



# Model Policy for the Protection of Vulnerable Adults

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## I. THEOLOGICAL AND ETHICAL FOUNDATIONS

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

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

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

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

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

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

The purpose of these Model Policies is to set forth expectations for diocesan leaders in their relationships with vulnerable people. The purpose of these model policies is to foster the highest standards of behavior in ministry settings. The document includes:

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

- Behavioral standards designed to ensure that vulnerable adults and all who engage in ministry with them are treated with dignity and respect in all settings; and
- ***Recommended Practices and Guidelines for Social Media and Electronic Communications for Vulnerable Adults*** ([Appendix A](#)); which contains recommended Practices and Guidelines for Social Media and Electronic Communications.

## **II. EXPECTATIONS AND LOCAL IMPLEMENTATION**

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

This policy is a model and, as such, it presents best practices for creating such safe space. Circumstances in many localities may make some of these best practices difficult to implement or even unworkable. As a result, parishes and other local entities may make additions or revisions in developing local policy so long as they meet or exceed the requirements of these policies. This requires that local leadership understand this policy thoroughly enough to make appropriate judgments about local circumstances.

Parishes, worshipping communities and organizations may adopt site-specific variations from these model policies, where permitted by vestries or governing bodies, which shall be described and minuted 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. Any such additions or revisions must be reported in writing to the Safe Church Officer. No provisions may be omitted from a local policy.

Church governing bodies, such as vestries, and all leaders should understand these policies and all local requirements thoroughly enough to make appropriate judgments.

*No policy can foresee every possible circumstance to which it may be applied. Whenever questions arise regarding employment, civil, or criminal law, and/or ecclesiastical discipline, such questions should be immediately addressed with appropriate subject matter experts.*

### III. DEFINITIONS

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

**Adult:** Anyone who is 18 years or older and not in high school.<sup>1</sup>

**Adult Protective Services:** Social service programs provided by state government serving vulnerable adults and their families who are in need of assistance. Elder Protective Services are available through the Department of Social Services (DSS) to anyone over 60 years of age. In addition, The Department of Developmental Services provides protective services for individuals between the ages of 18-59 with an intellectual disability. Both Departments 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.

**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.

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

**Intake Officer:** The person(s) designated by each diocese to receive information regarding an offense for which a member of the clergy may be held accountable under Title IV of the Constitution and Canons of The Episcopal Church, which sets out the disciplinary process for clergy. Anyone may contact an Intake Officer to report concerns. The Diocese of Western MA has one Intake Officer, whose contact information can be found on the diocesan website at [www.diocesewma.org](http://www.diocesewma.org).

**Intersex:** a general term used to describe a variety of conditions in which a person is born with reproductive or sexual anatomy that does not fit the typical definitions of female or male. This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.

**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.

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

**Mandated Reporter:** A person who is required by state law to report reasonable suspicions of abuse, neglect and/or exploitation of vulnerable populations to the appropriate state agency. Connecticut law mandates that adults in certain professions report suspected abuse of elders (anyone over 60 years of age), and individuals with an intellectual disability between the ages of 18-59.<sup>1</sup>

In Massachusetts, clergy are mandated reporters, as are "persons performing official duties on behalf of the church."

Individuals who are not legally mandated to report suspicion of abuse may make a report to the appropriate state agency.

(In Massachusetts clergy are also mandated reporters of suspected abuse, neglect and/or exploitation of children and youth under 18 years of age.)

**Off-Site:** Any location other than the sponsoring Episcopal church or institutional facility or campus.

**Organizations:** All institutions for which the Diocese of Western MA, parishes or worshipping communities have legal or fiduciary responsibility (examples: commissions, conference & retreat centers, adult day care centers, retirement communities, religious orders, parishes, worshipping communities, 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

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<sup>1</sup> Ages established in accordance with generally accepted definitions in the United States. These ages may vary across the wider Episcopal Church.

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 diocese, parishes, worshipping communities and other organizations (examples include: mission trips, pilgrimages, single day on-site and off-site fellowship events, 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.

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

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

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

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

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

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

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

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

out their Baptismal Covenant.

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

#### **Vulnerable Adult:**

- Any adult 60 years of age or older;
- Any adult who is infirm or diminished in capacity due to age, illness, or disability;
- Any adult who is ministered to in their home (by Eucharistic Visitors, Pastoral Care Visitors, Stephen Ministers, or others);
- Any adult who is wholly or partially dependent upon one or more other persons for emotional, psychological, or physical care or support, 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.

## **IV. APPLICATION AND SCREENING**

The diocese, parishes, worshipping communities, 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.

### **A. Public Records Checks**

- The diocese, parishes, worshipping communities and other organizations shall use a provider to conduct public records checks. Such checks must be completed before the employee or volunteer begins programmatic interaction with vulnerable adults;
- Criminal public records checks shall include all available criminal records and sex offender registries;



- A Department of Motor Vehicles (DMV) records check is needed if transporting vulnerable adults as part of, or an extension of, ministry of the church or for a church-sponsored event;
- A criminal public records check and a credit check is required of treasurers and those with check signing authority; and
- Public records checks must be updated at least every five years.

## **B. Additional Screening Requirements**

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

- Submission of a completed written application to serve in a specified role with a clearly defined, written "job description." The application includes verifiable personal information;
- Personal interview;
- Reference verification conducted by the diocese, parishes, worshipping communities and/or other organizations to verify personal information and check references listed in the application (people who know but are not related to the applicant); and
- Maintenance of these records as described below.

Potential leaders or supervisors must be known and active in the parish, worshipping community or organization for at least six months before engaging in ministry with vulnerable adults unless they are serving in a paid position and have completed required public records checks and reference checks pursuant to the screening and training protocols.

The diocese, parishes, worshipping communities, and other organizations must keep and maintain all application and screening records secure and confidential in the diocese, parish, worshipping community, or organization's office. This includes a signature by each applicant verifying receipt of a copy of this policy, including any local procedures or variations.

## V. EDUCATION AND TRAINING

Training shall be appropriate to each person's function.

All Leaders (people who engage in ministry without responsibility for oversight of others engaged in that ministry) 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 diocese shall have access to this training.

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

### **Depending on role and responsibility, Specialized Training should include:**

- 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 identity and expression;
- 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.

The diocese, parishes, worshipping communities, and other organizations with responsibility for programs with, or services or ministries to, vulnerable adults shall keep records sufficient to evidence compliance with this policy.

## **VI. MONITORING AND SUPERVISION OF PROGRAMS**

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

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

Parishes, worshipping communities, and organizations shall ensure that all people who minister to vulnerable adults receive prior training as to the scope, accountability, and responsibility of the ministry.

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

### **A. Presence of Unrelated Adults Suggested**

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

If a parish, worshipping community, or organization's policy requires that there be two unrelated adults present, and if circumstances result in a minister being alone with a vulnerable adult, that minister shall report this to the Supervisor, clergy, senior warden, or Responsible Person as soon as possible.

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

To create a safe space, it is necessary to anticipate and avoid circumstances 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.

## **C. Inclusiveness**

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

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

Transgender, genderqueer, or gender non-binary adults who express the need or desire for increased privacy should be provided with reasonable alternative arrangements.

Reasonable alternative arrangements may include the use of a private area, or a separate changing schedule, or use of a single-stall restroom. Any alternative arrangement should be provided in a way that protects the adult's ability to keep their transgender status confidential, if they so desire.

Transgender, genderqueer, or gender non-binary adults should not be required to use a locker room or restroom that conflicts with their gender identity. Appropriate access to restrooms and showers by all participants requires the diocese, parishes, worshipping communities and other organizations to consider numerous factors, including, but not limited to: age, sex, gender identity and expression, and privacy. To welcome and include gender non-binary individuals, it may be necessary to relabel existing bathrooms as "restrooms" or "anybody".

## **D. Violence**

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

- No one is to control or attempt to control another by bullying, intimidation, threats, verbal/emotional abuse, or isolation from others. Bullying of any kind by anyone is prohibited.
- Report suspected violations immediately. See *Suspected Violations of this Policy* (Section VII, B).

#### **E. 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.

#### **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;
  - handshakes;

- holding hands during prayer; and
- Maintain healthy boundaries when sharing personal information.

## **DON'Ts**

Adults shall not under any circumstances:

- Provide vulnerable adults with non-sacramental alcohol, cannabis, illegal drugs, cigarettes, e-cigarettes, vapes, or pornography;
- Arrive under the influence of alcohol, illegal drugs, or misuse of legal drugs when they are responsible for, or ministering to, a vulnerable adult;
- Consume non-sacramental alcohol or illegal drugs or misuse legal drugs when they are responsible for, or ministering to, a vulnerable adult;
- Engage in illegal behavior or permit others to engage in illegal behavior; or
- Engage in any sexual, romantic, illicit, or secretive relationship or conduct with any vulnerable adult. (Note: pursuant to the disciplinary canons of the Episcopal Church, clergy are prohibited from engaging in such a relationship with anyone with whom they have provided pastoral care.)

## **F. Visits to Private Residences**

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

- Avoid situations that might compromise privacy; common examples include:
  - Visiting behind closed bedroom doors;
  - Sitting on the bed of the person being visited; 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 should be present. If neither is possible, documentation of the time, duration of visit, general matters discussed, and any pastoral concerns shall be provided to the Supervisor as soon as possible after the visit.

## **G. Visits to Residential Facilities**

The safety of all persons and healthy boundaries are essential when visiting a vulnerable adult in a Residential Facility. Best practices dictate that for each such visit:

- 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.

## **H. Off-site programs, trips, and events**

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.

### **1. Prior Approvals**

All off-site programs, trips and events need to be sponsored by an entity that is identified in publicity and event registration information. Prior approval by the governing body of the sponsoring entity is required (see below for examples), and that approval shall be reflected in the minutes of the governing body. "Prior Approval" indicates the sponsoring entity has approved sponsoring the off-site program, trip, or event and approved its (a) compliance with model Safe Church policies; (b) designation of a custodial account to receive, hold, or distribute any registration funds or fees; and (3) coverage by appropriate liability insurance.

- **Standing Committee** sponsored trips or events shall receive prior approval from the

Standing Committee.

- **Commission on Ministry (COM)** sponsored programs, trips or events shall receive prior approval from COM.
- **Bishop**-sponsored programs, trips, or events shall receive prior approval from the Standing Committee.
- **Christ Church Cathedral (CCC)** sponsored programs, trips, or events shall receive prior approval by the Cathedral Chapter.
- **Region**-sponsored programs, trips or events shall receive prior approval by the Region leadership.
- **Multi-parish**-sponsored programs, trips and events shall receive prior approval by the vestry of each parish unless a single parish has explicitly agreed in writing to function as the sponsoring entity for that event.
- **Organizers of Ministry Network**-sponsored programs, trips or events shall indicate in writing assurance of 1) compliance with these Model Policies, and 2) if any funds are involved, creation or designation of a custodial account to receive, hold and distribute any registration funds or fees, as evidenced by the minutes of the governing body of a parish, CCC, or other authorized entity. This written assurance of these two conditions is to be submitted to the Bishop and Canons at least three weeks prior to a Ministry Network sponsored program, trip or event. The Bishop and Canons will certify receipt of this information thereby ensuring general liability insurance coverage for the Ministry Network's program, trip or event.
- These same prior approvals are required when the site is a private residence, hosting such events as cook outs, progressive dinners, etc.

## **2. 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 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, conservator, spouse, or other trusted family member is required. Digital signatures are acceptable.
- Completed release and waiver forms shall be maintained in a secure location on-site or electronically.
- Permission slips shall be provided for each event and shall be signed by the vulnerable adult, guardian, spouse, or other trusted family member.
- Prior permission for an individual to be photographed or recorded on film, videotape, audiotape, or other electronic media is required.

### **3. First Aid and Medications**

- Current certification in First Aid, CPR, and Automated External Defibrillator (AED) is strongly encouraged for those who work with vulnerable adults.
- A first aid kit, appropriately stocked for the event and participants, shall be available in an easily accessible location.
- If a vulnerable adult requires assistance with medications of any type, then a record must be kept for all medication or first aid given to a participant. This record shall include the participant's name, the date and time of service, the name of the person administering medication or treatment, and 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.

#### **I. Transportation**

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

- For events that originate and/or terminate at the parish, worshipping community, 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, a completed volunteer driver information

form, and have a satisfactory DMV records check;

- A list of those approved to provide transportation to vulnerable adults shall be maintained in the office of the organization;
- Anyone being transported must consent to such transportation beforehand. If a person is unable to consent due to impairment or lack of agency, then prior approval by that person's guardian, spouse, or other trusted family member is required; and
- All drivers and riders must comply with state laws including seat belt and cell phone usage.

#### **J. Insurance for Overseas Pilgrimages and Mission Trips**

- Short-term 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.
- All trips to off-site destinations must have adequate insurance in case of emergency.

#### **K. International Considerations**

- Check in with the U.S. Department of State on travel requirements, including visas.
- Make certain that every traveler's passport is valid for at least six months beyond your return date.
- Determine whether or not vaccinations are required and/or recommended for entry into specific countries.
- Arrange to have at least two cell phones with the group that will have active coverage in your destination(s). Make a back-up plan for communication with your Responsible Person at home.

#### **L. Camps, Conference and Retreat Centers**

All camps, conference and retreat centers affiliated with a diocese shall follow the guidelines for off-site Programming established in this policy and should aim to follow American Camp

Association standards to the best of its ability.

## **VII. RESPONDING TO CONCERNS**

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

Anyone who has reason to suspect that abuse, neglect, or exploitation of an elder (60 and older) or an individual with intellectual disabilities between the ages of 18-59 has taken place, is strongly encouraged, and all mandated reporters are required to contact Elder Protective Services at DSS or the Department of Developmental Services, respectively.

In addition, anyone who has reason to suspect that abuse, neglect, or exploitation of a vulnerable adult has taken place within a facility or program of the diocese, a parish, worshipping community, or other organization, should immediately inform one of more or the following, all contact information is provided below in section C:

- A bishop or the bishop's office in the case of the diocese;
- Member of the clergy in charge or the senior warden in the case of a parish, worshipping community ;
- The director, head, or other governing officer in the case of other organizations; and/or
- An Intake Officer in case a member of the clergy is suspected of abuse, neglect, and/or exploitation.

### **B. Suspected Violations of this Policy**

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

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

Anyone who knows of a violation of these policies by a member of the clergy shall immediately

report the violation to the bishops' office and/or an Intake Officer. Anyone can make a report to the bishops' office and/or an Intake Officer.

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

### **C. Local Resources for Response**

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

- Responsible Person(s) for programs and ministries with vulnerable adults;
- Clergy in charge and Wardens of a parish, worshipping community ;
- Bishop's Office: The Rt. Rev. Douglas Fisher, 413-737-4786.
- Intake Officer(s); Contact information of diocesan Intake Officer(s) can be found on the website at [www.diocesewma.org](http://www.diocesewma.org).
- Adult Protective Services:
- Department of Social Services, Protective Services for the Elderly, to report suspected abuse, neglect or exploitation of anyone 60 years or older; call 1-800-922-2275.
- Department of Developmental Services, to report suspected abuse, neglect or exploitation of an individual with an intellectual disability between the ages of 18-59; call 1-800-426-9009.

## **VIII. POLICY ADOPTION, IMPLEMENTATION, AND AUDIT**

### **A. The Episcopal Church Adoption and Implementation**

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

The Episcopal Church shall also ensure that each diocese adopts a ***Policy for the Protection of Vulnerable Adults*** in accordance with this model policy.

#### **B. Diocesan Adoption, Implementation, and Audit**

Dioceses shall adopt a ***Policy for the Protection of Vulnerable Adults*** that is consistent with and/or exceeds the requirements in this model policy.

Dioceses may adopt site-specific variations from this model policy, where permitted by their governing body, 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 governing body.

The bishop or ecclesiastical authority for each diocese shall inform parishes, worshipping communities and other organizations within the diocese of the contents of the diocesan policy, the requirement that each parish, worshipping community or organization adopt a policy in accordance with the diocesan policy, and the vendor(s) approved by each diocese to conduct Public Records Checks.

Each diocese is required to conduct a ***Safe Church Self-Audit*** every three years to confirm compliance with diocesan safe church policies.

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

- Existence of diocesan policy that is consistent with and/or exceeds the requirements of this model policy;
- Provision of accessible and appropriate training for all those who work with vulnerable adults. Such training shall include, at a minimum, topics identified in this model policy;
- Verification that each parish, worshipping community and/or organization within the diocese has adopted a policy that is consistent with and/or exceeds the diocesan policy; and
- Verification that each parish, worshipping community and/or organization has a process to ensure members access training and conduct public record checks.

#### **C. Parish, Worshipping Community and Organization Adoption, Implementation, and Audit**

Parishes, worshipping communities and organizations must adopt a ***Policy for the Protection of***

***Vulnerable Adults*** that is consistent with and/or exceeds the requirements in this model policy.

Parishes, worshipping communities and organizations may adopt site-specific variations from diocesan policies, where permitted by vestries or governing bodies, which shall be described in detail, including the circumstances under which those variations are to be permitted and their rationale. This approval shall be recorded in the minutes of the vestry or governing body. Any such additions or revisions must be reported in writing to the Safe Church Officer. No provisions may be omitted from a local policy.

The ***Policy for the Protection of Vulnerable Adults*** shall be posted in an area where activities take place, and shall be given to all adults, guardians, and all paid and unpaid persons who minister to vulnerable adults. These policies shall include the names and phone numbers of the member of the clergy in charge, the senior warden, and a contact person in the bishop's office.

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

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

- Public records checks, application forms, records of screening, and reference verification of paid and unpaid persons engaged in ministry with vulnerable adults;
- Records of compliance with screening and training protocols;
- Procedures for responding to concerns and incidents; and
- Evidence of compliance with "safe space" requirements.

**Appendix A: Recommended Practices and Guidelines for Social Media and Electronic Communications for Vulnerable Adults**

Social media is an ever-increasing part of adult lives, and has the potential to empower ministry. Behavior in the digital sphere is never private. Posted content may be used out of context and out of the control of the originating individuals and organizations, putting them at risk. In addition, these powerfully connective tools are subject to the same dynamic of unequal power and potential for abuse present in all ministry relationships.

In the midst of rapidly evolving technology, churches face the challenge of identifying and proactively addressing areas of potential risk in social media use. The following recommended practices and guidelines are designed to be a flexible template for developing policies and covenants governing the safe use of social media and digital communication in ministry settings.

### **General Information about Digital Communications**

- All communications sent digitally (email, social networking sites or platforms, notes, texts, or posts, etc.) are NOT CONFIDENTIAL and can be shared or reposted to others.
- Interactions in the virtual world need to be transparent; that is, occurring in such a way that it is easy for others to see what actions are performed.
- In the virtual world, healthy boundaries and safe church practices must be adhered to as they are in the physical world.
- In the virtual world, "friend" can mean anyone with whom you are willing to communicate through that medium. In the physical world, friend can mean much more in terms of intimacy, self-disclosure, mutuality, and expectations for relationship.
- Laws regarding mandated reporting of suspected abuse, neglect, or exploitation of vulnerable adults apply in the virtual world as they do in the physical world.

### **Recommended Practices and Guidelines for Churches and Organizations:**

- Establish a policy that outlines professional and institutional standards for profiles and interactions on social networking sites and platforms.
- Establish a policy of transparency regarding social media accounts. The best practice is to have the diocese, a parish, worshipping community, or organization create and "own" the social media accounts representing the diocese, a parish, worshipping community, or organization respectively and have multiple administrators and/or supervisors with access. If personal accounts are used, a system of monitoring should be established.
- The diocese, a parish, worshipping community, or organization does not have a responsibility to review or monitor the personal pages or groups that are not sponsored by the diocese, a parish, worshipping community, or organization, except as described above. The preceding statement should be included in the diocese, a parish, worshipping community, or organization's Social Media Policy

- Establish a policy regarding the identification or “tagging” of individuals in online photos. For example, on Facebook, “tagging” someone in a photo or video creates a hyperlink to that person’s profile page that can be clicked by anyone. The best practice is for the diocese, a parish, worshipping community, or organization not to identify or “tag” individuals. The “tagging” of vulnerable adults should be discouraged. The captioning of photos or videos may be permitted when written permission is provided by a vulnerable adult (or the person’s guardian, spouse, or other trusted family member when the vulnerable adult is unable to consent due to impairment or lack of agency). The caption should not include the individual’s full name, nor should it create a clickable link to someone’s personal profile. A policy of whether or not an individual can “self-tag” in the diocese, parish, worshipping community, or organization’s online photo should also be established.
- 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 using photos and videos for ministry purposes, obtain a media release for each person and only post images that respect the dignity of every person depicted.
- The diocese, parishes, worshipping communities, or organizations must inform participants when they are being videoed because church buildings are not considered public space. Signs should be posted that indicate a service or activity will be broadcast when worship services or activities are streamed or distributed on the web or via other broadcast media.

#### **Recommended Practices and Guidelines for Vulnerable Adults:**

- Prudent judgment 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 judgment 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.