



ARCHDIOCESE OF ST. LOUIS

**OFFICE OF CHILD AND YOUTH PROTECTION
POLICY, PROCEDURE AND GUIDELINES**

SAFE ENVIRONMENT PROGRAM

MISSION & PURPOSE

The Safe Environment Program was established by the Archdiocese of St. Louis (“Archdiocese”) to insure the safety of minors and vulnerable adults, as required by the *Charter for the Protection of Children and Young People* (“Charter”) set forth by the United States Conference of Catholic Bishops (“USCCB”).

The purpose of this Safe Environment Program Policy (“Policy”) is to address the prevention of sexual abuse within the Archdiocese through education and screening. It also provides a framework for the Archdiocese to work collaboratively with parents, civil authorities, educators and community organizations to maintain a safe environment for children, youth and vulnerable adults. The Policy applies to all priests, seminarians, religious, employees and volunteers of the Archdiocese (collectively “Church Personnel”).

The Policy specifically refers to the Safe Environment Program and all applicable prevention efforts of the Archdiocese. Listed below are additional archdiocesan policies that are available on the Archdiocese’s website to provide information related to reporting incidents of abuse; the investigatory process; caring for the person affected by abuse; and compliance for registered sex offenders.

- Policies and Procedures Regarding Cases of Sexual Abuse of Minors by Clergy or Other Church Personnel
(available online at <https://www.archstl.org/promise-to-protect/investigatory-process>)
- Child Abuse and Neglect Reports Policy
(available online at <https://www.archstl.org/child-and-youth-protection/policies>)
- Registered Sex Offender Participation and Accountability Policy
(available online at <https://www.archstl.org/child-and-youth-protection/policies>)

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DEFINITIONS

The definitions below apply to this Policy only.

Adult – anyone who has reached eighteen (18) years of age and who is no longer in high school

Archdiocese – the Roman Catholic Archdiocese of St. Louis

Church Personnel – employees, volunteers, religious, priests, deacons and seminarians of the Archdiocese. This includes those who participate in overnight programs with minors and those who are on a list of eligible persons to work with minors even if it is not known whether or how often he/she would actually be scheduled to participate in such a program.

SPA – includes all schools, parishes and agencies of the Roman Catholic Archdiocese of St. Louis which have direct accountability to the Archbishop of St. Louis

Abuse – all forms of sexual misconduct inflicted on a child, youth or vulnerable adult including enticement, exploitation, and other related behaviors, whether in person, verbal, written or through the use of technology or other media. The term also includes sexual misconduct defined by the moral teachings and doctrines of the Catholic Church and the applicable terms defined in the sexual offenses statutes of the State of Missouri and the federal sex offense laws defined in the Code of Federal Regulations.

Minor – any person who has not yet reached eighteen (18) years of age and any person equivalent to a minor under the Code of Canon Law of the Catholic Church

Volunteer – any unpaid person engaged in or involved with an activity or ministry of the Archdiocese, and who is entrusted with the care and supervision of minors and/or have regular individual contact with vulnerable adults

Vulnerable Adult – any adult who cannot seek help without assistance due to temporary or long-term physical, mental, or emotional impairment

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

Sandra Price, Executive Director	314-792-7271	sandraprice@archstl.org
Tina Steck, Program Manager	314-792-7837	tinasteck@archstl.org
Karen Nagel Hall, Program Coordinator	314-792-7272	karennagelhall@archstl.org
Nancy McCarthy, Accountability Specialist		nancymccarthy@archstl.org
Help Desk	314-792-7272	ocyp@archstl.org
Main Office Line	314-792-7704	

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I. SAFE ENVIRONMENT COMPLIANCE FOR ADULTS

I.1 Safe Environment Program for Church Personnel

To be in compliance with the Safe Environment Program all Church Personnel must:

- complete the *Protecting God's Children® for Adults* training program and agree to complete online training updates every three years thereafter.
- agree to undergo a national background check prior to the start of employment or volunteer service and agree to a criminal background check update every three months thereafter.
- read and sign the *Ethical Code of Conduct for Clergy, Employees and Volunteers Working in Ministry*.

I.1.1 Protecting God's Children® for Adults

Protecting God's Children® for Adults is a sexual abuse prevention training program that educates participants about the nature of child sexual abuse; how to recognize the warning signs of child sexual abuse; and how to implement effective steps for the prevention of child sexual abuse. Church Personnel must renew their sexual abuse prevention training online every three years.

Please Note: Church Personnel who are themselves victims of sexual abuse are encouraged to contact the Executive Director of the Office of Child and Youth Protection (314-792-7271) to inquire about alternative educational materials.

I.1.2 Continuing Education Requirement for Priests and Deacons of the Archdiocese of St. Louis

All active and retired priests and deacons of the Archdiocese, who are working in ministry, are required to renew their sexual abuse prevention training online every three years. Priests and deacons of the Archdiocese who fail to comply with this continuing education requirement may have their faculties rescinded at the discretion of the Archbishop.

I.1.3 Criminal Background Checks

Prior to beginning employment or volunteer service, Church Personnel must have a completed criminal background check on file with the Archdiocese. Once a criminal background check is on file with the Archdiocese, this document is then applicable to any SPA location where the individual may work or volunteer.

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Please Note: The Archdiocese does not contact past employers or complete credit checks for Safe Environment purposes.

If a background check is returned with findings related to a past offense, the report is reviewed by the Safe Environment Committee to determine the individual's eligibility to work with minors and/or vulnerable adults. (Further information can be found in Section VI of this Policy.)

1.1.4 Code of Ethical Conduct

Prior to beginning employment or volunteer service, Church Personnel must read and sign the *Code of Ethical Conduct for Clergy, Employees and Volunteers Working in Ministry*. This document will be provided by the pastor/administrator of the SPA in which the individual is employed or volunteering. It is also available at <https://www.preventandprotectstl.org> where it may be digitally signed and submitted electronically.

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

Religious order priests and brothers and women religious serving or volunteering in any SPA must follow the same Safe Environment Program compliance regulations as the Archdiocese's Church Personnel.

In addition to Safe Environment Program compliance, upon arrival in the Archdiocese, religious order priests and brothers and women religious must submit a letter from their order superior stating there is nothing in their past that would prevent them from working with or near minors and/or vulnerable adults.

Religious order priests who are assigned to be pastors or associate pastors in the Archdiocese; who provide ministry in the Archdiocese; or who live in residence at a parish in the Archdiocese, are to be cleared for pastoral service through the Office of Priest Personnel in partnership with the Office of Child and Youth Protection.

All background screenings of religious order priests and brothers and women religious will be updated every three months. All Safe Environment Program records pertaining to religious order priest and brothers and women religious will be maintained by the Archdiocese.

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1.2.1 **Alternative Child Protection Training Programs for Religious Order Priests and Brothers and Women Religious**

The Archdiocese will accept alternative child protection training programs used by religious order communities. The religious order priest or brother or woman religious must provide documentation naming the program used and the date and location of attendance. To receive credit, documentation should be sent directly to the Executive Director of the Office of Child and Youth Protection.

If the religious order community does not provide child protection training, the religious order priest or brother or woman religious ministering in an archdiocesan SPA will be required to complete the *Protecting God's Children® for Adults* training program and enroll in the Archdiocese's online training system to renew their sexual abuse prevention training every three years. Religious order priests and brothers who fail to comply with the continuing education requirement may have their faculties rescinded at the discretion of the Archbishop.

1.2.2 **Safe Environment Policy Exceptions for Retired Religious Order Priests**

Compliance with Safe Environment Policy is required for retired religious order priests and brothers who are providing any ministry within an archdiocesan SPA. Priests and brothers may, at times, be excused from certain requirements due to illness, aging, or another compelling reason. Exceptions are approved by the Vicar for Priests in partnership with the local superior and the Executive Director of the Office of Child and Youth Protection. Exceptions are made on a case by case basis and may be temporary or permanent depending on the situation.

1.3 **Safe Environment Program for Independent Contactors and Vendors**

An independent contractor or vendor is a person or entity under contract with an archdiocesan SPA to perform work for, or provide services to, an SPA but who are not directly employed by the SPA.

1.3.1 **Background Check**

Independent contractors/vendors must ensure pastors/administrators of SPAs that any employee placed at an SPA location has successfully completed a criminal background check. The independent contractor/vendor must also ensure that their employee will not be placed at an SPA location if the employee has been convicted of a sex crime or a crime against children.

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The responsibility of the background checks for independent contractor/vendor employees rests with the independent contractor/vendor – not with the pastor/administrator of the SPA. Independent contractors/vendors must provide a letter, to the pastor/administrator of the SPA, stating the date of their employee's most recent background check as well as a statement indicating that the individual has nothing in his or her history that would prevent them from working with or near minors or vulnerable adults. Alternatively, an independent contractor/vendor may provide the SPA pastor/administrator a copy of their employee's background check. If necessary, the Office of Child and Youth Protection will provide the independent contractor/vendor with potential screening providers.

The pastor/administrator of the SPA is responsible for ensuring that the proper documentation from the independent contractor/vendor is obtained prior to the beginning of service. All documentation should be retained permanently by the SPA. The pastor/administrator of the SPA should perform ongoing evaluations of independent contractor/vendor employees who are working with minors or vulnerable adults, or who are in a position to have contact with minors or vulnerable adults at the SPA location. If an independent contractor/vendor does not cooperate with these screening requirements, the SPA should seek another independent contractor/vendor.

1.3.2 Code of Ethical Conduct

All independent contractors/vendors who may have contact with minors or vulnerable adults at an SPA location must sign a *Code of Ethical Conduct for Third-Party Contractors*.

1.4 Safe Environment Compliance for Undocumented Immigrant Volunteers

Every effort must be made by the SPA to determine whether or not the immigrant volunteer has documents to show their immigration status.

SPAs and undocumented immigrant volunteers must comply with the following Safe Environment Program requirements:

- If the undocumented immigrant is volunteering at a parish and/or school, he/she must be a registered member of the parish and/or school for a minimum of six months before he/she can apply to volunteer.

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- The undocumented immigrant's volunteer service must be performed in the presence of another adult who is in full compliance with the Safe Environment Program. This individual may not volunteer with or near children independently.
- The undocumented immigrant must provide, to the pastor/administrator of the SPA, two reference letters from individuals who can attest to the undocumented immigrant's character. The reference letters should not be from the undocumented immigrant's family members or archdiocesan personnel.
- The undocumented immigrant must complete a *Protecting God's Children® for Adults* training program.
- The undocumented immigrant must read and sign the *Code of Ethical Conduct for Employees, Clergy and Volunteers Working in Ministry*.

II. SAFE ENVIRONMENT COMPLIANCE FOR CHILDREN AND YOUTH

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

The Safe Touch curriculum has been approved by the archdiocesan Child Safety Committee. Students in archdiocesan day schools and parish schools of religion (grades K-9) receive an age-appropriate Safe Touch curriculum annually. The Safe Touch curriculum was developed in partnership with professionals from various backgrounds including education, psychology and religion. The curriculum aims to teach children about healthy and appropriate boundaries, how to identify safe adults in whom they can confide, and steps they can take if they find themselves in an uncomfortable situation. The Safe Touch Program for Children and Youth will be coordinated and taught by a lead teacher designated by the principal or pastor and trained by the staff of the Office of Child & Youth Protection.

Parents or guardians are encouraged to view the Safe Touch curriculum in advance and reinforce key concepts at home. Any concerns or objections by parents or guardians about the Safe Touch curriculum material are to be addressed at the school and/or parish level, as appropriate.

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Any student attending an archdiocesan day school or parish school of religion may be excused from the Safe Touch classes at the request of their parent or guardian. If the parent or guardian requests that their child be excused from Safe Touch classes, the Safe Touch curriculum will be provided to the parent or guardian so that the child can be taught the curriculum at home. A parent or guardian who requests that their child(ren) be excused from Safe Touch classes and chooses not to teach the curriculum to the child(ren) at home, will be asked to complete and sign an “opt out” form provided by the school. If the parent or guardian declines to sign the “opt out” form, the Safe Touch lead teacher should note the decision of the parent/guardian on the student form.

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

For the purposes of this Policy, “student” includes anyone who has not reached 18 years of age and/or who has reached 18 years of age old but has not graduated from high school or completed the equivalent education level.

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

Minors who volunteer or work with or near younger children as part of a high school service project or any other archdiocesan or parish program/activity must sign the *Code of Ethical Conduct for Minors Volunteering or Working with Younger Children*. Parents or guardians must also sign this form as an attestation that the minor has nothing in his/her history that would prevent him/her from working with or near younger children.

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

Volunteers serving as the lead chaperone for an event involving minors must be at least 21 years old and the pastor/administrator of the SPA sponsoring the event must determine his/her fitness to be a lead chaperone.

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III. SAFE ENVIRONMENT COMPLIANCE FOR NON-ARCHDIOCESAN ORGANIZATIONS AND PRIVATE GROUPS

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

Often archdiocesan SPAs enter into agreements with non-archdiocesan organizations or private groups who wish to utilize space on the SPAs' premises. Some examples of these organizations and private groups include, but are not limited to:

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

The SPA should discuss, agree upon, and document the archdiocesan Safe Environment Program compliance requirements prior to entering into any agreement with a non-archdiocesan organization, or private group. The Archdiocese's Office of Risk Management should be notified when allowing any non-archdiocesan organization or private group to utilize space on archdiocesan SPA campuses. The SPA should consult with the Office of Child and Youth Protection to determine appropriate compliance measures for each individual group utilizing space.

Parents should be educated about the difference between an archdiocesan or parish-sponsored event where Safe Environment Program compliance is mandated versus a non-archdiocesan or private group event where Safe Environment Program compliance may have been waved.

When parents allow their child(ren) to attend a non-archdiocesan or private group event, they should make every effort to ensure that they are placing their child(ren) in the care of safe adults. Any questions regarding the child protection policies of the non-archdiocesan organization or private group should be directed to the administrator or authorized representative of that non-archdiocesan organization or private group. If the parent has any concerns related to the child protection

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policy of the non-archdiocesan organization or private group, the pastor/administrator of the SPA should be notified immediately. Upon notification, the pastor/administrator should review their agreement with the non-archdiocesan organization or private group and decide if termination of the agreement is necessary.

IV. SAFE ENVIRONMENT COMPLIANCE FOR VISITING LAY MINISTERS

Lay ministers from other dioceses who will be providing temporary ministry in an archdiocesan SPA and, in doing so, will be in contact with or working directly with minors or vulnerable adults, must provide written documentation from their home diocese showing that they meet all of their home diocese's safe environment compliance requirements. The visiting lay minister must also provide a letter on their home diocese's letterhead outlining information about their home diocese's safe environment program. This letter should be signed by an authorized representative of their home diocese's safe environment office. Visiting lay ministers should also be educated by the sponsoring SPA about the Archdiocese's Safe Environment Program policies.

The visiting lay minister may rely on their home diocese's safe environment compliance as long as:

- The lay minister's residency has not been established in Missouri and/or the St. Louis metropolitan area.
- There is no intent of establishing residency in Missouri and/or the St. Louis metropolitan area.
- The ministry is considered temporary such as for a single school semester or a single event.

The visiting lay minister must provide all of the necessary paperwork to the sponsoring SPA prior to beginning their ministry at the SPA. The Office of Child and Youth Protection is happy to assist SPAs with visiting lay ministry compliance.

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V. SAFE ENVIRONMENT COMPLIANCE FOR SPA FAMILY EVENTS

Archdiocesan SPAs often host family events where children attend but remain in the care and control of their parents or guardians. Examples of such events include but are not limited to: parish picnics, fish fry dinners, breakfasts with Santa, etc. These events are considered family events and, as such, the SPA is not the primary caretaker of the minors in attendance.

It may, however, be necessary to require certain individuals to be in Safe Environment Program compliance. For example, an individual supervising service hours of students where the student's parents are not present, must be in compliance. Additionally, "Santa," who would have direct contact with minors, must be in compliance.

The pastor/administrator of the SPA is responsible for ensuring that the Safe Environment Program compliance requirements for SPA family events are met to ensure the safety of minors in attendance.

VI. CRIMINAL BACKGROUND CHECK RETURNED WITH CRIMINAL HISTORY

6.1 Suitability Determination

When the result of a criminal background check is returned with a criminal history attached, the Safe Environment Committee ("Committee") will review the results to determine if the individual is suitable to work/volunteer with or near minors and vulnerable adults. Possible Committee determinations are as follows:

- The individual is allowed to work/volunteer with or near minors and vulnerable adults without limitations.
- The individual is allowed to work/volunteer with or near minors and vulnerable adults with limitations and/or supervision.
- The individual is prohibited from working with or near minors and vulnerable adults.

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The SPA safety coordinator will be notified of the Committee's determination. The SPA safety coordinator will then inform the individual of the Committee's decision by sending a letter of determination to the individual. The Committee's determination will be effective in all archdiocesan SPAs.

Please Note: When convicted of the offense of driving while intoxicated (DWI) or driving under the influence (DUI), an individual is restricted from driving minors in a Church-related role for ten years from the date of the offense. If convicted of more than one DWI/DUI, an individual is permanently restricted from driving minors in a Church-related role.

6.2 **Suitability Determination Appeals Process**

An individual may file an appeal with the Office of Child and Youth Protection if they disagree with the Committee's determination of suitability to work with or near minors and vulnerable adults. In order to file an appeal, the individual must have the full support of the pastor/administrator of the SPA. Specific details regarding how to begin the appeal process will be included in the letter of determination sent to the worker/volunteer.

Individuals appealing a determination for an archdiocesan parish or school work/volunteer position will only be considered if the individual is a registered member of the parish or school, or if the individual is otherwise known by the pastor.

Individuals appealing a determination for an archdiocesan agency work/volunteer position will only be considered if the individual is otherwise known by the administrator of the agency.

If an appeal is filed, the individual must be prepared to provide information regarding their criminal history, such as police reports and official court documents specifically related to the charges. The Office of Child and Youth Protection will not accept letters of reference, communications from third parties, or the individual's verbal or written explanation of the events in question. Exceptions may be made if police reports and/or court documents are not available due to the date of the offense.

All information related to an individual's criminal history is considered confidential and will only be available to SPA safe environment coordinators and/or SPA administrators.

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Filing an appeal does not guarantee that the Committee's determination will be changed. In order to maintain a safe environment for all of God's children, the Archdiocese reserves the right to deny any individual a work/volunteer position at an archdiocesan SPA.

VII. MONITORING SAFE ENVIRONMENT COMPLIANCE

Internal Parish Audits and Archdiocesan Audit

The Archdiocese and archdiocesan SPA are audited on a regular basis by both the Office of Child and Youth Protection and the United States Conference of Catholic Bishops to ensure all requirements of the *Charter for the Protection of Young People* are being met. While all archdiocesan SPAs are accountable for ensuring that the Charter requirements are being met, not all SPAs will be included in every audit.

VIII. COMMUNICATION OF REPORTING INFORMATION

All SPAs must make Safe Environment compliance requirements and the following reporting information readily available to Church Personnel. In addition, all SPAs should have posters and brochures with the reporting information displayed in public areas.

To request materials, please contact the Office of Child and Youth Protection.

**Missouri Department of Social
Services, Children's Division**
CHILD ABUSE AND NEGLECT
HOTLINE NUMBER
800-392-3738

**Missouri Department of
Health & Senior Services**
ADULT ABUSE AND NEGLECT
HOTLINE NUMBER
800-392-0210

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

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