Diocese of Austin

Ethics and Integrity in Ministry 101

An EIM procedures manual for
PASTORS

** to be used in conjunction with the Diocese of Austin *Policies on Ethics and Integrity in Ministry*

2020

Welcome!

"Let the children come to me" (Mt 19:14). As Jesus' disciples, we are called to continue his invitation to our young people to be part of our community. The Diocese of Austin's Ethics and Integrity in Ministry program is intended to help our parish and Catholic school staff and volunteers provide a welcoming and safe environment for our children and others who might be vulnerable to those who wish to cause harm.

This manual explains the tasks required of specific parish and school staff members in order to be in compliance with the Diocese of Austin *Policies on Ethics and Integrity in Ministry*, as well as the USCCB *Charter for the Protection of Children and Young People*.

Much of this information is also available on our diocesan website, www.austindiocese.org; follow the link for Ethics and Integrity in Ministry. Please use this as a resource in your effort to support all who serve our children, youth and vulnerable adults. Contact the EIM Office at (512) 949-2447 if you have any questions or if you need assistance.

May God continue to bless you as you serve his people in so many ways.

> Emily C Hurlimann, LCSW
> Associate Director, Office of Ethics and Integrity in Ministry
> emily-hurlimann@austindiocese.org   512-949-2447

Table of Contents

EIM terminology and information

EIM: Ethics and Integrity in Ministry (the "safe environment" program of the Diocese of Austin).

EIM site administrator: The individual designated by the pastor at a parish (or principal at a Catholic school) to manage EIM compliance at the site.

EIM compliant: An individual or site (parish, Catholic school or diocesan agency) that has completed all EIM requirements and has made a commitment to follow the EIM policies of the Diocese of Austin. EIM compliance is required of all persons who serve in any ministry, program or organization that serves youth or vulnerable adults in any manner, or which functions at a time and place where minors or vulnerable adults are typically present.

EIM requirements for individuals: Complete an Application for Ministry (which initiates a background check), attend an EIM workshop every three years and sign (electronically) a Code of Ethics form, agreeing to support and abide by the EIM policies of the Diocese of Austin.

EIM requirements for parishes or schools: Verify the EIM compliance of employees and those volunteers in service to minors or vulnerable adults. Assist with individual compliance questions. Suspend from ministry those who are not compliant until they have taken corrective steps. Schedule annual *Called to Protect for Youth* workshops for sixth and ninth grade students and the *Called to Protect for Children* curriculum to educate Kindergarten through fifth grade students about age appropriate personal safety information; parishes and schools must schedule and promote the *Called to Protect* programs each school year.

Application for Ministry: MUST BE SUBMITTED prior to serving in any ministry which requires EIM compliance, the application gathers particular information about any individual who wishes to serve in any ministry requiring EIM compliance. Submission of the form can be done online (most timely and secure) or using a paper application, and grants permission to the Diocese of Austin to conduct a criminal records check.

eAppsDB: The online electronic application and database system used by the Diocese of Austin for the Ethics and Integrity in Ministry program.

EIM Workshop: On August 1, 2016, the diocese began using a new education program which replaced our previous Basic/Refresher workshop format. The workshop uses a video, titled *Fulfilling Our Commitment to Heal and Protect*, as well as discussions, to explain the experience of sexual abuse of minors and to teach the skills of prevention and response. In addition, our diocesan EIM policies are reviewed throughout the program and participants receive printed material to take home for reference and further information. EIM Workshop attendance is required every three years.

Called to Protect for Youth (**CTPY**): A three- to four-hour safety education and abuse prevention workshop for middle and high school students. The Diocese of Austin requires every parish and Catholic school to schedule CTPY workshop(s) each year for their sixth grade and ninth grade students. Students who missed the program the previous year should also be included.

Called to Protect for Children (**CTPC**): A safety education and abuse prevention program for Kindergarten through fifth grade students. CTPC is required to be taught annually by the religious education teacher using the CTPC curriculum and activity pages. Students in each grade complete three simple, developmentally appropriate lessons each year; the topics build sequentially each school year.

Site: The general term used for a parish, Catholic school or diocesan agency.

The purpose of this manual

This EIM procedures manual was created to assist those that work in parish, Catholic school and diocesan agency ministries in the Diocese of Austin in understanding and complying with the EIM policies of the diocese. By providing guidelines on "how to 'do' EIM" at each site, each person responsible for ensuring compliance should feel more confident in understanding their role and be able to complete their required EIM tasks. Additionally, we hope that having this information in a manual format will assist during times of transition so that 'new folks' will know what their responsibilities are vis-à-vis EIM policies and procedures. Regarding format, each primary site leader has a version of this document devoted to their particular EIM responsibilities. However, as the bulk of EIM compliance tasks are performed by the EIM site administrator, many details are more fully specified in the EIM site administrator version.

EIM and confidentiality

*This specific section on confidentiality should be read by **all members** of the parish staff responsible for any aspect of the EIM program.*

We are called, as members of and workers in the vineyard of the Lord, to serve one another with justice and love. However, the very fact that we have to have an Office of Ethics and Integrity in Ministry reminds us that some have abused the trust placed in them and that we must always strive to live as God calls us to.

The EIM Office is responsible for receiving and evaluating a great deal of information, and we are humbled by the trust placed in us to do so in a confidential and ethical manner. Over the years we have established and refined procedures so that EIM compliance requirements are not only as "user friendly" as possible, but also that the information provided is securely received, processed, evaluated and maintained. It is important that those of us entrusted to safeguard the information we receive treat it as we would want our own information treated.

At the site level we ask that the pastor or principal approve the individual(s) responsible for accessing sensitive EIM-related information and to help ensure that these persons understand the responsibility of confidentiality that they have in their position. Thus, at each parish or school there is at least one person assigned a User ID and Password to access the EIM database as the administrator. Only information needed to assist in verifying EIM compliance is accessible to those individuals assigned a User ID/Password. This information is to be used solely to verify EIM compliance and may not be discussed with anyone, other than the pastor/principal, for any other purpose. NOTE: the pastor or principal is the only person at the site who will receive specific information from the diocesan EIM Coordinator about an individual regarding any issue pertaining to a background check or decision about compliance, and he or she may not discuss these specifics with any other person.

Following these guidelines, we will work together to achieve our Bishop's mandate that all who serve in any kind of ministry do so with great integrity and with the highest ethical standards. Thank you for your commitment to help keep all children safe from preventable harm and to support our diocesan policies concerning ethics and integrity in ministry.

Charter for the Protection of Children and Young People

The charter was created by the USCCB in 2002 in response to the numerous and serious allegations made by many victims of sexual abuse by clergy over many years and was revised most recently in 2018 to re-affirm the bishops' commitment to creating a safe environment within the church for children and young people. This was a challenging time for the bishops and priests, but throughout the process of developing the charter they emphasized their commitment to the protection of children, which must also be the work of all God's people.

The first articles of the charter address the needs of victims: outreach, healing and reconciling, and procedural requirements for each diocese related to responding to an allegation of abuse. The next articles address effective response to allegations: reporting allegations to civil authorities, removing clergy (temporarily or permanently) as warranted, establishing clear and well-publicized policies regarding boundaries, and communicating about allegations in a timely and transparent manner. The next four articles specify requirements for accountability to ensure the church is doing what it says it is doing. The final articles address issues of collaboration with various entities to help prevent harm from coming to children in the future.

Articles 12 and 13 most immediately affect the lay faithful, and the workings of our local church, because they address the training and background check requirements. These are the foundation for most of the policies and procedures that have been developed in our diocese since 2002. Please go to **http://www.usccb.org/ocyp/charter.pdf** to read the full text of the charter.

The Charter concludes with this message from the bishops:

Let there be no doubt
or confusion on anyone's part:
For us, your bishops, our obligation to
protect children and young people and
to prevent sexual abuse flows
from the mission and example
given to us by Jesus Christ himself,
in whose name we serve.

Since the charter was established, part of the accountability has been the completion of an audit every year by each diocese in the U. S. The audit is conducted by an outside firm and uses a standard audit instrument to ensure uniform information collection throughout the country. Within the diocese each parish and school completes an annual EIM Self Audit to help evaluate strengths and challenges.

Ethics and Integrity in Ministry for parishes and Catholic schools

The parish pastor or Catholic school principal is ultimately responsible for the compliance of the parish or school with all Ethics and Integrity and Ministry policies. A pastor or principal that is supportive of the EIM program emphasizes to all members – clergy, educators and lay paid and volunteer persons – the importance of working together to ensure the safety of all youth and vulnerable individuals in the parish or school community. He or she sets an expectation of high standards of ethical and moral conduct for all parishioners, or members of the school community, and that the integrity of those who lead and serve should be above reproach.

The pastor or principal typically designates a trusted, responsible member of their staff to implement the day-to-day tasks of EIM compliance. This person is called the EIM site administrator. But these are not the only individuals responsible for ensuring EIM compliance at a site. Additional partners in the EIM program are the director or coordinator of the religious education program and the youth minister at the parish, and perhaps the vice principal or religion coordinator at the school. The pastor or principal may also designate additional persons to assist with implementing the EIM program. Finally, the diocesan EIM Office is a valuable resource and is available to assist in implementation of EIM policies and procedures.

EIM compliance requirements for all clergy, paid staff and volunteers

Instated on Jan. 1, 2002, and revised in September 2018, Section 4 of Diocese of Austin Policies on Ethics and Integrity in Ministry require the following adult individuals to maintain EIM compliance: clergy; seminarians and deacon aspirants and candidates; religious brothers and sisters; employees of any parish, Catholic school, or other diocesan agency; independent contractors who regularly provide services where minors, elderly adults, or adults with disabilities may be present; members of any Catholic school board; pastoral council members; finance council members; EIM Review Board members; any person who is considered to be a leader of a ministry, program, or organization; members of any independent Catholic organization that may serve youth of a parish, Catholic school, or other diocesan agency, even if the primary function of the organization is not necessarily to serve youth (e.g., ladies or men's clubs, Catholic Daughters of America, Knights of Columbus, Knights of Peter Claver, and organizations promoting vocations); and, individuals who serve in any ministry, program, or organization that provides services to or at which minors, elderly adults, or adults with disabilities may be present, including but not limited to: (1) any activity in a Catholic school; (2) religious education; (3) youth ministry; (4) parish nursery and mother's day out or pre-school programs; (5) parish or school sponsored scouting groups; (6) homeschooling organizations that use church property; (7) liturgical ministries (e.g., hospitality, ushers, extraordinary ministers of Holy Communion, lectors, choir, or music ministry); (8) homebound ministry; (9) St. Vincent de Paul Society conferences; and (10) hospital ministry; and, any other individual as required by a pastor, principal, or director of a diocesan agency (e.g., requiring EIM compliance of all who engage in any type of ministry).

Visit **eappsdb.com/austin** to complete the online Application for Ministry, to update an existing EIM account or to sign up to attend an EIM Workshop (required at least once every three years throughout individual's service in ministry).

EIM responsibilities for pastors

Pastor CHECKLIST

Details about the tasks included on this summary list are explained more fully in the next section.

  I.   Maintain your own **EIM compliance** – attend an EIM Workshop every three years.

 II.   **Designate** one or two persons at your parish to serve as EIM site administrators to complete the day to day tasks of reviewing EIM compliance of members of your parish. You can update this as often as needed for your parish – just contact the EIM office.

III.   The pastor is responsible for ensuring the **EIM compliance** of all persons in the parish with all diocesan EIM policies and procedures. This includes: 1) knowing who needs to be compliant (see page 5) and 2) removing from ministry any persons who are not EIM compliant for any reason.

IV.   Review/evaluate those with a **restricted** status on their EIM account. Background check details can only be discussed with the pastor.

 V.   Ensure that *Called to Protect for Children* (K-5th) and *Called to Protect for Youth* (middle/ high parish) is scheduled and promoted at your parish each year.

VI.   **Report** suspected cases of abuse to the civil authorities and complete a Notice of Concern to document actions taken by you/the parish and to address matters to be reviewed by the diocese.

 I.   **EIM COMPLIANCE – PASTOR**

      A.   Maintain your personal EIM compliance; complete the EIM Application for Ministry (one time only) and attend an EIM workshop every three years. Ask your site administrator to check for you if you do not know when you are due or how to access your EIM account to check when due.

II.   **EIM SITE ADMINISTRATOR DESIGNATION**

      2.   **EIM site administrator designation**

         A. The pastor appoints a person (or persons) at the parish to serve as the liaison between the parish and the Office of Ethics and Integrity in Ministry. The designated person(s) is called the EIM site administrator and is assigned an administrator ID/password to access the EIM database (eAppsDB) and is the primary point of contact between the parish and the EIM Office. This should be someone who will maintain utmost confidentiality regarding all EIM matters. Any individual assigned an admin ID/password **may not** share this ID/password; if additional persons need to access the EIM database, the pastor should designate those persons using the EIM site administrator designation form. The specific responsibilities of the EIM site administrator are specified in a separate document. It is recommended that two persons be designated to this role in the event that one of the persons is unavailable to address an EIM matter when needed.

         B. The pastor may designate additional persons to have 'read-only' access to the EIM database in order to assist in monitoring compliance at the parish.

III. **EIM COMPLIANCE – PARISH**

A. The pastor is ultimately responsible for the compliance of all members of the parish community with all Ethics and Integrity and Ministry policies and procedures. This includes the removal of any persons from service to the parish who do not follow EIM policies, including maintaining EIM compliance (i.e. those who have not completed the EIM application, are not current on workshop attendance or have a restriction based on the background check). This sets the tone and attitude supporting EIM compliance at the parish and ensures that those responsible for assisting in this process (e.g. the EIM site administrator and those designated to provide the CTPC and CTPY programs, etc.) are completing their requirements.

B. The annual Parish Self Audit document assists you and your parish administration in verifying compliance; in signing this document you certify your understanding of and commitment to the EIM program of the Diocese of Austin.

C. ALL clergy, religious, parish employees and adult volunteers in service to minors or vulnerable adults MUST be EIM compliant all the time. Before any person begins employment or volunteering at the parish, they must submit the EIM Application for Ministry which permits the diocese to run a background check and creates their EIM account; application information is found at www.austindiocese.org. Applicants must attend an EIM Workshop within 60 days of submitting the application, and every three years thereafter.

D. At the beginning of each school year, and at other times when there may be employee/volunteer turnover (i.e. 2nd semester/spring session), your EIM site administrator should verify EIM compliance of all parish personnel.

E. Thoroughly screen all candidates for employment during the interview process. When there is a question about a potential volunteer based on the criminal background check or other issues, the pastor should complete the interview and reference check procedures prior to approving the applicant for ministry at the parish.

F. EIM Workshops are scheduled based on requests by parishes/schools and are available throughout the diocese. It is critical to encourage employees and volunteers to regularly monitor their own EIM compliance and plan ahead to attend a workshop before becoming **non-compliant** (past due). Your EIM site administrator can schedule workshops as needed for your parish personnel.

1. A brief message from the pastor about an upcoming scheduled EIM workshop is often effective in reminding individuals about EIM requirements and the importance of this program to the parish. When your parish is hosting a workshop, it is nice when possible for the pastor to welcome those in attendance. If you happen to need to attend a workshop for your own compliance, attending at your parish is a good opportunity to fulfill your own compliance requirement and demonstrates your visible support of the EIM program.

IV. **BACKGROUND CHECK EVALUATION AND RESTRICTED STATUS REVIEW**

A. The pastor makes any final determination regarding whether a particular individual may serve in a ministry or organization at the parish when there is a question raised by a background check result, a reference check, an interview or from any Notice of Concern submitted concerning the individual. The diocesan EIM Office is always available to the pastor as a resource in dealing with EIM questions and concerns at the parish.

B. Background checks
1. Criminal record background checks are run by the diocese for clergy, religious, seminarians, diocesan, parish and school employees, and volunteers serving in ministries requiring EIM compliance. This process is initiated when an individual completes the Application for Ministry using the online application system (eAppsDB); this is a secure, electronic process. Once the EIM Office receives the results of the background check, a determination is made to approve, restrict or reject an individual based on various factors. This is a preliminary decision based on the background check result and information the applicant might have included on his/her application.
   a. The most secure and timely process for application completion is to do so through eApps. Individuals without access to a computer may complete a paper copy of the application.
      i. A Social Security number is not needed to submit the EIM Application. Individuals lacking a US driver's license still complete an application (on-line or paper). This information is used only to verify applicant identity in situations where there may be a common name or other identifiers. In the event that identity cannot be verified based on information provided by the applicant, the EIM Office will work with the school to assist with verification. NOTE: personal information is secure in the eApps database and is not provided to any government entity.
2. The pastor is advised in the event of a "restricted or rejected" status determination made by the EIM Office (indicated as organization status).
   a. The EIM Office may contact the pastor directly to discuss and evaluate to determine the permanent status of the applicant, or
   b. Your EIM site administrator, upon checking your parish EIM database, will notify you that there is an individual with a "restricted or rejected status" based on a background check that needs follow-up with the EIM Office. [The EIM site administrator will only know the individual has a "restricted or rejected" status, which is to remain confidential, and is not to know the nature of the restriction.]
   c. NOTE: on occasion this process may include the need to verify the identity of the individual in question, particularly in cases of similar names. You may be asked to help verify driver's license #, address, date of birth or other identifier. The EIM site administrator can assist with this process without needing to know the details of the situation.
   d. The EIM Office will only give information to the pastor about the offense; the details of the background check result should not be discussed with anyone other than the EIM Office.
   e. The EIM Office may give guidance to the pastor if requested and suggest options based on similar cases.
   f. When discussing the background check matter with the applicant, the pastor could ask if there is "anything that might have been revealed in a background check."
      i. If the applicant denies that there would be anything on the check, there will be a need to re-verify their identity. Upon positive ID verification, the applicant would be informed that there was a background check result. The applicant may contact the EIM Office for assistance in reviewing their background check result. In this case the restriction would remain unless the applicant can verify that the record did not pertain to him/her.

        ii.   Once the issue has been reviewed with the applicant, the pastor may make one of the following determinations:

- Remove the restriction and
    - approve the applicant for ministry, or
    - approve the applicant for ministry with noted restriction (i.e. approved for ministry but may not transport minors, may not handle parish finances, etc.).
    - Maintain the "restricted" status. A restricted status can be reviewed and reconsidered at any time at the discretion of the pastor.
    - Typically, a "rejected" status is not changed, but may be reviewed at the discretion of the pastor.

g. For applicants that remain restricted, the pastor should inform the applicant that he/she may not work or volunteer at the parish. This should be done in a pastoral and confidential manner. This does not impact the individual's ability to attend Mass or other public parish functions unless noted otherwise. In the process of evaluating an applicant's past behaviors, we must remember that ours is a forgiving God; however, the safety of our children and ministries must always be the determining factor when reviewing information regarding applicants. The EIM Office will update the applicant's status in the EIM database based on the final determination of the principal.

h. If the applicant has self-disclosed information on the application that raises concerns about his/her suitability for ministry, whether or not it appears on a background check result, the pastor will be informed of the details and this should be discussed with the applicant.

V. ***Called to Protect for Children (CTPC)* and *Called to Protect for Youth (CTPY)***

As Catholics, we believe that every human being is created in the image and likeness of God. CTPC is the safety education piece of our diocesan Ethics and Integrity in Ministry program designed specifically for elementary grade students K-5 and CTPY is an interactive sexual abuse education and prevention program that gives our middle and high school students practical tools, in language and a medium they can understand, to realize this fundamental teaching of our faith. Go to the austindiocese.org/parish-admin for important information about these programs.

A. Since the 2009-2010 schoolyear, every parish and Catholic school in the Diocese of Austin is required to teach the CTPC program annually to all Kindergarten through fifth grade students. This is not an optional parish/school program; active promotion of the CTPC program impresses upon parents that you believe it is important that we do all we can to help keep children safe from preventable harm.

B. In three brief sessions (15-20 minutes) per grade, per year, the catechist provides students with basic understanding about rules appropriate touch, boundaries, how to respond to uncomfortable situations and introduces technology safety. The specific grade level lessons should be provided to teachers with adequate time for them to prepare to teach the lessons. Contact the EIM Office if your parish needs to purchase a CTPC binder.

C. Parishes and Catholic schools in the Diocese of Austin are **required to provide** the CTPY program annually for their sixth and ninth grade students; middle and high school students in other grades who are new to the parish since the last CTPY workshop should also be invited.

D. The parish should make serious effort to schedule this program to maximize attendance; active promotion of the CTPY program impresses upon parents that you believe it is important that we do all we can to help keep children safe from preventable harm.
   1. Prior to scheduling CTPY, the persons responsible for your middle/youth ministry program should review the important CTPY implementation and scheduling information included on this CTPY page of the website.
E. CTPC and CTPY are not part of the human sexuality or religion curriculum in our parishes and Catholic schools and are not to replace the catechetical curriculum in parish and school religious education programs. Due to the maturation process that occurs in these years, students should attend the program in both 6th and 9th grades. Students and their parents must understand the importance of safety and sexual abuse prevention education; program absence should be for a valid reason. This topic cannot be taken lightly.
F. Any parent that signs a waiver, and parents of any student that is absent for a class session, should be given the Learning Objectives page and the missed Lesson Activity sheet(s) for the appropriate grade level (CTPC) or the 'How can I reinforce the message with my children?' handout (CTPY) to review with their child. These and other parent resources can be found at austindiocese.org/parent. Students unable to attend due to illness or other unspecified absence are not required to "make up" the classes and should plan to attend the following year.
G. Upon completion of all sessions for all grades, the parish CTPC/CTPY program coordinator should complete and submit the appropriate Program Reports; these documents must be submitted to complete your annual Audit.

I. REPORTING ABUSE OR AN EIM VIOLATION

A. Due to the nature of the topic of abuse, it is possible during the course of any of our education programs that an individual may recognize that they are a victim, or know a victim, and might need support. It is recommended that you work with your pastoral staff to determine what counseling resources you might have within your own parish community and encourage those persons to be available during EIM programs in case of need. The EIM Office is able to suggest resources or provide assistance.
   a. If a minor discloses that they are being (or have been) abused, or you suspect abuse, you (or the person to whom they disclose) are required by law to report this information within 48 hours to the TX Department of Family and Protective Services. TDFPS maintains a 24-hour abuse hotline at (800) 252-5400; or a report may be made on their website at www.dfps.state.tx.us.
   b. The minor may be reluctant to tell you about their situation. It is important to listen openly, but you must notify them at the beginning that you will have to make a report to authorities to ensure that the abuse stops – you can't keep this secret. This may be difficult, but it is an important step in beginning the healing process. You are not responsible for any investigation.
B. The process for reporting concerns and/or allegations of any EIM violation, including abuse, are specified in the EIM policies. A copy of the current policies should be available at the parish/school and may be found at austindiocese.org/eim-policies.
C. A Notice of Concern should be completed for any allegation of abuse or policy violation. This assists the individual with the concern to clearly describe the situation or occurrence. The Notice of Concern may be found on the EIM page of the diocesan website.

Visit austindiocese.org/eim-policies **for additional guidance on EIM matters.**