

Policy for the Protection of Vulnerable Adults



Episcopal Diocese of Pittsburgh

Adopted by Diocesan Council on June 11, 2024

RELATIONSHIP OF THIS POLICY TO THE DIOCESE'S POLICY FOR THE PROTECTION OF CHILDREN AND YOUTH

Readers who come to this Policy having first encountered our Diocese's *Policy for the Protection of Children and Youth* will quickly recognize the many areas in which the two documents overlap. We strongly encourage everyone whose ministry involves vulnerable adults to read this Policy in its entirety, since they will be held responsible for following all of 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, **Vulnerable Adult** and **Residential Facility** are defined only in this Policy, for example, while **Child** and **Youth** are defined only in the *Policy for the Protection of Children and Youth*.

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, with their contact information, approved to minister to vulnerable adults and/or engage in pastoral relationships with others," the *Policy for the Protection of Children and Youth* mandates "an up-to-date list of persons approved to minister to children and youth."

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 CHILDREN AND YOUTH*

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

It recommends detailed documentation of every occasion when an individual visits a vulnerable adult, whether in a residential setting or in a facility.

It prohibits both the acceptance of gifts from vulnerable persons and any form of involvement in their plans for their estates.

It includes two sections that do not appear in the *Policy for the Protection of Children and Youth*: Visits to Private Residences and Visits to Residential Facilities.

It suggests the presence of "at least two unrelated adults" in any setting that involves vulnerable adults. [A similar requirement is required in the other Policy for situations involving young people.]

MATERIAL THAT DOES APPEAR IN THE *POLICY FOR THE PROTECTION OF CHILDREN AND YOUTH* BUT DOES NOT APPEAR IN THIS POLICY

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

The *Policy for the Protection of Children and Youth* 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.]

The *Policy for the Protection of Children and Youth* sets specific standards for the use of

electronic devices by children and youth. [Note that there is also a separate diocesan policy on the use of social media and electronic communication.]

The *Policy for the Protection of Children and Youth* sets screening and training requirements for “[anyone] with a key or electronic access to church buildings.”

The instructions provided in the *Policy for the Protection of Children and Youth* about meetings at off-site public locations (such as coffee shops) are more restrictive than those in this Policy.

The *Policy for the Protection of Children and Youth* requires that all programs and events for children and youth meet their “basic needs.”

The *Policy for the Protection of Children and Youth* addresses the need for locker room, bathroom and showering facilities adequate to ensure young people’s privacy and propriety.

The *Policy for the Protection of Children and Youth* explicitly prohibits the possession of “weapons of any kind at any event or program for children or youth.”

The *Policy for the Protection of Children and Youth* contains considerably more detailed—and, in some instances, different—provisions regarding Off-Site Programming, Overnight Programs, Transportation, and Extended Travel.

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 and youth or with vulnerable adults are always responsible for familiarizing themselves thoroughly with whichever policy/policies apply to the work they engage in.

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I. THEOLOGICAL AND ETHICAL FOUNDATIONS

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

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

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

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

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

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

Ministry involves a necessary tension between a Gospel-based integrity and a Gospel-based intimacy as modeled by the life of Christ. Rigid adherence to a system of rules leads to an unproductive legalism. Yet, without the framework of the law, the intimate relationships into which Christ calls us risk distortion and harm. All the people of God are called to minister attentively within this tension. These policies are intended to provide a pattern for 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 who engage in ministry with vulnerable adults. Its provisions apply to all such activities sponsored by the diocese itself or by any congregation, institution, organization, school, or agency in the diocese.* It broadly follows

* 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*.

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 vulnerable adults and sets standards designed to ensure that vulnerable adults and all who engage in ministry with them are treated with dignity and respect in all settings.

The purpose of this Policy is to create safe and welcoming space for all vulnerable adults 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 vulnerable adults. 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 marked 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.†

Adult Protective Services: In Pennsylvania, responsibility for providing social services to adults is divided between two state agencies.

- Services for “adults between the ages of 18 and 59 with a physical or mental disability”

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

† 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.

are handled by the Adult Protective Services Division of the Department of Human Services.

- Services for “Pennsylvanians 60 years of age and older” with or without disabilities are provided by the Department of Aging.

For contact information for both departments, see Section VIII, A.

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

***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 might 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 who, for the benefit of another, engages in ministry without responsibility for oversight of others engaged in that same ministry. Examples include Eucharistic Visitors and members of pastoral care teams.

***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 individuals to the appropriate state agency. Pennsylvania law defines this term quite narrowly in situations involving vulnerable adults, applying it only to employees and administrators of facilities who have reason to suspect that a client is the victim of abuse or neglect. However, both of the responsible State agencies (see Adult Protective Services above) stress that “[reporting] abuse is voluntary and anonymous for the general public, and the law protects all reporters from retaliation and civil or criminal liability.”

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.

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.

Program: Any official activity and program sponsored by The Episcopal Church and its provinces, dioceses, and congregations. Examples include Bible study groups, book or craft clubs, mission trips, and Altar Guild meetings. 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.

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

Responsible Person: 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.

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.

Vulnerable Adult: For the purposes of this Policy, any adult who is, at a given moment,

- infirm or diminished in capacity due to age, illness, or disability;
- being ministered to in their home by Eucharistic Visitors, Pastoral Care Visitors,

Stephen Ministers, or others* ;

- wholly or partially dependent on one or more other persons for emotional, psychological, or physical care or support (even if only temporarily, as in the case of an accident, illness, or the birth of a child); or
- by virtue of a crisis, experiencing vulnerability leading to dependency on another or lacking agency in a pastoral relationship (as in the wake of death of a family member or the loss of a job).

It is critical to understand that, while some individuals meet one or more of these criteria throughout their adult lives, the vulnerability of others may change from moment to moment based on the circumstances in which they find themselves. When the current status of an adult is unclear, they should be regarded as vulnerable.

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 vulnerable adults or an activity described in this Policy.

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

A. Public Records Checks

- The diocese, congregations and other organizations shall require all employees and all volunteers who seek to engage in ministry with vulnerable adults to complete public records checks.† These include:
 - Pennsylvania State Police Criminal History Clearance
 - Federal Bureau of Investigations (FBI) Criminal History Clearance.‡

* “A **Eucharistic Visitor** is a lay person authorized to take the Consecrated Elements in a timely manner following a Celebration of Holy Eucharist to members of the congregation who, by reason of illness or infirmity, were unable to be present at the Celebration.” [Title III, Canon 4, Sec. 7.] The term **Pastoral Care Visitor** applies more broadly to a member of a congregation who visits another member who is ill or shut-in. “**Stephen Ministers** are lay congregation members trained to provide one-to-one care to those experiencing a difficult time in life, such as grief, divorce, job loss, chronic or terminal illness, or relocation.” [See the *Stephen Ministries Web site* at <https://www.stephenministries.org/stephenministry/default.cfm/1596>.]

† 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>. The requirements laid out there for those working with children are the same ones mandated by this Policy.

Persons who (i) are applying to serve as volunteers and (ii) have also been residents of Pennsylvania during the entirety

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 may transport vulnerable adults 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 vulnerable adults 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.
- All checks must be completed and the relevant documentation submitted before an employee or volunteer first interacts with vulnerable adults.
- Whenever a check surfaces questions about an individual's suitability for ministry with vulnerable adults, 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. 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 vulnerable adults 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 vulnerable adults.* 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.

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. 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.

* An employee or volunteer who (i) already held an active role in ministry with vulnerable adults 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.

- 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 below.

V. TRAINING

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

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 vulnerable adults 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

* The Diocese's *Policy for the Protection of Children and Youth* states that professionals in more than twenty-five fields licensed by the Commonwealth of Pennsylvania who apply to work with church-sponsored programs for children and youth may request to be excused from completing some of the Praesidium training modules. Teachers, school administrators and independent contractors engaged with K-12 school districts who are subject to ACT 126 requirements may also request waivers. However, it is not clear from the State's description of the courses required for licensure that they address the protection of vulnerable adults. At this time, therefore, no waivers of Praesidium modules are available for those who intend to engage in ministry with vulnerable adults.

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 vulnerable adults receive prior training as to the scope, accountability, and responsibility of that ministry.

All people who minister to vulnerable adults 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 all participants 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 vulnerable adults and/or engage in pastoral relationships with others. This list shall include contact information for each individual and be kept in the organization's office or other place where records are kept.

It is best practice for those ministering to vulnerable adults to document their visits, recording the time and location of the visit and noting any observations or concerns. This documentation promotes continuity of care and transparency in ministry and should be reviewed periodically by the Supervisor of the ministry program. Visit <https://www.episcopalpgh.org/safe-church-resources/> and follow the appropriate link for a suitable electronic template.

Confidentiality among clergy, lay ministers and the adults to whom they minister is critical and all documentation shall be securely stored.

A. Presence of Unrelated Adults Suggested

It is best practice for trained laypersons ministering to vulnerable adults to do so with another trained adult minister present. Where this is not possible, the presence of a responsible adult who has not received formal training is acceptable. If circumstances result in a lay minister being alone with a vulnerable adult, that minister shall report the circumstances to the Bishop, Clergy in Charge, Senior Warden, Supervisor, or Responsible Person (as appropriate) at the earliest possible time.

Clergy ministering to vulnerable adults should carefully consider whether the general purpose of their visit and the nature of the likely interactions between the parties make it inappropriate to have others present in the room. Even where clergy determine that a one-on-one meeting is indicated, they shall still comply with all other requirements outlined in Section VII.

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

To create a safe space, it is necessary to anticipate and avoid circumstances that could result in the exposure of vulnerable adults to undue influence or exploitation. On-site and off-site ministry with vulnerable adults, as well as pastoral relationships and conversations, should take place in settings that both convey a sense of safety and comfort and permit casual monitoring by other persons (for example, behind doors with clear glass panels or doors that can be left ajar without compromising confidential conversation).

C. Inclusiveness

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

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

Transgender, genderqueer, or gender non-binary adults who express the need or desire for increased privacy should be provided with reasonable alternative arrangements. These may include the use of a private area, or a separate changing schedule, or use of a single-stall restroom. Such alternative arrangement should be provided in a way that protects the adult'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, sufficient showering times should be offered to guarantee the greatest comfort of everyone involved.

D. Violence

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 control or attempt to control another by intimidation, threats, verbal or emotional abuse, or isolation from others.

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.

E. Standards of Behavior for Ministry with Vulnerable Adults

All persons who work with vulnerable adults are expected to model the patterns of healthy relationships that all God's children deserve. Interactions must meet all the requirements outlined above as well as those that follow, and laypersons and ordained ministers working with vulnerable adults shall take particular care (1) not to influence unduly any person to whom they minister, and (2) to accept only token gifts from those to whom they minister. Ministers who receive gifts shall report those gifts in writing to the Bishop, Clergy in Charge, Senior Warden, Supervisor, or Responsible Person (as appropriate) at the earliest possible time.

DO's

All who minister to vulnerable adults shall:

- decline to accept loans or gifts of any kind from those to whom they minister.
- decline to be named as a beneficiary or to act as an administrator or executor in a will executed by anyone to whom they minister.
- inform the Bishop, Clergy in Charge, Senior Warden, Supervisor, or Responsible Person (as appropriate) of anything that causes them concern for the safety or wellbeing of a person to whom they minister.

All who minister to vulnerable 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, vulnerable adults, and advocate for their ministry within the Body of Christ.
- maintain healthy boundaries when sharing personal information about themselves or others.

All who minister to vulnerable adults may also offer appropriate physical expressions of care and affection, such as handshakes, pats on the forearm or shoulder, or hand-holding during prayer. However, it is best practice always to assess the willingness of the vulnerable adult before initiating physical contact of any kind and to be sensitive to any indication on their part that the contact causes discomfort or embarrassment either before or after the fact.

DON'Ts

Adults shall not under any circumstances:

- provide vulnerable adults with non-sacramental alcohol, marijuana, illegal drugs, cigarettes, e-cigarettes, vapes, or pornography;
- arrive under the influence of alcohol, illegal drugs, or misused legal drugs when they

- are responsible for, or ministering to, a vulnerable adult;
- consume non-sacramental alcohol or illegal drugs or misuse legal drugs while they are responsible for, or ministering to, a vulnerable adult;
 - engage in illegal behavior or permit others to engage in illegal behavior; or
 - engage in any sexual, romantic, illicit, or secretive relationship or conduct with any vulnerable adult.*

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

F. Visits to Private Residences

The safety of all persons and the maintenance of healthy boundaries are essential when visiting a vulnerable adult in a private home. It is important to respect a spouse, other family member or trusted friend who may be present and to ascertain, if possible, whether that person carries any legal authority to make decisions for the vulnerable adult.

Avoid situations such as the following:

- visiting behind closed bedroom doors.
- visiting a person while they are not fully clothed.
- sitting on the bed of the person being visited unless no alternative presents itself and even then only with the agreement of that person.

In general, choosing how and where to stand or sit can be challenging. It is usually best for the visitor to invite the person being visited to suggest an arrangement. Key considerations include maintaining an appropriate distance from the person being visited (neither too close nor too distant) and facilitating sustained, effort-free eye contact (ideally with the parties being at the same level).

It is best practice for laypersons ministering to vulnerable adults to visit in teams of two or more. If it is not possible for a second adult minister to be present, a member of the vulnerable adult's household should be present. If neither of these arrangements is possible, documentation of the time and duration of visit, of the general matters discussed, and of any pastoral concerns shall be provided to the Bishop, Clergy in Charge, Senior Warden, Supervisor, or Responsible Person (as appropriate) at the earliest possible time.

G. Visits to Hospitals and Residential Facilities

The safety of all persons and the maintenance of healthy boundaries are also essential when visiting a vulnerable adult in a hospital or residential facility. It is important to respect the authority of the facility's professional staff and the routine duties that they need to carry out. This may include

* Conduct prohibited 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*.

terminating the visit if a member of staff requests it.

It is best practice for those ministering to vulnerable adults to:

- inform facility staff of their presence.
- notify facility staff in advance if a visit is about to take place out of their sight and inform them when the visit is concluded.
- keep the door to a resident's private room open during the visits.
- be mindful that LGBTQIA+ residents may wish to keep their sexual identity or orientation confidential within the facility.

In the event of uncertainty about how to apply these recommendations in specific contexts, the person ministering to the vulnerable adult should contact their Supervisor with the relevant queries.

H. Off-Site Visits, Events, and Programs

Off-site programs, trips, and events represent welcome means for supporting the spiritual, social, and emotional wellbeing of vulnerable adults. 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 how its 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

Due to the unique risks of off-site visits, events, and programs—risks that cannot always be anticipated—it is important to obtain permissions and manage documentation as described below.

- Responsible Persons shall ensure that they have received a registration form and a waiver-and-release form specific to that program for each vulnerable adult before she or he participates in any program.
- There must be a signature on every release and waiver form. If a person is unable to

consent due to impairment or lack of agency, then the signature of that person's guardian, spouse, or other trusted family member is required.

- All registration and waiver-and-release forms must include a dated affirmation by the person who signs it that she or he has reviewed this Policy.*
- 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.

3. 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 vulnerable adults.
- A first aid kit, appropriately stocked for the anticipated activities and participants, shall be available in an easily accessible location.
- Only the Responsible Person or their designee may administer medications.
- Well in advance of the date of travel, the vulnerable adult (or, if appropriate, the individual who signed the registration and waiver-and-release forms for them) shall discuss with the Responsible Person suitable arrangements for receiving, storing and administering whatever prescription or over-the-counter medications, dietary supplements or herbal remedies they take routinely. This discussion should also address medications that the individual takes weekly, monthly, at some longer interval or "as needed" in case travel delays or other circumstances might make it critical to obtain and administer them.

In addition, this discussion should include sharing of information contained in the vulnerable adult's Advance Directive(s) pertaining to their physical and/or mental health if they have executed one. A copy of the vulnerable adult's Advance Directive(s) should be given to the Responsible Person. Advanced Directives provide legally binding instructions concerning the type of care and the duration of care that the vulnerable adult wishes to receive in the event of a health crisis.

- A record shall be kept of all medications and first aid given to individuals. 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

* 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.)

with respect to medical and other sensitive information provided.

I. Images and Recordings

No vulnerable adult shall be photographed or recorded on film, videotape, audiotape, or other electronic media unless she or he has previously signed and submitted a permission form for photography and/or recording that covers the specific event or activity concerned. If a person is unable to consent due to impairment or lack of agency, then the signature of that person's guardian, spouse, or other trusted family member is required.

Even if a permission form has been submitted, a vulnerable adult may at any time indicate their wish not to be recorded and any such expression shall be respected.

J. 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).
- All individuals being transported ("riders") must have given prior consent to such transportation. If a rider is unable to give consent due to impairment or lack of agency, then prior approval by that person's guardian, spouse, or other trusted family member is required.
- 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 vulnerable adults shall be maintained in the office of the diocese, congregation or organization and updated at least once a year.

K. Extended Travel

Extended travel presents amazing opportunities for participants—including vulnerable adults—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 link.

- One person should serve as the Travel Administrator who is responsible for all aspects

of the trip, including carrying all necessary documentation, contact information, and forms including (as appropriate): 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 person 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 (as appropriate) 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 should 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 one additional person to serve as back-up to the Travel Administrator and another to serve as back-up for simple first aid and the administration of prescriptions. If the number in the group is modest, 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.
- Short-term trip or supplemental insurance should be secured at least one month prior to travel. 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.
- 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 any 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.*
- Most importantly, however, plans for communication among the Travel Administrator,

* 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.

the Responsible Person, the Supervisor, and the families of all participants should be developed well in advance and communicated to all parties. These should include back-up plans for emergency situations.

L. Conference and Retreat Centers

All conference and retreat centers in the diocese shall follow the guidelines for off-site programming established in this Policy.

VIII. RESPONDING TO CONCERNS

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

1. Reporting to Government Authorities

Anyone who has reason to suspect that a vulnerable adult has been abused, neglected or exploited is strongly encouraged to contact Pennsylvania's Adult Protective Services Hotline at 1-800-490-8505. Both the Department of Human Services (for vulnerable adults under 60) and the Department of Aging (for all adults over 60) monitor calls to this number. 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 a vulnerable adult 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 a vulnerable adult 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.

B. Suspected Violations of this Policy Not Involving 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 vulnerable adult 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 immediately 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 the 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 vulnerable adults for which the diocese, congregation or organization is responsible.
- The Clergy in Charge (of a congregation).
- The Wardens (of a congregation).
- The Director or administrative head (of an organization).
- The Bishop.
- The Intake Officers.
- Pennsylvania's Adult Protective Services Hotline

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 vulnerable adults and/or pastoral counseling.
- By sending it electronically and/or in printed form to any vulnerable adult who registers for any program sponsored by the diocese, congregation or organization.
- By posting a physical copy in plain view in any location where activities involving vulnerable adults 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 Vulnerable Adults required two responses on the part of each diocese.

- Explicitly, it stated that each diocese should “adopt a Policy for the Protection of Vulnerable Adults 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 Vulnerable Adults 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 fulfilment 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 vulnerable adults take place and provided to all vulnerable adults (or to guardians or family members known to be responsible for their welfare) as well as to all paid and unpaid persons who minister to them.

C. Audit Requirements

1. Self-Audits by the Diocese

The Episcopal Church also 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 vulnerable adults 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 vulnerable adults.
- 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.