

2016 Compliance Plan



**St. Mark Catholic Church
Oro Valley, Arizona**

Compliance Plan

October 11, 2016

Memorandum to: Most Reverend Bishop Gerald F. Kicanas, Bishop of Tucson
c/o Office of Child, Adolescent and Adult Protection

Reference: Guidelines for the Prevention of and Response to Sexual Misconduct

Subject: **COMPLIANCE PLAN FOR THE PROTECTION OF
CHILDREN, ADOLESCENTS, AND VULNERABLE ADULTS**

St. Mark Catholic Church witnesses herewith to its solidarity with all the parishes of the Diocese of Tucson in the common commitment to protect the children, adolescents, and vulnerable adults of the parish community from harm.

I hereby attest that I have reviewed the St. Mark plan for Compliance and believe that is consistent with the Diocese of Tucson Code of Conduct, and Guidelines for the Prevention of and Response to Sexual Misconduct, as adopted by the parish.

I further attest that I will personally review this Plan as circumstances change, no less often than once per year. A revised Plan will be submitted no more than 13 months after the date on which this document was prepared. If there are no revisions, a dated and signed statement to that effect will be submitted in lieu of the Plan. In adherence to canonical law and in communion with the Bishop of Tucson, I also attest that all supporting information that bears on implementation of the Plan will be maintained and ready for review by the Parish Corporate Board of Directors, by the Diocese of Tucson Department of Human Resources and the Office of Child, Adolescent and Adult Protection or any other person delegated authority to review those records by the Ordinary of this Diocese.

Attested to:

Fr. John Arnold, J.C.L., J.D.
Pastor

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SECTION I - Introduction

This Plan is adopted by St. Mark, Oro Valley, AZ to meet or exceed the minimum requirements recommended by the Diocese of Tucson for an effective plan to prevent the abuse or mistreatment of children, adolescents and vulnerable adults.

Parish Contact Information:

Address 2727 W Tangerine Road, Tucson, AZ 85742
P.O. Box 68650, Tucson, AZ 85737
Phone 520-469-7835
Fax 520-219-6003
Email info@stmarkov.com

Compliance Representative:

Name Ruth Parness
Home Address 13414 N Sunset Mesa Drive, Marana, AZ 85658
Mobile Phone 520-349-6872
Alternative FAX 520-219-6003
Email childssafety@stmarkov.com

Record System

The parish will employ a tiered record system.

1. A Compliance file is maintained for each employee and volunteer. The file contains the application and materials associated with the review of that application with regard to accuracy and appropriateness for the position. It also contains the results of the criminal history background check, if required for the individual. A separate file will be maintained in a separate location to record any disciplinary actions or reports made to law enforcement, when and if necessary. The files of each employee and volunteer are considered privileged information. They are maintained in locked cabinets with access limited to the Pastor and the Compliance Officer. These files will also be made available to appropriate Diocesan personnel who are delegated by the Ordinary to audit the parish.
2. A sign-in sheet is maintained for each education session conducted by the parish. The sign-in sheet will include the name of the speaker, the subject, the duration of the program and its location. Each attendee prints his or her name and designates his or her role in the parish. If the employee or volunteer, following the educational session, signs an attestation form, it is placed in the Compliance file that is referenced above.
3. A log of education programs will be maintained. The log will be organized by date. It will include also the name of the speaker, the name of the program, and the target audience.
4. A spreadsheet will be maintained for all employees and volunteers, separately. The spreadsheets will include the name of the individual, designation of the role occupied as high or low risk (with or without independent influence over or access to minors or vulnerable adults). There are columns for critical elements of the file, name, phone,

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- email, and ministry, and critical dates, such as application date, date sent to Diocese, approval date, expiration of clearance date (including state issued cards), current year training attendance, and on-line criminal offense check verification.
5. Worksheets are rolled over each year, effective July 1 of the current calendar year. Personnel that do not attend training or have discontinued ministry are not carried forth to the current worksheet. Personnel, who no longer minister in any capacity are moved from “active files” to “inactive files” and are still kept in a secure, locked cabinet with access limited to the Pastor and Compliance Officer.
 6. Training logs, sign in sheets, and attendance forms for children and youth are all kept together in folders marked “Training – Current Year” in the Compliance Officer’s files. All attendance forms for RE and Life Teen collected at the end of the designated training sessions are given to the Compliance Officer by the R.E. Administrative Assistant and Youth Ministry Administrative Assistant. These are maintained on a school year basis.
 7. A list of students in religious education, youth group, and the like will be compiled and maintained each academic year. For Religious Education, Parish Soft attendance sheets will be generated each week and organized by class/grade level. The teacher will record the attendance each week and indicate any personal safety education that took place on that date. The Religious Education assistant will enter attendance in Parish Soft and retain the hand written attendance sheet in a separate file labeled “ Personal Safety Education R.E. Students”. Should a parent expressly refuse personal safety education for their child, they will sign a waiver. The Compliance Officer will notify the teacher of the parent’s waiver. The Youth Ministry Administrative Assistant will create a spreadsheet organized by class level of all students to include weekly attendance and the topic for each meeting. Any personal safety education that took place will be so noted on the spreadsheet. The Youth Ministry Administrative Assistant will submit a copy of this spreadsheet to the Compliance Officer at the end of the academic year.
 8. Schedule of records retention is as follows:

Document	Retention
Application	With SEP Personnel File (see below)
Attestation	Until superseded by a more recent one
Clearance Memo (Criminal History Check)	Until superseded by a more recent one
Educational Log	One audit cycle
Personnel Spreadsheet	Permanent, with a new version for each audit year
SEP Personnel File	Three years post termination/resignation
Yearly Audit Report	One audit cycle

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SECTION II - Orientation, Diocese of Tucson Code of Conduct and the Summary Statement of The Guidelines for the Response to and Prevention of Sexual Misconduct.

Each new employee or volunteer entered into ministry or service in the parish has gone through a systematic process of screening appropriate to the responsibility/risk associated with the position he or she is to occupy.

At the end of that process, if the individual is accepted for ministry or service pending successful completion of the criminal history background check, an orientation to the Safe Environment Program will be carried out.

The Orientation consists of the following elements:

- Individual is instructed in the Safe Environment Program of the Diocese of Tucson.
- Code of Conduct and the Summary of the Guidelines for the Prevention of and Response to Sexual Misconduct are presented in writing and they are elaborated in an oral presentation. The oral presentation is done in person or through the video program provided for the purpose by the Diocese.
- Mandated reporting law of the State of Arizona, adherence to which is a critical element of the Diocese, is given prominent attention.
- Employee or volunteer is asked to sign an Attestation, which is a concrete statement that he or she has understood and agrees to abide by the law of the State and the policies of the Diocese to prevent harm to minors and vulnerable adults. The Attestation is placed in the personnel file and noted as completed on the spreadsheet.
- SOP is provided to all volunteers at the time of ministry training/orientation.
- Attestation forms are required to be completed by volunteers every three years.

SECTION III – New Volunteers

A volunteer is a person who works one or more days per month on a regular basis and is a registered member of St. Mark parish.

Volunteers are categorized according to role. Roles may be classified as having high responsibility for others and, therefore, high risk (Category 1) or as having low responsibility for others and, therefore, low risk (Category 2).

The following categories of volunteers are classified as roles of high responsibility and therefore of high risk.

These categories of volunteers are classified as high responsibility/risk because they have independent access to or influence over minors or vulnerable adults. This access may be due to the specific nature of the ministry or service or because of the general prominence of the role. In addition, some roles are classified as high responsibility/risk for other reasons, including but not limited to authority to handle money, secure documents or transport others.

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High Risk

- Altar Server Trainer
- American Heritage Girls Leadership Team
- Any parishioner serving in a leadership role including officers in the Knights of Columbus and Catholic Daughters
- Bible Study/Book Study Facilitators – regardless of location
- Children’s Choir Director
- Choir Members
- Finance Council Members
- Life Teen: Youth Ministry Administrative Assistant, Life Teen Core members and all assistants over the age of 18
- Mass Coordinators
- Messengers of Christ (Eucharistic home bound ministry)
- Pastoral Council/Leadership Council Members
- Pro Life Committee Leaders
- Religious Education: R.E. Administrative Assistant, all teachers and aides over the age of 18
- Sacristans
- Staff
- Supervisors of Volunteers
- Volunteer Office Personnel

Our Diocesan policy is that volunteers driving minors to functions held off of church property must also complete an “Annual Driver Information & Consent Form”. On a yearly basis, the individual will provide a copy of their current driver’s license, current auto insurance and current vehicle registration for the vehicle to be used to the Compliance Officer.

Low Risk

- Lectors
- Eucharistic Ministers
- Hospitality
- Parish Events Committee (PEC)
- Arts & Environment
- Ushers and Greeters

Youth Volunteers

Volunteers who are minors (those younger than 18 years of age) are not exempt from screening. Screening of minors will involve the completion of the “Commitment to the Code of Conduct” form for their specific ministry; an interview, and a Safe Environment orientation with the staff director of their specific ministry or the Compliance Officer. They will also be given the All Parish Volunteer Standard Operating Procedure (SOP) as part of their training.

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Volunteer Supervisors

Larger parish events requiring additional volunteers will be monitored by level one supervisor in the ratio of ten volunteers to one level one supervisor. This does not replace any of the above requirements.

Little Tots Children Center and Parish Childcare

All compensated employees associated with parish childcare, and Little Tots Children Center must receive Level I clearance.

- All adult volunteers of parish childcare during any parish activity or event must receive Level I clearance.
- Supervisors of parish childcare may supervise volunteer parents whose children attend in a ratio of one supervisor with Level I clearance to five parents.
- Teenage volunteers (13 -17 years of age) who demonstrate maturity may assist with childcare while under the constant supervision of an adult with Level I clearance. The ratio is one Level I adult to three teens.

Process for Clearance

Volunteer Clearance Process for all Volunteers, (other than those who are one-time event volunteers who are supervised by a Level I volunteer) includes the following:

- **Application:** Complete the application form
- **Permission:** Sign the Permission to Obtain Information for reference and fact checking
- **Interview:** Go through one or more interviews at the time of orientation of SEP and service
- **Orientation to SEP:** Be oriented to the Safe Environment Program (as noted in Section II)
- **Read and Sign:** Attestation
- **Orientation and Training for Service:** Be oriented to the service or ministry to be provided
- **Level I additional procedures:** Any volunteer who is being considered for a position of Level I high responsibility/risk must also:
 - Sign the Permission to Obtain Information allowing a criminal history check and any other such checks that are determined by the parish to be relevant to the role
 - Submit fingerprints for the criminal history background check.
 - **Other clearance procedures outside the parish:** A potential volunteer may satisfy the requirement for a criminal history background check by documentation of such a check by another agency; however, he or she must also demonstrate that the check is at least as stringent as that conducted by the Diocese of Tucson.
- **Documentation:** In addition to the foregoing clearance process, the documentation of the clearance itself must include:
 - Date of clearance

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- Type of clearance (e.g., law enforcement, teacher, etc.)
- Agency conducting the criminal history background check
- Expiration date of the clearance
- **Time Period:** No volunteer, other than those to be supervised pursuant to the terms of this section, can be placed in ministry or service until the above materials have been submitted, the SEP and service orientation is concluded, and a conditional clearance, in the case of Level I volunteer, is received from the Department of Human Resources of the Diocese of Tucson, a service provided to the Parish by the Diocese of Tucson.
- **Sex Offender Screening:** All volunteers, including those in Category 2, will be screened via a check of the relevant sex-offenders' lists. The screening will be done and documented by the Compliance Officer or their delegate. Verification will be located on the annual spreadsheet in a column marked "Verification." The following website will be used for this criminal check:
 - http://www.azdps.gov/Services/Sex_Offender/.
 - For persons who have lived elsewhere, you may conduct a national check at <http://www.nsopr.gov>. This check does not replace the criminal history check required for all employees and category I volunteers.
- The Compliance Officer will not obtain clearance or maintain Compliance records on parishioners not volunteering at St. Mark.

SECTION IV – New Employees

All employees, whether full or part time, are required to go through the following process:

- Complete the application form
 - Complete the Permission to Obtain Information form (to allow reference checking, fact checking, the criminal history background check and any other such checks that are determined by the parish to be relevant to the role)
 - Go through one or more interviews
 - Submit fingerprints for the criminal history check
 - Be oriented to the Safe Environment Program (as noted in Section II)
 - Sign the Attestation
 - Be oriented to the ministry or service to be provided
1. The Diocese of Tucson policy adopted by the Parish states that all employees, regardless of the apparent level of responsibility or risk, must go through the criminal history background check prior to employment.
 2. In addition, all other aspects of the screening and orientation process are handled as for the highest level of responsibility among volunteers. In addition, the documentation of the clearance itself must include:
 - a. Date of clearance
 - b. Type of clearance (e.g., law enforcement, teacher, etc.)
 - c. Agency conducting the criminal history background check
 - d. Expiration date of the clearance

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3. All new employees will be screened via a check of the relevant sex-offenders' lists. The screening will be done and documented by the Compliance Officer. Verification will be located on the annual spreadsheet in a column marked "Verification." The following website will be used for this criminal check:
 - a. http://www.azdps.gov/Services/Sex_Offender/.
 - b. For persons who have lived elsewhere, you may conduct a national check at <http://www.nsopr.gov>. This check does not replace the criminal history check required for all employees.

Teen Employees

All Teen employees must be 16-17 years of age and are required to go through the following process:

- Complete the application form
- Submit a resume
- Go through one or more interviews
- Attend an age appropriate orientation with the Compliance Officer. Teen Code of Conduct will be distributed and discussed.

SECTION V- Other Employment and Volunteer Situations

Rejection of Volunteers: Those applicants for employment that have been rejected will be sent the proper applicant rejection letter by the parish hiring authority in accordance with the current employment process.

Independent Contractors: Agencies with which the parish contracts for recurring services, such as maintenance, are required to demonstrate that they have risk mitigation strategies that meet the diocesan standard.

1. The contract with such agencies should include a statement that requires disclosure of the agency's policy to reduce risk of one of their personnel abusing a minor or vulnerable adult.
2. The policy and associated procedures will ordinarily be some combination of screening, education and supervision.
3. Individuals or firms engaged to perform intermittent or time limited services on an irregular basis will be actively supervised during the time they are on the grounds. At no time will they be allowed to be around children, youth or vulnerable adults without this supervision.

Volunteers on an irregular basis: Volunteers engaged to serve on an irregular basis will be adequately prepared as to the procedures of the parish to mitigate risk during the activity in which they are involved and will be actively supervised during the time of their service.

1. Volunteers who are engaged on an intermittent but irregular basis include those engaged for periodic, large-scale activities associated with fiestas or seasonal liturgies.
2. It is not feasible to screen all such persons.
3. These persons are under direct supervision of the appropriate persons who have been screened and educated to be on site supervisors, circulation of written policies

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regarding prudent behavior, and education regarding the implementation of those policies for all who will be engaged at whatever level.

4. Examples of time - limited services include repair and remodeling contractors engaged by the parish, Vacation Bible School parents and volunteers, seasonal musicians for Easter and Christmas.

Visiting Presenter Requirements: In order to maintain our commitment to provide safe environments for the people we serve and to ensure the authentic Catholic teachings and traditions are respected, all leaders of organizations must adhere to the Diocesan and parish policies with regard to guest presenters.

The Pastor must approve all clergy, religious, lay presenters, (individuals, performers, musicians, group retreat leaders, etc.) before they are invited to present to members of the parish.

A priest or deacon who comes to this Diocese and ministers in any way, which includes baptisms, weddings, retreats, parish missions and such; must be cleared through the Chancellor's office prior to any of these events. The same is true for lay ministers coming to conduct prayer meetings, youth ministry, retreats, missions, healing services etc. It is preferable to notify the Chancellor's office 60 days prior to the planned event to allow enough time for the proper clearance procedures to be performed.

- Prior to extending an invitation to a priest, deacon or even a lay minister, contact the Chancellor's office to see if the person or persons in question are already in the database and if they have been or are presently in good standing. (If yes, no further action is required; if no, go on to next step)
- Notify the Chancellor's office of the event by completing the "Compliance Clearance Form" available on the Diocesan website.
- For a priest or deacon, a letter of good standing must be sent directly to the Chancellor's office from their Chancellor's office or provincial on their letterhead – a fax copy may be sent, but the original document must also be sent to the Chancellor's office. When making contact with the particular priest or deacon, this letter must be requested.
- For lay ministers, a letter of good standing from their parish Pastor must be forwarded to the Chancellor's Office.
- Upon processing, the information is then placed in the Diocesan database and is accepted as a one year clearance from the date of the original document.
- All copies of clearance documents issued by the Chancellor's Office will be maintained by the Compliance Officer.

SECTION VI- Renewal of Criminal History Background Checks

Each employee and each volunteer required to undergo a criminal history background check must have that background check renewed. In case of persons checked through the Diocese, the renewal occurs after five years. In the case of persons cleared by virtue of a check done by an approved agency, the renewal occurs upon expiration of the clearance card.

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The Compliance Officer will maintain [or oversee the maintenance of] a record-keeping system by which affected employees and volunteers can be notified at the beginning of the year in which their criminal history background check must be renewed.

Each affected employee and volunteer will be notified at the beginning of the year in which he or she must renew the criminal history background check. Since all reporting will be done at the end of the academic year, St. Mark's will conform the notice (and the deadline by which renewal must be accomplished) to the academic year. Beginning in August, a review of the "Active Worksheet" will take place to discern which employees and volunteers need a renewal of the Criminal Background check. A letter, accompanied by the necessary forms will be sent to employee/volunteer informing them that the check needs to be done and a deadline date for submission. For those who have been previously screened and whose clearance is expiring, the following submission is required:

- A new "Permission to Obtain Information" form.
- A completed "Criminal History Check Renewal Transmittal" form

Documentation should be sent three months prior to expiration date to avoid suspension from ministry. After completion of re-screening via the electronic process, a comparison will be made between the original and the new results. If any changes of significance are noted, the individual may then be asked to undergo a complete screening, including a new fingerprint check.

If the employee or volunteer seeks to demonstrate an up-to-date criminal history background check by virtue of documentation of such a check by another agency, he or she must also demonstrate that the check is at least as stringent as that conducted by the Diocese of Tucson.

In addition, the documentation of the clearance itself must include:

- Date of clearance
- Type of clearance (e.g., law enforcement, teacher, etc.)
- Agency conducting the criminal history background check
- Expiration date of the clearance

Documentation that a check of sex offender lists was conducted and will be recorded by the Compliance Officer on the volunteer worksheet.

Failure to submit the necessary material for this renewal within 30 days of current expiration date will result in automatic suspension until the material is submitted.

In the case of employees or volunteers whose criminal history check is conducted and verified by another agency, the year in which their clearance card expires should be entered in the database or reminder system. Their new clearance card will be copied for parish records and a copy forwarded to the Diocese.

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SECTION VII- Response to Signs of Sexual Abuse

1. Any cleric, consecrated religious, employee or volunteer of the parish is expected to report reasonable suspicion of abuse of any minor, consistent with the mandatory reporting law of the State of Arizona.
2. The dual reporting protocol is recommended, in which reports are made both to local law enforcement (by calling 9-1-1) and to Child Protective Services (888-SOS-CHILD or 888-767-2445). The latter call is especially important if a parent, guardian or other family member is the suspected perpetrator of abuse.
3. It is also mandatory to make a report of reasonable suspicion of abuse, exploitation or neglect of an elder or an adult considered under the law to be vulnerable. Call Adult Protective Services (877-SOS-ADULT or 877-767-2385). In case of emergency, call law enforcement (9-1-1).
4. The person making the report should write out a succinct summary of what gave rise to the concern and when/to whom the report was made.
5. The person making the report should inform the Pastor and the Compliance Officer, who should also keep a record of the report and of follow up actions taken at the direction of these agencies or otherwise.
6. After a report is made, the Office of Child, Adolescent and Adult Protection (OCAAP) of the Diocese of Tucson must be notified (520-792-3410, ext. 1013) and supplied with a copy of the summary/log created.
7. Suspected abuse of a minor or vulnerable adult or any other criminal behavior is not the only situation in which action is expected. Any suspected or observed
 - a. violation of the norms of appropriate or prudent conduct,
 - b. with minors, vulnerable adults or any adult with whom a cleric, religious, employee or volunteer is in a ministerial relationship,
 - c. as established in the Code of Conduct and/or the Guidelines for the Prevention of and Response to Sexual Misconduct,
 - d. should be reported to the Pastor and/or the Compliance Representative.
8. If an adult reports sexual misconduct when he or she was a minor by a priest, deacon, or any worker in the church, no matter how long ago it is reported to have occurred, a report will be made to the OCAAP, which will make a report to the Pima County Attorney's Office.
9. The person making such a report should be encouraged to report it independently to the Pima County Attorney's Office or to local law enforcement. If the individual would like to have counseling assistance, he or she should be instructed to call the Victim Assistance Program (800-234-0344).
10. An adult making any other kind of report of sexual abuse as a minor should be encouraged to make an independent report to law enforcement.
11. All such complaints will be investigated internally and reported to the Department of Human Resources and/or the Office of Child, Adolescent and Adult Protection of the Diocese of Tucson. This aspect of the policy includes any inappropriate behavior, dress, attitude, language, or improper use of the computer.
12. The purpose of a report is not to summarily judge the person suspected of inappropriate conduct; it is to initiate an internal investigation that will make clear what actually happened.

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Therefore, as much as possible, confidentiality (beyond those with a genuine “need to know”) with respect to the person accused should be maintained.

13. In addition, as much as possible, the identity of the person making the allegation should be protected; however, in the course of many investigations it is necessary to directly or indirectly reveal the identity of the person making the report in order to allow the accused to make a response.
14. The results of the investigation will either clear the individual against whom the allegation has been made or point to what type of corrective action must be undertaken to prevent harm to those served, to the individual accused and to the parish.
15. It is a difficult thing to make a report. For that reason, it is important to be clear that any person making a good faith report will not be subject to any adverse consequences. No retaliatory action of any kind should be tolerated.

SECTION VIII – Supervision

St. Mark's has written “standard operating procedures” (SOPs) for specific areas of ministry and service involving minors or vulnerable adults as directed in this plan. SOPs are the rules for handling one's self in the situations typical of a particular ministry. They reflect the most prudent manner of behaving in such situations. Prudence in ministry or service acknowledges the importance of the mission but asserts that the mission can be accomplished without exposing the one being served, the one serving or the parish to undue risk of harm.

Each employee and volunteer is expected to know and adhere to the SOP applicable to his or her ministry or service. Failure to adhere to SOP will be cause for review and possible disciplinary action, up to removal from the ministry or service in question. Handouts are copied and distributed at the volunteer ministry orientation.

Supervision of ongoing activities is the responsibility of every level of leadership in the parish. It is accomplished in part by direct observation.

1. Persons with a history of sexual misconduct with a minor cannot be employed or engaged in service or ministry as volunteer.
2. An employee or volunteer should not be alone with a minor other than his or her own children. If the situation is unavoidable due to emergency or unavoidable conditions, the employee or volunteer should call another person on the team to seek assistance and/or to document the occurrence at the time it is happening.
3. Any outing with youth should include an adequate number of adult chaperones who have undergone the screening process and an SOP for them to follow. This rule is especially important when an overnight stay is included.
4. Minors in volunteer service are not immune from the need to follow rules of prudent behavior. Minors can offend other minors and are also vulnerable to false allegations.
5. Minors being served should be given clear rules for behavior during any class or group, especially if this includes an outing of any type.
6. An employee or volunteer should avoid meeting with anyone he or she is serving in isolated circumstances or at odd hours. Visits to the home of a person being served

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- or visits by the person being served to the home of the employee or volunteer are high risk events and it is recommended that two people exercise this ministry if practical.
7. Behavior that singles out any one person among those served may signal increased risk and certainly invites misinterpretation.
 8. The more responsible the role of the employee or volunteer, the more risk is associated with the role. Such an employee or volunteer must learn to carry himself or herself as a public figure within the parish community.
 9. Dress appropriate to the role is an important aspect of carrying one's self as a public figure.
 10. Appropriate speech is equally important in maintaining one's self as a person who is in service to others.
 11. Touch must be done with discretion and with respect for the comfort of the person being touched. Touch that might reasonably be construed as romantic or sexual is never appropriate.
 12. Prudent behavior includes interpersonal boundaries. Maintaining healthy interpersonal boundaries requires sensitivity to the reactions of others and awareness of one's self. Ongoing education to enhance interpersonal sensitivity is critical for any employee or volunteer in a role of high responsibility and risk.
 13. Accountability is not the enemy of privacy, but of secrecy. Secrecy is the breeding ground for abuse. Accountability includes being "visible" with respect to what, when, where and how a ministry or service is being provided. Any employee or volunteer is expected to be accountable regarding his or her activities.

SECTION IX- Computing Policy

Any use of computing facilities of the parish for unlawful action will, when discovered, be reported to law enforcement. The parish will fully cooperate with authorities to provide any information necessary.

All computing facilities of the parish are subject to unannounced audits and will be audited whenever there is a change in the regular user of a particular computer.

Any individual user of parish computing facilities is expected to establish password protected access to his or her computer or, in the case of a shared computer, a password protected individual user profile.

INSTRUCTION

It is necessary to insure that each cleric, consecrated religious, employee or volunteer who uses parish computing facilities understands the dangers and consequences of its misuse or abuse. It should be clear that any violation of parish policy with respect to computing facilities will result in disciplinary action, up to and including immediate termination.

It is important that employees and volunteers be periodically reminded of the computing policy and procedures in the current personnel guidelines and that the policy be enforced consistently.

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It is advisable to initiate an audit of parish computers for evidence of illicit use on a regular basis and whenever there is change in the regular user of a machine.

If the parish operates an internal network, it is advisable to maintain software to detect and inhibit illicit use of computing facilities.

It is advisable to use a password to protect access to computers. In the case of shared computers, it is advisable to establish individual user profiles with separate passwords for access.

SECTION X – Education Plan

All employees and volunteers will participate in education regarding the Safe Environment Program at least once every three years.

More frequent education for high-responsibility volunteers will be provided in the context of their ongoing education program. This education will include information regarding any changes in Diocesan policy or the mandatory reporting law of the State of Arizona, interpersonal boundaries, recognizing dangerous situations, and responding appropriately to reduce risk or stop abuse. There will also be opportunity to discuss particular cases, brought out as examples by individual employees or volunteers or by parish leadership that will bring out nuances and difficulties in recognizing potential abuse and/or making a report.

Low responsibility volunteers will undergo the orientation and education as provided to high responsibility volunteers; however a criminal history check is not done. In addition, the orientation should be that once the individual moves into another position involving contact with or influence over minors or vulnerable adults in any way makes that person a high risk volunteer.

Each employee and volunteer will sign an Attestation/ Affirmation at the end of the educational session. The Attestation will be placed in the personnel file and noted on the spreadsheet.

Any employee or volunteer who has not completed and documented the re-educational requirement by the end of three years will be suspended from active ministry or service until it is completed.

Children and youth will, in the course of their religious education or other group activity, be offered annual education in personal safety. This education will be carried out using the Personal Safety Curriculum for Children and Youth of the Diocese of Tucson or other approved program such as: Veritas, nsteens.org, kidsmartz, and netsmartz. The goal is to reach at least 90% of the children and youth who attend a minimum of 80% of the classes offered, excepting those whose parents refused such education on their behalf, with personal safety education.

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Parents will be given the right of refusal of this education for their children. Refusal forms, completed by the parents or by the person to whom the refusal was given orally, will be maintained at the parish. Those parents who refuse such education for their children will be given educational material with which to educate their own children.

On the first day of VBS each summer, Safe Environment Training will be provided for all children in attendance.

Parents and Grandparents as well as all other adults in the parish community will be offered education in how to maintain a safe environment for their children, how to respond to reports of abuse and what are the policies of the Diocese of Tucson as adopted by the Parish with respect to maintaining a safe environment for children and youth. This education may be offered in the form of particular programs, in the form of homilies or special announcements, as bulletin inserts or in the course of other parish events. The goal ultimately is to enhance awareness of all in the parish community regarding safety issues for children, youth and vulnerable adults in the parish and in the larger civic community and to encourage participation in parish and civic efforts to prevent harm.

Documentation of all educational sessions will be maintained at the parish in the form of the educational log, log of planned sessions, sign-in sheets, class lists, spreadsheet and personnel files.

INSTRUCTION

- 1) The educational program for employees and volunteers builds on the basic educational program that is provided to all new employees and volunteers.
 - a) All employees and volunteers are expected to participate in an educational update at least once in three years that bears on some aspect of the Safe Environment Program.
 - b) For low risk volunteers and for employees without direct contact with minors or vulnerable adults (broadly defined), the educational program may focus on the mandated reporting law, experience with the law during the last year, the Code and Guidelines, and recent developments regarding the parish plan for Compliance and the diocesan safe environment program.
 - c) For volunteers and employees with a higher level of responsibility and risk vis-à-vis minors or vulnerable adults (broadly defined), the educational program should be more advanced and embedded in the context of an ongoing education program. Safe Environment Education for high-responsibility volunteers and employees should include maintaining healthy boundaries, recognizing signs of abuse in those who may have been harmed and danger signs in those who may be abusers, intervening to stop potential abuse, and supervising effectively to mitigate risk of abuse or false allegations of abuse. For such programs, it is useful to invite local law enforcement and social service professionals to address the group. If the presentations are taped, they form a library for use with personnel who were not present.
 - d) Following each educational program, the employee or volunteer should sign an Affirmation, which should then be placed in the file of the individual.

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- 2) Clerics document their education with the Office of Child, Adolescent and Adult Protection (OCAAP). Education obtained at the parish will serve to satisfy the education requirement if a counter-signed copy of the Affirmation is sent to OCAAP.
- 3) Education of children and youth is an annual requirement.
 - a) This education need not be complicated. Its focus is to encourage children and youth to recognize abuse or other inappropriate actions of another person and to tell a trusted adult so that the situation can be reported and dealt with.
 - b) The Personal Safety Curriculum for Children and Youth of the Diocese of Tucson is a flexible instrument for implementing such education. The use of repetitions after the primary class is a helpful way to reach more of the students since, on any given day, there will be students missing from class.
 - c) Other types of risk to student well-being, such as social media, should not be neglected, especially for older students. Nor should the program neglect the responsibility of older children with good personal resources to notice distress in other minors and make a report to law enforcement or a trusted adult in the family or parish.
- 4) Parent communication regarding the education of their children in personal safety is an important part of a successful education program.
 - a) In communicating with parents about this education, it should be clear that this is not sex education, nor is the focus solely on sexual abuse. The focus includes physical abuse, emotional abuse and neglect. The focus includes misconduct that may be initiated by a worker in the church, but it includes any misconduct by any person in any setting. It includes risk that accrues from the behavior of another minor and risk that may be attendant on use of the internet.
 - b) The parent has the right to refuse to have the child participate in safety education, but this refusal should be clear and in writing.
 - c) Parents that have refused to allow their child(ren) to participate in personal safety education should be documented. This documentation may be a refusal form signed by the parent(s) or by a notation if the parent(s) will not sign or simply did not send the child to the class. Note all efforts to educate these parents as to how they might educate their children and maintain a safe environment in the home.
- 5) Some examples of optimal practice include the following.
 - a) Education that is integrated into regular class time is preferable to scheduling safety education at other times.
 - b) Education that is integrated into the regular curriculum is preferable to a class that appears to be unrelated to the overall teaching of the Faith, especially as it addresses respect for self and others.
 - c) Education that integrates agencies (e.g., police or sheriff's department) in the local community into the planning or delivery of the programs builds connections with those agencies for the common good. Such connections build trust, which will be invaluable if there is an emergency of any type.
 - d) The use of repetitions at teachable moments supplements the learning provided in the primary personal safety class.
- 6) Education of parents is a valuable undertaking. It should be undertaken in a manner that best fits the parish.
 - a) Parents benefit from education in maintaining a safe environment in the home.
 - b) Elements of a safe environment include the following.

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- i) Children are safer when they feel free to speak with their parents about what might be troubling them.
 - ii) Children are more likely to speak with their parents if they are confident that the parent will maintain a balanced response, comforting the child without jumping to conclusions.
 - iii) Parents need to know how to make a report and why the parish might have to make a report, even one that affects a particular parent.
 - iv) Parents benefit from information that makes them more aware of behavior that suggests an adult may be pursuing their child and that increases their knowledge of internet dangers.
- c) It is often valuable to offer parent education sessions in collaboration with local law enforcement or other agencies involved in child welfare.
- 7) Education of adults in the parish at large is beneficial.
- a) Many adults who do not have children or youth in parish programs will have children and youth in the extended family. If they are aware of the risks that children and youth face, they are more likely to be alert to particular problems that these children and youth face.
 - b) Many adults will have elders or other vulnerable adults in the immediate or extended family. If they are aware of the risks that elders or other vulnerable adults face, they are more likely to be alert to particular problems that might arise in their own families.
 - c) Many adults will have had negative ideas from secular media regarding the church with respect to sexual abuse. They will benefit from learning about their parish's efforts to prevent harm and to respond effectively should there be reason to suspect abuse or maltreatment.
 - d) All adults, as citizens of their civic communities, have a responsibility for the welfare of children, youth and vulnerable adults. When they are made aware of the risks and the civic organizations created to prevent or respond to maltreatment, they are better able to respond to urgent situations and to support the civic effort to prevent harm.
- 8) Useful educational materials are available from the Compliance Officer Toolbox (www.Diocesetucson.org/cot.php).
- 9) Parishes experiencing difficulty implementing an effective educational plan at any level should call OCAAP as early as possible in the academic/fiscal year.

SECTION XI – Audits

The parish will make a report annually to the Diocese in the month of July. The report will include information necessary to document the implementation of the education and screening components of the prevention plan.

Additional information may be requested by the relevant diocesan offices, as necessary to meet the expectations of the audits sponsored by the USCCB.

The parish will maintain records as outlined in Section I and referenced throughout the plan. These records will be available to persons delegated by the Ordinary to audit on-site the performance of the parish with respect to the Safe Environment Program.

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Reports bearing on implementation of the Compliance plan will be requested in the month of July, referencing the preceding academic year.

- Total number of employees
- Total number of employees classified as having independent access to or influence over minors or vulnerable adults
- Total number of volunteers
- Total number of volunteers classified as having independent access to or influence over minors or vulnerable adults
- Total number of volunteers who are required in the parish plan to have an up-to-date criminal history background check (This may be less than the total number of volunteers but cannot be less than the total number of volunteers classified as having independent access to or influence over minors or vulnerable adults.)
- The total number of children and youth in religious education, youth groups or other formation program
- The number of employees whose criminal history background check is up-to-date
- The number of employees who have received in the last academic year their basic safe environment program education or an update to the basic education
- The number of volunteers (of those subject to criminal history background checks in your plan) whose criminal history background check is up-to-date
- The number of volunteers (of the total number of volunteers) who have received in the last academic year their basic safe environment program education or an update to the basic education
- The number of children and youth who in the last academic year have received personal safety education bearing on prevention of abuse or other maltreatment
- The number of parents who in the last academic year have received education in how to maintain a safe environment for their children

It is expected that by July 1, all employees and volunteers will be current with respect to their obligations under the parish plan for Compliance or that they will be placed on inactive status as of July 1 until they have satisfied those obligations.

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Table Changes from the St. Mark 2015 plan to the Diocesan 2016 plan:

Section III / pg 5 Added: Volunteers must be registered in the parish.

Section III / pg 6 Added: American Heritage Girls Leaders, Pro Life Committee Leaders, Sacristans, and “Any parishioner serving in a leadership role including officers in the Knights of Columbus and the Catholic Daughters” to the High Risk volunteer list. Deleted: Sacristan from the Low Risk volunteer list and Life Teen Choir Director from the High Risk volunteer list.

Section III / pg 6 Added: Our Diocesan policy is volunteers driving minors to functions held off of church property must also complete an “Annual Driver Information & Consent Form”. On a yearly basis, the individual will provide a copy of their current driver’s license, current auto insurance and current vehicle registration for the vehicle to be used.

Section III / pg 7 Added: Volunteers who are minors (those younger than 18 years of age) are not exempt from screening. Screening of minors will involve the completion of the “Commitment to the Code of Conduct” form for their specific ministry; an interview, and a Safe Environment orientation with the staff director of their specific ministry or the Compliance Officer. They will also be given the Standard Operating Procedure (SOP) for their specific ministry as part of their training.

Section III / pg 7 Changed: All supervisors of parish childcare during any parish activity or event must receive Level I clearance to: All adult volunteers...

Section III / pg 7 Redefined age adolescents may help with childcare from 14 to 13 and added “who demonstrate maturity”.

Section III / pg 8 Added: The Compliance Officer will not obtain clearance nor maintain Compliance records on parishioners not volunteering at St. Mark.

Section IV / pg 9 Added: **Teen Employees**

All Teen employees must be 16-17 years of age and are required to go through the following process:

- Complete the application form
- Submit a resume
- Go through one or more interviews
- Attend an age appropriate orientation with the Compliance Officer. Teen Code of Conduct will be distributed and discussed.

Section V / pg 10 Added: **Visiting Presenter Requirements:**

Section X / pg 15 Added: The goal is to reach at least 90% of the children and youth who attend a minimum of 80% of the classes offered,

Section X / pg 16 Added: On the first day of VBS each summer, Safe Environment Training will be provided for all children in attendance.