

Policy for the Protection of Children and Youth



Episcopal Diocese of Pittsburgh

Approved by Diocesan Council on June 11, 2024

RELATIONSHIP OF THIS POLICY TO THE DIOCESE'S POLICY FOR THE PROTECTION OF VULNERABLE ADULTS

Readers who come to this Policy having first encountered our Diocese's *Policy for the Protection of Vulnerable Adults* will quickly recognize the many areas in which the two documents overlap. We strongly encourage everyone whose ministry involves children and youth to read this Policy in its entirety, since they will be held responsible for following all its provisions. However, the following summary may be helpful for those who are looking for a quick way to identify the key points where the two documents diverge.

DIFFERENCES PREDICTABLE BECAUSE OF THE POPULATION THAT EACH DOCUMENT ADDRESSES

Section III in each policy defines key terms critical to understanding its provisions. Those two lists differ in ways that are predictable on the basis of its assumed readership. Thus **Child** and **Youth** are defined only in this Policy, for example, while **Vulnerable Adult** and **Residential Facility** are defined only in the *Policy for the Protection of Vulnerable Adults*.

Specific requirements in the two policies may also differ on the same grounds. For instance, where this Policy requires “the diocese, congregation, or organization [to] maintain an up-to-date list of persons approved to minister to children and youth,” the *Policy for the Protection of Vulnerable Adults* mandates “an up-to-date list of persons with their contact information approved to minister to vulnerable adults and/or engage in pastoral relationships with others.”

We will not list all such predictable divergences here.

MATERIAL THAT DOES APPEAR IN THIS POLICY BUT DOES NOT APPEAR IN THE *POLICY FOR THE PROTECTION OF VULNERABLE ADULTS*

It is Section VII of this Policy that differs most significantly from its counterpart in the *Policy for the Protection of Vulnerable Adults*. Note specifically:

It requires the presence of “at least two unrelated adults” in any setting that involves children and youth. [A similar requirement is only “suggested” in the other Policy.]

It requires that alcohol “shall not be stored in publicly accessible areas of the church buildings.” [Note however that both policies make other statements about alcohol in their respective lists of Standards of Behavior.]

It sets standards for the use of electronic devices by children and youth. [Note that there exists a separate diocesan policy on the use of social media and electronic Communication.]

It sets screening and training requirements for “[anyone] with a key or electronic access to church buildings.”

The instructions it provides about meetings at off-site public locations (such as coffee shops) are more restrictive than those in the *Policy for the Protection of Vulnerable Adults*.

It requires that all programs and events for children and youth meet their “basic needs.”

It addresses the need for locker room, bathroom and showering facilities to ensure privacy and propriety.

It explicitly prohibits the possession of “weapons of any kind at any event or program for children or youth.”

It contains considerably more detailed—and, in some instances, different—provisions regarding Off-Site Programming, Overnight Programs, Transportation, and Extended Travel.

MATERIAL THAT DOES APPEAR IN THE *POLICY FOR THE PROTECTION OF VULNERABLE ADULTS* BUT DOES NOT APPEAR IN THIS POLICY

Once again, it is Section VII of the *Policy for the Protection of Vulnerable Adults* that differs most significantly from its counterpart in this Policy. Note specifically:

The *Policy for the Protection of Vulnerable Adults* recommends detailed documentation of every occasion when an individual visits a vulnerable adult, whether in a residential setting or in a facility.

The *Policy for the Protection of Vulnerable Adults* prohibits both the acceptance of gifts from vulnerable persons and any form of involvement in their plans for their estates.

The *Policy for the Protection of Vulnerable Adults* includes two sections that do not appear in this Policy: Visits to Private Residences and Visits to Residential Facilities.

To return to where we began: this summary is provided to assist readers who wish to compare the two policy documents. Those who minister with children, youth or vulnerable adults are always responsible for familiarizing themselves thoroughly with whichever policy/policies apply to the work they engage in.

Table of Contents

I. THEOLOGICAL AND ETHICAL FOUNDATIONS.....1

II. PURPOSE.....1

III. DEFINITIONS.....2

IV. EMPLOYEES AND VOLUNTEERS: APPLICATION AND SCREENING5

A. Public Records Checks..... 5

B. Additional Screening Requirements..... 6

V. TRAINING6

Waivers 7

VI. RECORD KEEPING7

VII. MONITORING AND SUPERVISION OF PROGRAMS8

A. Requirements for the Presence of Adults..... 8

B. Creating Safe Space for Children and Youth..... 9

C. One-to-One Conversations with Children or Youth..... 10

D. Basic Needs..... 11

E. Inclusiveness..... 11

F. Registration and Waiver-and-Release Forms..... 11

G. First Aid and Medications 12

H. Violence and Weapons..... 12

I. Images and Recordings..... 13

J. Standards of Behavior for Adults in Ministry with Children or Youth..... 13

K. Special Considerations for Off-Site Programming..... 14

 1. Prior Approvals 14

 2. Registration and Waiver-and-Release Forms 14

 3. Supervision Ratios 15

 4. Insurance..... 15

L. Overnight Programs 15

M. Transportation..... 16

O. Extended Travel 17

 1. Adult Leaders and Chaperones..... 17

 2. Insurance for Travel..... 18

P. International Considerations..... 18

VIII. RESPONDING TO CONCERNS.....19

A. Suspected Abuse, Neglect, or Exploitation of Children and Youth 19
 1. Reporting to Government Authorities..... 19
 2. Reporting to Church Authorities 19
B. Suspected Violations of this Policy that do not Involve Abuse, Neglect, or Exploitation..... 20
D. Local Resources for Response..... 20

IX. POLICY ADOPTION, IMPLEMENTATION, AND AUDIT21

A. The Episcopal Church Adoption and Diocesan Implementation 21
B. Adoption and Implementation by Congregations and Organizations 21
C. Audit Requirements..... 22
 1. Self-Audits by the Diocese..... 22
 2. Self-Audits by Congregations and Organizations..... 22
 3. Audit Forms 23

I. THEOLOGICAL AND ETHICAL FOUNDATIONS

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

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

God expressed the fullness of humanity in Jesus of Nazareth, whom we worship as the Word made flesh. To be human is to live with God and the whole of creation in the fullness of freedom and the challenge of responsibility. The pattern of Jesus’ life, death, and resurrection resonates unreservedly with God’s call to perfect freedom and responsibility.

In baptism, God, speaking through the Church, claims us in Christ. We become, in Christ, the community of God’s final purpose: justice and peace, love and plenty for the whole creation. This new community lives in Eucharistic fellowship with God and Creation, as a sign and instrument of God’s reconciling purpose in the world.

The Church is called to embody and advance God’s mission. Ministry is the vocation of the whole community: laypersons, deacons, priests, and bishops who together represent Christ and the Church in the world. The obligation to seek and serve Christ in all persons and to respect the dignity of every human being is binding for all the baptized.

The authority with which leaders are entrusted creates an inherent power imbalance in the pastoral relationship. This power imbalance derives from the leadership role and, in the case of clergy, from the symbolic authority of an ordained person. Christian leadership is intended to provide occasions for guidance and grace, and its abuse is always and unequivocally wrong.

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

II. PURPOSE

This Policy sets forth the general expectations and guidelines for behavior of the Episcopal Diocese of Pittsburgh for ordained and lay people in the diocese when engaged in ministry with children and youth. It broadly follows the form and content of a “Model Policy” developed by The Episcopal Church in 2017.* That document details the screening and training required before an individual may engage in ministry with children and youth and sets standards designed to ensure that children and youth and all who engage in ministry with them are treated with dignity and

* For further details about the relationship between the two documents, see Section IX, A.

respect in all settings. Its provisions apply to all such activities sponsored by the diocese itself or by any congregation, institution, organization, school, or agency in the diocese.*

The purpose of this Policy is to create safe and welcoming space for all children and youth in our communities, as well as those engaged in ministry with them, and to prevent abuse. Accordingly, it presents best practices for creating such safe space. Circumstances in some localities may make some of these best practices difficult to implement or even unworkable. As a result, local entities may make additions or revisions in developing their own policies so long as those policies meet or exceed the requirements of this Policy (see Section IX, B). This requires that local leadership—particularly those serving on governing bodies such as vestries—understand this Policy thoroughly enough to make appropriate judgments about local circumstances. Any additions or revisions shall be submitted in writing for the approval of the Bishop. No provision of this Policy may be omitted from a local policy.

No policy can foresee every possible circumstance to which it may be applied. Questions that arise regarding possible civil, criminal, ecclesiastical and/or employment offenses must be addressed with the relevant authorities immediately. Please contact the Bishop’s Office for consultation and resources if assistance is needed.

This Policy is designed to provide guidance and not as the basis for establishing civil liability. It is not the intent of this Policy to augment or change any substantive legal duty of the diocese or of any of its congregations or organizations that are subject to the requirements of any third parties, including children and youth. Accordingly, neither the provisions of this Policy nor any departure from them should be used to establish that any such legal duty exists or has been breached.

III. DEFINITIONS

NOTE: Definitions preceded by an asterisk () reflect our best understanding of gender identity and sexuality at the time that this Policy was being developed. That understanding has evolved over time and will probably continue to do so. This Policy will be updated as necessary to remain current.*

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

Bullying: Verbal, psychological, social, physical, or other behavior that intimidates, humiliates, offends, degrades, or harms another person.

Child: Anyone under the age of 12 years.

* The conduct of clergy outside the framework of such sponsored activities is governed by Title IV of the *Constitution and Canons of The Episcopal Church*.

† This definition follows the generally accepted understanding in the United States, but legal definitions may vary by state and on the basis of the specific context in which a definition is called for.

Child Protective Services: A social services program provided by a state or local government serving children and their families who need assistance. Child protective services receive and investigate reports of suspected abuse, neglect, and exploitation. In Pennsylvania, the relevant State agency is Child Welfare Services (see Section VIII, A).

***Cisgender:** An adjective describing a person whose sense of personal identity and gender corresponds with their gender or sex assigned at birth.

Clearances: see Public Records Check below.

***Gender Non-Binary:** An umbrella term for people who identify their gender as neither male nor female. These people may identify as both genders (“bigender”), neither gender (“agender”), or a mix or fluctuation between the two (“genderfluid”). They may also be unsure of their gender (“genderqueer”).

Intake Officer: Any person designated by the diocese to receive information regarding an offense for which a member of the clergy may be held accountable under Title IV of the *Constitution and Canons of The Episcopal Church* (see Title IV below). Anyone may contact an Intake Officer at any time to report a concern.

Leader: A person—adult or youth—who, for the benefit of another, engages in ministry without responsibility for oversight of others engaged in that same ministry. Examples include Sunday school teachers, camp counselors, and program team members.

***LGBTQIA+:** This acronym (for Lesbian, Gay, Bisexual, Transgender, Queer/Questioning, Intersexual, Asexual) refers to people whose gender identities vary from their gender or sex assigned at birth and/or whose sexual orientations differ from the heterosexual majority. The “+” reflects an openness to additional gender identities and orientations.

Mandated Reporter: A person who is required by state law to report reasonable suspicions of abuse, neglect, and/or exploitation of vulnerable populations to the appropriate state agency. Under Pennsylvania law, Mandated Reporters include all clergy and other religious leaders and any “individual, paid or unpaid, who, on the basis of the individual’s role as an integral part of a regularly scheduled program, activity or service, is a person responsible for the child’s welfare or has direct contact with children.” This definition encompasses Leaders, Responsible Persons and Supervisors as defined in this Section. For further details regarding Pennsylvania’s laws on this topic, visit <https://www.dhs.pa.gov/contact/Pages/Report-Abuse.aspx> and follow in particular the link on that page to More Information on Mandated Reporting. (See also Permissive Reporter below.)

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

Organization: Any institution for which the diocese or a congregation has legal or fiduciary responsibility. Examples currently relevant to our diocese include schools, child daycare and preschool programs, and residential summer camps.

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

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

Permissive Reporter: Any person who suspects abuse, neglect, and/or exploitation of vulnerable populations, including children and youth. Pennsylvania law encourages any individual to report such suspicions to the appropriate state agency, even if they are not Mandated Reporters legally required to do so. See <https://www.dhs.pa.gov/contact/Pages/Report-Abuse.aspx>.

Program: Any official activity or program sponsored by The Episcopal Church and its provinces, dioceses, and congregations. Examples include Sunday schools, vacation Bible schools, youth groups, mission trips, and acolyte programs. Group travel to and from such activities or programs may be regarded as a part of the activity or program itself (see Section VII, K).

Public Records Check: A search of documents and data available to the public including criminal and civil court records, credit reports, and driving records from the Department of Motor Vehicles. Public records checks are often referred to as “clearances.” For more details, see Section IV, A.

Responsible Person: A person designated as being accountable for compliance with this Policy for a specific event or program. The work of a Responsible Person will often be directed or overseen by a Supervisor (see below).

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

Sexual Misconduct: A broad term encompassing any behavior of a sexual nature that is committed without consent or capacity for consent or by force, intimidation, coercion, or manipulation. Sexual misconduct can be committed by a person of any gender, and it can occur between people of the same or different genders. Sexual misconduct includes but is not limited to the types of misconduct defined as Sexual Misconduct under Title IV of the *Constitution and Canons of The Episcopal Church*.

Supervisor: Any person designated as having oversight responsibility for a ministry program and in particular for its compliance with this Policy. A Supervisor will often work with one or more Responsible Persons (see above) in exercising that responsibility.

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

***Transgender:** An adjective describing a person whose sense of personal identity and gender does not correspond with the gender or sex assigned to them at birth.

Training: Organized activity designed to provide information and/or instruction to strengthen and enhance the recipient’s understanding of, capacity for, and exercise of ministry. See Section V for detailed information relative to this Policy.

Youth: Anyone who is at least 12 years old but not yet 18 years old. An individual who is 18 years old or older but is still in high school may also be a youth.

IV. EMPLOYEES AND VOLUNTEERS: APPLICATION AND SCREENING

Full screening consists of a Public Records Check, a written application, an interview, and a reference verification. The diocese, congregations, and other organizations shall fully screen

- all employees (clergy and laypersons) and
- all volunteers engaged in ministry with children and youth or an activity described in this Policy.

Elected Vestry members are subject to a Public Records Check only.

Even persons who have no involvement with children and youth other than possessing keys and/or access to locked spaces may be subject to a Public Records Check (see Section VII, B).

A. Public Records Checks

- The diocese, congregations and other organizations shall require all employees and all volunteers who seek to engage in ministry with children and youth to complete the public records checks mandated in the Pennsylvania Child Protective Services Law (CPSL).^{*} These include:
 - Pennsylvania Child Abuse History Clearance
 - Pennsylvania State Police Criminal History Clearance
 - Federal Bureau of Investigations (FBI) Criminal History Clearance.[†]

Completing these checks may require that the individual be fingerprinted.

- A Department of Motor Vehicles records check is also required if the employee or volunteer will transport children or youth as part of, or an extension of, a ministry of the church or for a church-sponsored event.
- If the employee or volunteer will have check signing authority for church funds, the Diocese shall be consulted about also performing a credit check.
- The individual seeking a role in ministry with children and youth shall be responsible for any fees charged for public records checks, but a congregation or other organization may adopt a policy of reimbursing those costs.

^{*} This critical first step is sometimes referred to as “obtaining one’s clearances.”

[†] For details, see <https://www.dhs.pa.gov/KeepKidsSafe/Clearances/Pages/default.aspx>. Persons who (i) are applying to serve as volunteers and (ii) have been residents of Pennsylvania during the entirety of the previous ten-year period may choose to sign and submit to the diocese, congregation or organization the Disclosure Statement for Volunteers listed at the bottom of the KeepKidsSafe Clearances page linked above. This exempts them from having to complete the FBI Criminal History Clearance process. Note, however, that this option is not available to employees, including clergy.

- All checks must be completed and the relevant documentation submitted before an employee or volunteer first interacts with children and youth.
- Whenever a check surfaces questions about an individual’s suitability for ministry with children or youth, she or he shall be accorded an opportunity to discuss those questions and correct any misinformation. However, responsibility for the final decision about whether or not to assign an individual to a given position rests with the Bishop, Clergy in Charge, Senior Warden, Supervisor, or Responsible Person (as appropriate).*
- Public records checks shall be updated at least every five years, as required by the CPSL. However, the Bishop, Clergy in Charge, Senior Warden, Supervisor or Responsible Person may ask individuals to update their checks after a shorter period. Such a step might be appropriate, for example, if an individual were resuming a ministry with children or youth after a significant period away from it.

B. Additional Screening Requirements

A written application, an interview, and reference verification are required before an employee or volunteer may engage in ministry with children or youth.[†] These components are generally conducted in the following order:

- Submission of a completed written application to serve in a specified role for which there is a clearly defined, written “job description.” The application shall include verifiable personal information.
- Personal interview.
- Reference verification conducted by the diocese, congregation or other organization to verify personal information by contacting people listed in the application who know, but are not related to, the applicant.

Each applicable screening step shall be fully documented and the records maintained as described in Section VI.

V. TRAINING

The Episcopal Church has contracted with Praesidium Inc. to provide online training consistent with its policies through the Praesidium Academy platform. The training takes the form of a series of short modules. Visit <https://www.episcopalpgh.org/safe-church-resources/> and follow the

* Note that the CPSL lists a number of offenses that automatically disqualify individuals from working in childcare facilities licensed by the Commonwealth (23 Pa. C. S. Section 6344). This list may influence any decision made under this Policy regarding the suitability of an applicant.

[†] An employee or volunteer who (i) already held an active role in ministry with children and youth on the date that this Policy was adopted and (ii) has been known to the congregation or organization in which they are serving for at least six months will be exempt from the application, interview, and reference verification requirements for that role. However, if they subsequently seek a different position, the full screening requirements will apply.

appropriate link for further information about the current training requirements, which are incorporated by reference as a part of this Policy.

Certification of the completion of such training shall be renewed and documented every three years.

Waivers

The Commonwealth of Pennsylvania requires professionals in more than twenty-five fields to meet strict standards set by State licensing boards in the relevant disciplines. The standards set by some (but not all) of those boards include training and/or continuing education in child abuse recognition and reporting. Individuals who wish to work with children and youth in the diocese and can show evidence that they are currently licensed by the Commonwealth in one of these professions may request to be excused from completing some of the training modules. Teachers, school administrators and independent contractors engaged with K-12 school districts who are subject to ACT 126 requirements may similarly request waivers. Visit <https://www.episcopalpgh.org/safe-church-resources/> and follow the appropriate link for further information about the current waiver policy, which is incorporated by reference as a part of this Policy.

The Bishop, Clergy in Charge, Senior Warden, Supervisor or Responsible Person (as appropriate) may grant or deny waiver requests based on the nature of the role the individual will fill and other factors identified during the application and screening process. Each such exemption and the reasons for it shall be fully documented.

VI. RECORD KEEPING

The diocese shall maintain all records pertaining to the application, screening, and training of clergy in areas covered by this Policy.

Each congregation or other organization with responsibility for programs, services or ministries to children and youth shall maintain all records pertaining to the application, screening, and training of lay employees and volunteers to whom this Policy applies.

Records must be sufficient to evidence compliance with this Policy and must include an affirmation from each individual that she or he has reviewed this Policy (or the approved policy of the congregation or organization for which they work or volunteer—see Section IX, B). This review may be completed online and the affirmation stored electronically, provided that the records can be retrieved in perceivable form if necessary.

All records must be kept in a secure and confidential location.

Praesidium, Inc. provides a convenient means for some key aspects of document review and record keeping. For additional resources, visit <https://www.episcopalpgh.org/safe-church-resources/> and follow the appropriate links.

VII. MONITORING AND SUPERVISION OF PROGRAMS

The diocese, congregation, or organization shall ensure that all people who minister to children and youth receive prior training as to the scope, accountability, and responsibility of that ministry.

All people who minister to children and youth shall have ongoing supervision. In particular, the diocese, congregation, or organization shall appoint a Responsible Person for each event or program it sponsors to monitor and supervise the behavior of the adults, children, and youth involved and to ensure appropriate practices and healthy boundaries.

Ongoing supervision shall also consist of regular check-ins by the Supervisor, who may be a member of the clergy or a layperson. The Supervisor shall review the scope, accountability, and responsibility within the ministry of each person engaged in the ministry. Each person engaged in the ministry must know who supervises it and how to contact the Supervisor at all times.

The diocese, congregation, or organization shall maintain an up-to-date list of persons approved to minister to children and youth. This list shall include contact information for each individual and shall be kept in the organization's office or another place where records are kept.

A. Requirements for the Presence of Adults

At least two unrelated adults (one of whom must be 25 or older) shall be present in all ministry settings and at all events designed for children and youth. If unanticipated circumstances result in an adult being alone with children or youth, that adult shall report the circumstances to the Bishop, Clergy in Charge, Senior Warden, Supervisor, or Responsible Person (as appropriate) at the earliest possible time.

A single adult may be sufficient in a well-monitored, visually accessible program space on the church grounds such as a Sunday school classroom, provided that another adult can maintain visual contact with that person. This can be accomplished by designating an individual to conduct frequent random checks of classrooms and unlocked spaces throughout the building(s). These exceptional circumstances must be specifically described in a written document and approved by the governing body of the congregation or organization.

Over and above the two-person minimum, adults shall be added as necessary to ensure that the following minimum staffing ratios are maintained*:

- for infants – 1:4
- for toddlers – 1:5
- for pre-school children – 1:10
- for lower elementary grade students – 1:12
- for upper elementary grade students – 1:15

* These ratios are based on those provided by State law (Title 55, PA Code, §3280.52).

If a group includes children of differing ages, the appropriate ratio is the one for the youngest child in the group.

For additional supervisory requirements for off-site and extended travel programs, see Section VII, K(3) and O(1).

B. Creating Safe Space for Children and Youth

To create a safe space, it is necessary to anticipate and avoid circumstances in which children and youth could be exposed to inappropriate consumables, inappropriate materials, unmonitored adult contact, or unsupervised peer contact.

For example:

- **Alcoholic beverages.** Alcohol (sacramental or otherwise) shall not be stored in publicly accessible areas of the church buildings.
- **Electronic devices.** Children and youth shall have close adult supervision when using electronic devices as part of a program or event sponsored by the Diocese or by a congregation or organization.

The Diocese's Policies on the Use of Social Media & Electronic Communication addresses in detail the appropriate use of social media and electronic communications in all facets of the Church's work and includes requirements specific to the engagement of children and youth online. Supervisors and Responsible Persons who minister to children and youth are responsible for knowing and following those Policies at all times.

For each program or event provided for children and youth, it is recommended that a summary list of expectations related to the use and/or non-use of social media and electronic communication be developed. This list should be closely tailored to the planned activities and written in language accessible to the relevant age group. This may then be included in the registration package for the program or event (see Section VII.F).

- **Videos and Movies.** Written parental approval is required prior to the screening of any movie rated "PG-13" or above, whether offsite or on-site, or the initiation of any conversation or program containing sexually explicit or violent content.
- **Persons with keys and access to locked spaces.** All reasonable steps shall be taken to control and monitor access to church buildings with particular attention to any risk to children and youth that might result.

The governing body of each congregation or organization shall review the list of individuals with such access (such as members of the Altar Guild, sextons and/or janitorial staff, leaders of Bible study groups, individuals preparing meals in the church kitchen for a food pantry, vendors who routinely drop off altar flowers, or leaders of twelve-step programs). They shall determine whether there is reason to believe that any

individual on the list might have unsupervised access to children or youth. In each such case, they shall determine how best to ensure that a safe space is maintained at all times. Possible means to that end might range from requiring individuals to complete the full education and training described in Section V to asking that they sign a document indicating that they understand the need to identify themselves to a responsible adult immediately if they become aware during their time in the building that children and youth are also present.

Both the decisions reached regarding such individuals and the documents used in implementing those decisions shall be maintained as outlined in Section VI.

- **Facility Rentals.** The governing body of each congregation or organization shall review the list of community organizations that regularly use its facilities, whether or not they pay a rental fee. Organizations that provide activities that involve children or youth must have current documentation that their employees and volunteers meet the standards set by Pennsylvania's Child Protective Services Law. They must agree to provide this documentation upon request. This provision shall be explicitly included in rental agreements with such organizations.

The governing body of each congregation or organization shall periodically review the rental agreements, indemnity statements and other documents that it uses when renting its facilities to private individuals for parties, receptions, etc., to ensure that those documents address issues covered in this Policy and protect the congregation or organization from liability for any violations.

- **Unused spaces.** Spaces not in regular use should not be readily accessible. Given the many differences in facilities, the diocese, congregation or other organization should determine how best to meet this standard.

C. One-to-One Conversations with Children or Youth

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

- Planned or unplanned on-site conversations taking place in a public location, away from where others can hear but in view of other adults.
- Planned off-site conversations/meetings in a public place (such as a coffee shop or restaurant) in view of other adults. For off-site conversations, the Responsible Person shall be informed about the plans in advance.

Because of mandatory reporting laws, no adult should ever promise a child or youth that their one-to-one conversation will be kept confidential. An adult may however assure a child that he or she will treat their conversation with care and discretion. If a child or youth discloses a situation pertaining to abuse, neglect, self-harm, or exploitation, that disclosure must be reported.

Any impulsive, secluded or secretive activity with children or youth, whether online or in person, may foster a high-risk situation and must therefore be avoided. (See the resource referenced in Section VII, B under Computers and Electronic Devices.)

D. Basic Needs

No person—in particular, no child or youth—shall be deprived at any event of the basic human needs of food, drinking water, shelter, sleep, access to restrooms, safety, and clothing.

Exceptions may be made for programs intended to teach children or youth about poverty, need, and hunger, such as an intentional fasting program. In such cases, children and youth must agree in writing to participate and their parents or guardians must give written permission that includes certification that the youth or child does not have a medical condition that would put the participant at risk as a result of the proposed deprivation. Participants who wish to withdraw, who are unable to complete the program, or whose parents withdraw permission for their participation must have their basic needs met without hesitation and in a way that avoids any implication of reservation or disapproval.

E. Inclusiveness

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

Regardless of state law, The Episcopal Church seeks to support all children and youth by providing reasonable alternative arrangements to address their safety and comfort.

Transgender, genderqueer, or gender non-binary children and youth who express the need or desire for increased privacy should be provided with reasonable alternative arrangements. These may include the use of a private area, a separate changing schedule, or the use of a single-stall restroom. Such alternative arrangements should be provided in a way that protects the child or youth's ability to keep their transgender status confidential. They should not be required to use a locker room or restroom that conflicts with their gender identity.

Wherever possible, safe separate bathroom/shower facilities should be provided. If group showers for members of each sex are unavoidable, additional showering times should be offered to guarantee the greatest comfort of all the children or youth.

Adults should either have separate shower facilities altogether or shower at other times than children or youth. Separate dressing facilities should also be provided.

F. Registration and Waiver-and-Release Forms

Responsible Persons shall ensure that they have received a registration form and a waiver-and-release form for each child or youth before she or he participates in any program. Where appropriate (for example, for Sunday school), such forms may encompass a program year.

All registration and waiver-and-release forms must include a dated affirmation by the parent or guardian that she or he has reviewed this Policy. This review may be completed online and the affirmation stored electronically, provided that the records can be retrieved in perceivable form if necessary. (Praesidium, Inc. provides a convenient means for such online review and record keeping.)

Completed forms shall be maintained in a secure location either on-site or online. Confidentiality must be preserved with respect to medical and other sensitive information provided on registration and waiver-and-release forms.

G. First Aid and Medications

- Current certification in First Aid, CPR, and the use of an Automated External Defibrillator (AED) is strongly recommended for those who work with children and youth.
- A first aid kit, appropriately stocked for the anticipated activities and participants, shall be available in an easily accessible location.
- A record shall be kept of all medications and first aid given to participants. This record shall include the participant's name, the date and time of service, the name of the person administering the medication or treatment, and a description of the medication, dosage, and/or treatment given. For sample forms, visit <https://www.episcopalpgh.org/safe-church-resources/> and follow the appropriate link. Confidentiality must be preserved with respect to all medical and other sensitive information provided.
- All prescription or over-the-counter medications belonging to minors shall be given to the Responsible Person at the beginning of the activity or event, unless otherwise agreed upon by the parents and the Responsible Person.
- Only the Responsible Person or their adult designee may administer medications.

H. Violence and Weapons

Bullying of any kind by anyone is absolutely prohibited.

- No one shall strike, hit, grab, restrain, shake, or otherwise physically threaten or harm another at any time.
- No one shall at any time control or attempt to control another by intimidation, threats, verbal or emotional abuse, or isolation from others.

Children and youth shall not have weapons of any kind at any event or program for children or youth. Exceptions to this restriction may be made for camp programs or other specific programs with the prior approval of the Bishop, Clergy in Charge, Senior Warden, or Supervisor (as appropriate).

Anyone observing a violation of any of the provisions in this Subsection shall immediately report this to the Responsible Person (or, in their absence, to the Supervisor) and also, if appropriate, to

law enforcement. This requirement is in addition to the more general instructions for Responding to Concerns in Section VIII.

I. Images and Recordings

No child or youth shall be photographed or recorded on film, videotape, audiotape, or other electronic media unless their parent/guardian has previously signed and submitted a permission form for photography and/or recording that covers the specific event or activity concerned. Even if a permission form has been submitted, a child or youth may at any time indicate their wish not to be recorded and any such expression shall be respected.

J. Standards of Behavior for Adults in Ministry with Children or Youth

Adults who work with children and youth are expected to model the patterns of healthy relationships that children and youth deserve in all settings. Interactions must meet all the requirements outlined above as well as those that follow, and adults should be discouraged from initiating a private relationship with any unrelated child or youth from the church outside of sanctioned church activities.

DOs

Adults are encouraged to:

- engage in ongoing spiritual practices, which may include daily prayer, regular participation in corporate worship, and Bible study.
- spend time with, and listen carefully to, children and youth, and advocate for their ministry within the Body of Christ.
- offer appropriate physical expressions of care and affection, which may include:
 - high fives and fist bumps;
 - hand-holding while walking with small children or in prayer;
 - brief touching of shoulders, hands, or arms;
 - “laying on of hands” under appropriate pastoral supervision;
 - brief hugs and extending of arms around shoulders.
- model appropriate affection with other adults and be accountable to the community for their behavior at all times.

DON'Ts

Adults shall not under any circumstances:

- provide children or youth with non-sacramental alcohol, marijuana, drugs, cigarettes, tobacco products, e-cigarettes, vapes, or pornography.

- arrive under the influence of alcohol, illegal drugs, or misused legal drugs at any children's or youth event or when responsible for children or youth at any event.
- consume non-sacramental alcohol or illegal drugs or misuse legal drugs at any children's or youth event or when responsible for children or youth at any event.
- engage in illegal behavior or permit other adults or children or youth to engage in illegal behavior.
- engage in any sexual, romantic, illicit, or secretive relationship or conduct with any child or youth.
- (except as part of planned and pre-approved educational programs) discuss with children or youth their own sexual activities or fantasies, or their own use or abuse of drugs or alcohol.

Anyone who suspects a violation of these standards shall immediately take steps to respond as outlined in Section VIII.

K. Special Considerations for Off-Site Programming

Off-site programs, trips, and events represent welcome opportunities for the spiritual, social, and emotional development of children and youth. They also present additional challenges for maintaining best practices for safe and healthy ministry. All the broader expectations for safe space outlined above must be observed off-site as they would be on-site.

In the event of uncertainty about how to apply this Policy off-site, the Responsible Person should consider in advance how individual provisions will apply to the planned activities and contact their Supervisor with any relevant queries. In addition, because there are always risks in conducting off-site programs that cannot be anticipated, all permissions, waivers and appropriate documentation as described below should be addressed well in advance of the beginning of the program.

1. Prior Approvals

- Both the governing body of a congregation or organization and its Clergy in Charge shall review and approve any off-site activity in advance. That approval must be reflected in the minutes of the governing body. Programs, trips, or events sponsored by the diocese shall receive prior diocesan approval by the Bishop or their designee.
- Prior approvals are also required when the site is a private residence hosting such events as cookouts, pool parties, or progressive dinners.

2. Registration and Waiver-and-Release Forms

- Prior to any off-site program, the Responsible Person shall ensure that a registration form and a waiver-and-release form specific to that program has been received from each child or youth. (For detailed requirements regarding such forms, see Section VII, F above.)

- For off-site programs, all adult participants shall also complete appropriate registration and waiver-and-release forms.

3. Supervision Ratios

- At any off-site gathering of children or youth, at least two unrelated adults shall be present. At least two of the adults present shall be aged 25 or older and their sexes and gender identities should preferably reflect those of the participants.
- Minimum ratios of adult to child/youth shall be in accordance with American Camp Association (ACA) guidelines as follows:
 - 5 years old and younger — 1 adult for every 5 overnight-participants and 1 adult for every 6 day-participants
 - 6–8 years old — 1:6 for overnight and 1:8 for day
 - 9–14 years old — 1:8 for overnight and 1:10 for day
 - 15–18 years old — 1:10 for overnight and 1:12 for day
- Additional adults can provide skills, mentorship, support, encouragement, spiritual guidance, and joy.
- When an activity or event includes new leaders-in-training, the leadership teams should also have a reasonable number of experienced adult leaders present to provide support to those in training.

4. Insurance

The Responsible Person organizing any trip to an off-site destination shall ensure that adequate insurance has been secured to cover foreseeable emergencies. For more information, contact the Bishop’s Office or your insurance broker (e.g., Church Insurance).

L. Overnight Programs

In planning and running overnight programs, particular attention shall be given to historically excluded or unrecognized people, such as LGBTQIA+ and differently-abled individuals. In a situation of unequal power and safety, the preferences of these individuals merit additional consideration, accommodation, and action to ensure participants’ privacy; the greatest possible social integration of all participants; the avoidance of stigmatization for any participants; the assurance that all participants have an equal opportunity to benefit; and the health and safety of all involved.

Additional guidelines for overnight programs:

- The safe use of restrooms and showers by all participants requires the diocese, congregations and other organizations to consider numerous factors, including but not limited to: age, sex, gender identity and expression, and privacy. Adults should have separate showers or separate times for showering.

- Overnight programs shall provide safe, supervised sleeping arrangements.
 - No bed, cot, or sleeping bag shall have more than one person sleeping in it.
 - Supervision by two unrelated adults is required in any space where one or more children or youth are sleeping.
 - It is acceptable for all participants to sleep in the same open area when dressing rooms and bathrooms provide appropriate privacy.
- Participants shall have access to three substantial meals each full day and access to sufficient water.
- Participants shall be given the opportunity for at least seven hours of sleep in each 24-hour period, except for programs where parental/guardian permission is given to miss sleep. In these cases, children and youth must agree to participate in writing, and parents or guardians must give written permission that includes certification that the youth or child does not have a medical condition that would put the participant at risk by missing sleep.
- Participants shall have some time set aside each day for rest or free time.

Best practice guidelines for hotel stays:

- No bed, cot, pullout, hide-a-bed, or rollaway bed should have more than one person sleeping in it
- At least 2 children or 2 youth of the same gender should be assigned to each room.
- Adult supervisors or chaperones be assigned rooms on the same floor, scattered among the rooms with children or youth, and at least one adult room should be located by the stairs or elevators.
- Rooms and room occupants should be assigned by the Responsible Person.

M. Transportation

Whenever the diocese, congregation or organization provides transportation to and/or from an event or activity, the following practices shall be followed:

- All drivers shall be at least 21 years of age and provide copies of their current driver's license, the state registration form for the vehicle they will be driving, and current proof of insurance. They must also have completed a satisfactory DMV records check (see Section IV, A).
- For each child or youth being transported, a parent or guardian must have given prior consent for such transportation.
- All drivers and riders shall comply with all state laws, including those regulating seat belt and cell phone usage.

- Occupancy of each vehicle shall be consistent with its seating capacity as stated by the manufacturer for that make and model.

A list of persons approved to provide transportation for children and youth shall be maintained in the office of the diocese, congregation or organization and updated at least once a year.

N. Camps and Retreat Centers

All camps, camping programs, and retreat centers in the diocese shall follow the guidelines for off-site programming established in this policy. In addition, camps should aim to follow American Camp Association standards to the best of their ability.

If the camp or retreat center is located in a state other than Pennsylvania, the director shall consult with the Bishop and the Chancellor regarding the applicability of that state's laws.

O. Extended Travel

Extended travel with children and youth (for example on pilgrimages or mission trips) presents amazing opportunities for participants to experience the church and the world on a larger scale and to appreciate the vastly different perspectives of faith communities in their respective contexts. It also presents challenges to normal safety protocols (as well as opportunities for creativity if managed well). The following guidelines will help groups prepare for a variety of potential scenarios that may arise during domestic and international travel. For additional valuable resources, visit <https://www.episcopalpgh.org/safe-church-resources/> and follow the appropriate links.

1. Adult Leaders and Chaperones

- Minimum ratios of adults to children and youth need to be lower, due to the possibility that an adult will need to stay behind with a participant in the event of a medical emergency.
 - 9–14 years old — 1:5
 - 15–18 years old — 1:7
- Regardless of group size, no group shall travel with fewer than three adult chaperones at least two of whom shall be at least 25 years old.
- One of the adults who is at least 25 shall serve as the Travel Administrator who is responsible for all aspects of the trip, including carrying all necessary documentation, contact information, and forms including: medical releases, community covenant forms, emergency contact information, itineraries, and cash and/or credit cards sufficient to address emergencies.
- It is best practice that one adult of at least 25 should hold a current medical certification to manage the administration of necessary and permissible medications, administer immediate and necessary first aid, and triage medical situations to determine whether a higher level of care is needed. Acceptable medical certifications include Wilderness

Medical Response, Outdoor Emergency Care, Emergency Medical Technician or Paramedic, Nurse (RN/LPN/Nurse Practitioner), Physician's Assistant, or M.D./O.D.

When this is not possible, one person shall be designated to supervise the administration of medications as instructed on medical release forms, and a clinic near each destination should be identified ahead of time in order to ensure that health emergencies can be responded to as rapidly and as expertly as possible.

- Best practice is to designate an adult to serve as back-up to the Travel Administrator and an adult to serve as back-up for simple first aid and the administration of prescriptions. These could be the same person.
- Copies of all program documents should be left with an accountable person at the diocesan, congregation's, or organization's office. That person should also serve as the local emergency contact person for communications between the traveling group and families at home.

2. Insurance for Travel

- The Responsible Person organizing any trip to an off-site destination shall ensure that adequate insurance has been secured to cover foreseeable emergencies. For more information, contact the Bishop's Office or your insurance broker (e.g., Church Insurance).
- All travelers should carry evidence of personal health insurance in the form of a copy of the actual insurance card issued to the policy holder (e.g., a child's parent).

P. International Considerations

International travel introduces still more complexity into the planning process. For example, organizers of international trips should check with the U.S. Department of State regarding travel restrictions or requirements, including visas. They should determine whether vaccinations are required or recommended for entry into each country on the itinerary. They should ensure that each traveler holds a passport valid for at least six months beyond the anticipated return date. And they should ensure that the group has at least two cell phones that will have active coverage in all the intended destinations. More comprehensive lists of steps to take and pitfalls to avoid are readily available on the Web—see <https://www.episcopalpgh.org/safe-church-resources/> and follow the appropriate link.

Most importantly, however, plans for communication among the Travel Administrator, the Responsible Person, the Supervisor, and the parents of all participants should be developed well in advance and communicated to all parties. These should include back-up plans for emergency situations.

If a situation arises that requires the filing of a report with Pennsylvania's Department of Child Welfare Services (see Section VIII, A), the organizers of the trip should ask the Bishop to obtain

legal advice about possible additional reporting requirements in the country or countries where the alleged act or acts occurred.

VIII. RESPONDING TO CONCERNS

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

1. Reporting to Government Authorities

Any person who has reason to suspect that a child or youth has been abused, neglected or exploited is strongly encouraged to contact Pennsylvania's Department of Child Welfare Services. All Mandated Reporters* are legally required to do so. Information about how to report abuse can be found at <https://www.dhs.pa.gov/contact/Pages/Report-Abuse.aspx>. The Commonwealth's abuse reporting line is 1-800-932-0313. If someone is at imminent risk, contact local law enforcement immediately.

If the act or acts suspected occurred outside Pennsylvania, this fact must be reported to the Bishop, who will obtain legal advice about possible additional reporting requirements in that state/those states.

2. Reporting to Church Authorities

In addition to these statutory reporting measures, anyone who has reason to suspect that a member of the clergy has abused, neglected, or exploited children or youth within a facility or program of the diocese or one of its congregations or other organizations shall immediately inform an Intake Officer. Reports of abuse, neglect and/or exploitation by a member of the clergy shall be handled as outlined in Title IV of the *Constitution and Canons of The Episcopal Church*.

Anyone who has reason to suspect that a layperson has abused, neglected, or exploited children or youth within a facility or program of the diocese or one of its congregations or other organizations shall immediately inform both the Bishop or the Bishop's Office and one or more of the following:

- The Clergy in Charge or the Senior Warden in the case of a congregation.
- The director, head, or other governing officer in the case of other church organizations.

The Bishop will work to ensure that appropriate measures are taken to cooperate with law enforcement and to provide for the safety of the community, as well as that a proper level of discretion is maintained in the process.

* Under Pennsylvania law, as noted in Section III above, Mandated Reporters include all clergy and other religious leaders and any "individual, paid or unpaid, who, on the basis of the individual's role as an integral part of a regularly scheduled program, activity or service, is a person responsible for the child's welfare or has direct contact with children." This definition includes Leaders, Responsible Persons and Supervisors as defined in this Policy.

B. Suspected Violations of this Policy that do not Involve Abuse, Neglect, or Exploitation

Anyone who suspects a violation of the policies set out in this document that does not involve the abuse, neglect and/or exploitation of a child or youth shall immediately report that violation to the Responsible Person for the program or event and, in a congregational setting, to both the Clergy in Charge and the Senior Warden.

Anyone who suspects a violation of these policies by a member of the clergy shall also report the violation to the Bishop's Office and/or an Intake Officer. Anyone can make a report to an Intake Officer.

The Bishop will work to ensure that appropriate measures are taken to provide for the safety of the community, as well as that a proper level of discretion is maintained in the process.

C. Pastoral Care and Disciplinary Action

The Bishop, on receiving a report of a violation of this Policy by a member of the clergy or by a layperson, shall be responsible for providing appropriate pastoral care to all those involved or affected and taking appropriate remedial and/ or disciplinary action, up to and including canonical disciplinary action (as provided by Title IV of the *Constitution and Canons of The Episcopal Church*), terminating church employees and/or ending volunteer relationships.

Clergy in Charge who receive reports of violations of these policies shall be responsible for providing appropriate pastoral care to all those involved or affected and for taking appropriate remedial and/or disciplinary action, up to and including terminating church employees and/or ending volunteer relationships.

If the Responsible Person is a layperson, she or he is also responsible for ensuring that appropriate pastoral care is provided for all individuals involved or affected.

D. Local Resources for Response

The diocese, congregations, and organizations shall develop a list of local resources to serve as a source of information and assistance for anyone concerned about possible violations of these policies. This list shall provide contact information for all key individuals including, as appropriate, the following:

- The Responsible Person(s) for each program and ministry with children and youth for which the diocese, congregation or organization is responsible.
- The Clergy in Charge (of a congregation).
- The Wardens (of a congregation).
- The Director or other administrative head (of an organization).
- The Bishop.
- The Intake Officers.
- Pennsylvania's Department of Child Welfare Services.

A current version of the list shall be published in at least the following ways:

- By posting it on the website of the diocese, congregation or organization and linking to it from any other page on the site that mentions programs for children or youth.
- By sending it electronically and/or in printed form to the parent or guardian of any child who registers for any program involving children or youth that is sponsored by the diocese, congregation or organization.
- By posting a physical copy in plain view in any location where activities involving children or youth occur on a regular basis.

A template for such a list may be found by following the appropriate link from the Resources page at <https://www.episcopalpgh.org/safe-church-resources/>.

IX. POLICY ADOPTION, IMPLEMENTATION, AND AUDIT

A. The Episcopal Church Adoption and Diocesan Implementation

In 2017, The Episcopal Church adopted two “Model Policies”—one for the protection of children and youth and a second for the protection of vulnerable adults. Section VIII of the Model Policy for the Protection of Children and Youth required two responses on the part of each diocese.

- Explicitly, it stated that each diocese should “adopt a Policy for the Protection of Children and Youth that is consistent with and/or exceeds the requirement of [the national] model policy.”
- Less directly, it also mandated that dioceses should work with the “congregations and organizations” of which they are composed “to adopt a Policy for the Protection of Children and Youth that is consistent with and/or exceeds the requirements of [the national] model policy and the diocesan policy.”
- In addition, Section VIII of the Model Policy also prescribed the development of audit processes both at the diocesan level (on a three-year cycle) and at the congregational level (annually).

The present document represents the Diocese of Pittsburgh’s fulfillment of the first of these mandates.

B. Adoption and Implementation by Congregations and Organizations

Once this Policy has been formally adopted at the diocesan level, the Bishop shall promptly inform all congregations and other organizations in our diocese of its adoption and shall direct them either to accept this Policy as their own or to develop and submit for approval a policy that is “consistent with and/or exceeds the requirements of this Policy.” Unless and until a policy submitted by a congregation or organization has been formally approved, this Policy shall apply to that congregation or organization.

[Various administrative steps are planned to make this process as straightforward as possible for clergy, wardens, vestries and the governing boards of other organizations.]

This Policy (or any policy adopted by a congregation or organization, once formally approved) shall be posted in any area where activities involving children and youth take place and provided to all parents and guardians as well as to all paid and unpaid persons who minister to children or youth.

C. Audit Requirements

1. Self-Audits by the Diocese

The Episcopal Church requires each diocese to conduct a *Safe Church Self-Audit* every three years to confirm its compliance with national Safe Church policies.

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

- The existence of a diocesan policy that is consistent with and/or exceeds the requirements of the national Model Policy.
- The provision of accessible and appropriate training for all those who work with children and youth including, at a minimum, topics identified in the national Model Policy.
- Verification that each congregation and/or organization within the diocese has adopted a policy that is consistent with and/or exceeds the diocesan policy.
- Verification that each congregation and/or organization has a process to ensure that its members undergo public record checks and complete the appropriate training.

2. Self-Audits by Congregations and Organizations

Each congregation and organization is also required to conduct a *Safe Church Self-Audit* annually to confirm compliance with safe church policies. It shall report satisfactory completion of this audit to the Diocese by responding appropriately to the relevant question(s) on the Audit Worksheet in the Diocese's *Parish Audit by Committee Manual*.

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

- Public records checks, application forms, records of screening and reference verification for all employees and volunteers who minister to children or youth.
- Evidence of compliance with screening and training protocols.
- Evidence of procedures for responding to concerns and incidents.
- Evidence that spaces, programs and events are being made safe and inclusive for all participants.

- Evidence of compliance with the requirement to post and publicize policies and procedures.

3. Audit Forms

The appropriate audit forms for the diocese and for congregations and organizations may be found by visiting <https://www.episcopalpgh.org/safe-church-resources/> and following the appropriate link.