

A Catholic Leaders Guide to Implementing the USCCB Charter for the Protection of Children and Young People

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Leadership Roundtable promotes best practices and accountability in the management, finances, communications, and human resources development of the Catholic Church in the U.S., including greater incorporation of the expertise of the laity.

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Table of Contents

About the Catholic Standards for Excellence and 6 Guiding Principles	
Catholic Standards for Excellence and the Abuse Crisis, Introduction	1
Charter for the Protection of Children and Young People	2
The Secretariat for Child and Youth Protection	4
An Overview of the Safe Environment Audit Process	5
What to Expect from the Audit Team	6
How to Prepare	7
What Data Needs to Be Collected	9
What Needs to Be in Place for Full Implementation and Compliance with the Charter 1	.3
Suggestions for Self-Audit	.6
Frequent Problem Areas	.8
Notes on Best Practices, Quality, Effectiveness, and the Future	1
Selected Resources	6
Attachment A: A Parish Self-Assessment Guide	2
Attachment B: 2007 Parish Interview Guidelines and Questions	6

About the Catholic Standards for Excellence

Leadership Roundtable is committed to raising the level of ethical and accountable practices in Catholic parishes. Therefore, Leadership Roundtable has released these Catholic Standards for Excellence to serve as a model for Catholic parishes to implement in their operations and governance. Based on fundamental values - such as honesty, integrity, fairness, respect, trust, compassion, responsibility, and accountability - these Catholic Standards for Excellence describe how parishes should act to be ethical and accountable in their program operations, governance, human resources, financial management and fundraising. Six (6) Guiding Principles are provided, along with sixty-nine (69) standards - more detailed performance benchmarks that will enable parishes to strengthen their operations. The Catholic Standards for Excellence are intended to describe how the most well-managed and responsibly governed parishes operate. They provide benchmarks related to temporal affairs to determine how well a parish is fulfilling its obligations to those who benefit from its ministry programs, to contributors, and to the public both inside and outside the Church. This document is rooted in these guiding principles.

Catholic Standards for Excellence - 6 Guiding Principles

I. Mission, Vision, Strategy, and Evaluation

A parish is established to carry out the mission and vision of the Catholic Church in a particular geographic location and through specific ministries and programs. It should have a well-defined vision statement that articulates how it seeks to fulfill the mission of the Church provided their unique context. A parish's ministries and programs should effectively and efficiently work toward achieving its defined vision. A Catholic parish has an obligation to ensure its ministries' and programs' effectiveness and to devote resources to achieving its stated purpose.

II. Pastoral Leadership: Pastor, Advisory Councils, Staff, and Volunteers

A parish depends upon effective pastoral leadership to successfully live out the Church's mission and provide meaningful and relevant ministry. Effective parish leadership occurs when the pastor is co-responsible with the faithful. This is achieved through meaningful consultation with parish advisory councils in accord with Catholic teaching and canon law. Understanding the various leadership roles and effectively utilizing advisory councils is essential to a mission focused parish.

A parish's clergy, employees, and volunteers are fundamental to its ability to serve its mission. The administration of a parish is entrusted to the pastor, appointed by the bishop, who is required by canon law to establish certain advisory councils. A parish finance council is required by canon law. Canon law allows the bishop to mandate the establishment of a parish pastoral council. These councils are governed by norms issued by the bishop. Canon law also places requirements on the financial administration of the parish by the pastor, as well as systems of accountability.

Advisory council members are in a position of trust to ensure good stewardship of resources for the mission of the Church. A parish's advisory councils should consist of parishioners who are committed to the mission of the Church and who demonstrate an understanding of the people

who are to be served. The pastor, along with input from an effective pastoral council, should determine the vision for the parish. The finance council, with guidance from the (arch)diocese and approval by the pastor, should establish management policies and procedures, assure that adequate human and financial resources are available, and actively monitor the parish's allocation of resources to effectively and efficiently fulfill its vision.

A parish should also have pastoral leadership which carries out the day-to-day activities, ensures financial and organizational sustainability, and provides adequate information to the advisory councils. A parish's human resources policies should address clergy, paid employees, and volunteers. The policies should be fair, establish clear expectations, and provide meaningful and effective performance evaluation.

III. Legal Compliance and Ethics

A parish should conduct periodic reviews to address regulatory and stewardship concerns. One of the pastor's fundamental responsibilities, with assistance from his advisory councils, is to ensure that the parish is led and operated in an ethical and legal manner. Fostering exemplary conduct is one of the most effective means of developing internal and external trust, as well as preventing misconduct. Moreover, to honor the trust that the faithful and wider public has given them, pastors - and those who assist them - have a moral obligation to go beyond legal requirements and embrace the highest ethical practices. Pastors, staff, and volunteers must act in the best interest of the Church, rather than furtherance of personal interests or the interests of third parties. A parish should have policies in place, and should routinely and systematically implement those policies, to prevent actual, potential, or perceived conflicts of interest. Ethics and compliance reinforce each other.

IV. Finance and Operations

A parish should have sound financial and operational systems in place and should ensure that accurate records are kept. The parish's financial and nonfinancial resources must be used to further its religious purposes. A parish should conduct periodic reviews to address accuracy and transparency of financial and operational reporting, and safeguards to protect the integrity of the reporting systems.

V. Financial Stewardship

The Church depends on charitable giving for the support of its work. All financial resource development should be conducted on a foundation of truthfulness and responsible stewardship. Parish financial stewardship policies should be consistent with the Church's mission, compatible with their capacity, respectful of the interests and intentions of donors and potential donors, and in compliance with applicable canon law.

VI. Public Life, Engagement, and Advocacy

"As Catholics, we are part of a community with a rich heritage that helps us consider the challenges in public life and contribute to greater justice and peace for all people....The work for justice requires that the mind and the heart of Catholics be educated and formed to know and practice the whole faith." (Forming Consciences for Faithful Citizenship, U.S. Conference of Catholic Bishops [USCCB], 2015). A parish should engage in promoting public participation

in community affairs and elections. As such, they should communicate in an effective manner, using Catholic Social Teaching to educate, inform, and engage the public.

Catholic Standards for Exellence and the Abuse Crisis

Leadership Roundtable's Catholic Standards for Excellence: Best Church Management Practices for Parishes states:

(48) All clergy, paid employees, and volunteers are required to be in compliance with the Charter for the Protection of Children and Youth and any diocesan protocols related to it. There should be periodic audits with which staff and volunteers cooperate to ensure compliance.

The *Catholic Standards for Excellence* code asserts that each parish should be able to specify how compliance with the United States Conference of Catholic Bishops (USCCB) *Charter for the Protection of Children and Young People* (developed by the Ad Hoc Committee for Sexual Abuse in 2002 and updated in 2005, 2011, and most recently in June 2018) is being implemented and, hopefully, achieved.

This educational resource packet is designed to assist parishes in meeting this standard by outlining in a general way the requirements of the *Charter*; best practices and general resources helpful to achieving those requirements; and the elements of the national audit process designed to measure successful compliance.

Introduction

The sexual abuse crisis that unfolded so dramatically in the Catholic Church in the United States in early 2002 set in motion an unprecedented number of activities designed to understand and address its root causes, achieve restorative justice for its victims, and work to ensure the future safety of children and young people. These activities included, but were not limited to:

- developing strategies to evaluate and strengthen policies and procedures;
- examining the components of the investigative and abuse reporting processes;
- identifying abuse prevention curricula for adults and children;
- creating training and education programs for use in parishes and schools;
- examining and strengthening screening mechanisms for employment, volunteer service, and entry into the seminaries and diaconate formation programs; and
- providing outreach to, and services for, the victims, their families, and communities.

On June 14, 2002, the USCCB provided a national framework for these activities by releasing the *Charter for the Protection of Children and Young People* and, in 2003, establishing an annual, independent national audit process to assess national compliance with the *Charter's* requirements. The vast majority of dioceses and eparchies in the United States have embraced the cause of child sexual abuse prevention since that time. Many have worked to implement the requirements of the *Charter* and have participated in annual independent audits. However, ongoing revelations about Church leaders who have been credibly accused of sexual offenses and subsequent failures of leadership to reveal

and address these abuses in a timely and responsible manner, show that the Church must still guard against the dangers of complacency and the assumption that the issue of child sexual abuse prevention has been adequately and thoroughly addressed.

This educational resource packet is designed to help parishes understand how the *Charter* applies to the parish level, the structure of the national audit process, and best practices in terms of how to comply with and articulate the elements of successful implementation (more detail about how the audit process is currently conducted via on-site and paper audits can be found in the May 2018 Report on implementation of the *Charter* (http://www.usccb.org/issues-and-action/child-and-youth-protection/upload/2017-Report.pdf). This packet also discusses why ongoing planning is important, who should be involved, and how you may wish to establish systems of data collection and accountability. A self-assessment guide for parishes is included, as well as a list of printed and online resources.

Charter for the Protection of Children and Young People

The Charter for the Protection of Children and Young People is a comprehensive set of procedures established by the USCCB in June 2002, and most recently updated in June 2018, for addressing allegations of sexual abuse of minors by Catholic clergy and other Church personnel. A companion document, the *Essential Norms for Diocesan/Eparchial Policies Dealing with Allegations of Sexual Abuse of Minors by Priests or Deacons*, was approved and promulgated by the bishops in 2002, was revised in 2005, and received the required approval (*recognitio*), most recently in May 2006. The *Norms* establish the steps to be taken in implementing the requirements of canon law in diocesan policies, establishing diocesan review boards, and conducting investigations and canonical trials. Both documents can be found on the USCCB website.²

The Preamble of the *Charter* acknowledges that the clergy abuse crisis is "without precedent in our times" not only because children were sexually abused by members of the clergy but also by the way in which these crimes and sins were addressed. The bishops accept responsibility for their failures and the pain, anger, and confusion they caused, offer profound apologies, and re-commit themselves by means of the *Charter* to create a safe environment within the Church for children and youth that will prevent any recurrence. In this way, the *Charter* becomes one of the bishops' (and thus the Church's) principal roadmaps for healing, justice, rebuilding of trust, transparency, accountability and, above all, for child abuse prevention, detection, investigation, and reporting.

The *Charter* (organized as a series of seventeen Articles) includes well-articulated guidelines for all of the above and directs action in the following matters:

 $[\]label{eq:constraint} ^2 \underline{usccb.org/issues-and-action/child-and-youth-protection/upload/Charter-for-the-Protection-of-Children-and-Young-People-revised-2011.pdf}$

- Enabling healing and reconciliation of victims and survivors (pastoral outreach, counseling, spiritual guidance, support groups, social services, publication of policies and procedures outlining the complaint process, etc.);
- Creating a safe environment for children and young people (providing education and training programs, conducting criminal background investigations, coordinating with religious orders, undertaking research initiatives, strengthening clergy formation programs, etc.);
- Making prompt and effective response to allegations (being aware of and complying with state child abuse reporting requirements, advising victims of their right to report, establishing investigative procedures in accord with the *Norms*, distributing standards of ministerial behavior, assembling a local review board to assist the ordinary, reviewing policies regularly, communicating transparently with the public, etc.);
- Cooperating with civil authorities (complying with all applicable civil laws, cooperating in civil investigations, reporting cases even when the person is no longer a minor, etc.);
- Disciplining offenders (removing them from ministry, suspending faculties, holding canonical trials, dismissing from the clerical state, etc.); and
- Providing for means of accountability for the future to ensure that the problem continues to be effectively dealt with through a national Secretariat of Child and Youth Protection and a National Review Board.

Although the administrative responsibility for compliance with the requirements of the *Charter* rests with the diocese and diocesan leadership (most of the Articles pertain to actions, structures, and responsibilities at the diocesan level), parishes play a critical role in implementation. After all, it is at the parish where the Church's clergy, employees, educators, and volunteers interact with children, and it is at the parish where the Church's children worship, socialize, attend schools, and are catechized. The parish that has implemented its safety policies with fidelity is also one of the most likely places that an adult or child who has been (or is being) victimized will be identified or come forward.

Consequently, it is important that parishes understand their responsibilities under the *Charter* and, in conjunction with local policies and procedures established by their ordinary, carry out those responsibilities in ways that achieve the desired goal of making the parish as safe an environment as possible for both children and adults. It is also widely recognized that parishes require a certain level of flexibility in how policies and programs are implemented in order to accommodate the pastoral and community needs that arise at the parish level.

In fact there is, by design, considerable flexibility in how dioceses and parishes can implement and fulfill the requirements of the *Charter*. But, over the many years since the *Charter* was first promulgated, there has been growing evidence and awareness that in order to do so most *effectively*, this flexibility – to be exercised responsibly – requires knowledge of the best evidence-based or evidence-informed practices in the field of child abuse prevention; awareness of the most current research; collaboration with public and private agencies; and integration of the core concepts and protective factors children (and adults) must learn in order to be truly protected (more on this below).

The Secretariat for Child and Youth Protection

As stated above, the *Charter* also established a national Secretariat for Child and Youth Protection (SCYP) and assigned it the responsibility to:

- assist each diocese in implementing "safe environment" programs designed to ensure necessary safety and security for all children as they participate in Church and religious activities;
- develop an appropriate compliance audit mechanism to assist the bishops and eparchs in adhering to the responsibilities set forth in the *Charter*; and
- prepare a public, annual report describing the compliance of each diocese and eparchy to the *Charter's* provisions (<u>http://usccb.org/issues-and-action/child-and-youth-protection/audits.cfm</u>).

The SCYP serves as a resource to those personnel (safe environment coordinators, victim assistance coordinators, and others) charged by their bishop with implementing the diocesan responsibilities of the *Charter*. The SCYP offers a wide range of documents, products, and services; conducts annual regional training sessions on the audit process; and hosts an annual national leadership conference.

Parishes can also benefit greatly by becoming familiar with the many products available for access and download from the Secretariat's website. Comprehensive resource materials for Child Abuse Prevention Month (April), links to magisterial documents outlining Church teaching on child sexual abuse, child safety material, self-assessment tools, and parent education resources are available for download and distribution (usccb.org/issues-and-action/child-and-youth-protection/resources).

The SCYP serves as staff support to the bishops' Committee for the Protection of Children and Young People – a standing committee of the USCCB with membership that includes representation from all the episcopal regions of the country. The National Review Board advises the Committee and collaborates with the SCYP to assist in the ongoing assessment of diocesan compliance with the *Charter* and awareness of the most recent and useful developments in the field of child abuse prevention.

The SCYP, although a small organization, is always available to answer questions and offer guidance to parishes requiring assistance. Among the SCYP's most significant responsibilities is its oversight of the annual, independent safe environment compliance audit.

An Overview of the Safe Environment Compliance Audit Process

Diocesan and parish compliance with the Articles of the *Charter* is measured annually by means of a national audit process overseen by the SCYP but conducted by an independent audit firm selected through competitive bid. Since Articles 8-11 pertain to *Charter* responsibilities of the USCCB itself, audits at the diocesan level measure compliance with only thirteen of the seventeen Articles (1-7 and 12-17). For information, the complete *Charter* is available on the USCCB website (www.usccb.org/issues-and-action/child-and-youth-protection/charter.cfm).

Data collection is currently accomplished by means of a comprehensive audit instrument (questionnaire and forms) that dioceses are required to fill out and return to the auditor for assessment. Additional questions at the end of the audit instrument request verification that the diocese has:

- copies of the curricula and materials to verify that safe environment programs exist for the various groups;
- verification that the training is ongoing by having a schedule of the number of times and places where safe environment training occurred during the year;
- a calendar of training dates scheduled to the end of the year;
- documentation from each pastor that the parish has received the required safe environment programs and has implemented them;
- documentation of signed parental declination for those parents who have chosen not to have their child participate in safe environment training;
- documentation that the safe environment training materials have been offered to parents who have chosen not to have their child participate in safe environment training; and
- records of parents who have refused to sign a form indicating that they have chosen not to have their child participate in safe environment training.

Audits began in 2003, and from 2003 – 2007, all dioceses were subject to a full on-site visit by an audit team. In these cases, the audit team used the responses on the questionnaire and charts to interview the principal administrative personnel responsible for the execution of various elements of the *Charter*, and reviewed the data available to verify their responses. Voluntary interviews with abuse victims and accused clerics were also conducted to assess how their complaints were handled and how they were treated.

Additionally, the bishops of dioceses scheduled for a full on-site audit could volunteer to have the auditors conduct on-site visits to parishes to determine the extent of *Charter* understanding and compliance at the parish level. Attachment C defines the questions the auditors ask during the parish visits. Half of the parishes to be visited are usually selected by the dioceses, and the other half are randomly selected by the auditors with consideration being given to sampling parishes of various types and locations (large, small, urban, suburban, and rural) as well as those with schools and those without.

The parish-level audits are carried out by an auxiliary team of auditors and are done concurrently with the diocesan-level audit. Interviews include the pastor, deacon, school principal if applicable, religious educators, and other staff member(s) designated to coordinate the safe environment program training. Training records and other documents maintained at the parish are also examined and verified. In dioceses that decline to have the auditors conduct a parish level audit, permission is requested by the auditors to interview (by phone or in person) personnel in a few parishes to identify how *Charter*-related policies, procedures, and practices are understood and being implemented at the parish level.

From 2008 to the present, audits began a three-year auditing cycle. Each year, one-third of the dioceses receive a full on-site audit (on a rolling schedule), and the remaining twothirds of the dioceses participate in a data collection audit. Thus, by design, every diocese currently receives *at least* one full on-site audit every three years. Although parish level audits currently remain voluntary, one can see by the above that – visited or not – parishes are integral to the creation of safe environments and are sources of a significant amount of the data necessary for the audit process. Thus, it is important to understand how to prepare, what data to collect, and what needs to be in place for full parish compliance with both the letter and spirit of the *Charter*.

What to Expect from the Audit Team

The on-site audit team for dioceses normally consists of two to three individuals who visit the administrative offices of the diocese for a period of one week. A staff member, sometimes the safe environment coordinator or victim assistance coordinator, often acts as primary liaison to the team, pre-coordinates schedules, interviews, and parish visits, and is "on call" for other needs as necessary. If parish visits are planned, a second team may be called in to conduct those visits and interviews concurrently with the administrative interviews. Parish visits by the audit team usually last from one to two hours, during which the auditors will interview the pastor and other parish staff individually or in groups, ask to inspect certain documents, and basically try to ascertain how the *Charter*-related policies, procedures, and practices are understood and being implemented at the parish level. They may also make suggestions and recommendations about areas that need improvement. At the end of the audit, the diocese/parish may also be given a short period of time to remedy any problem areas (and provide evidence of having done so) before the completion of the audit report.

How to Prepare

The key to implementing the requirements of the *Charter* is a robust set of clearly defined programs, policies, and practices that are:

- distributed among the parishes, schools, and institutions of a diocese;
- coordinated with and understood by those who are designated as responsible for their organization and implementation;
- implemented with fidelity in terms of the requirements (and any flexibility in those requirements) the diocese has communicated; and
- regularly assessed as to their day-to-day execution.

The key to being able to demonstrate and verify compliance with the requirements of the *Charter* at the parish level is *data*.

Most parishes have hundreds of personnel including clergy, school and parish employees, school and parish volunteers, and children who are subject to the training requirements of the *Charter* and must be accounted for. Background and criminal history checks must be conducted and recorded. Policies and procedures must be available, and standards of ministerial behavior must be distributed, understood, and signed. Suspected abuse reports must be reported and filed within the required civil and Church timelines. Victims and survivors who have suffered abuse in the past (or currently) must be able to know who to contact in the diocese and how to contact them. Ongoing turnover of clergy, staff, volunteers, and students demands a dynamic process that can keep track of who is coming and going in the parish and which of these individuals have unsupervised access to children. Under these circumstances, a robust data collection framework is an absolute requirement.

It is highly unlikely that a pastor – although ultimately responsible for implementing a safe environment in his parish and school, as well as for compliance with diocesan policies and procedures – would have the amount of time necessary to collect, process, consolidate, and report all this data to the diocese himself. Consequently, a team approach is often employed with responsibilities delegated to a small parish "safety team" composed of some combination of the parish secretary, deacon, pastoral associate, director of religious education (DRE), school principal, and several parishioners.

For example, safe environment training of clergy, employees, and volunteers can be delegated to a team of parishioners who volunteer to become parish trainers, who coordinate, schedule, and administer the required safe environment training. The pastor may invite parishioners with appropriate backgrounds and credentials (educators, nurses, social workers, law enforcement personnel, physicians, etc.) to come forward from the congregation for this purpose. Once identified, they are trained in the safe environment program for adults selected by the diocese and offer periodic training sessions during the year to the parish clergy, employees, and volunteers in order to fulfill the requirement (the

so-called "train the trainer" model). The pastor can also ensure that the team is aware of the reporting requirements of the diocese (and of the state) and know whom to contact (along with the required timelines and paperwork) at both the diocese and the state's children's protective services. Parish and school reporting protocols can also be established that identify specific "chains of command" or individuals to whom all reports of abuse are made. In this way, the team can include this important information in their training sessions; function as a resource to parishioners and staff in the event that child abuse is observed, suspected, or disclosed; and assist in making the required contacts and filing the proper reports.

Likewise, the DRE and several catechists can be trained in the diocesan curricula selected for the children and can assume the responsibility to train their fellow catechists to teach the material to the students in the various grades. In the event that catechists are uncomfortable teaching the material to children, the DRE him/herself can provide the lessons with assistance provided by catechists who are willing; by volunteer teachers from the parish school; or by parishioners who teach in the local public schools in the district in which the parish resides.

Principals and teachers in the parish schools, as professional educators, are usually more familiar than catechists with the concepts of teaching safe environment concepts to children – and safety curricula are more easily integrated within the school day than into the shorter periods of time afforded by the religious education schedule (more on this below). A small group comprised of some combination of the principal, school nurse, guidance staff, and teachers can be trained in the curricula selected by the diocese to train students in the various grades and can, in turn, train their fellow teachers.

Parish bulletins, periodic announcements, and orientation sessions at the beginning of the school year can be utilized to:

- familiarize parishioners with the existence of the programs and their requirements;
- publish the whereabouts of copies of the diocesan policies and procedures;
- announce the schedule of training sessions and who is required to attend;
- educate parents about the curricula for the children and where they might review the curricula if desired;
- identify the parish teams responsible for training and available to assist in making reports to civil and Church authorities; and most importantly
- communicate the commitment of the pastor and parish leadership to keeping the parish children safe.

Once the logistics to accomplish the training are in place, the pastor and administrative team must establish ways of collecting performance data and keeping track of ongoing progress.

What Data Needs to Be Collected?

The question about the kinds of data to be collected can be answered by examining the Parish Self-Assessment Guide (Attachment A). The self-assessment guide is not a requirement of the *Charter*, nor is it part of the annual audit. It was created by the SCYP as an internal document for parishes to help identify the general areas of measurement for compliance with the *Charter*, and to help frame the dialogue between the diocese and the parish regarding the awareness of diocesan policy and its implementation at the parish level. It is also a useful tool for pastors and parish administrators to use periodically with their parish and school staff to gauge progress. As such, the SCYP invites dioceses to change the format and/or questions to suit individual needs. In general, the questions ask whether parish personnel know:

- how to create safe environments in their parish and school;
- how to implement diocesan/eparchial policies concerning training of all employees and volunteers;
- how to implement diocesan/eparchial policies concerning background evaluations of employees and volunteers who work with children;
- how to implement the diocesan/eparchial policy on extern/visiting priests;
- the names of the people responsible for the implementation of the *Charter* at the parish level and at the diocesan level;
- who schedules safe environment training for adults;
- who is responsible for training children both in religious education and in the parish school;
- how to report allegations and to whom; and
- how to get outreach services for a victim, his/her family, or the parish community.

The answers to these nine areas (requiring sixteen yes/no answers) will provide a "snapshot" of the data needed to measure compliance with the *Charter* as measured by the audit process. The data to be collected is largely quantitative, but there are qualitative factors that must also be considered from a best practices viewpoint (see below). Particularly important is knowing the accurate numbers of clergy in the parish who serve in various capacities (diocesan and religious order priests, visiting clergy, senior priests in residence, priests from foreign countries, deacons, etc.); parish and school employees; religious and school educators; parish and school volunteers; and the numbers of children in the parish school and religious education programs in all grades.

Equally important are the numbers that reflect how many of the adults have received the required criminal background check; have received and acknowledged the diocesan code of ministerial behavior or conduct; have received or have access to the policies and procedures for child protection (and/or know where they are located); have received the required diocesan-mandated training in recognizing, preventing, and reporting child abuse and neglect; and are trained in how to present the concepts of personal safety and abuse prevention to students.

Finally, there must be a means of verifying the existence of personal safety/abuse prevention programs for children, verification that the safety training is taking place, the number of times it is taking place along with the training locations and schedules, and the number of children opted out of the training by their parents.

The parish safety team, the director of religious education, and the school principal can each be responsible for ensuring that his or her "piece" of the parish's safe environment requirements is completed (and recorded and filed) and for reporting periodically to the pastor. For example, during the process of hiring new staff, the school principal will normally conduct the necessary interviews as well as verify work history and references. During this time, he or she can also ensure that the appropriate authorization forms are filled out that enable the background and criminal history checks to commence; provide the prospective employees with the diocese's code of conduct; retrieve the signed statement of acknowledgement/agreement; brief them about the parish or school abuse reporting protocol; provide a list of upcoming safe environment training sessions; ensure that the individuals understand that the safety training is mandatory; and confirm with the parish trainers (or by means of a certificate of completion) that the individuals have attended (or are scheduled to attend) the training session. As a general rule, it is wise to ensure that at least the background and criminal history checks are completed prior to hiring new staff.

The principal can also make it clear to volunteers who assist at school events or in the classroom that they, too, must comply with the required background and criminal history check as well as attend the safe environment training. Then, by means of a checklist, the principal can record for each employee or volunteer whether the requirements have been completed, or are pending with an expected date of completion. With this data in hand or on a spreadsheet or computer database, the principal not only maintains (and can demonstrate) awareness of the status of the required training and background checks for the school's faculty, staff, and volunteers, but can report that status statistically to the pastor and to the audit team when necessary. Auditors will often ask to inspect the local filing and storage of the signed documents and training records for staff and employees.

Likewise, the parish DRE can make it clear to parishioners volunteering to serve as catechists that they fall under the same requirements for background and criminal history checks, receipt and acknowledgement of the code of conduct, and safe environment training. It should also be made clear that while completion of the requirements is pending, the volunteer must serve in an "associate" capacity with another catechist who has completed the requirements. As with the principal, the DRE can maintain a spreadsheet or database of the catechists' names and check off the requirements as they are completed. Coordination between the office or individual(s) at the diocese responsible for background checks, the pastor, the parish safe environment trainers, the principal, and the DRE will be essential in order to establish a screening and training schedule that effectively meets the "demands" of supplying sufficient numbers of trained

personnel as quickly as possible. Parishes in close proximity might also consider sharing their training schedules with one another in order to ensure that multiple training sessions are available to fit individual daytime, evening, or weekend schedules. Although turnover among parish volunteers is usually more frequent than among staff and employees, it remains important to keep training and background check records as up to date as possible, and ready for inspection.

Since these "people numbers" shift on a daily basis, the SCYP acknowledges that it is impossible to be 100 percent accurate – but the *process* of how this data is collected, updated, verified, and stored will be examined by the auditors in order to determine the level of accuracy they contain.

Other data that needs to be collected pertains to the accurate number of students in both the parish religious education program and school, the number that are enrolled in the personal safety/abuse prevention program(s) the diocese has chosen, and the numbers that are "opted out" of the training by their parents. Registration and enrollment numbers are collected and reported to the diocese as a matter of course by the Catholic schools and religious education programs. During orientation sessions, or by means of parent letters or notices in the parish bulletin, parents can be informed about the existence of the safe environment education programs for children, the requirements of the diocese for attendance, and the selected programs and learning objectives can be described. Curriculum kits can be made available for inspection, and any questions or concerns can be raised and answered. At the same time, parents can be informed of the option to decline having their child(ren) participate. Those who do are requested to sign a form indicating that they are exercising the "opt-out" option, and are to be provided materials regarding personal safety and abuse prevention for use at home. The signed forms are kept on file, and their number is subtracted from the enrollment and/or attendance figures and reported as "numbers trained." If parents decline to sign the opt-out form, the parish/school is still expected to keep some manner of record to account for the students not participating in the safety training. Auditors may also ask to inspect the "opt-out" record keeping.

As mentioned above, there is considerable flexibility in how dioceses and parishes can fulfill the safe environment training requirements of the *Charter*. One way to teach personal safety concepts to the students is to integrate them into the school or religious education curriculum and teach them during the classroom period. Another option exercised by parishes is to separate the safety training from the classroom environment altogether by designating particular "safety retreats," "safety fairs," or "Safety Saturdays or Sundays" during which the safety concepts are taught. One of the problems associated with this concept is that the training assumes the "flavor" of an optional program, and low attendance results. Another problem is that the students who do not attend are counted as "opt-outs" (rather than "absent") for audit purposes. This may be an accurate assumption for some but may not be for all students due to weekend obligations, sports, family vacations, etc. So if this option for instruction is chosen, particular care must still be taken to determine and distinguish accurately those students who did not attend because their parents chose not to have them participate from those who simply had other obligations and would have attended otherwise.

Another type of data that should be collected at the parish level is information about the number of abuse complaints and how they are handled. For audit purposes, allegations about clergy, employees, and volunteers that come to the attention of parish or school staff are usually reported to the person or office identified by the diocese as handling complaints of that nature. It is important that the pastor ensures that all parish clergy, employees, and volunteers understand the reporting process and can identify the person(s) to whom the allegations must be reported.

However, experience shows that the majority of child abuse and neglect situations that come to the attention of parish staff – particularly in the parish school – will be domestic in nature. These may or may not be reported to the diocese since they do not involve abuse or maltreatment by a person associated with the parish or diocese, and are not collected as part of the audit process. However, this data can provide important information nonetheless. In terms of the Church's overall goal of protecting children, understanding how the alleged or suspected abuse or neglect came to the attention of a parish or school employee or volunteer; whether that individual knew what to do in terms of reporting the suspicion or allegation (either by following the school, parish, or diocese's reporting protocol, or by reporting it to the state children's protective services); and whether or not it was done correctly and within the time periods required can serve as a measure of how well the *process* of protecting children under any circumstances is understood.

No matter what data collection methods are chosen, the best ways to stay on top of *Charter* implementation (as well as to prepare for an audit) include:

- having clearly defined persons and teams responsible as the parish focal points for safe environment training for adults and children, background evaluations, abuse reporting, data storage, etc.;
- regular communication to the community from the pastor and other parish leadership about child protection initiatives, creating safe environments, training schedules, the diocesan personnel responsible for *Charter* implementation and coordinating services for victims;
- communication and collaboration that establish an ongoing, transparent flow of information and data; and
- a repository, filing system, or online database for parish safe environment information and data.

With this framework in place, periodic "snapshots" of the health and status of *Charter* implementation can be generated. These snapshots can then be distributed to update and inform parishioners and to keep the issues and actions related to the protection of

children in the forefront of parish consciousness. An additional benefit is that these periodic assessments can be used by parish leadership in an ongoing way to determine what is working well, what is not working well, what is not working as planned, and to identify needed improvements. Finally, being able to back up the answers to the auditors' questions with numbers, and descriptions of the processes used to collect and analyze those numbers, is critical and will make the audit process go a lot more smoothly than without them.

What Needs to Be in Place for Full Implementation and Compliance with the *Charter*?

The functions and elements required to be in place at the parish level for full implementation and compliance with the *Charter* (and what the auditors may ask about or inspect) are as follows:

- Methods of publicizing to parishioners the existence of diocesan policies and procedures related to the *Charter for the Protection of Children and Young People*.
 - Ability to demonstrate and show examples of the type and frequency of publication (e.g., monthly or quarterly publication in the parish bulletin), information about child safety provided at Masses, brochures and bulletins in parish magazine racks or at the entrance to the church, posters about child safety practices in the vestibules of the church or school, and the names and phone numbers of the diocesan victim assistance and/or safe environment coordinator (auditors may ask to review examples).
- Knowledge on the part of the pastor, school principal, and others interviewed about how, when, and to whom to report allegations of suspected child abuse and neglect.
 - Availability of written protocols, information sheets, or flow charts that designate how persons at the parish or school who suspect or witness child abuse, or to whom a child or adult has disclosed prior or current abuse, make that information known to those at the school, parish, or diocese designated to receive it. Auditors may also ask about the process used to report suspected child abuse to local children's protective services or law enforcement.
- The methods of obtaining outreach for victims.
 - Related to the first point (above), full compliance requires that the pastor, principal, DRE, and other staff members know who the diocesan contact(s) is/are for victim assistance services and how to contact that person or office (auditors may ask individuals to identify them as part of the interview process).
- Evidence that copies of the diocesan code of conduct or standards of ministerial behavior have been made available to clergy and any other staff or volunteers who have regular contact with children; as well as evidence that the standards of conduct for those in positions of trust with regard to children are available to and made clear to all members of the community.

- Persons interviewed by the auditors should be able to describe the practice of receiving the code of conduct as part of orientation or during training, and the requirement to sign documentation that they had received it (the auditors may request to review filed copies of the signed "statements of receipt").
- Copies of the code should be posted on the bulletin board of the parish offices or in the parish vestibule, or clergy/staff should be able to describe other ways that the parish is made aware of their existence (e.g., publication in the diocesan newspaper or diocesan/parish website).
- Safe environment training for each of the groups identified in Article 12 of the *Charter* (children and youth, priests, deacons, educators, parish/school employees, parish and school volunteers, parents).
 - For adults: Auditors may ask to review the curriculum, evidence that training has taken place (times, locations), training schedules, copies of sign-in sheets, and records indicating that all who are required to receive training have either been trained or are scheduled to be trained.
 - For children/youth: Similar review of the various curricula (used by the school and adapted by the religious education programs) for different age groups (Pre-K to Grade 12), evidence that teachers/catechists have been trained in the curriculum appropriate to the grade level of their students, evidence that the programs have been taught, frequency of training, schedules, announcements, etc. (see NOTE below).
- A policy for parents who choose to opt their child(ren) out of the class periods when safe environment training is conducted, either in the school or in religious education, that requires parents to sign a form declining their child's participation.
 - Auditors may ask to review and ask questions about the policy in order to understand how opt-outs occur in the parish/school and how they are counted and recorded.
 - Signed copies of "opt out" or "parent declination" forms should be kept on file at the school or religious education office and be available for review.
 - A packet of safe environment training materials for use at home should be compiled and given to all parents who decline to have their children participate in the programs. Documentation that they have received the packet should be kept along with the signed copies of parental declination (perhaps on the same form).
 - A manner to record the instances when children have been opted out of the programs by their parents, but the parents refuse to sign a parent declination form.
- Evidence that the pastor and school principal ensure that background investigations are conducted on all parish and school personnel, to include priests, deacons, and other paid personnel and volunteers who have ongoing, unsupervised contact with children.
 - Auditors will ask about the process used to ensure the checks take place: how the individuals who require a background check are identified, the

authorization form used, the person at the diocese to whom the requests are sent, and how the pastor/principal keeps track of the background checks completed or pending. Auditors may also ask to view copies of the forms used, and review the databases and/or spreadsheets on which the data is recorded.

- Methods used by the pastor to ensure that visiting or non-permanent clergy (weekend assistants, non-incardinated priests/deacons who witness marriages, conduct funerals or baptisms, etc.) are clergy in good standing.
 - Methods can include requiring visiting/non-permanent clergy to provide evidence (i.e., a letter from their ordinary or clergy personnel office) before their visit of completed background screening and safe environment training by their diocese, or some other form of communication between the dioceses indicating that they are clergy in good standing. Auditors may ask to review samples of these materials, as well as how the information is tracked at the parish (or the diocese).
- For parishes that have been directly affected by allegations of sexual abuse of children (i.e., if a pastor or other clergy member has been the subject of such an allegation during the audit period) the auditors will want to know whether the diocese has kept the parish informed, provided some manner of outreach to the affected persons or groups, and supported reinstatement of the accused cleric if the allegations are determined to be unfounded.
 - If there were reported allegations at the parish (within the confines of respect for the privacy and reputation of the individuals involved), the auditors will ask parish personnel to describe the extent of the diocese's communication with the parish and its efforts to keep the parish informed about the case.

<u>NOTE</u>: It is relatively easy to integrate personal safety and abuse prevention lessons into the Catholic schools since the children are there on a daily basis and safety lessons can be "folded into" the academic schedule – either as part of an existing class, like health, or as a stand-alone safety class. A different approach may be required, however, to share personal safey and abuse prevention lessons with the children in religious education. They do not attend class daily. When they do attend it is usually for a short period (1-2 hours), and it is much more difficult to overlay or integrate a personal safety/abuse prevention curriculum of any substance without supplanting a significant portion of the time dedicated to catechesis. Streamlining a curriculum, or only presenting a lesson once a year, runs the risk of presenting too little information to the children to be effective.

Early guidance from the USCCB suggested that a diocese could utilize a community or public-school based abuse prevention program, as long as the program is in accord with Catholic moral principles (as assessed by the ordinary), includes age-appropriate materials (for all grades) pertaining to personal safety, includes information about improper touching and relationships, and teaches the children about when they should seek assistance from a trusted adult. On the surface, this sounds like an easy answer to the question of safety training for children in religious education – obviating the need to use catechetical instruction time to teach abuse prevention skills to the students.

However, it is insufficient to report that a diocese does not provide abuse prevention training to children in religious education programs because the programs exist in the public schools. This is an example where *process* becomes important.

If the diocese is in a state that mandates such training in the public schools, funds it, approves the programs and monitors implementation, the process for a diocese would be to review the curricula, verify that they contain the necessary pedagogical elements and are in conformity with Catholic moral teaching, and verify that the public schools in the cities and towns of the diocese have implemented them. Although time-consuming at first, annual contact with the state Department of Education (DOE) to ascertain any programmatic changes or additions should suffice in subsequent years.

In a state without a safety education mandate, the decision to implement an abuse prevention program becomes the responsibility of the individual school district and is very much dependent on local funds. Also, without a state mandate, it is unlikely that a state DOE would have a database of implemented programs for review. To get an accurate picture of the public school programs, a diocese in this situation would have to poll each district (or perhaps even each school within a district), identify which sex abuse prevention programs are in place in the public schools in each parish, understand how they are being implemented, and evaluate the elements of what is in place (as above). Further, since (without a mandate) programs of this type are often among the first casualties of public school budget constraints, there is no ability to predict whether an existing, acceptable program in place in a public school one year would be there the next – requiring a diocese to annually recertify that the programs are still being administered. This process is both time-consuming and expensive. But if a diocese chooses to defer the training responsibility to the public sector, such a process would have to be implemented and *documented* to the satisfaction of the auditors in order to meet the requirement.

Suggestions for Self-Audit

Keeping track of all the requirements above and assessing the "health and welfare" of a parish's implementation of and compliance with the *Charter* should be a dynamic rather than a static (annual) exercise. Regular status updates to the pastor from all constituencies and programs – particularly those that may still be evolving to fully meet the requirements, or that may have been designated as incomplete during the last audit – are a good way to target and marshal resources toward those areas of implementation needing further development or improvement, and avoiding "surprises" while the annual audit is underway.

The parish self-assessment guide is merely one way to frame a regular flow of information about the parish's safe environment initiatives. A companion document to the Parish Self-Assessment Guide, the "2007 Parish Interview Guidelines and Questions" (Attachment B),

was created by the SCYP for dioceses to send out to the parishes as pre-audit guidance, and restates the same areas of measurement in a different format. A third document, "USCCB Audit Chart E - Parish Audits" (Attachment C) is the chart that the auditors themselves fill out during each parish visit and submit as part of their report and assessment. Together, these three documents provide a complete picture of what the audit process evaluates at the parish level in order to gauge compliance with the *Charter*.

Periodic (perhaps quarterly or bi-annual) distribution of the questions to the parish pastoral staff and others serves to guide ongoing conversations about program status, facilitates communication with parishioners about the programs, and enhances the parish's ability to provide updates to the diocese. Again, although parish-level audits are not mandatory in terms of the on-site audit process, there really is no better way to assess whether the requirements of the *Charter* are filtering down to where it matters most – the parishes, schools, and other institutions where the Church's children come to worship, learn, and serve.

Parish-level information gathering also provides a good opportunity to gather information more detailed (and qualitative) than what the audit requires. For example, the audit asks for the numbers of children being opted out of the safe environment training classes by their parents. A comparison of these numbers over time may show them to remain steady at a certain percentage of the overall student population, or may show increases or decreases either in the school or in religious education. If a significant increase occurs in the numbers of children being opted out, it could be a sign that the parish has not adequately introduced the parents to the abuse prevention curriculum at orientation or other similar opportunities in order to help them feel comfortable with it, does not announce when the education is taking place, has not consistently kept parents informed by sending parent materials home to reinforce what is being taught in the classroom, has not updated the programs enough to keep them relevant, or the safety education for children is not being given consistent, regular emphasis by parish leadership.

Similarly, as stated above, keeping track of the number of reports of suspected, observed, or disclosed abuse and neglect can establish baseline data as to the average number of reports being made annually by the parish school or religious education staff to the diocese and/or to the state's children's protective service or law enforcement. Yearly fluctuations in the number of reports are to be expected, but significant changes to the numbers may indicate areas needing attention. For example, turnover in parish and school personnel from year to year is normal, but if the safe environment training of new staff or volunteers is not keeping up with the demand, confusion and lack of awareness about the reporting protocols and requirements could result. This could point to the need to reassess the timing of the parish training sessions, or the need to add additional training opportunities to the parish schedule.

In any case, the collection of more detailed information as part of a self-initiated, parishlevel data collection effort may point to areas in need of attention or support and, as such, serve as an important tool for communication and accountability.

Frequent Problem Areas

Audit reports published annually and publicly by the USCCB at the conclusion of the data collection and analysis process include a section that identifies areas of general concern and recommendations. The following is a sample of areas affecting parishes that have been mentioned most consistently in recent reports (all material is quoted directly from the annual reports and can be found on the USCCB website; the mention of StoneBridge Associates refers to the current auditor):

Tone at the Top—General complacency: There is a wide range of resources allocated to *Charter* responsibilities across the dioceses and eparchies that StoneBridge visits. Each location is unique and reflects the direction provided by the Bishop. StoneBridge believes there are instances where more resources are necessary within a diocese or eparchy to fully implement programs to adequately respond to the directive and spirit of the *Charter*. Resource shortages were observed regardless of compliance with the *Charter*. As an overall observation of the audit process for 2017, StoneBridge observed more dioceses/eparchies that were not as prepared for the auditors as they had been in prior years. In some instances, StoneBridge noted a lack of supporting documentation, others did not prepare interview schedules ahead of time, and some did not provide audit documents until just prior to the auditors' arrival. The lack of preparation

<u>could potentially impede the auditor's ability to perform a thorough review. The</u> <u>opportunity to highlight potential areas of exposure prior to the arrival of the auditors</u> <u>could allow them to more strategically focus their efforts and resources.</u>

<u>Screening and Training Issues:</u> StoneBridge noted some instances of background checks not being completed in a timely manner and/or poor recordkeeping of the background check database, which can lead to individuals going unscreened. StoneBridge observed isolated incidences where some clergy, employees, and volunteers were not trained or background checked, but have contact with children. It is important that dioceses/eparchies are effectively monitoring parishes and schools to ensure those working with children have the proper training and background checks. There are some dioceses/eparchies that reported a high percentage of children as untrained. The majority of the gaps are related to training in the parish religious education classes. For various reasons, dioceses/eparchies reported difficulties in getting parishes to cooperate. It is the responsibility of the diocese/eparchy to work with parishes to ensure the training program for children/youth is working effectively.

<u>Safe Environment Record Keeping (1)</u>: Safe environment record keeping is a critical piece of the audit process. Accurate, verifiable records are the only way to prove to the faithful that bishops take the *Charter for the Protection of Children and Young People* seriously. While dioceses are cutting back due to economic times, personnel cuts in this area should be looked at very carefully. It is too easy to become complacent about creating safe environments and to assume that everyone is doing what is required of them. Ideally dioceses/eparchies should have a *Charter* point person to ensure that all areas of the *Charter* are fully implemented. There needs to be in place a recordkeeping system that can accurately and in a timely fashion track clergy, employees, and volunteers in order to determine who has and has not been trained, and whose background has and has not been evaluated. It is only through adequate, careful record keeping that parishes can be assured that their parish or school is a safe place for children to attend.

The implementation of a safe environment training program continues to be a challenge with respect to effective oversight of compliance and accurate reporting. Some database systems

continue to be poorly managed, and the processes for collecting data from parish/school locations are inefficient or ineffective

<u>Record Keeping (Monitoring)</u>: StoneBridge observed that dioceses/eparchies struggled with effective monitoring of training and background checks at the parish/school level. Dioceses/eparchies not using a centralized database rely significantly on parishes and schools to ensure compliance with safe environment requirements. In these cases, the ability to verify compliance at the local level is limited unless those dioceses/eparchies conduct parish/school audits on a regular basis. As of June 30, 2017, 95 dioceses indicated that they perform parish audits in some form on a regular basis and 10 perform them on an "as needed" basis. Although not required by the *Charter*, StoneBridge continues to suggest to dioceses/eparchies that they consider the feasibility of implementing a process to periodically visit parish and school locations in order to review documentation and assess compliance with safe environment requirements. These visits would allow the diocese/eparchy to gain a better understanding of how policies and procedures are being implemented at the parish and school level and assist in ensuring compliance with safe environment requirements.

Policies and Procedures: Based on visits to the parishes/schools and discussions with diocesan/eparchial personnel, the auditors found that information on how to make a report of sexual abuse wasn't consistently displayed at the parishes or schools. Some parishes/schools publish the information in weekly bulletins, others display it in prominent locations. Dioceses/eparchies need to reinforce the importance of posting this information at the parishes/schools to ensure that everyone has access to the information should they need to use it.

The auditors [also] observed some instances where dioceses/eparchies were not requiring individuals to sign off on the Code of Conduct. It is important to ensure that individuals have read the Code and understand what is expected of them in their employment/ministry with the diocese/eparchy.

Parish Accountability: The role of pastors and parish personnel in implementing diocesan policies and enforcing diocesan procedures cannot be ignored or understated. In several dioceses the inaction of pastors or directors of religious education programs led to Management Letters (outlining required actions) to the bishop. Pastors must be held accountable for implementing all diocesan policies and procedures that deal with creating safe environments for the children of their parishes. Dioceses/eparchies need to begin to look at how parishes are implementing diocesan policies and whether that implementation is effective. Abuse occurred at the parish level. It was parish priests, Church personnel, or volunteers—with access to parish or a parish's school children—who committed the abuse. Prevention programs must be incorporated into the life of the parish. All the diocesan policies in the world will not prevent child sexual abuse if they are not implemented at the parish level. Dioceses/eparchies are encouraged to keep up and improve efforts to audit parishes to ensure compliance with the *Charter*. In order to prevent child sexual abuse, the requirements of the *Charter* need to be implemented at the parish level. Parents have the right to expect that every parish is doing what it takes to keep their children safe as their bishop promised. To continue to drive parish accountability, parish audits should be performed by diocesan/eparchial personnel on a regular basis and become a required component of the on-site Charter audit process.

<u>Promulgation Letters</u>: The auditors have noted that, to meet the *Charter* requirements, dioceses/eparchies are increasingly relying on the public school systems to train and educate the children who are enrolled in religious education programs. In quite a few states, the teaching of safe environment is mandated as part of the public school curriculum. A growing number of dioceses/eparchies rely on the local public school's training without confirming that the local public school actually teaches safe environment in their curriculum. In addition, some of these programs have not been reviewed by the local ordinary to determine whether they are in accord with Catholic moral teaching.

<u>Standardizing the Approach to Parish Participation in the Audit Process</u>: Processes for data collection and record keeping vary from diocese/eparchy to diocese/eparchy. In some places, data for audit compliance are collected and maintained at the diocesan/eparchial central office. In other places, audit-related data are maintained at the local level – in the parishes, schools, and other institutions. These local sites are responsible for reporting numbers of those trained and to be trained, and those for whom background evaluations are completed and need to be completed. When data and records are maintained at the local level, the diocese/eparchy depends on the parishes, schools, and institutions to provide accurate information. It is recommended that bishops/eparchs

create structures, or use existing ones, to verify the accuracy of the audit-related data at the parish, school, and institutional level.

<u>Charter Drift</u>: The increased number of Management Letters seems to indicate a drift away from the practices and procedures of the past. A number of the Management Letters dealt with Bishop Aymond's memo of March 31, 2006, that requires pastors to verify that the policies and procedures of the diocese are being implemented at the parish level. The memo also requires written opt-out letters from parents choosing not to have their children participate in safe environment training. Though these requirements have been in effect since 2006, eighteen dioceses advised that they were unaware of the requirement and thus failed to get such documentation from pastors. The Church cannot relax its standards on the implementation of all the *Charter* requirements without putting our children at risk.

<u>Effectiveness</u>: The structures and programs required by the *Charter* have been established, as the audits confirm. We must now move to assessing the effectiveness of those structures and programs while streamlining the audit process. It is recommended that audit documents should be reexamined with a view toward assessing the *Charter* structures and programs as well as combining some of the concepts of the audit process. This could result in a simplification of the process for both those audited and the auditors.

Notes on Best Practices, Quality, Effectiveness, and the Future

As noted in the last paragraph above, as well as in the paragraph on "Parish Accountability," the USCCB acknowledges an extremely important point in the dynamics of implementing policies, procedures, practices, and programs designed for the protection of children. Namely, once the structure to do so is implemented, how does the Church assess whether or not it is working? Other ways to frame this question are: 1) How does the Church know that the structures and programs designed to protect children are achieving the goals and objectives for which they were put in place?, 2) What are the elements of organizational and behavioral change and adaptation that support the structures and programs?, and 3) What are the methodologies that can be employed to quantify their quality and effectiveness?

Although perhaps not imminent, it is clear that the National Review Board is interested in evolving the audit process into one that moves beyond simply measuring implementation compliance to one that includes measurement of the effectiveness or quality of the policies, procedures, and programs being implemented. This evolution could have serious implications for parishes and dioceses in terms of issues such as the core elements of effective safe environment programs for children, criteria for selection, evidence-based and outcome-oriented practices, frequency of training, and methods of presentation. Therefore, it may be important for dioceses and parishes to begin educating themselves

on the issues of best practices, and to be mindful of opportunities and methods to measure quality, improvement, and outcomes. Some tools that exist for the measurement and evaluation of prevention programs are listed on the website of the Child Welfare Information Gateway.³

The societal understanding of child sexual abuse and how to respond to it has been evolving slowly for over fifty years. Until comparatively recently, the only response to abuse, once a community became aware of it, was a reaction to events that had *already* occurred. Preventative education is a relatively new idea. It is not surprising that since 2002, the faith community as a whole has been on a steep learning curve in terms of determining the best ways to incorporate the protection of children and the prevention of abuse into regular parish programs and school/religious education curricula. Nonetheless, dioceses have come up with a variety of creative ways to accomplish this task, implementing over 100 programs across the country. Given the diversity of programs and implementation strategies being employed, perhaps one of the best ways to meet the goal of creating the safest environments for children is to ensure that no matter what is done, it is done with an acute awareness of evidence-based best practices and current research in the field of child protection and abuse prevention.

The national research sponsored by the National Center for Missing and Exploited Children has determined the elements that go into effective abuse prevention programs for children, and has even given the criteria by which to evaluate them.⁴ This research indicates that the most effective programs are those that are:

- research based;
- begin early;
- use developmentally appropriate materials;
- utilize active, systematic and specific skills training;
- have multiple program components such as classroom training combined with parental involvement;
- use interactive instructional techniques that provide children multiple opportunities to observe the desired behavior, model the behavior, and get feedback; and
- are instituted as a comprehensive part of the child's education being repeated many times during the school year and instituted over several years of instruction.

Self-examination of a diocese's/parish's programs in light of these criteria would be a worthwhile exercise.

³ www.childwelfare.gov/preventing/evaluating/tools.cfm

⁴ www.missingkids.com

A USCCB report⁵ entitled "Safe Environment Training of Children in the Catholic Church," published in 2007 by the Safe Environment Work Group, provides a suggested set of "core elements" for safe environment programs for children, criteria for selection, suggestions about incorporating the criteria into religious education instruction, and frequency of training. It also encourages collaborative efforts with the publishers of catechetical texts and with Catholic schools of higher education on conducting research on effectiveness measurement. The report also contains appendices that address the scientific and moral/ethical dimensions of such training. Note: several of the major publishers of catechetical texts and core child safety concepts. A next logical step would be to integrate the core safety concepts into their basic texts. Until this is accomplished, it would be worthwhile to check with the publishers of the texts you use in the diocese/parish to get an update.

Although it is unlikely that any given program will meet all the criteria above, knowledge of best practices and core elements in the field of child abuse prevention reflects awareness that the protection of children is a dynamic rather than a static process, and should be periodically re-evaluated as to the accomplishment of its intended purpose and goals. It is through such reassessment and vigilance that we keep ourselves apprised of current research and best practices in the field, while seeking out the potential elements of quality improvement.

Also, in terms of outcome measurement, one could argue that even with all the required elements in place, and confirmed by the audit, compliance with the spirit of the *Charter* is not guaranteed. Policies and procedures can be changed, but it is the individual behaviors and collective willingness to utilize the structure and to make it work in ways it has failed in the past that will truly protect the children both now and in the future. Thus, measurement of true organizational change includes the measurement of behaviors – behaviors that reflect the desired changes and outcomes hoped for when the new structures were put in place.

Given the desire to eventually incorporate some form of effectiveness measurement that examines program quality and outcomes, dioceses and parishes may find it worthwhile to begin exploring current practice in partnership with local universities, state child protective agencies, state children's trust funds, and other social service providers. A number of program evaluation strategies exist in the literature regarding child abuse prevention. The Child Welfare Information Gateway (U.S. Department of Health and Human Services) has an entire section devoted to program evaluation⁶ and offers several articles on its website that provide overviews of the current state of program evaluation as it is applied to the field of child abuse prevention, the extent to which empirical

⁵ <u>http://www.usccb.org/issues-and-action/child-and-youth-protection/resources/upload/SCYP-Safe-Environment-Work-Group.pdf</u>

⁶ <u>http://www.childwelfare.gov/preventing/evaluating/index.cfm</u>

evaluation has been used, the results of state and local studies, and the degree to which programs have been shown to be effective.

In conclusion, what the Catholic Church has attempted to do since 2002 with respect to the child sexual abuse crisis is historic and transformative. Indeed, the Church has moved forward on this issue with unprecedented speed and has done more to address the societal issues of child abuse and neglect than most other organizations of comparable size. But, now more than a decade removed from the revelations that resulted in the *Charter's* promulgation, we know that systemic, foundational change to any organization will not be a linear process or a one-time event, and that in times of crisis (or even when a crisis is perceived to have passed), organizations undergoing a change process that is not yet complete often tend to revert to traditional ways of behaving. Now, more than ever, a sustained level of vigilance, encouragement, ongoing communication, and support by diocesan and parish leadership is necessary for all levels of the Church undergoing change, lest the perceived commitment to the change is seen as waning – further encouraging a backward slide and resulting in additional harm.

An encouraging and important step in this forward-looking direction is the continuing project on creating "cultures of protection and healing" being undertaken by the SCYP. This initiative centers around implementing the principles of High Reliability Organizations (HROs) in dioceses and eparchies. In the business community, HROs are organizations that manage risk successfully. They go beyond traditional risk management practices in which internal and external risks are identified and controls are built to mitigate them. Instead, they create a culture and workforce that respond to threats dynamically.

HRO pilot training programs were developed by the SCYP and implemented in a number of doceses and eparchies beginning in 2017 and have already begun to produce results. Child sexual abuse prevention efforts become part of organizational culture as the necessary behavioral changes required to maintain the preventative structures become part of the mindset of every individual involved, and become *normative*. As the SCYP update in the 2017 Audit Report⁷ states: "When a culture of protection and healing is created, the complacency leaders may have related to their systems of response and prevention can be broken. Leaders within such a culture will know that the potential for abuse always exists, and that they must be proactive if they are to prevent it from occurring."

Note that the very first issue raised as a concern in the 2017 audit report was *complacency*. As Dr. Francesco C. Cesareo, Chairman of the National Review Board for the Protection of Children and Young People, writes in his letter transmitting the Audit

⁷ Report on the Implementation of the Charter for the Protection of Children and Young People (2018), page 10

results to the president of the USCCB: "The apparent complacency that is emerging seems to suggest that some believe that the sexual abuse of minors by the clergy is now an historic event of the past. This would be an unfortunate conclusion as this year's audit report makes evident...While the audit found that the number of allegations, the vast majority from the past, decreased significantly as compared to 2015 and 2016, there were 24 allegations reported in this audit cycle that involved current minors.... Any allegation involving a current minor should remind the bishops that they must re-dedicate themselves each day to maintaining a level of vigilance that will not permit complacency to set in or result in a less precise and thorough implementation of the Charter."

We know that child abuse, so endemic in our society, still finds its way into the Catholic environment. Despite the Church's most valiant efforts, we will not be able to eradicate it. But much can be done toward understanding and revealing the requirements for true systemic, sustainable change and the rebuilding of trust. This includes efforts at understanding and quantifying what works best in dioceses and parishes where it is suspected or discovered at the earliest opportunity; reporting immediately and appropriately to civil and Church authorities; handling reports quickly, efficiently, and openly with feedback to all organizational levels; and understanding how the leadership at all levels in dioceses emulates the behaviors the bishops espouse and that the new culture requires.

We have come a long way, but there is more to be done before the desired changes become part of a new Church culture. As Bishop Edward J. Burns, former chair of the Bishops Committee on the Protection of Children and Young People recently stated, "We cannot ever simply be coasting along in child protection. Coasting means we are going downhill. We must always endeavor to improve and move forward."

Selected Resources

Attachments

- Attachment A: Parish Self-Assessment Guide
- Attachment B: 2007 Parish Interview Guidelines and Questions

Websites (from USCCB)

American Psychological Association Resources about Child Abuse www.apa.org/topics/topicsabuse.html

Committee for Children

Programs and prevention curricula focus on the topics of youth violence, bullying, child abuse, and personal safety. www.cfchildren.org

Darkness to Light

Resource site and materials to provide adults with information to prevent, recognize, and react responsibly to reduce child sexual abuse through education and public awareness. Educational booklets, bookrack cards, and posters are available in English and Spanish. https://www.d2l.org/

Federal Bureau of Investigation

Site with resources for Internet safety for parents, Kids' Page for K-12 students, and child safety tips. www.fbi.gov

Sexual offenders registry https://www.fbi.gov/scams-and-safety/sex-offender-registry

Crimes against children page www.fbi.gov/hq/cid/cac/crimesmain.htm

The National Center for Missing and Exploited Children

A comprehensive resource for educators, parents and guardians, child care providers, attorneys, and media, providing information about missing children, reporting exploitation, keeping children and teens safe, and child/teen sexual exploitation prevention.

www.missingkids.com

National Child Traumatic Stress Network

Established by Congress in 2000, the National Child Traumatic Stress Network (NCTSN) is a unique collaboration of academic and community-based service centers whose mission is to raise the standard of care and increase access to services for traumatized children and their families across the United States. Combining knowledge of child development, expertise in the full range of child traumatic experiences, and attention to cultural perspectives, the NCTSN serves as a national resource for developing and disseminating evidence-based interventions, trauma-informed services, and public and professional education. https://www.nctsn.org/

The National Federation for Catholic Youth Ministry

Provides information for youth ministry coordinators to support a pastoral response to young people, to foster awareness of and education on sexual abuse issues, and to promote authentic dialogue. www.nfcym.org

The NetSmartz Workshop

An interactive, educational safety resource from the National Center for Missing & Exploited Children[®] (NCMEC) and Boys & Girls Clubs of America (BGCA) for children aged 5 to 17, parents, guardians, educators, and law enforcement that uses age-appropriate, 3-D activities to teach children and teens how to stay safer on the Internet. <u>www.NetSmartz.org</u>

United States Department of Justice National Sex Offender Public Website www.nsopw.gov

Organizations to Report Child Abuse and Neglect

Child Welfare Information Gateway

Children's Bureau/ACYF 330 C Street S.W. Washington, DC 20201 Toll-free: 1-800-394-3366 Email: info@childwelfare.gov Website: www.childwelfare.gov

Provides toll-free and local telephone numbers for reporting child abuse and neglect in each state. In most cases, the toll-free numbers listed are accessible only from within the state. Also listed are links to state websites, which may provide additional information.

Childhelp USA

4350 E. Camelback Road, Bldg F250 Phoenix, Arizona 85018 Hotline: 1-800-4-A-CHILD (1-800-422-4453) Telephone: 480-922-8212 Website: <u>www.childhelp.org</u>

Provides professional crisis counselors via a confidential hotline 24 hours a day, accessible throughout the U.S., its territories, and Canada. Through interpreters, communication is possible in 140 languages.

National Center for Missing & Exploited Children[®] (NCMEC)

Charles B. Wang International Children's Building 699 Prince St. Alexandria, VA 22314-3175 Hotline: 1-800-THE-LOST® (1-800-843-5678) Telephone: 703-224-2150 TDD: 1-800-826-7653 "Phone free" from Mexico: 001-800-843-5678 From other countries: 001-703-522-9320 Fax: 703-224-2122 Website: www.missingkids.com CyberTipline: www.cybertipline.com

Serves as a clearinghouse of information about missing and exploited children. It provides technical assistance to the public and law-enforcement agencies; distributes photographs of and descriptions about missing children worldwide; and coordinates child protection education and prevention programs, training, and publications.

National Center for Victims of Crime (NCVC)

Suite 480 2000 M St., NW Washington, DC 20036-3307 Hotline: 855-4-VICTIM (800-484-2846) Toll-free: 1-800-394-2255 Telephone: 202-467-8700Fax: 202-467-8701 Email: gethelp@ncvc.org Website: www.ncvc.org or http://victimsofcrime.org/

Offers help, information about options, and referrals to local services anywhere in the country.

Prevention Organizations

National Alliance of Children's Trust and Prevention Funds (ACT) P.O. Box 15206 Seattle, WA 98115 ATTN: Teresa Rafael E-mail: <u>info@ctfalliance.org</u> Web site: <u>www.ctfalliance.org</u>

Assists state children's trust and prevention funds to strengthen families and protect children from harm.

National Children's Alliance 516 C St., NE Washington, DC 20002 Toll-free: 1-800-239-9950 Telephone: 202-548-0090 Fax: 202-548-0099 Website: <u>www.nationalchildrensalliance.org</u>

Provides training, support, technical assistance and leadership on a national level to local children and child advocacy centers and communities responding to reports of child abuse and neglect. A children's advocacy center is a child-focused, facility-based program in which representatives from many disciplines, including law enforcement, child protection, prosecution, mental health, medical and victim advocacy, and child advocacy work together to conduct interviews and make team decisions about investigation, treatment, management, and prosecution of child abuse cases.

Committee for Children

2815 Second Ave., Suite 400 Seattle, WA 98121 Toll-Free: 1-800-634-4449 Telephone: 206-343-1223 Email: <u>info@cfchildren.org</u> Website: <u>www.cfchildren.org</u>

Provides award-winning social skills curricula for the prevention of child abuse, bullying, and youth violence, as well as family education, training, and technical assistance to educators throughout North America (has also paid particular attention to streamlining its child abuse prevention curriculum to fit within the time constraints of religious education).

Crimes Against Children Research Center University of New Hampshire 15 Academic Way 125 McConnell Hall Durham, NH 03824 Email: **doreen.cole@unh.edu** Telephone: 603-862-1888 Fax: 603-862-1122 Website: <u>www.unh.edu/ccrc</u>

> Combats crimes against children by providing high-quality research and statistics to the public, policy makers, law enforcement personnel, and other child welfare practitioners. CCRC is concerned with research about the nature of crimes including child abduction, homicide, rape, assault, and physical and sexual abuse, as well as their impact.

VIRTUS

3114 E. 81st Street, Suite 101 Tulsa, OK 74137 Toll-free: 1-888-847-8870 Fax: 918-392-4400 Website: https://www.virtusonline.org/virtus/

Provides sexual abuse prevention courses that create adult awareness of sexual abuse and teach adults how to prevent such abuse. With a target audience of employees, volunteers, and other caring adults, Sexual Abuse Prevention overviews (1) what is sexual abuse, (2) what damage is caused by sexual abuse, (3) what are the warning signs of sexual abuse and of abusers, (4) how to respond appropriately, and (5) what caring adults can do about sexual abuse on their campuses and in their communities. VIRTUS also provides an 8-module, schoolbased curriculum for children, entitled *Touching Safety Program for Children*[™].

Other

Abuse Prevention Solutions, LLC

Anthony P. Rizzuto, PhD, President and Founder 54 Fellsmere Road Malden, MA 02148 Telephone: : 617-519-3253 Email: <u>rizzutoto@aol.com</u> Company offers professional consultation regarding the prevention of child abuse and neglect including corporate awareness and prevention strategies, organizational and policy assessment, process re-engineering, curriculum development, education and training, accountability and effectiveness measurement.

Thanks to Deacon Anthony P. Rizzuto, PhD, previous Cabinet Secretary and Director of the Office of Child Advocacy, Implementation and Oversight for the Archdiocese of Boston, for writing and compiling the information in this educational resource packet. Thanks also to Deacon Bernie Nojadera, Executive Director of the Secretariat for Child and Youth Protection, and Mary Jane Doerr, Director of the Office for the Protection of Childern and Youth for the Archdiocese of Chicago, and Karen Clark, Director of Safe Environment for the Archdiocese of Newark for their contributions and review. Special thanks to Millie Hennemann and Veronica Jaeger for proofreading and editing this educational resource packet. Attachment A



A Parish Self-Assessment Guide

Charter for the Protection of Children and Young People

Secretariat of Child and Youth Protection United States Conference of Catholic Bishops 3211 Fourth St, NE Washington, DC 202-541-5413

Purpose and Overview

Since on-site audits occur every three years, the SCYP thought it would be beneficial to the dioceses/eparchies to create a parish self assessment guide to help dioceses and eparchies determine to what extent their parishes and schools are implementing the diocesan/eparchial policies relating to the *Charter for the Protection of Children and Young People* at the parish level. This self-assessment can be used by staff to determine if all diocesan/eparchial policies are being followed as well as help determine where there might be a need for more training in the implementation of the *Charter*.

If the *Charter* is going to be effective and the audit a tool for creating safe environments, it is important that parish personnel know:

- How to create safe environments in their parishes and schools
- How to implement diocesan/eparchial policies concerning training of all employees and volunteers
- How to implement diocesan/eparchial policies concerning background evaluations of employees and volunteers who work with children
- How to implement the diocesan/eparchial policy on extern/visiting priests
- The names of the people responsible for the implementation of the *Charter* at the parish level and at the diocesan/eparchial level
- Who schedules safe environment training for adults
- Who is responsible for training children both in religious education and in the parish school
- How to report allegations and to whom
- How to get outreach for a victim, his/her family, or the parish community

This self-assessment guide is not a requirement of the *Charter*, nor is it part of the annual audit. It is intended as an internal document solely for the use of the diocese or eparchy. Dioceses and eparchies should feel free to change the format and/or questions to suit their individual needs.

1. Is the existence of the diocesan/eparchial policies and procedures relating to the *Charter* publicized to parishioners?

If Yes, describe the types and frequency of publications. (Examples might include publication in parish bulletins, information provided at Masses, brochures and/or posters in the vestibules of Church buildings.)

If No, provide explanation. ٠

2. Does the pastor/school principal/other know when and how to report an allegation of sexual abuse of a minor?

• If No, provide explanation.

3. Does the pastor/school principal/other know how to obtain outreach for victims?

4. a) Are copies of the code of conduct and/or diocesan/eparchial standards of ministerial behavior made available to clergy and any other paid personnel and volunteers of the Church in positions of trust who have regular contact with children and young people?

b) Are standards of conduct for clergy and other persons in positions of trust with regard to children and young people made available and clear to all members of the community?

YES NO If No, provide explanation. •

5. Is safe environment training provided for each of the various groups set forth in Article 12?

If No, provide explanation. ٠

6. a) Is there a policy for those parents who choose not to have their child participate in the diocesan/eparchial safe environment training?

b) Does the parish/diocese have documentation of the signed parental declination?

c) Does the parish/diocese have documentation that the safe environment training materials have been offered to parents?

> YES NO

If No, provide explanation. ٠

NO

YES NO

YES NO

YES

NO

NO

YES

YES

YES NO

YES

NO

d) If parents refuse to sign any form, has a record been maintained by the parish/diocese?

• If No, provide explanation.

- 7. a) Does the pastor ensure that background evaluations are conducted on all parish personnel to include priests and deacons as well as other paid personnel and volunteers whose duties include ongoing, unsupervised contact with minors?
- b) Does the principal ensure that background evaluations are conducted all school personnel, to include priests and deacons, as well as other paid personnel and volunteers whose duties include ongoing, unsupervised contact with minors?

• If No, provide explanation.

8. Does the pastor ensure that visiting or non permanent clergy (e.g., weekend assistants, priests who witness marriages, perform baptisms, conduct funerals, or otherwise engage in supply ministry) are clergy in good standing?

If No, provide explanation. •

9. For those parishes directly affected by allegations of sexual abuse of children which have been brought forward during this current audit period:

a) Has the diocese/eparchy kept the parish informed?

b) Has the diocese/eparchy provided outreach to affected persons or groups?

c) Has the diocese/eparchy supported reinstatement of the accused when allegations are determined to be unfounded?

• If Yes, describe. If No, provide explanation.

Name of the person completing this parish self assessme	nt:
Title:	
Date:	

YES NO

NO

NO

NO

YES

YES

YES

YES NO

YES NO

NO

YES

Attachment B 2007 Parish Interview Guidelines and Questions

Guidelines for the parishes

At the request of the cardinal/archbishop/bishop/eparch, detailed interviews are being conducted in parishes to determine the extent of *Charter* compliance at the parish level. Dioceses/eparchies and auditors should come to an agreement on which parishes to audit. Consideration should be given to selecting various types of parish locations within a diocese/eparchy such as suburban, urban, and rural. Interviews will include the pastor, school principal if applicable, and staff member(s) designated to coordinate the safe environment program training. Distant parishes may be interviewed telephonically.

Areas of interview and questions are as follows:

1. Does the parish publicize the existence of the archdiocesan/diocesan/eparchial polices and procedures relating to the *Charter* to its parishioners?

If Yes, describe the types and frequency of publications. (Examples might include publication in parish bulletins, information provided at Masses, brochures and/or posters in the vestibules of Church buildings.)

If No, provide explanation.

2. Does the pastor/school principal/other know when and how to report an allegation of sexual abuse of a minor?

If No, provide explanation.

3. Does the pastor/school principal/other know how to obtain outreach for victims?

If No, provide explanation.

4. a) Does the parish provide copies of the code of conduct and/or archdiocesan/diocesan/eparchial standards of ministerial behavior to clergy and any other paid personnel and volunteers of the Church in positions of trust who have regular contact with children and young people?

b) Does the parish make the standards of conduct for clergy and other persons in positions of trust with regard to children and young people available and clear to all members of the community?

If Yes, Auditors will ask to review documentation verifying that these standards have been provided to those who have regular contact with children and young people as well as to the community.

If No, provide explanation.

5. Does the parish provide safe environment training for each of the various groups set forth in Article 12?

If Yes, Auditors will ask to review the documentation that the training has been provided, as well as the review curricula and material designed for use in the programs.

If No, provide explanation.

6. a) Does the parish have a policy for those parents who choose not to have their child participate in the archdiocesan/diocesan/eparchial safe environment training?

b) Does the parish have documentation of the signed parental declination?

c) Does the parish have documentation that the safe environment training materials have been offered to parents?

d) If parents refuse to sign any form, has a record been maintained by the parish?

If Yes, Auditors will ask to review the documentation regarding non-participation in safe environment training.

If No, provide explanation.

7. Does the pastor ensure that background investigations are conducted on all archdiocesan/diocesan/eparchial personnel to include priests and deacons, as well as parish/school or other paid personnel and volunteers who duties include ongoing, unsupervised contact with minors?

If No, provide explanation.

8. Does the pastor ensure that visiting or non permanent clergy (e.g., weekend assistants, priests who witness marriages, perform baptisms, conduct funerals or otherwise engage in supply ministry) are clergy in good standing?

If No, provide explanation.

- **9.** For those parishes directly affected by allegations of sexual abuse of children which have been brought forward during this current audit period:
 - a) Has the archdiocese/diocese/eparchy kept the parish informed?

b) Has the archdiocese/diocese/eparchy provided outreach to affected persons or groups?c) Has the archdiocese/diocese/eparchy supported reinstatement of the accused when allegations are determined to be unfounded?

If Yes, describe. If No, provide explanation.

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