sacramental alcohol or illegal drugs or misuse legal drugs when they are responsible for or ministering to a vulnerable adult;

- Engage in illegal behavior or permit others to engage in illegal behavior;

- Engage in any sexual, romantic, illicit, or secretive relationship or conduct with any vulnerable adult.

F.   Visits to Private Residences

The safety of all persons and healthy boundaries are essential when visiting a vulnerable adult in a private home.

- Avoid situations that might compromise privacy; common examples include;

  - Visiting behind closed bedroom doors;

  - Sitting on the bed of the person being visited;

  - Visiting a person while they are not fully clothed.

- The best practice is to visit in teams of two or more. If it is not possible for another adult minister to be present, a member of the vulnerable adult's household should be present. If neither is possible, documentation of the time, duration of the visit, general matters discussed, and any pastoral concerns shall be provided to the Supervisor as soon as possible after the visit.

G.   Visits to Residential Facilities

The safety of all persons and healthy boundaries are also essential when visiting a vulnerable adult in a Residential Facility. Best practices include:

- Facility staff should be informed of the visitor's presence;

- If a visit take place out of the sight of staff, they should be notified in advance and informed when such meeting is concluded;

- The door to a resident's private room must remain open during visits;

- Visitors should be mindful that LGBTQ+ residents may not be safe to express their sexual identity or orientation, as staff members may not yet have been trained; and

- In the event of uncertainty about application of this policy, the visitor is encouraged to contact their Supervisor with the relevant queries.

H.   Off Site Visits, Events, and Programs

Off-site programs, trips, and events are a welcome and often necessary means for spiritual, social, and emotional development of vulnerable adults. They also present additional challenges for maintaining best practices for safe and healthy ministry. The expectations for safe space, as described above, should be observed off-site.

In the event of uncertainty about application of the policy, the Responsible Person should contact their Supervisor with the relevant queries.

Because of the unique risks that can't always be anticipated, it is important to obtain permissions and manage documentation as described below.

1. Prior Approvals

- Prior approval by the governing body and the member of the clergy in charge is required, and that approval shall be reflected in the minutes of the governing body. Diocesan sponsored programs, trips, or events shall receive prior diocesan approval.

- These same prior approvals are required when the site is a private residence, hosting such events as cook outs, pool parties, progressive dinners, etc.

2. Registration, Waiver, and Release Form

Due to the unique risks of off-site visits, events and programs that cannot always be anticipated, it is important to obtain permissions and manage documentation as described below:

- All participants shall complete and sign a registration form and a waiver and

release form before participating in any program. Confidentiality must be preserved with respect to medical and other sensitive information in the forms.

- There must be a signature on all release and waiver forms. Digital signatures are accepted as long as the entity can present policy for them that is in compliance with PA state law concerning digital signatures.

- Completed release and waiver forms shall be maintained in a secure location on-site or online. Such forms may be saved electronically and must be saved.

- Permission slips shall be provided for each event and shall be signed by the vulnerable adult, guardian, spouse, or other trusted family member.

- Prior permission for an individual to be photographed or recorded on film, videotape, audiotape, or other electronic media is required.

3. First Aid and Medications

Current certification in First Aid, CPR, and Automated External Defibrillator (AED) is strongly encouraged for those who work with vulnerable adults.

- A first aid kit, appropriately stocked for the event and participants, shall be available in an easily accessible location.

- If a vulnerable adult requires assistance with medications of any type, then a record must be kept for all medication or first aid given to a participant. This record shall include the participant's name, the date and time of service, the name of the person administering medication or treatment, and the description of the medication, dosage and/or treatment.

- All medications (prescription and over the counter) belonging to vulnerable adults requiring assistance shall be given to the Responsible Person, unless otherwise agreed upon.

- Only the Responsible Person, or their adult designee, shall administer medications.

I. Transportation

For the health and safety of all participants, the following practices shall be followed:

- For events that originate and/or terminate at the diocesan, congregation, or organization's facility, all drivers must be at least 21 years of age, provide proof of insurance and a current driver's license, a completed volunteer driver information form, and have a satisfactory DMV records check.

- A list of those approved to provide transportation to vulnerable adults shall be maintained in the office of the church or organization

- Anyone being transported must consent to such transportation beforehand. If a person is unable to consent due to impairment or

lack of agency then prior approval by that person's guardian, spouse, or other trusted family member is required; and

- All drivers and riders must comply with state laws including seat belt and cell phone usage.

J. Insurance for Overseas Pilgrimages and Mission Trips

- Short-term of supplemental insurance, available through most church and organization's policies as an added rider, must be secured at least one month prior to travel.

- It is recommended that travelers carry evidence of personal health insurance by virtue of a copy of the acual card provided to the insured person.

- Because not all individuals have access to affordable and adequate health insurance, it is recommended that health insurance be added to trip insurance.

K. International Considerations

- Check in with the U.S. Department of State on travel requirements, including visas.

- Make certain that every traveler's passport is valid for at least six months beyond your return date.

- Determine whether or not vaccinations are required and/or recommended for entry into specific countries.

- Arrange to have at least two cell phones with the group that will have active coverage in your destination(s). Make a back-up plan for communication with your Responsible Person at home.

L. Conference and Retreat Centers

All conference and retreat centers of the diocese, congregations and organizations shall follow the guideline of off0site Programming established in this policy.

VII.   RESPONDING TO CONCERNS

A.   Reporting Suspected Abuse, Neglect, or Exploitation of Vulnerable Adults

Anyone who has reason to suspect that abuse, neglect, or exploitation of a vulnerable adult has taken place, are strongly encouraged, and all [mandated reporters](#) are required to contact the [PA Adult Protective Services](#).
Call: 1-800-490-8505

In addition, anyone who has reason to suspect that abuse, neglect, or exploitation of vulnerable adult has taken place within a facility or program of the diocese, congregation, or other organization, the Leader or Responsible Person will immediately inform the director, head, or other governing officer in the case of other organizations; *and*, a member of the clergy in charge, or the senior warden in the case of a congregation.

The member of the clergy in charge, or the senior warden, will immediately inform the bishop or the bishop's office. The bishop or the bishop's office will inform the Intake Officer in case a member of the clergy is suspected of abuse, neglect and/or exploitation.

B.   Suspected Violations of this Policy

Anyone who suspects a violation of these policies shall immediately report the violation to the Responsible Person, member of the clergy in charge, and senior warden.

Clergy in charge receiving reports of violations of this policy shall be responsible for providing appropriate pastoral care to all those affected and appropriate remedial and/or disciplinary action up to and including termination of employment or unpaid ministry with the church. If the Responsible Person is a lay person, they are responsible to ensure that appropriate pastoral care is provided for all.

Anyone who suspects a violation of these policies by a member of the clergy shall immediately report the violation to the bishop's office and/or the Intake Officer. Anyone can make a report to an Intake Officer.

The bishop, hearing reports of violations by clergy, or by laity at diocesan events, shall be responsible for providing appropriate pastoral care to all those affected and appropriate remedial and/ or disciplinary action, up to and including canonical disciplinary action, as provided by Title IV of the Constitutions and Canons and/or termination of employment or unpaid ministry with the diocese.

C.   Local Resources for Response

Each diocese, congregation, or organization shall provide a list of local resources that can give information and assistance to anyone concerned about circumstances that may violate this policy. Such resources with contact information shall include:

- Responsible Person(s) for programs and ministries with vulnerable adults;
- Clergy in charge of a congregation;
- Wardens;
- Bishop;
- Intake Officer(s); and
- [PA Adult Protective Services.](#)

VIII. POLICY ADOPTION, IMPLEMENTATION, AND AUDIT

A. The Episcopal Church Adoption and Implementation

The Episcopal Church decrees that all programs and events of the Episcopal Church involving vulnerable adults comply with the standards set out in this policy.

The Episcopal Church shall, also, insure that each diocese adopts a **Policy for the Protection of Vulnerable Adults** by January 1, 2019.

B. Diocesan Adoption, Implementation, and Audit

The Episcopal Diocese of Pennsylvania is adopting a policy that is consistent with and/or exceeds the requirements in the *Model Policy*.

The Episcopal Diocese of Pennsylvania has not adopted site-specific variations from the *Model Policy* that requires permission by Diocesan Council or Standing Committee described in detail, including the circumstances under which those variations are to be permitted and their rationale.

The Diocese will conduct a **Safe Church Self-Audit** every three years to confirm compliance with diocesan safe church policies.

Procedures to be confirmed by audit will include (but are not limited to):

- Existence of diocesan policy that is consistent with and/or exceeds the requirements of the *Model Policy*.

- Provision of accessible and appropriate training for all those who work with vulnerable adults in accordance with **Screening and Training Protocols** (Appendix A). Such training shall include, at a minimum, topics identified in this policy;

- Verification that each congregation and/or organization within the diocese has adopted a policy that is consistent with and/or exceeds the diocesan policy; and

- Verification that each congregation and/or organization has a process to ensure members access training and conduct public record checks before beginning work.

C. Congregation and Organization Adoption, Implementation, and Audit

Congregations and organizations must adopt *Safe-guarding God's People: The Safe-Church Policy for the Protection of Vulnerable Adults of the Diocese of Pennsylvania*.

Congregations and organizations may adopt site-specific variations diocesan policies, where permitted by vestries or governing bodies, which shall be described in detail, including the circumstances under which those variations are to be permitted and their rationale. This approval shall be recorded in the minutes of the vestry or governing body.

Safe-guarding God's People shall be posted in an area where activities take place, and shall be given to all adults, guardians, and all paid and unpaid persons who minister to children or youth. This posting shall include the names and phone numbers of the member of the clergy in charge, the senior warden, and a contact person in the bishop's office.

Each congregation and organization is required to conduct a ***Safe Church Self-Audit*** annually to confirm compliance with safe church policies, and to report such audit to the bishop's office.

Procedures to be confirmed by audit will include (but are not limited to):

- Public records checks, application forms, records of screening and reference verification of paid and unpaid persons;
- Records of compliance with ***Screening and Training Protocols*** (Appendix A);
- Procedures for responding to concerns and incidents; and
- Evidence of compliance with "safe space" requirements.

Appendix A: Screening and Training Protocols

Screening and Training Chart	Ministry Function	Public Records	App/Inter/Ref	Universal Training	Leader	Supervisor
Staff & Contracted Ministers (not covered below)	Church Employees	X	X	X		X
	Diocesan contractors (1099)	Depends		X	X	
	Clergy	X	X	X		X
	Church contractors (1099)	Depends		X		
	Diocesan Employees	X	X	X		X
	Diocesan Staff - unpaid	X	X	X		X
Program Supervisors						
	Child/Youth Choir Director	X	X	X		X
	Choir Director	X	X	X		X
	Commissioned Ministry Teams	X	X	X		X
	Director of Religious Education	X	X	X		X
	Camp Director	X	X	X		X
	Youth Minister	X	X	X		X
Program Participants (non-supervisory)						
	Acolyte Mentor	X		X	X	
	Choir parents			X		
	Church School Teacher	X		X	X	
	Counselor in Training	X- 18 and over	X	X	X	
	Nursery Worker - unpaid	X		X	X	
	Parish Nurse	X	X	X		X
	Teenage assistants			X	X	
	Musicians who work with youth	X	X	X		X
*Off-site	Camp Counselor	X	X	X		X
	Confirmation mentors	X	X	X	X	
	Lay Chaplains	X	X	X		X
	Pastoral Care Teams	X	X	X	X	
*Overnight	Youth Group Leaders	X	X	X		X
Drivers	Drivers	X		X		
Governance	Church Elected			X	X	
	Treasurer	Criminal & Credit		X	X	
	Vestry			X	X	
	Wardens	Criminal & Credit		X		X
Key Access	Altar Guild	Recommended		X		
	Building Hosts	Recommended		X		
Home Visitors	Eucharistic Visitors	X	X	X	X	
	Home Visitors	X	X	X	X	
	Stephen Ministers	X	X	X	X	
	Church Staff- unpaid	X	X	X		X

*Off-site: Any location other than the sponsoring Episcopal church, institution, facility, or campus.
*Overnight: Any event that starts on one calendar day and ends on a different calendar day.

Appendix B: Recommended Practices and Guidelines for Social Media and Electronic Communications for Vulnerable adults

Social media is an ever-increasing part of adult lives, and has the potential to empower ministry. Behavior in the digital sphere is never private. Posted content may be used out of context and out of the control of the originating individuals and organizations, putting them at risk. In addition, these powerfully connective tools are subject to the same dynamic of unequal power and potential for abuse that present a risk in all ministry relationships. Churches face the challenge of identifying and proactively addressing areas of potential risk in social media use in the midst of rapidly evolving technology. The following recommended practices and guidelines are designed to be a flexible template for developing policies and covenants governing the safe use of social media and digital communication in ministry settings.

General Information about Digital Communications

- All communications sent digitally (email, social networking sites or platforms, notes, texts, or posts, etc.) are NOT CONFIDENTIAL and can be shared or reposted to others.

- Interactions in the virtual world need to be transparent; that is, occurring in such a way that it is easy for others to see what actions are performed.

- In the virtual world, healthy boundaries and safe church practices must be adhered to as they are in the physical world.

- In the virtual world, "friend" can mean anyone with whom you are willing to communicate through that medium. In the physical world, friend can mean much more in terms of intimacy, self-disclosure, mutuality, and expectations for relationship.

- Laws regarding mandated reporting of suspected abuse, neglect, or exploitation of children or youth apply in the virtual world as they do in the physical world.

Recommended Practices and Guidelines for Churches and Organizations:

- Establish a policy that outlines professional and institutional standards for profiles and interactions on social networking sites and platforms.

- Establish a policy of transparency regarding social media accounts. The best practice is to have the diocese, congregation, or organization create and "own" the social media accounts representing the diocese, congregation, or organization respectively and have multiple administrators and/or supervisors with access. If personal accounts are used, a system of monitoring should be established.

- Establish a policy regarding the identification or "tagging" of individuals in online photos or videos. For example, on Facebook, "tagging" someone in a

photo or video creates a hyperlink to that person's profile page that can be clicked by anyone. The best practice is for the diocese, congregation, or organization not to identify or "tag" individuals. The "tagging" of vulnerable adults should be discouraged. The captioning of photos or videos may be permitted when written permission is provided by a vulnerable adult (or the person's guardian, spouse, or other trusted family member when the vulnerable adult is not able to consent due to impairment or lack of agency.) The caption should not include the individual's full name, nor should it create a clickable link to someone's personal profile. A policy of whether or not an individual can "self-tag" in a diocese, congregation, or organization's online photo should also be established.

- A diocese, congregation, or organization does not have a responsibility to review or monitor the personal pages or groups that are not sponsored by that diocese, congregation, or organization, except as described above.

- Email can be a good method of communication, and it also has the opportunity to be misunderstood. Best practices are not responding immediately and sharing the communication with a supervisor before responding. Phone and face-to-face meetings are preferred when responding to emotionally driven communications or pastoral emergencies.

- When using photos and videos for ministry purposes, obtain a media release for each person and only post images that respect the dignity of every person depicted.

- Dioceses, congregations, or organizations must inform participants when they are being videoed because church buildings are not considered public space. Signs should be posted that indicate a service or activity will be broadcast when worship services or activities are streamed or distributed on the web or via other broadcast media.

Recommended Practices and Guidelines for Interactions with Vulnerable adults:

- Prudent judgement should be used in the time of day a vulnerable adult is contacted through social media. Under normal circumstances, refrain from contact or exchanging texts, chats, or emails before 8:00 am or after 10:00 pm, unless it's an emergency.

- Privacy settings and personal boundaries should be implemented.

  - Create and use profiles on social networking sites that meet professional and institutional standards.

  - Apply privacy settings that are consistent with all vulnerable adults, across all social networking sites and platforms. Avoid playing favorites or the appearance of playing favorites.

  - Establish a regular ongoing and consistent system of review that focuses on settings, accessible content, photos, and videos to ensure compliance with professional and institutional standards.

  - When possible, send communication (1) to entire groups, (2) on an individual's "wall," or (3) in public areas, rather than in private messages. This includes photos, images and videos.

- Disclose **ongoing** digital pastoral communications (ie: e-mails, Facebook messages, texting, etc) with vulnerable adults to a supervisor to determine when a referral to a professional provider or resource is needed.

- Create covenants to govern digital groups, which include:

  - Appropriate and inappropriate behavior of members (bullying, pictures that depict abuse, violence, illegal activities, sexual acts, etc.) and the consequence for inappropriate behavior;

  - Who may join and/or view group activity, when participants should leave the group and when/if the group will be disbanded;

  - Description of content that can be posted or published on the site or page;

  - Discourage "tagging" photos and videos of vulnerable adults. However, the captioning of photos and videos is permissible with written permission from a parent or guardian;

  - Notification that mandatory reporting laws will be followed; and

  - Consequences for breaking the covenant.

- Delete inappropriate material posted in digital groups, address the behavior and report it, if necessary, in accordance with legal and institutional requirements.

- In video calls, follow the same criteria used in telephone calls. In addition, prudent judgment regarding attire and surrounds should be observed.

- Comply with the following be practices regarding "groups" on social networking sites:

  - Have at least two unrelated administrators

  - Use closed groups, but not "hidden" or "secret" groups, for vulnerable adults;

  - Remove any content that shows or describes inappropriate behavior outside the bounds of the established behavioral covenant; and

  - Observe mandated reporting laws regarding suspected abuse, neglect and exploitation.

- In video calls, follow the same criteria used in telephone calls. In addition, prudent judgement regarding attire and surroundings should be observed.

- Comply with the following best practices regarding "groups" on social networking sites:

  - Have at least two unrelated adult administrators as well as at least two youth administrators for groups that are designed for youth;

  - Use closed groups, but not "hidden" or "secret" groups, for youth;

  - Have only youth administrators invite other youth to join the online group, unless a youth previously asked an adult administrator to invite them to join;

  - Remove any content that shows or describes inappropriate behavior outside the bounds of the established behavioral covenant;

  - Open social networking groups for youth to parents of current members;

  - Remove adult leaders of youth groups and youth who are no longer members, due to departure, removal from position, or are ineligible because they "aged-out" of a program from social networking sites, list serves, etc;

  - Observe mandated reporting laws regarding suspected abuse, neglect, and exploitation.

Appendix C: Application for Exemption from FBI Background Check for Volunteers

THE EPISCOPAL DIOCESE OF PENNSYLVANIA

Application for Exemption from FBI Background Check for Volunteers

Please read this entire form carefully before completing it. This form is to be used by a Pennsylvania resident who serves or wants to serve as a volunteer with a program or activity associated with the Episcopal Diocese of Pennsylvania and seeks exemption from the requirement to submit a report of federal criminal history record information (FBI background check). Even if granted an exception from obtaining FBI background checks, you are still required to submit a report of criminal history record information from the Pennsylvania State Police and a certification from the Department of Human Services concerning child abuse.

Section I. Personal Information

Name of Volunteer (please print): _____ Date: _____/_____/_____

Current Address: _____

Number of Years _____ Months _____ at this Address*
If less than 10 years, provide prior Pennsylvania addresses on a separate page.

Volunteer Position: _____

Section II. Instructions

Check the appropriate boxes below. Then, sign the certification under **Section 3**.

☐ By checking this box, I certify that I have been a resident of Pennsylvania for the entirety of at least the last 10 consecutive years prior to the date of this application, which is set forth above.

☐ By checking this box, I certify that I have not been convicted of any of the Reportable Offenses listed below.

(page 1)

List of Reportable Offenses

A Reportable Offense enumerated under Pennsylvania's Child Protective Services Law, 23 Pa.C.S. §6344(c), consists of one or more of the following:

1. Provisions of Title 18 of the Pennsylvania Consolidated Statutes (relating to crimes and offenses) or an equivalent crime under the laws or former laws of the United States or one of its territories or possessions, another state, the District of Columbia, the Commonwealth of Puerto Rico or a foreign nation, or under a former law of the Commonwealth of Pennsylvania:

- Chapter 25 relating to criminal homicide
- Section 2702 relating to aggravated assault
- Section 2709.1 relating to stalking
- Section 2901 relating to kidnapping
- Section 2902 relating to unlawful restraint
- Section 3121 relating to rape
- Section 3122.1 relating to statutory sexual assault
- Section 3123 relating to involuntary deviate sexual intercourse
- Section 3124.1 relating to sexual assault
- Section 3125 relating to aggravated indecent assault
- Section 3126 relating to indecent assault

- Section 3127 relating to indecent exposure
- Section 4302 relating to incest
- Section 4303 relating to concealing death of a child
- Section 4304 relating to endangering welfare of children
- Section 4305 relating to dealing in infant children A felony offense under Section 5902(b) relating to prostitution and related offenses
- Section 5903(c) or (d) relating to obscene and other sexual materials and performances
- Section 6301 relating to corruption of minors
- Section 6312 relating to sexual abuse of children

2. An offense designated as a felony under the act of April 14, 1972 (P.L. 233, No. 64), known as "The Controlled Substance, Drug, Device and Cosmetic Act," committed within the preceding five-year period.

3. A founded report within the preceding five-year period in the statewide database maintained by the Department of Human Services.

Section 3. Certification

I understand that by submitting this completed Volunteer Exemption Form, I swear or affirm that all of the information I have provided on this application is complete, accurate, true, and correct. I make this declaration subject to the penalties of 18 Pa.C.S. §4904 relating to unsworn falsification to authorities.

Volunteer's Signature: _____   Date:_____