

SAFE CHURCH:

**Policies for the Protection of
Children, Youth and Vulnerable
Adults**

Updated: October 2021

The Episcopal Dioceses of Eastern and Western Michigan

Adopted by Western Michigan Diocesan Council, October 2021

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The purpose of these policies is to ensure that, to the extent possible, the doctrine and teachings of the Episcopal Church are honored and that the welfare and safety of children, youth and vulnerable adults are maximized in the Dioceses of Eastern and Western Michigan. These are internal policies of the Dioceses of Eastern and Western Michigan. It is not a contract and does not create contractual rights for any persons. These policies are administered by the Dioceses of Eastern and Western Michigan and the application and administration of these policies are not subject to review of any type as to substance or procedure by any secular authority or other authority outside of the Episcopal Church.

A copy of this document may be downloaded in digital form for printing at edwm.org/safe-church or eastmich.org/safe-church.

Our thanks:

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¹ <https://extranet.generalconvention.org/staff/files/download/21313>

² <https://extranet.generalconvention.org/staff/files/download/21314>

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I. THEOLOGICAL AND ETHICAL FOUNDATIONS

“Will you seek and serve Christ in all persons, loving your neighbor as yourself?”

“Will you strive for justice and peace among all people, and respect the dignity of every human being?”

The above two questions, taken from the Baptismal service in the *Book of Common Prayer*, form the theological and ethical foundation for all Episcopalians. 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 grace-filled inclusion for all of God’s children. 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 promise to seek and serve Christ in all persons and to respect the dignity of every human being is a core principle for all the baptized. Our ministries should reflect these baptismal promises in how we conduct ourselves and in how we foster a safe and inclusive community.

The authority with which *leaders* — ordained persons and adults who minister with *children, youth* and *vulnerable adults* 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 spiritual authority of an ordained person. All Christian leadership is intended to provide occasions for guidance and grace, and its abuse is always and unequivocally wrong.

All the people of God are called to minister within the framework of respecting the dignity of all people by word and deed as modeled by the life of Christ. These policies are intended to provide a pattern for the attentive practice of ministry.

This document is a statement for the Episcopal Dioceses of Eastern and Western Michigan, setting forth expectations for its leaders in their

relationships with children, youth and vulnerable people. The purpose of these policies is to foster the highest standards of behavior in ministry settings.

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 are at risk of distortion and harm. All the people of God are called to minister authentically within this tension.

II. EXPECTATIONS AND LOCAL IMPLEMENTATION

These policies set forth statements of general expectations and guidelines of behavior for ordained and lay people in the church when engaged in ministry with children, youth and vulnerable adults. These policies are mandated for all such activities sponsored by every congregation, institution, organization, school, and agency of the diocese. The purpose of these policies is to create safe and welcoming space for all children, youth and vulnerable adults in our communities and those engaged in ministry with children, youth and vulnerable adults and to prevent abuse and exploitation of all kinds.

These policies present best practices for creating inclusive and safe space within ministries of the Episcopal Dioceses of Eastern and Western Michigan. Church governing bodies and all leaders should understand these policies and all local requirements thoroughly enough to make appropriate judgments, and should consult with the Office of the Bishop when unanticipated situations arise.

The diocese, and each individual congregation, institution, organization, school, and/or agency of the diocese is required to conduct a “Safe Church Self-Audit” every year to confirm compliance with diocesan Safe Church policy.

Procedures to confirm compliance by audit will include, but are not limited to, the following:

- Existence of policy that is consistent with and/or exceeds the requirements of the model policies.
- Provision of accessible and appropriate training for all those who work with children, youth, and vulnerable adults, in accordance with the “Screening and Training Protocols” standard. Such training will include, at a minimum, the topics identified in the model policies.
- Verification that each congregation and/or organization within the Dioceses of Eastern and Western Michigan has adopted a policy that is consistent with and/or exceeds the diocesan policy.
- Verification that each congregation and/or organization has a process to ensure members access training and is conducting public record background checks.

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

Abuse (Types):

- **Physical Abuse** is physical injury or death caused by other than accidental means. Injuries may include severe beatings, burns, bites or other physical problems.
- **Sexual Abuse** perpetrated by an adult is any contact or activity of a sexual nature that occurs between a child or youth and an adult. This includes any activity which is meant to arouse or gratify the sexual desires of the adult, minors or legal incompetents, even where that contact seems consensual.
- **Sexual Abuse Perpetrated by Another Child or Youth** is any contact or activity of a sexual nature that occurs between a child or youth and another child or youth when there is no consent, when consent is not possible, or when one child or youth has power over the other child or youth. This includes any activity which is meant to arouse or gratify the sexual desires of any of the children or youth.
- **Emotional Abuse** is mental or emotional injury to a child or youth that results in an observable and material impairment in the child or youth's growth, development or psychological functioning.
- **Neglect** is the failure of a parent or caretaker to provide for a child's or youth's basic needs or the failure to protect a child or youth from harm.
- **Commercial Sexual Exploitation of Children** involves the treatment of a child as a sexual and commercial object such as in prostitution, pornography and other forms of transactional sex.
- **Child Endangerment** is where a child is allowed to witness or hear the commission of a forcible felony, battery or family violence. Examples are driving under the influence with children in the car or engaging in family violence with children present.

- **Sexual abuse of a child** is a criminal offense in the United States. The law also defines child neglect or abuse as:
 - causing, or threatening to cause a non-accidental physical or mental injury, or creating a substantial risk of impairment of bodily or mental function;
 - neglecting or refusing to provide adequate food, clothing, shelter, emotional nurturing or health care;
 - neglecting or refusing to provide adequate supervision in relation to a child's age and level of development; and
 - abandoning the child.

Sexual abuse encompasses acts of sexual assault and sexual exploitation by a parent or other caregiver. It includes a broad range of behaviors, such as fondling, oral vaginal or anal intercourse, indecent exposure, voyeurism and sexual exploitation. It may consist of a single incident or of many incidents over a long period of time. Victims range in age from infants to teenagers.

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

Adult Protective Services/Michigan Department of Health and Human Services (DHHS): The state agency charged with protecting vulnerable adults and their families who are in need of assistance. Adult Protective Services receive and investigate reports of suspected abuse, neglect and exploitation.

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

Child: Any person under the age of 12 years, or in 5th grade or below.

Child Protective Services/Michigan Department of Health and Human Services (DHHS): The state agency charged with protecting children and families. Each county has its own DHHS office which provides services, including a CPS unit which receives and investigates allegations of abuse.

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 the Intake Officer to report concerns.

Leader: A person who, for the benefit of another, engages in ministry without responsibility for oversight of other adults engaged in that same ministry. Examples include: Eucharistic visitors and members of pastoral care teams.

Mandated Reporter: A person who is required by Michigan state law to report reasonable suspicions of abuse, neglect, endangerment and/or exploitation of children, youth, elders, vulnerable and/or dependent adults to the State of Michigan DHHS through a report to Centralized Intake. The Episcopal Dioceses of Eastern and Western Michigan considers all personnel, whether paid or volunteer, who work regularly with children or youth to be mandated reporters.³

Minorities of Gender and Sexuality: A phrase used with reference to individuals whose sexuality and/or gender identity/expression are different from the cisgender and heterosexual majority. Throughout this document, you will instead see substituted the following acronym referring to the same group: LGBTQIA+. This acronym stands for the terms Lesbian, Gay, Bisexual, Transgender, Queer/ Questioning, Intersex, and Asexual. It is important to understand that people's identities and their relationship to them can be complex, and this language is evolving.⁴

Relevant terms include:

Asexual: Someone who experiences the lack of a sexual attraction or desire for other people.

Bisexual: A person emotionally, romantically or sexually attracted to more than one sex, gender or gender identity though not necessarily simultaneously, in the same way or to the same degree.

Cisgender: An adjective describing a person whose sense of personal identity and gender corresponds with their gender or sex assigned at birth. This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.

Gay: A person who is emotionally, romantically or sexually attracted to members of the same gender.

Intersex: An umbrella term used to describe a wide range of natural bodily variations affecting the sexual development of the human body. In some cases, these traits are visible at birth, and in others, they are not apparent until puberty. Some chromosomal variations of this type may not be physically apparent at all.

Lesbian: A woman who is emotionally, romantically or sexually attracted to other women.

³ A guide to detailed reporting provided by the Michigan Department of Health and Human Services can be found here:
https://www.michigan.gov/documents/mdhhs/MR_Guide_to_Detailed_Reporting.3.14.19_653727_7.pdf

⁴ <http://www.hrc.org/resources>

Non-binary: With reference to gender identity, an umbrella term for people who identify as neither male nor female. These people might identify with two genders (“bigender”), no gender (“agender”), have a gender identity that is not static (“genderfluid”), or identify as having a relationship to gender identity and expression that is non-normative (“genderqueer”). These are evolving terms, as our understanding and language around gender identity and sexuality expands and matures.

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.

Transsexual: An older term that originated in the medical and psychological communities. Still preferred by some people who have permanently changed - or seek to change - their bodies through medical interventions, including but not limited to hormones and/or surgeries. Unlike transgender, transsexual is not an umbrella term. Many transgender people do not identify as transsexual and prefer the word transgender. It is best to ask which term a person prefers. If preferred, use as an adjective: transsexual woman or transsexual man.

Queer: A term people often use to express their own fluid identities and orientations.

Questioning: A term used to describe people who are in the process of exploring their sexual orientation or gender identity.

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

Organizations: All institutions for which the diocese or congregations have legal or fiduciary responsibility (examples: diocesan ministries, commissions, conference & retreat 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 (examples include: The Episcopal Youth Event, Provincial Youth Events, Happening, pilgrimages, mission experiences, New Beginnings, camp programs, Acolyte Festival, etc.).

Public Records Check: A search of documents and data available to the public including criminal and civil court records, credit reports, and driving records from the department of motor vehicles. Typically, such searches are conducted by a third party with expertise in this area.

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 and foster a parish or organizational culture that adheres to our ethical and theological foundation to respect the dignity of all.

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.

Sexual Exploitation involves an imbalance of power, such as employer over employee, strong over weak, spiritual leader over church member, and so on. It can be overt, such as where favors are given in return for sexual favors. It can be more subtle, such as where a sexual relationship develops between a church worker and someone under him or her in a pastoral, mentoring or supervisory relationship.

Feelings of attraction can develop from unequal relationships, giving rise to exploitation even where there is apparent consent from both individuals. This is why a romantic relationship between a clergy member, whose role as a spiritual advisor places him or her in a position of power, and a church member is fraught with danger, whether or not it involves sexual relations.

Historically, romantic relationships between single clerics and other single persons with whom the cleric has a pastoral relationship have not been defined as sexual exploitation. However, such clergy dating could create feelings of resentment, competition or rejection for other members of the church. In some circumstances, it could lead to legal proceedings. A cleric cannot be both spiritual advisor and suitor at the same time.

Therefore, in the event a romantic relationship develops, steps must be taken to address the facts that (a) when dating a cleric a church member loses their priest, and (b) secrecy surrounding such a relationship could harm the church. At the very least, the clergy member must arrange for alternate pastoral care for the involved church member.

One way to do that is to have either the cleric or the church member leave the church. For rectors, vicars and priests-in-charge, such relationships might be possible if there is ongoing consultation with the bishop. Additionally, in a multi-staffed congregation, a dating relationship might be possible where there is ongoing consultation between the priest and the rector. In a single clergy congregation, such a relationship might be possible if there is ongoing consultation with the bishop.

While dating is allowed between lay staff and church members generally, because of the imbalance, dating between a lay worker and those church members who participate in that worker's programs also is discouraged, and requires similar safeguards.

Sexual Harassment: The term sexual harassment comes from employment law and refers to behavior of a sexual nature that is experienced by an employee in the workplace. There are two broad categories:

- In *quid pro quo* harassment, an employee's hiring, pay, promotion or maintenance of a job is made contingent on their response to sexual advances.
- In hostile environment harassment, unwelcome sexual conduct unreasonably interferes with an individual's job performance or creates a hostile, intimidating or offensive work environment.

Harassment can take four forms:

1. **Physical Harassment** involves unwanted physical touching of the hair, body or clothing, or even purposefully brushing against someone. Prolonged hugs, especially front to front, or those with pelvic contact or rubbing the hands across the back, could constitute physical harassment, as could unwanted massage of the shoulders, back or neck. Even behavior that is intended to be playful could be considered physical harassment.
2. **Verbal Harassment** includes making explicit comments or innuendos about one's own sex life, or asking questions about another's sexual behavior. Verbal harassment can include comments about a person's anatomy or clothing that may be perceived as sexual, using nicknames with sexual connotations (such as "hunk" or "babe"), or making repeated requests for social engagements. It can also take the form of sexually oriented humor or language, or sending emails, telephone messages or other communications that contain such humor or language. It is important to note that appropriate conversational norms develop and evolve in every workplace or

community over time. When in doubt about propriety, refrain from such conversations or seek counsel from an advisor.

3. **Non-verbal Harassment** can include displaying sexually suggestive visual materials, from cartoons to calendars, to displaying one's own body parts through lack of clothing or positioning of the body. It also includes making sexual gestures with hands or body movements, and making facial expressions that communicate sexual or romantic interest.
4. **Online Harassment** often referred to as cyber-bullying describes the use of the Internet to harass, threaten or maliciously embarrass. It can involve such behaviors as sending unsolicited and/or threatening email, encouraging others to send the victim unsolicited or threatening email, sending viruses by email (electronic sabotage), spreading rumors, making defamatory comments, sending negative messages, impersonating the victim by sending inflammatory, controversial or enticing messages which can cause others to respond negatively to the victim, harassing the victim during a live chat, leaving abusive messages online, sending the victim pornography or graphic material that is knowingly offensive or sharing online content that depicts the victim in negative or intimate ways.

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.

Unrelated: Where applied to a child or youth and an adult means that the child or youth is not the offspring or ward of the adult.

Vulnerable Adult: Any adult who is infirm or diminished in capacity due to age, illness, or disability; Any adult who is wholly or partially dependent upon one or more other persons for emotional, psychological, or physical care or support, such dependency may be temporary as in the case of an accident, illness, or birth of a child; and 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.

Youth: Anyone who is 12 to 17 or is currently in middle school or high school. This includes anyone who is 18 years old or older and still in high school.

Weapons: Refers to actual weapons not toys or stage props.

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). 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.

I. Public Records Checks

- Congregations and other organizations shall use the Authorization to Conduct Background Check document and process found in Appendix E to initiate the background check process for all employees and volunteers as defined in Appendix A of this document. Such checks must be completed before the employee or volunteer begins interacting with children, youth or vulnerable adults.
- Criminal Records Check must be conducted in any state where the Candidate has resided during the past seven (7) years, and other states, if any, as determined by the church. This check can only search for convictions; may not consider arrests that did not result in a conviction.
 - Candidates must complete the Criminal History Check Form Appendix E to conduct the Criminal Records Check.
 - After the form has been completed, contact the Diocesan Office to initiate the check.
- Sexual Offender Registry Check in any U.S state where the Candidate has resided during the past (7) years is required.
- MI-DHHS (Michigan Department of Health and Human Services) Central Registry Clearance
- A Department of Motor Vehicles (DMV) records check is needed if transporting children, youth or vulnerable adults as part of, or an extension of, ministry of the church or for a church-sponsored event;
- The Diocese prohibits direct supervision of children, youth or vulnerable adults within the congregations, agencies, and organizations of the Diocese by anyone with a civil or criminal record of child sexual abuse or who is currently under investigation for sexual abuse or who has admitted prior sexual abuse or has been known to have a paraphilia diagnosis (e.g., pedophilia, exhibitionism, voyeurism, etc.) as defined by the American Psychiatric Association in the DSM-5™ or its updates; ; and
- Public records checks must be updated at least every five years. To update the records, a new request for a background check form will need to be completed.

II. 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 shall be known to the leadership of the congregation for at least six (6) months prior to engaging in ministries involving children, youth or vulnerable adults. This rule does not apply when hiring as employed staff someone outside the local congregation.
- The respective ministry leader and the responsible Clergy should have a discussion to determine if the candidate is appropriate for the particular ministry, including ensuring compliance with this policy.

Congregations and other organizations must keep and maintain all application and screening records secure and confidential in the congregation's or organization's office. These records must be archived for the duration of the individual's employment or volunteering or seven years, whichever is longer. This includes a signature by each applicant verifying receipt of a copy of these policies. This form can be found in Appendix D of this policy.

The governing body or wardens of individual congregations, or its designee, shall be responsible for requesting completion of screening procedures and any related costs. The Authorization to Conduct Background Check form can be found in Appendix E of this document and should be submitted to the appropriate diocesan office for processing. Any costs accrued by these background checks will be billed to the congregation or organization requesting the screening. Most background checks or screenings in the state of Michigan are free of charge unless the individual has lived out of state. More details and specifics around different types of screening required and anticipated potential costs can be found in Appendix A.

For Diocesan sponsored youth activities the Diocesan Youth Coordinator in consultation with the Diocesan Administrator shall be responsible for screening procedures. The Diocese shall incur all costs associated with this screening.

III. Camp Requirements

- Background checks for camp employees and volunteers must be completed to be in compliance with state regulations.
- All volunteers and staff serving at our camp must have a completed and clear Criminal Check, Sexual Offenders Registry Check and Central Registry Clearance through MI-DHHS before they participate in camp activities.
- The camp director is responsible to fill out the clearance request form, have it signed by all volunteers and staff members and process the checks including photo IDs of all members or forward it to the Background Check Contact person for the appropriate diocese with photo IDs of all members.
 - The Department of Human Services will return the results to the Background Check Contact person for the appropriate diocese or camp director depending on who has processed the checks, if the clearances are clear. If they don't send a result, that person is responsible to obtain the result themselves directly from MI-DHHS and forward it to the Background Check Contact person for the appropriate diocese or camp director.
 - If there is a record of an allegation of substantiated abuse the camp director or Background Check Contact person for the appropriate diocese will work with the individual to further investigate the situation and the final decision of whether that individual works at the camp will be decided by the Bishop.
 - All forms and documentation pertaining to background checks for camp employees will be kept on file in the appropriate diocesan office.

IV. Prior Criminal Convictions Procedure

People with any of the following in their criminal history shall not engage in ministry with Children or Youth, without the approval of the rector, in consultation with the appropriate Canon Missioner in Western Michigan or the Canon to the Ordinary in Eastern Michigan and, if necessary, the Bishop:

- A felony conviction,
- A single or multiple misdemeanor convictions involving violence, sexual activity, drugs, dishonesty, or malicious acts, or
- A pending criminal case involving the above crimes. In this situation, the person should not be permitted to engage in ministry with children, youth or vulnerable adults until the pending case is brought to conclusion. Then a determination can be made based on the standards set out in this policy.

In determining a candidate's suitability to work with children, youth or vulnerable adults, a person's past criminal record may be relevant and appropriate to consider a record with respect to the type of role model this person will be. If it is determined that a candidate

does have a criminal record it is imperative to consider the complicated history of justice systems of our country and how implicit, systemic racial bias may have played into their conviction. The rector or organizational leadership are encouraged to use all of the tools at hand, including reference checks and character conversations and to have conversations with their Canon Missioner or Canon to the Ordinary or the Bishop and make their judgment based on their knowledge of how this individual is living out the baptismal covenant in the world.

Individuals who are determined based upon criminal history or other circumstances not suitable to engage in ministry with children, youth or vulnerable adults are welcome to worship in our parishes, receive ministry through our parishes and engage in ministry that does not involve children, youth or vulnerable adults, with the appropriate safe church precautions in place.

Health screenings for potential employees are only permitted after an offer of employment is made. Genetic testing is not permitted.

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 standard safe church training, all supervisors and those with oversight responsibilities for ministry programs and/or other adults who engage in ministry with children, youth or vulnerable adults shall have Specialized Training that is tailored to their role and ministry function.

Safe Church training received in other dioceses meets the requirement for training. Certificates of completion should be obtained from the other diocese.

Safeguarding God's Children Training includes:

- Prevention, identification, and response to all forms of abuse and neglect;
- The inherent vulnerability of children and youth in relationships with their adult leaders;
- An introduction to non-binary genders;
- The needs of LGBTQIA+ children and youth;
- The ways that children and youth can engage in self-advocacy; and

- The needs of differently-abled children and youth;
- Certification of training shall be renewed every three years.
 - Individual congregations and organizations are responsible for ensuring that recertification occurs.

Safeguarding God's People Training includes:

- The 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 within the pastoral relationship;
- An introduction to gender non-binary;
- The needs of aging LGBTQ+ individuals who often struggle to find care or residential facilities adequately equipped to meet their needs; and
- The ways that vulnerable adults can engage in self-advocacy.
- Certification of training shall be renewed every three years.
 - Individual congregations and organizations are responsible for ensuring that recertification occurs.

Congregations and other organizations with responsibility for programs with services or ministries to children, youth and vulnerable adults shall keep records sufficient to evidence compliance with these policies.

Training on the prevention of child sexual abuse and adult misconduct is achieved by reading this policy and completing the appropriate online courses as outlined in **Appendix A**. This training should be completed prior to working with children, youth or vulnerable adults. If that is not possible, this policy must be reviewed and discussed with them before they engage in ministry with children, youth or vulnerable adults. In that case, the rest of the training must be completed within three (3) months of beginning such activity. Training and screening requirements for varying positions within the church can be found in Appendix A.

VI. RECORD KEEPING

Criminal Records and Sexual Offender Registry Check results will be maintained by the diocese.

Training Records and records sufficient to evidence compliance with this policy will be maintained by the individual congregations or organizations and yearly compliance forms will be filled out and returned to the Diocesan Office to ensure compliance.

VII. MONITORING AND SUPERVISION OF PROGRAMS

Adults in charge of ministry programs or activities shall monitor and supervise the behavior of adults, children, and youth to ensure appropriate behavior and healthy boundaries.

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

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

Congregations, and organizations shall ensure that all people who minister to children, youth or vulnerable adults receive prior training as to the scope, accountability, and responsibility of the ministry.

Congregations and organizations shall maintain an up-to-date list of persons, with their contact information, approved to minister to children, youth or vulnerable adults and/or engage in pastoral relationships with others. This list shall be kept in the organization's office or other place where official records are kept.

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 reviewed 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.

- **Two Adults Required**

There shall be at least two unrelated adults (at least two years older than the eldest participant) present (generally in the same room) at ministry settings and events designed for children and youth. If unanticipated circumstances result in an adult being alone with children or youth, that adult shall report those circumstances to the supervisor, clergy in charge, or senior warden as soon as possible.

In exceptional circumstances, only one adult may be sufficient in well monitored, visually accessible program space on the church grounds, such as a Sunday School classroom, provided that another adult can maintain visual contact with the adult program leader.

This can be accomplished by designating an individual to conduct frequent random checks of classrooms and unlocked spaces throughout the building(s). These exceptional circumstances must be specifically described in a written document and approved by the governing body of the congregation and the bishop. See also sections on **Overnight Programs** (Section VI, G) and **Transportation** (Section VI, H).

- **One-to-One Conversations with Children or Youth**

When one-to-one conversations occur between an adult and an unrelated child or youth, another unrelated adult is either to be present or capable of visually monitoring the conversation.

Examples include:

- Planned or unplanned on-site conversations can take place in a public location, away from where others can hear but in view of other adults.
- Planned off-site conversations/meetings can take place in a public place (such as a coffee shop or restaurant) in view of other adults. The program leader or their supervisor shall be informed about the appointment or plans in advance.

Confidentiality cannot be guaranteed if a child or youth discloses a situation pertaining to abuse, neglect, self-harm, or exploitation because of mandatory reporting laws and the need to enforce these policies.

- **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 that could result in exposure of vulnerable adults to undue influence or exploitation. On-site and off-site settings for ministry with vulnerable adults and pastoral relationships and conversations should:

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

Visiting 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; or
- 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 is recommended to be present.

Understanding that it is not always possible to have an additional person present for all pastoral care visits, a Pastoral Care Log is recommended to be used by all clergy and lay pastoral care providers and kept as contemporaneous notes. The log would include the date, time (beginning and end), location, people present, the reason for the visit, significant observations or comments for every pastoral visit. As a supervisor and chief pastor, the rector would be responsible for reviewing the logs of assisting clergy and lay pastoral care ministers. The clergy and lay pastoral care providers' logs may be reviewed by the bishop upon request. These logs should be archived for seven years.

Visiting 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 takes place out of 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.

- **Behavioral Standards for Ministry with Vulnerable Adults**

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

- Take care not to unduly influence a person to 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 or 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.

If any of the above situations occur and, due to complex circumstances, the minister is not sure how best to respond, the minister shall bring the situation to the supervisor for advice and, if needed, ongoing monitoring of the relationship to ensure equity and health.

DO's

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 affection, as long as they are welcomed by the recipient. These may include:
 - brief hugs;
 - pats on the shoulder or back;
 - kisses on the cheek;
 - handshakes;
 - holding hands during prayer; and
- Maintain healthy boundaries when sharing personal information.

DON'Ts

Adults who minister to vulnerable adults shall not under any circumstances:

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

- **Inclusiveness**

No one shall be denied equal access to any program or activity because of race, color, ethnic origin, national origin, religion, marital status, sex, sexual orientation, gender identity and/or expression, differing abilities, or socioeconomic class. To the extent possible, all spaces and settings for programs, activities, and ministry shall be accessible.

Transgender, genderqueer or gender non-binary children, youth or 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 person's ability to keep their transgender status confidential. They 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).

Adults should either have separate shower facilities or shower at other times than the youth. Separate dressing facilities should also be provided. See section on [**Inclusive Guidelines for Programming and overnight programs.**](#) (Section VI, G)

- **Violence and Weapons**

- No one is to strike, hit, or otherwise physically threaten or harm anyone at any time.
- Bullying of any kind by anyone is prohibited.
- Children and youth shall not have weapons of any kind at any event or program for children or youth. Exceptions to this restriction may be made for camp programs or other specific programs with prior approval.
- Report suspected violations immediately. See [**Report Inappropriate Behaviors or Policy Violations**](#) (Section VII, B).

- **Behavioral Standards for Adults in Ministry with Children or Youth**

Adults are encouraged to:

- Spend time with and listen to children and youth, and advocate for their ministry within the Body of Christ;
- Offer appropriate physical expressions of care, which may include:
 - high fives and fist bumps;
 - hand-holding while walking with small children or in prayer;
 - brief touching of shoulders, hands, or arms;
 - “laying on of hands” under appropriate pastoral supervision;
 - brief hugs and arms around shoulders.
- Model appropriate affection with other adults and be accountable to the community for behavior.

Adults shall not under any circumstances:

- Provide children or youth with non-sacramental alcohol, marijuana, drugs, cigarettes, tobacco products, e-cigarettes, vapes, or pornography;
- Arrive under the influence of alcohol, illegal drugs, marijuana or misuse legal drugs at any children’s or youth event or when they are responsible for children or youth at an event;
- Consume non-sacramental alcohol or illegal drugs or misuse legal drugs at any children’s or youth event or when they are responsible for children or youth at an event;
- Engage in illegal behavior or permit other adults or children or youth to engage in illegal behavior;
- Permit any youth to sit in the lap of an unrelated adult or other youth;

- Engage in any sexual, romantic, illicit, or secretive relationship or conduct with any child or youth; or discuss their own sexual activity, history, or fantasies;
- Apart from planned pre-approved educational programs, discuss their own use or abuse of drugs or alcohol with children or youth.

- **Offsite Visits, Events and Programs for Vulnerable Adults**

Off-site programs, trips, and events are a welcome and often necessary means for spiritual, social, and emotional wellbeing 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 this 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.

Prior Approvals

Prior approval by the governing body or 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, progressive dinners, etc. Verbal approval is acceptable - communication is key.

In the event of uncertainty, the Responsible Person should contact the bishop's office with the relevant information.

Registration, Waivers, and Release Forms

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 defined as vulnerable adults shall complete and sign a registration, waiver, and release before participating in any program. Confidentiality must be preserved with respect to medical information.

- There must be a signature on all release and waiver forms. If a person is unable to consent due to impairment or lack of agency, then the signature of that person's guardian, spouse, or other trusted family member is required.

- Completed release and waiver forms shall be maintained in a secure location on-site. Check with the bishop's office regarding whether such forms may be saved electronically and how long they must be retained.

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.

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 a description of the medication, dosage and/or treatment given.
- All medications (prescription and over the counter) belonging to vulnerable adults requiring assistance with medications shall be given to the Responsible Person, unless otherwise agreed upon.
- Only the Responsible Person, or their adult designee, shall administer medications.

Transportation

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

- For the transportation of vulnerable adults, a transportation log of who was taken where, when and for what purpose must be kept. 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 and provide proof of insurance and a current driver's license.
- 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, speed and cell phone usage.

Insurance for Overseas Pilgrimages and Mission Trips

- Short-term trip or 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 all travelers carry evidence of personal health insurance by virtue of a copy of the actual 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.

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.

- **Off-Site Programming for Children and Youth**

Because of unique risks associated with off-site programming 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 or 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.
- Written parental approval is required prior to viewing any movie, whether off-site or on-site, rated "PG-13" or above.

2. Registration, Waiver, and Release Forms

- All children, youth, and adults shall complete and sign a registration form and a waiver and release form before participating in any programs. Confidentiality must be preserved with respect to medical and other sensitive information in the forms. Such forms can encompass a program year.
- There must be a parent/guardian's signature on all release and waiver forms for minors. A digital signature is acceptable.

- Permission slips shall be provided for each off-site event and shall be signed by the parent/guardian. Collaborative church events between multiple parishes can have one form for the event.
- Prior permission for a minor to be photographed or recorded on film, videotape, audiotape, or other electronic media is required from a parent/guardian.

3. First Aid and Medications

- Current certification in First Aid, CPR, and Automated External Defibrillator (AED) is strongly encouraged for those who work with children and youth.
- A first aid kit, appropriately stocked for the event and participants, shall be available in an easily accessible location.
- 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 a description of the medication, dosage, and/or treatment given.
- All medications (prescription and over the counter) belonging to minors shall be given to a designated adult, unless otherwise agreed upon by the parents and the designated adult. Exceptions may include inhalers, epipens, and birth control pills.
- Only the designated adult shall administer medications.

4. Supervision

- At any gathering of children or youth, there shall be at least two unrelated adults at least two years older than the oldest participant, preferably reflecting the gender identity of the participants.
- Minimum ratios of adult to child/youth shall be in accordance with American Camp Association (ACA) guidelines as follows:
 - 5 years & younger – 1 adult for each 5 overnight-participants and 1 adult for each 6 day-participants
 - 6–8 years – 1:6 for overnight, and 1:8 for day
 - 9–14 years – 1:8 for overnight and 1:10 for day
 - 15–18 years – 1:10 for overnight and 1:12 for day
- **Note: while the ratios above may suggest that there are times when having one adult present is appropriate - at least two adults must be present at all times for programs while still meeting or exceeding the ratios for the number of young people to adults present.**
- Additional adults can provide skills, mentorship, support, encouragement, spiritual guidance, and joy.
- No person will be allowed to volunteer to regularly work in a parish context with Children or Youth until the person has been known to the clergy and congregation for at least six (6) months.

- Programs for infants and Children under six (6) years old will have procedures to ensure that Children are released only to their parents or legal guardians or those designated by them.

G. Inclusive Guidelines for Programming and overnight programs

In programming, particular attention will be given to historically excluded or unrecognized people, such as LGBTQIA+ and differently-abled individuals. In situations where these populations are particularly vulnerable, additional consideration, accommodation, and action are necessary to ensure:

- Participant privacy;
- Maximization of social integration of all participants;
- Minimization of stigmatization of any participants;
- Equal opportunity to participate; and
- Safety of all participants.

Additional guidelines for overnight programs:

- The safe use of restrooms and showers by all participants requires congregations and other organizations to consider numerous factors, including, but not limited to: age, sex, gender identity and expression, and privacy. Adults should have separate showers or separate times for showers.
- Overnight programs shall provide safe, supervised sleeping arrangements.
- No bed, cot, or sleeping bag shall have more than one person sleeping in it.
- It is acceptable for all participants to sleep in the same open area when dressing rooms and bathrooms provide appropriate privacy.
- Participants will remain fully clothed while in common areas at all times.
- Participants shall be given the opportunity for at least seven hours of sleep each 24-hour period, except for programs where parental/guardian permission is given to miss sleep. In these cases, children and youth must agree to participate in writing, and parents or guardians must give written permission that includes certification that the youth or child does not have a medical condition that would put the participant at risk by missing sleep.

Best practice guidelines for hotel stays:

- One child or youth per bed, including cots, pullouts or hideabeds, and rollaway beds;
- At least 3 children or 3 youth in each room;
- Adult supervisors or chaperones have rooms on the same floor, scattered among the rooms with children or youth, and at least one adult room is by the stairs or elevators;
- Adult leaders assign rooms and room occupants.

H. 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, congregational, 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;
 - have a satisfactory DMV records check.
- All drivers and riders must comply with state laws including seat belt, speed and cell phone usage.

I. Camps and Retreat Centers

All camps, camping programs, and retreat centers of the diocese shall follow the guidelines for off-site programming established in these policies. In addition, camps should aim to follow the State of Michigan's Licensing Rules for Camps and the American Camp Association standards to the best of the camp's ability. All camps and camping programs that fall under the State of Michigan's requirements for licensing should also be licensed with their license on file at their appropriate diocesan office.

J. Travel

The following policies will help groups prepare for a variety of potential scenarios relating to both domestic and international travel.

1. Adult Leaders and Chaperones

- Minimum ratios of adults to youth need to be greater due to the possibility of leaving an adult behind with a participant in the event of a medical emergency.
 - 9–14 years – 1:5
 - 15–18 years – 1:7
- Regardless of group size, no group should travel with fewer than three adult chaperones.
- One adult, minimum age 25, should serve as the travel administrator who is responsible for all aspects of the trip, including carrying all necessary documentation, contacts, and forms including:
 - medical releases;
 - community covenant;
 - emergency contacts;
 - itineraries; and

- cash and/or credit card capacity to address emergencies.
- Parents or guardians must complete written permission forms before Church Personnel transport Children and Youth for a church sponsored activity or for any purpose on more than an occasional basis.
- It is a best practice that, one adult, minimum age 25, should hold a current medical certification to manage administration of necessary and permissible medications, administer immediate and necessary first aid, and triage medical situations to determine if care of an individual needs to be taken to a higher level of care. When this is not possible, one person should be designated to supervise the administration of medications as instructed on medical release forms, and a clinic near your destination should be identified ahead of time in order to respond to health emergencies as rapidly as possible.
- Acceptable medical certifications include:
 - Wilderness First Responder
 - Outdoor Emergency Care
 - Emergency Medical Technician/Paramedic
 - Nurse – RN/LPN/Nurse Practitioner
 - Physician’s Assistant
 - Medical Doctor
- Best practice is to designate an adult to serve as backup to the travel administrator, and as backup for simple first aid and administration of prescriptions. These could be the same person.
- A copy of all documents should be left with an accountable person at the diocesan, congregational, or organization’s office. That person should also serve as the local emergency contact person for communications between the traveling group and families at home.

2. Insurance for Travel

- Short-term trip or 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 all travelers carry evidence of personal health insurance by virtue of a copy of the actual 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.

3. 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).
- A more thorough list of international travel considerations with links to U.S. and global organizations can be found in the **Youth in Mission Manual** here:
http://www.episcopalchurch.org/files/7-traveling_7.pdf

VII. RESPONDING TO CONCERNS and REPORTING

A. Suspected Abuse, Neglect or Exploitation of a Vulnerable Adult

Anyone who has reason to suspect that abuse, neglect, or exploitation of a vulnerable adult has taken place, is strongly encouraged, and all mandated reporters are required to contact the Michigan Adult Protective Services within 24 hours. Once allegations of abuse have been received, a report should be made regardless of whether or not the abuse took place on church property or somewhere else.

Some definition reminders:

Vulnerable: A condition in which an adult is unable to protect himself or herself from abuse, neglect, or exploitation because of a mental or physical impairment or advanced age.

Abuse: Harm or threatened harm to an adult's health or welfare caused by another person. Abuse may be physical, sexual or emotional.

Neglect: Harm to an adult's health or welfare caused by the inability of the adult to respond to a harmful situation (self-neglect) or the conduct of a person who assumes responsibility for a significant aspect of the adult's health or welfare.

Exploitation: Misuse of an adult's funds, property, or personal dignity by another person.

1. By Michigan law, an oral report shall be made immediately, but in no case later than 24 hours from the time there is a reasonable cause.
2. **Reports are taken 24 hours a day by calling DHS Centralized Intake at 1-855-444-3911. If the individual is in immediate danger, report to local law enforcement (911) in the county where the person lives.** For details of what the report should include, see Appendix C.
3. A report to the Rector or other Clergy person in charge of a parish may constitute fulfilling the above, providing that the clergy person follows

through with the reporting within the 24 hour period and that no changes are made in the report itself (See Appendix C).

4. Failure to report suspected abuse of children or youth is a crime. Reports may be made confidentially or anonymously. Every state provides immunity from civil liability for persons required to report suspected abuse in good faith and without malice.
5. Any report of abuse made to MI-DHHS should also be made to the clergy person in charge or the director or other governing officer in the case of other organizations. In addition, a copy of the **Confidential Notice of Concern (Appendix C)**, signed or unsigned, should be sent to the appropriate Diocese's Intake Officer.
 - a. Intake Officer for the Diocese of Eastern Michigan:
 - The Rev. Canon Michael P. Spencer: [mspencer@eastmich.org](mailto:m Spencer@eastmich.org) or 989-752-6020
 - b. Intake Officer for the Diocese of Western Michigan
 - The. Rev. Canon Alan C. James: ajames@edwm.org or 616-319-2006
6. If an allegation of abuse, exploitation, or endangerment is made against a clergy person, the intake officer of the appropriate diocese should be alerted immediately in addition to contacting authorities.
 - a. Intake Officer for the Diocese of Eastern Michigan:
 - The Rev. Canon Michael P. Spencer: [mspencer@eastmich.org](mailto:m Spencer@eastmich.org) or 989-752-6020
 - b. Intake Officer for the Diocese of Western Michigan:
 - The. Rev. Canon Alan C. James: ajames@edwm.org or 616-319-2006

The Dioceses of Eastern and Western Michigan and all parishes or Episcopal institutions involved will cooperate with any investigation by state/county authorities to the fullest extent and inform authorities that a concurrent internal investigation will be directed by the Dioceses of Eastern or Western Michigan.⁵

Given the nature of the seal of confession even recognized by civil law, a priest may not share any information received in the Sacrament of Reconciliation of a Penitent.⁶

B. Suspected Abuse, Neglect, or Exploitation of Children and Youth

⁵ Specific information about Michigan Adult Protective Services can be found here: https://www.michigan.gov/mdhhs/0,5885,7-339-73971_7119_50647---,00.html

⁶ See also:

[http://www.legislature.mi.gov/\(S\(r12d0wrobeffoli5ostooct1\)\)/mileg.aspx?page=GetObject&objectname=mcl-722-631](http://www.legislature.mi.gov/(S(r12d0wrobeffoli5ostooct1))/mileg.aspx?page=GetObject&objectname=mcl-722-631)

If a child or youth discloses allegations of abuse, neglect, exploitation or endangerment to an adult or if an adult has reason to suspect that abuse of a child or youth has taken place, that person should report the abuse to the appropriate authorities. *All church personnel (paid and volunteer) are considered mandated reporters and are required by these policies and by Michigan law to report known or suspected abuse of children or youth to MI-DHHS within 24 hours.* Once allegations of abuse have been received, a report should be made regardless of whether or not the abuse took place on church property or somewhere else.

1. By Michigan law, an oral report shall be made immediately, but in no case later than 24 hours from the time there is a reasonable cause.
2. **Reports are taken 24 hours a day by calling DHS Centralized Intake at 1-855-444-3911. If the child is in immediate danger, report to local law enforcement (911) in the county where the child lives.** For details of what the report should include, see Appendix C.
3. A report to the Rector or other Clergy person in charge of a parish may constitute fulfilling the above, providing that the clergy person follows through with the reporting within the 24 hour period and that no changes are made in the report itself (See Appendix C).
4. Failure to report suspected abuse of children or youth is a crime. Reports may be made confidentially or anonymously. Every state provides immunity from civil liability for persons required to report suspected abuse in good faith and without malice.
5. Any report of abuse made to MI-DHHS should also be made to the clergy person in charge or the director or other governing officer in the case of other organizations. In addition, a copy of the **Confidential Notice of Concern (Appendix C)**, signed or unsigned, should be sent to the appropriate Diocese's Intake Officer.
 - a. Intake Officer for the Diocese of Eastern Michigan:
 - The Rev. Canon Michael P. Spencer: mspencer@eastmich.org or 989-752-6020
 - b. Intake Officer for the Diocese of Western Michigan
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The Dioceses of Eastern and Western Michigan and all parishes or Episcopal institutions involved will cooperate with any investigation by state/county authorities to the fullest extent and inform authorities that a concurrent internal investigation will be directed by the Dioceses of Eastern or Western Michigan.⁷

Given the nature of the seal of confession even recognized by civil law, a priest may not share any information received in the Sacrament of Reconciliation of a Penitent.⁸

B. Report Inappropriate Behaviors or Policy Violations

Anyone who suspects a violation of these policies shall immediately report the violation to their supervisor and program director, and in parish contexts the member of the clergy in charge and a warden. This report should be made by submitting a **Confidential Notice of Concern**, Appendix C, to the immediate supervisor, program director, clergy in charge, or a warden.

Clergy in charge receiving reports of violations of these policies 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 supervisor or program director 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 the Intake Officer.

The bishop, hearing reports of violations by clergy or by laity 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 congregation or organization shall provide a list of local resources that can give information and assistance to anyone concerned about circumstances that may violate these policies. Such resources with contact information shall include:

- The adult leaders in charge of programs and ministries with children and youth;
- Clergy in charge of a congregation

⁷ Specific information about Michigan Children's Protective Services can be found here: https://www.michigan.gov/mdhhs/0,5885,7-339-73971_7119_50648---,00.html

⁸ See also:

[http://www.legislature.mi.gov/\(S\(r12d0wrobeffoli5ostooct1\)\)/mileg.aspx?page=GetObject&objectname=mcl-722-631](http://www.legislature.mi.gov/(S(r12d0wrobeffoli5ostooct1))/mileg.aspx?page=GetObject&objectname=mcl-722-631)

- Wardens
- Intake Officer for the Diocese of Eastern Michigan:
 - The Rev. Canon Michael P. Spencer: [mspencer@eastmich.org](mailto:m Spencer@eastmich.org) or 989-752-6020
- Intake Officer for the Diocese of Western Michigan:
 - The Rev. Canon Alan C. James: ajames@edwm.org or 616-319-2006
- Director of Safe Church for Eastern and Western Michigan:
 - McKenzie Knill, Director of Children, Youth and Young Adult Formation: mknill@eastmich.org or mknill@edwm.org.
- Child and Adult Protective Services/MI-DHHS Centralized Intake 1-855-444-3911.

IX. POLICIES ADOPTION, IMPLEMENTATION, AND AUDIT

A. The Episcopal Dioceses of Eastern and Western Michigan Adoption and Implementation

The Episcopal Dioceses of Eastern and Western Michigan shall ensure that each parish or diocesan sponsored organization adopts these **Policies for the Protection of Children, Youth and Vulnerable Adults** by June 1, 2021.

B. Safe Church Self-Audit

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 an 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.
- Evidence of compliance with “safe space” requirements.

C. Congregation and Organization Adoption

Congregations and organizations must adopt the Diocese of Eastern and Western Michigan's **Policies for the Protection of Children, Youth and Vulnerable Adults**.

Congregations and organizations may adopt site-specific variations from diocesan policies, with Bishop's approval and 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 and on file in the appropriate diocesan office.

These ***Policies for the Protection of Children, Youth and Vulnerable Adults*** shall be posted in an area where activities take place. This posted copy shall include the names and phone numbers of the adult leaders in charge of programs and ministries with children and youth, and a contact person in the bishop's office; and in parishes, the member of the clergy in charge and the senior warden.

Appendix A

Screening and Training Protocols

Dioceses, congregations, and other organizations are required to screen all persons according to the standards in the **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. The chart on the next two pages is a standards checklist for each role within the congregation and the Application Requirements and Training Requirements.

Key:

DMV	<p>Motor Vehicle Driving Records Check</p> <ul style="list-style-type: none"> - MI- Secretary of State: https://www.michigan.gov/sos/0,4670,7-127-1627_8996-107635--,00.html
SCT	<p>Safe Church Training</p> <ul style="list-style-type: none"> - Classes to take will be determined by the position responsibilities. The breakdown of position titles, online class descriptions and requirements can be found on your diocesan website.
Y	Yes/Required
SCP	Safe Church: Policies for the Protection of Children, Youth and Vulnerable Adults (this document)
SOR	<p>Check Sex Offender Registry Online</p> <ul style="list-style-type: none"> - National: https://www.nsopw.gov/
CRC	<p>Central Registry Clearance Request - DHS-1929 Form</p> <ul style="list-style-type: none"> - A copy of photo ID and completed form must be mailed or faxed to MI-DHHS. Response from MI-DHHS will be sent back within ten (10) working days. - DHS-1929 Form and instructions can be found here: https://www.michigan.gov/mdhhs/0,5885,7-339-73971_7119-180331--,00.html - Instructions for Employers and Volunteer Agencies (Churches) can be found at the bottom of the page.
CRIM	<p>Criminal History Check</p> <ul style="list-style-type: none"> - For Michigan addresses, these background checks are typically free. If out of state address checks are required, these may incur fees. - Check at least the last 7 years of address history. - State of Michigan: Online iChat system (your church will need to register for an account - churches and nonprofits qualify for free accounts): https://apps.michigan.gov/Home/Index - Other States will have other processes. Most information can be found online. Contact the Background Check Contact person in your diocesan office if you have questions.

	<ul style="list-style-type: none"> - Eastern Michigan Background Check Contact: Angela Krueger, akrueger@eastmich.org, 877-752-6020 - Western Michigan Background Check Contact: Maggie Gonzalez, safechurch@edwm.org, 616-319-2006
OXF	<p>Oxford Background Check</p> <ul style="list-style-type: none"> - These background checks range in price from about \$210 to about \$400 depending on the history of the employee. These background checks are run by the Diocesan Office. <ul style="list-style-type: none"> - Eastern Michigan Background Check Contact: Angela Krueger, akrueger@eastmich.org, 877-752-6020 - Western Michigan Background Check Contact: Maggie Gonzalez, safechurch@edwm.org, 616-319-2006

Positions (and examples of positions that fall into those ministry categories)	Screening Requirements			Training Requirements	
	Background Check Type	Application & Interview with Reference Checks	DMV Check	Receive & Sign Safe Church Policies (Signature Page Appendix D)	Safe Church Training
Clergy (Including retired clergy who are supplying or assisting in congregations)	OXF	Y	Y	REQUIRED	Y
Church Staff (Paid employees within the church)	SOR/CRC/CRIM	Y		REQUIRED	Y
Church Finance Staff (Paid finance employees within the church)	SOR/CRC/CRIM	Y		REQUIRED	Y
Program Director (Primary youth minister, Children's minister, Children's choir director, School director, Diocesan Staff who oversee programming, Adult Ministries Directors)	SOR/CRC/CRIM (OXF if Diocesan Staff)	Y	Y (if will be driving on behalf of church)	REQUIRED	Y
Diocesan Staff (Diocesan Staff who do not work directly with children or youth)	OXF	Y	Y (if will be driving on behalf of church)	REQUIRED	Y
Teacher (Christian Formation Teacher)	SOR/CRC/CRIM	Y		REQUIRED	Y
Nursery, Children or Youth Worker	SOR/CRC/CRIM	Y		REQUIRED	Y

Camp Staff (Paid or volunteer employees of a camp facility)	SOR/CRC/CRIM	Y	Y (if will be driving on behalf of camp)	REQUIRED	Y
Children/Youth Volunteers (who volunteer >4 times/year)	SOR/CRC/CRIM	Y		REQUIRED	Y
Confirmation Mentors or Sponsors	SOR/CRC/CRIM	Y	Y (if will be driving on behalf of church)	REQUIRED	Y
Drivers	SOR		Y	REQUIRED	
Treasurer	CRIM	Y		REQUIRED	Y
Vestry (All vestry members)		Y		REQUIRED	Y
Wardens	CRIM	Y		REQUIRED	Y
Building Hosts/Family Promise	SOR/CRC/CRIM Recommended			REQUIRED	Y
Home Visitors (Eucharistic Visitors, Stephen Ministers, Home Visitors, Pastoral Care Teams)	SOR/CRC/CRIM	Y		REQUIRED	Y
Church affiliated school / Preschool Board Members				REQUIRED	Y
Church affiliated school / Preschool Director	SOR/CRC/CRIM	Y	Y (if will be driving on behalf of church)	REQUIRED	Y
Church affiliated school/ Preschool Staff	SOR/CRC/CRIM	Y	Y (if will be driving on behalf of church)	REQUIRED	Y
Church affiliated school / Preschool Substitute Teachers	SOR/CRC/CRIM	Y		REQUIRED	Y
Church affiliated school / Preschool After-School program leaders	SOR/CRC/CRIM	Y		REQUIRED	Y

Appendix B

Recommended Practices and Guidelines for Social Media and Electronic Communications for Children, Youth and Vulnerable Adults

Social media is a tool of discipleship and evangelism for young people and an ever-increasing part of adult lives. Though a powerful tool, it is important to keep in mind that digital actions are 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 presents 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.
- 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 online world, healthy boundaries and Safe Church practices must be adhered to as they are in the physical world.
- In the online world, “friend” or “follower” can mean anyone with whom you are willing to communicate through a digital medium. In the physical world, friends can mean much more in terms of intimacy, self-disclosure, mutuality, and expectations for the relationship.
- Laws regarding the mandated reporting of suspected abuse, neglect or exploitation of children, youth or vulnerable adults apply in the online world as they do in the physical world.

Policies for Digital Communications for Congregations and Organizations:

- In the online world, healthy boundaries and safe church practices must be adhered to as they are in the physical world.
- Interactions in the online world need to be transparent; that is, occurring in such a way that it is easy for others to see.
- All social media accounts representing congregations or organizations must be non-personal accounts. These accounts must use the congregation’s or organization’s name as the username or page title. These accounts are used for promotional and educational purposes only.
- An individual should not use their personal account as the primary promotional or educational account for a congregation or other organization.

- The “tagging” of children, youth or vulnerable adults in posts made by a congregational or organizational account is prohibited.
- The captioning of photos or videos of minors or vulnerable adults may be permitted when written permission is provided by a parent/guardian, vulnerable adult themselves or other trusted family member when the vulnerable adult is unable to consent due to impairment or lack of agency. The caption should not include the individual’s full first and last name, nor should it create a clickable link to someone’s personal profile. Individuals are allowed to “self-tag” in online photos.
- Congregations and organizations are not responsible for reviewing or monitoring pages or groups that are not sponsored by that congregation or organization.
- Email can be a good method of communication, and it also has the opportunity to be misunderstood. Having a clear understanding and procedure when responding to digital communication that raises concern is prudent for all. Best practices can include 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 emailing with a minor, another adult (preferably a parent/guardian or other program leader) shall be included in the communication.
- When using photos and videos for ministry purposes, obtain a media release for each person when posting photos or videos to a congregational or organizational account.
- All congregations and organizations must inform participants when they are being recorded. 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.
- Laws regarding the mandated reporting of suspected abuse, neglect or exploitation of children, youth or vulnerable adults apply in the online world as they do in the physical world.
- Photos or videos of individual children or youth should not be posted on personal individual accounts. Photo releases have been obtained for organizational or congregational accounts and not for personal individual accounts.

Best Practices for Digital Interactions with Children and Youth:

- Prudent judgment should be used in the time of day a child or youth is contacted through text or social media. Under normal circumstances, refrain from contact or exchanging texts, chats, or emails before 8am, during school hours or after 10pm.
- Inform parents of children and youth of social networking sites and platforms used within the ministry.
- Do not submit connection requests (such as friend requests on Facebook or “Add Me” on Snapchat) from personal accounts to children or youth for interactions. Youth may not be able to decline such requests due to the disparity of power between youth and adults.
- Send communication to entire groups, on an individual’s “wall,” or in public areas, rather than in private messages. This includes photos, images and videos.

- When sending emails or private messages to an individual child or youth, send a copy to the parents or guardians as well. Or at least be certain to include another adult in your communications.
- Any “Community Covenant” should include a line that states all electronic communications/gatherings within the congregational or organizational community are held to the same standards as all face to face gatherings.
- 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.
 - Use closed groups, but not “hidden” or “secret” groups.
 - Youth-aged group administrators should be the ones to invite other youth to join the online group.
 - Remove any content that shows or describes inappropriate behavior outside the bounds of the established behavioral covenant.
 - Allow access to social networking groups for parents/guardians of current members.
 - Remove from social networking groups adult leaders of youth groups and youth who are no longer members due to departure, removal from position, or ineligibility because they “aged out” of a program.
 - Users of such a site may not post images of children under 18 without the prior consent of a parent or legal guardian of any minor depicted.

Best Practices for Digital 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 a vulnerable adult 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 appropriate written permission as described above;
- 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, if necessary, in accordance with legal and institutional requirements.
- 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 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.

Any use of social media that does not comply with this policy should be brought to the attention of Katie Forsyth, Canon for Evangelism and Networking. Katie can be reached at kforsyth@eastmich.org or kforsyth@edwm.org.

Appendix C

Confidential Notice of Concern (Page 1 of 2)

A digital version of this form can be [found here](#).

Individual(s) of Concern:

Date of Occurrence:

Time of Occurrence:

Type of Concern:

- Inappropriate behavior with a child or youth
- Inappropriate behavior with an adult
- Policy violation with a child or youth
- Policy violation with an adult
- Possible risk of abuse

Note: Abuse must be reported to MI-DHHS Centralized Intake immediately or no later than 24 hours after witnessing the action or hearing of the occurrence. Reports are taken 24 hours a day by calling DHS Centralized Intake at 1-855-444-3911. If the child is in immediate danger, report to local law enforcement (911) in the county where the child lives.

- Other concern

Describe the situation:

What happened?

Where did it happen?

When did it happen?

Who was involved?

Who was present?

Who was notified?

Has this situation ever occurred previously? Attach additional sheets if necessary.

What action was taken? How was the situation handled, who was involved, who was questioned, were police called? Attach additional sheets if needed.

Confidential Notice of Concern (Page 2 of 2)

What is the follow up plan? Does anyone else need to be notified? **If suspected abuse, it needs to be reported to MI-DHHS or police within 24 hours.**

Will the situation need monitoring? Would you like someone to call you to discuss this situation? Attach additional sheets if needed.

Submitted by: (Please print) _____

Telephone number: _____

Location and address of occurrence: _____

Signature: _____ Date: _____

Reviewed by: _____

Report made to MI-DHHS or Police: Yes _____ No _____

If report filed, made by: _____

Date: _____ Time: _____

Signature: _____

Inappropriate behaviors or possible policy violations that relate to interactions with children or youth should be reported in one of the following ways:

- A telephone call or meeting with the immediate supervisor of the person;
- A telephone call or meeting with the rector, if the person is not the rector;
- A telephone call or meeting with a church warden if the person is the rector; or
- A telephone call or meeting with the Intake Officer (see below)

Please give this form to the appropriate supervisor or clergy person or contact the diocesan Intake Officer.

- Intake Officer for the Diocese of Eastern Michigan:
 - The Rev. Canon Michael P. Spencer: mspencer@eastmich.org or 989-752-6020
- Intake Officer for the Diocese of Western Michigan:
 - The. Rev. Canon Alan C. James: ajames@edwm.org or 616-319-2006

Appendix D

Compliance Agreement Form

Name (Print):

Address:

Phone:

E-mail:

Compliance Statement

I certify that:

- I have received and read the Diocese of Eastern and Western Michigan's policies on the Prevention of Abuse for Children, Youth and Vulnerable Adults.
- I understand the contents of the aforementioned policy.
- I fully understand my responsibility to comply with the policies.
- I understand my responsibility to report any violations or potential violations of the policies to church authorities.
- I recognize that any violation of the policies may be grounds for dismissal from my employment or may terminate my opportunities to volunteer and work with children, youth or vulnerable adults in this setting.

Signature:

Printed Name:

Date:

Congregation or Organization:

NOTE: All clergy acknowledgement forms and forms for Diocese of Eastern or Western Michigan ministries will be kept on file in the Diocesan Office. Acknowledgement forms for local lay employees and volunteers will be kept on file by the entity engaging their services. These files are considered: Permanent. All Clergy **MUST** file this form with the Office of the Bishop as well. (1 copy for Permanent File, 1 copy for Signee)

Appendix E: Authorization to Conduct Background Check

Position for which this person is applying: _____ Diocese in which Congregation or Institution is located: Eastern MI _____

This position is: Paid: _____ or Volunteer: _____ Western MI _____

Congregation/Institution Requesting Check: _____ City of Congregation/Institution: _____

The items of personal information requested below are needed to process your background investigation. This information is intended solely for that purpose and will not be used in a discriminatory manner by the parties noted below in the making of appropriate business decisions.

Printed Full Name of Applicant:

 Last Name First Name Middle Name
 Other names you have used, including maiden names and the date(s) your name(s) changed:

Social Security #: _____ - _____ - _____ Date of Birth: ____/____/____ Phone #: (____) _____ - _____

Drivers License #: _____ State of Issuance: _____

List all residential addresses for the past seven (7) years, starting with your current address
 (Use additional page if necessary):

Street Address	City	State	County	From (Mo/Yr)	To (Mo/Yr)
----------------	------	-------	--------	--------------	------------

Have you ever been convicted of a felony or misdemeanor? Yes _____ No _____
 If Yes, please explain (include dates and locations - use additional page if necessary):

I authorize the Episcopal Diocese of Eastern and/or Western Michigan and/or their designated agents to investigate my background as part of my application for employment, appointment, or a volunteer position. This may include information contained in public records which could include credit history, sex offender registry checks, criminal files at the county, state, and federal jurisdiction levels, motor vehicle records, and investigations of employment history and performance and educational credentials. I hereby release all persons, companies or corporations furnishing such information from liability and responsibility. I declare that the contents of this form have been examined by me and are true to the best of my information, knowledge and belief. This document shall be valid for a period of 1 (one) year from the date of my signature.

Signature

Date

Please complete and return this form to the appropriate Diocesan Office:

<p style="text-align: center;">Diocese of Eastern Michigan Attn: Background Check Contact 924 N. Niagara St., Saginaw, MI 48602 Or by email to: akrueger@eastmich.org</p>	<p style="text-align: center;">Diocese of Western Michigan Attn: Background Check Contact 1815 Hall Street SE, Suite 200, Grand Rapids, MI 49506 Or by email to: safechurch@edwm.org</p>
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Internal Use Only:

_____	_____	_____
Date Background Check Completed	Check Processed By	Accepted and Reviewed By

Appendix F: Annual Safe Church Self-Audit for Congregations & Organizations

Audit Year: _____

Name of Congregation/Organization: _____

Address of Congregation/Organization: _____

City: _____

State: _____

Zip: _____

Policy Confirmation:

- We have a Safe Church policy for the protection of Children and Youth that is consistent with the Diocese of Eastern and Western Michigan's model policy, which meets or exceeds that of the model policy, and is appropriate for our congregation or organization.

Date Adopted: _____ Date Reviewed: _____

- We have a Safe Church policy for the protection of Vulnerable Adults that is consistent with the Diocese of Eastern and Western Michigan's model policy, which meets or exceeds that of the model policy, and is appropriate for our congregation or organization.

Date Adopted: _____ Date Reviewed: _____

Screening of Ministry Leaders:

- There is a well-understood process, in accordance with the Screening and Training Protocols included in the Safe Church policies for the Dioceses of Eastern and Western Michigan, which includes:
- A written application;
 - A personal interview;
 - Verification of personal references; and
 - Public records check, updated every 5 years.

Individual records of these procedures are located _____ and

_____ has access to them.

Notes:

Training of Ministry Leaders:

- All leaders, paid or volunteer, have completed the appropriate Safe Church training, according to the Screening and Training Protocols included in the Safe Church policies for the Dioceses of Eastern and Western Michigan; and
- Certification of training is renewed every three (3) years.
- Records of completion of this training are located:

Notes:

Safe Program Space:

- There are always two or more unrelated adults present in ministry settings and events designed for children and youth.

- All program space whose primary use is for children, youth, vulnerable adults and pastoral relationships are visually accessible.
- Alcoholic beverages are not stored in publicly accessible areas of the church buildings.
- Publicly accessible computers with internet access are password protected and children and youth use church computers only with supervision.
- Keys to church spaces are limited to people who have met all requirements for screening and training.
- No one is denied the right, 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 furthest extent possible, all spaces and settings for programs, activities, and ministry are accessible.

Notes:

Responding to concerns and incidents:

- There is a well-understood procedure for responding to concerns and/or incidents of the suspected abuse, neglect, or exploitation of children, youth and vulnerable adults, which includes:
 - Contact information for the local Child and Adult Protective Service and MI-DHHS Centralized Intake;
 - Contact information for the appropriate person to report to in the Diocese, Congregation and/or Organization;
 - Steps to take when you have concerns; and
 - Who to contact
- Copies of these procedures are located:

Notes:

Program Documentation:

- There is documented approval from the governing body, and individual parental approval, for:
 - All programs for children and youth that are hosted off-site;
 - Sexually explicit conversation or program content; and
 - Screening of media rated PG-13 or above.
 - The following documents are on file for all programs involving children, youth and vulnerable adults:
 - Registration forms;
 - Medical release and waiver forms;
 - Media and image release forms; and
 - Field trip and transportation permission forms for off-site programming.⁹
- Records of these procedures are located:

⁹ Sample forms are available here:
<https://www.episcopalchurch.org/ministries/youth-ministries/model-policies-and-sample-forms/>

Notes:

Posting of Policy:

- A copy of the Policy for the Protection of Children, Youth and Vulnerable Adults is posted in an open area of the facility.
Location of the policy: _____

Notes:

Name(s) of person(s) in congregation responsible for ministries with children or youth (volunteer or paid) - use additional page if needed:

Email(s) and phone # of person(s) in congregation responsible for ministries with children or youth (volunteer or paid) - use additional page if needed:

Name of the person filling out this form:

Phone number and Email Address of the person filling out this form:

Date of completion:

This form must be submitted to McKenzie Knill, Director of Children, Youth and Young Adult Formation for the Episcopal Dioceses of Eastern and Western Michigan by **March 1st** of each year. Completed forms may be submitted in the following ways:

By email: mknill@eastmich.org or mknill@edwm.org

By mail:

Diocese of Eastern Michigan
Attn: McKenzie Knill
924 N. Niagara St., Saginaw, MI 48602

Diocese of Western Michigan
Attn: McKenzie Knill
1815 Hall Street SE, Suite 200, Grand Rapids, MI 49506