

The Episcopal Diocese of San Diego

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.

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

This document is a statement for The Episcopal Church, setting forth expectations for its leaders in their relationships with vulnerable people. The purpose of these 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

- ***Screening and Training Protocols*** (Appendix A), which explains the level of screening and training required before engaging in ministry with vulnerable adults. Appendix A shall be updated by the Canon to the Ordinary from time to time, based on current training and formation needs;
- ***Recommended Practices and Guidelines for Social Media and Electronic Communications for Vulnerable Adults*** (Appendix B); which contains recommended Practices and Guidelines for Social Media and Electronic Communications;
- ***Contact Information For Protective Services For Children And Vulnerable Adults And Information Regarding Mandated Reporting*** (Appendix C).

II. EXPECTATIONS AND IMPLEMENTATION

This policy sets forth statements of general expectations and guidelines of behavior for ordained and lay people in the church when engaged in ministry with vulnerable adults. This policy is mandated for all such activities sponsored by every congregation, institution, organization, school, and agency of our 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 abuse.

This policy presents best practices for creating such safe space. Circumstances in many congregations may make some of these best practices difficult to implement or even unworkable. As a result, congregations 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. Any such additions or revisions must be submitted in writing for the approval of the bishop. No provisions may be omitted from a local policy.

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.

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

III. DEFINITIONS

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

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

Adult Protective Services: A social services program provided by state and local governments serving 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.

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.

Leader: A person who, for the benefit of another, engages in ministry without responsibility for oversight of other adults engaged in that same ministry. Leaders report to Supervisors (see definition below). 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. State laws vary greatly. Generally, state law mandates that either all adults or adults in certain professions report suspected abuse of elders, vulnerable, and/or dependent adults. Information regarding mandated reporting and contact information for Adult Protective Services in all of the counties of the diocese are included in Appendix C.

It is imperative to know the requirements of applicable state laws. Typically, individuals who are not mandated to report suspicion of abuse may make a report to the appropriate state agency, even though not legally required to do so.

An abbreviated list follows (full list in Appendix C):

In **California**, P.C. 11165.7 defines "mandated reporters" as . . . : 1) A teacher. 2) An instructional aide. 3) A teacher's aide or a teacher's assistant employed by any public or private school. 4) A classified employee of any public school. 5) An administrative officer or supervisor of child welfare and attendance, or a certificated pupil personnel employee of any public or private school. 6) An administrator of a public or private day camp. 7) An administrator or employee of a public or private youth center, youth recreation program, or youth organization. 8) An administrator or employee of a public or private organization whose duties require direct contact and supervision of children. . . 10) A licensee, an administrator, or an employee of a licensed community care or child day care facility. 11) A

Head Start program teacher. . . 14) An employee of a child care institution including, but not limited to, foster parents, group home personnel, and personnel of residential care facilities. . . 16) An employee of a school district police or security department. 17) Any person who is an administrator or presenter of, or a counselor in, a child abuse prevention program in any public or private school. . . marriage, family and child counselor, . . . 24) A marriage, family and child therapist trainee, . . . 25) An unlicensed marriage, family, and child therapist intern . . . 30) A child visitation monitor. For purposes of the California Child Abuse Reporting Law, “child visitation monitor” means any person who, for financial compensation, acts as monitor of a visit between a child and any other person when the monitoring of that visit has been ordered by a court of law. . . 32) A clergy member, as specified in subdivision (d) of P.C. 11166. For purposes of the California Child Abuse Reporting Law, “clergy member” means a priest, minister, rabbi, religious practitioner, or similar functionary of a church, temple, or recognized denomination or organization. 33) Any custodian of records of a clergy member, as specified in P.C. 11165.7 and subdivision (d) of Section 11166. . . 38) An “alcohol and drug counselor” is a person providing counseling, therapy, or other clinical services for a licensed or certified drug, alcohol, or drug and alcohol treatment program. However, alcohol or drug abuse, or both alcohol and drug abuse, is not in and of itself a sufficient basis for reporting child abuse or neglect. . . 41) An employee or administrator of a public or private postsecondary institution, whose duties bring the administrator or employee into contact with children on a regular basis, or who supervises those whose duties bring the administrator or employee into contact with children on a regular basis, as to child abuse or neglect occurring on that institution’s premises or at an official activity of, or program conducted by, the institution. . . 42) An athletic coach, athletic administrator, or athletic director employed by any public or private school that provides any combination of instruction for kindergarten, or grades 1 to 12, inclusive. . . 44) Any athletic coach, including but not limited to, an assistant coach or a graduate assistant involved in coaching, at public or private postsecondary institutions.

NOTE: Unless otherwise stated, volunteers are not mandated reporters.

In **Arizona**, Medical personnel including a physician, physician assistant, registered nurse practitioner, licensed practical or registered nurse, certified nursing assistant, emergency medical technician, home health provider, hospital intern or resident, surgeon, dentist, psychiatrist, psychologist, pharmacist, speech, physical or occupational therapist, long-term care provider, social worker, peace officer, medical examiner, guardian, conservator, fire protection personnel, developmental disabilities provider, employee of the Department of Economic Security or other person who has responsibility for the care of a vulnerable adult.

Financial personnel including an attorney, accountant, trustee, guardian, conservator or other person who has responsibility for preparing the tax records of a vulnerable adult or a person who has responsibility for any other action concerning the use or preservation of the vulnerable adult's property.

Any person other than one required to report or cause reports to be made who has a reasonable basis to believe that abuse, neglect or exploitation of a vulnerable adult has occurred may report the information to a peace officer or to the adult protective services central intake unit.

[Mandated Reporters | Arizona Department of Economic Security \(az.gov\)](https://www.az.gov)

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

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

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

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

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

Public Record 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.

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

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

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

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

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

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

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

Vulnerable Adult: Any adult at or older than the age designated as an elder by applicable state law;¹

- 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, congregations, and other organizations are required to screen all persons who work with children and/or vulnerable adults 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

- Congregations and other organizations shall arrange for public background checks with the diocesan office. Such checks must be completed before the employee or volunteer begins programmatic interaction with vulnerable adults;

¹ Currently 60 year of age or older in California. The state of Arizona does not specify an age.

- 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 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 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.

Volunteers must be known and active in the congregation for at least six months before engaging in ministry with children and youth. Paid employees are required to have public records checks and reference checks pursuant to the ***Screening and Training Protocols*** ([Appendix A](#)).

The Diocese, congregations, and other organizations must keep and maintain all application and screening records secure and confidential in the diocese, church, 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 according to the *Screening and Training Protocols* ([Appendix A](#)).

All members of the Episcopal Diocese of San Diego have access to this training.

Certification of training shall be renewed every three years.

The Diocese, congregations, 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

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.

The Diocese, congregations, 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.

The Diocese, congregations, 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.

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

A. Presence of Unrelated Adults Suggested

While not required, it is 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 diocese, congregation, 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 offsite 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 Episcopal Church seeks to support all persons by providing reasonable alternative arrangements regardless of state law to address safety and comfort.

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

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

D. Violence

- No one is to strike, hit, or otherwise physically threaten or harm anyone at any time.
- No one is to control or attempt to control another by bullying, intimidation, threats, verbal/emotional abuse, or isolation 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, marijuana, 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.

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 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.

H. Off-Site Visits, Events, and Programs

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

- Prior approval by the governing body and the member of the clergy in charge is required, and that approval shall be reflected in the minutes of the governing body. Diocesan sponsored programs, trips, or events shall receive prior diocesan approval.
- These same prior approvals are required when the site is a private residence, hosting such events as cook outs, progressive dinners, etc.

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

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, spouse, or other trusted family member is

required. Applicable state law determines whether digital signatures are acceptable.

- 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.

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 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, 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.

K. International Considerations

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

L. Conference and Retreat Centers

All conference and retreat centers of the diocese, congregations, and organizations shall follow the guidelines for off-site Programming established in this policy.

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 a vulnerable adult has taken place, is strongly encouraged, and all mandated reporters are required to contact the state's Adult Protective Services.

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, congregation, or other organization, should immediately inform one of more or the following:

- The bishop or the bishop's office in the case of a diocese;
- Member of the clergy in charge or the senior warden in the case of a congregation;
- The director, head, or other governing officer in the case of other organizations; and/or
- The Intake Officer in case a member of the clergy is suspected of abuse, neglect, and/or exploitation.
- Clergy in charge of congregations will report these suspected incidents to the Canon to the Ordinary.

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/bishop's 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. Clergy in charge or the responsible lay person will contact the Canon to the Ordinary within 48 hours of receiving the report.

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

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

C. Local Resources for Response

There are local resources available to give information and assistance to anyone concerned about circumstances that may violate this policy. In addition to these, see Appendix C.

- If it is a congregational activity/employee, please contact the local priest-in-charge.
- If you have concerns about the local priest-in-charge, please contact the Bishop's office. 619-291-5947
- Intake Officers are available if you believe a clergy person has committed a Title IV offense. Their contact information can be found here: [EDSD: » Reporting Misconduct](#)
- Adult Protective Services can also offer assistance and advice. Their contact information is:
 - California 883-401-0832 (enter zip code to be connected to the county office)
 - Arizona 877-SOS-ADULT (877-767-2385)
- If someone is in immediate physical danger, please call 911.

Appendix A: Screening and Training Protocols

Appendix A - Screening and Training Protocols for the Protection of Children and Vulnerable Adults	Clergy	Bishops Priests Deacons Retired Clergy Postulants Seminarians	SCSC - Introduction & Theological Background	SCSC - Organizational Rules and Model Policies	SCSC - Healthy Boundaries	SCSC - Power & Relationships	SCSC - Abuse & Neglect	SCSC - Inclusion	SCSC - Pastoral Relationships	SCSC - Bullying	Promoting a Safe Environment (Supervisor - CA only)	Promoting a Safe Environment (Employee - CA only)	SGP - Preventing Sexual Harassment (Supervisor - AZ only)	SGP - Preventing Sexual Harassment (Employee - AZ only)	Anti- Racism Training (LARK)
Clergy			X	X	X	X	X	X	X	X	X	X	X	X	X
ALL Paid Church/School/Camp Staff - Supervisors			X	X	X	X	X	X	X	X	X	X	X	X	X
ALL Paid Church/School/Camp Staff - Employees			X	X	X	X	X	X	X	X	X	X	X	X	X
Children's Ministry (Volunteer)			X	X	X	X	X	X	X	X	X	X	X	X	X
Youth Ministry (Volunteer)			X	X	X	X	X	X	X	X	X	X	X	X	X
Elected Positions			X	X	X	X	X	X	X	X	X	X	X	X	X
Key Holders (Volunteer)			X	X	X	X	X	X	X	X	X	X	X	X	X
Lay Leadership (Volunteer)			X	X	X	X	X	X	X	X	X	X	X	X	X

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

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

General Information about Digital Communications

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

Recommended Practices and Guidelines for Churches and Organizations:

- Establish a policy that outlines professional and institutional standards for profiles and interactions on social networking sites and platforms.
- Establish a policy of transparency regarding social media accounts. The best practice is to have the diocese, congregation, or organization create and “own” the social media accounts representing the diocese, congregation, or organization respectively and have multiple administrators and/or supervisors with access. If personal accounts are used, a system of monitoring should be established.

- Establish a policy regarding the identification or “tagging” of individuals in online photos. For example, on Facebook, “tagging” someone in a photo or video creates a hyperlink to that person’s profile page that can be clicked by anyone. The best practice is for the diocese, congregation, or organization not to identify or “tag” individuals. The “tagging” of vulnerable adults should be discouraged. The captioning of photos or videos may be permitted when written permission is provided by a vulnerable adult (or the person’s guardian, spouse, or other trusted family member when the vulnerable adult is 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 a diocese, congregation, or organization’s online photo should also be established.
- A diocese, congregation, or organization does not have a responsibility to review or monitor the personal pages or groups that are not sponsored by the diocese, congregation, or organization respectively, except as described in #2 above. The preceding statement should be included in the diocese, congregation, or organization’s Social Media Policy.
- 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, congregations, or organizations must inform participants when they are being videoed because church buildings are not considered public space. Signs should be posted that indicate a service or activity will be broadcast when worship services or activities are streamed or distributed on the web or via other broadcast media.

Recommended Practices and Guidelines for 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 8:00 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.

Appendix C: CONTACT INFORMATION FOR PROTECTIVE SERVICES FOR CHILDREN AND VULNERABLE ADULTS and INFORMATION REGARDING MANDATED REPORTING

Child Protective Services

Arizona (Yuma County)

1-888-SOS-CHILD (1-888-767-2445)

San Diego County

(858)-560-2191

(800)-344-6000

Riverside County

(800)-442-4918

(877)-922-4453

Imperial County

(760)-337-7750

Adult Protective Services

Arizona (Yuma County)

1-877-SOS-ADULT (1-877-767-2385)

California (all counties)

1-833-401-0832 (enter zip to be connected to your county)

Mandated Reporting

California

Adults

Most people who work with elders or disabled adults are mandated reporters under state law. To determine whether you are a mandated reporter, please review Welfare and Institution Code Section 15630, which reads in part:

“Any person who has assumed full or intermittent responsibility for care or custody of an elder or dependent adult, whether or not that person receives compensation, including administrators, supervisors, and any licensed staff of a public or private facility that provides care or services for elder or dependent adults, or any elder or dependent adult care custodian, health practitioner, or employee of a county adult protective services agency or a local law enforcement agency is a mandated reporter.”

Mandated reporters are required to report suspected abuse or neglect by phone as soon as possible and follow up with a completed written report within two days. Failure to report abuse of an elder or dependent adult is a misdemeanor, punishable by not more than six months in the county jail or by a

fine of not more than \$1,000, or both imprisonment and fine. Any mandated reporter who willfully fails to report abuse where the abuse results in death or great bodily injury, may be punished by up to one year in county jail, a fine of up to \$5,000, or both imprisonment and fine.

The following forms are to assist you in filing your report of suspected dependent adult or elder abuse. If you are employed by a financial institution, please complete form SOC 342. All other persons should complete form SOC 341. [Information for Mandated Reporters \(ca.gov\)](#)

Children

A list of persons whose profession qualifies them as “mandated reporters” of child abuse or neglect is found in California Penal Code Section 11165.7. The list is extensive and continues to grow. It includes: clergy members, or similar functionaries of a church; an administrator of a public or private day camp; an administrator or employee of a public or private youth center, youth recreation program, or youth organization; an administrator, board member, or employee of a public or private organization whose duties require direct contact and supervision of children; teachers, teacher’s aides, administrators, and employees of public or private schools; administrators or employees of day camps, youth centers, or youth recreation programs. [Law section \(ca.gov\)](#)

All persons who are mandated reporters are required, by law, to report all known or suspected cases of child abuse or neglect. It is not the job of the mandated reporter to determine whether the allegations are valid. If child abuse or neglect is reasonably suspected or if a pupil shares information with a mandated reporter leading him/her to believe abuse or neglect has taken place, the report must be made. No supervisor or administrator can impede or inhibit a report or subject the reporting person to any sanction.

To make a report, an employee must contact an appropriate local law enforcement or county child welfare agency, listed below. This legal obligation is not satisfied by making a report of the incident to a supervisor or to the school. An appropriate law enforcement agency may be one of the following:

- A Police or Sheriff’s Department (not including a school district police department or school security department).
- A County Probation Department, if designated by the county to receive child abuse reports.
- A County Welfare Department/County Child Protective Services.

The report should be made immediately over the telephone and should be followed up in writing. The law enforcement agency has special forms for this purpose that they will ask you to complete. If a report cannot be made immediately over the telephone, then an initial report may be made via e-mail or fax. A report may also be filed at the same time with your school district or county office of education (COE). School districts and COEs, however, do not investigate child abuse allegations, nor do they attempt to contact the person suspected of child abuse or neglect.

School districts and COEs may have additional policies adopted at the local level relating to the duties of mandated reporters. School staff should consult with their district to determine if there are additional steps that must be taken.

These policies do not take the place of reporting to an appropriate local law enforcement or county child welfare agency. [Child Abuse Identification & Reporting Guidelines – Child Abuse Prevention Training and Resources \(CA Dept of Education\)](#)

Arizona**Children**

Any person who reasonably believes that a minor is or has been the victim of physical injury, abuse, child abuse, a reportable offense or neglect that appears to have been inflicted on the minor by other than accidental means or that is not explained by the available medical history as being accidental in nature, or who reasonably believes that there has been a denial or deprivation of necessary medical treatment or surgical care or nourishment with the intent to cause or allow the death of an infant who is protected under A.R.S. Â§ 36-2281, shall immediately report or cause reports to be made of this information to a peace officer or to Department of Child Safety, except if the report concerns a person who does not have care, custody or control of the minor, the report shall be made to a peace officer only. [Report Child Abuse or Neglect | Arizona Department of Child Safety \(az.gov\)](#)

Adults

Medical personnel including a physician, physician assistant, registered nurse practitioner, licensed practical or registered nurse, certified nursing assistant, emergency medical technician, home health provider, hospital intern or resident, surgeon, dentist, psychiatrist, psychologist, pharmacist, speech, physical or occupational therapist, long-term care provider, social worker, peace officer, medical examiner, guardian, conservator, fire protection personnel, developmental disabilities provider, employee of the Department of Economic Security or other person who has responsibility for the care of a vulnerable adult.

Financial personnel including an attorney, accountant, trustee, guardian, conservator or other person who has responsibility for preparing the tax records of a vulnerable adult or a person who has responsibility for any other action concerning the use or preservation of the vulnerable adult's property.

Any person other than one required to report or cause reports to be made who has a reasonable basis to believe that abuse, neglect or exploitation of a vulnerable adult has occurred may report the information to a peace officer or to the adult protective services central intake unit.

[Mandated Reporters | Arizona Department of Economic Security \(az.gov\)](#)