

Responsible Ministry and Safe Environment Policy

Revised March 2021



Roman Catholic DIOCESE OF VICTORIA

Catholic Diocese of Victoria



Office of the Bishop

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March 19, 2021 Feast of St. Joseph

Dear Sisters and Brothers in Christ,

The care and protection of children, minors, and persons with vulnerabilities is central to the very mission of the Church. We are called to imitate Jesus Christ, to protect and respect the dignity of all those entrusted to our care. We are interconnected, as members of the Body of Christ, and thus responsible for the well-being of others.

The Diocese has mandated policy, protocols, screening, and training for Responsible Ministry and Safe Environment (RMSE) in our communities for many years. The existing policies and protocols were revised as we reconfirm our commitment to ensure a safe environment for all. In full cooperation with civil authorities, the policies and protocols are mandated to protect from harm, and to help victims of historical abuse find assistance and support on their healing journey.

The RMSE Protocols have been modified in the hope of being clearer and more accessible, and the Diocesan website (www.rcdvictoria.org.) has been updated with information for quick reference. Most importantly, the Diocese has contracted an **outside independent In-Take Service Agency** to serve as the first point of contact for all cases of sexual abuse. A trained counsellor will respond to the toll-free number (1-800-968-3146) to provide assistance with the process for reporting claims.

We take seriously our responsibility to care for one another, and to facilitate healing for those who have been harmed. Our focus on the essentials in life, including the safety, protection and well-being of our communities, has renewed our pastoral commitment to Responsible Ministry and Safe Environment as we look to the future with renewed faith and hope.

St. Joseph, husband of the Blessed Virgin Mary, foster father of Jesus, Principal Patron of Canada, and Patron of the Universal Church, pray for us.

In Communion,

+ Dary Joshan

Most Reverend Gary Gordon Bishop of Victoria

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Policy Outline

The Responsible Ministry & Safe Environment Policy is comprised of 4 parts:

- I. RMSE Policy
- II. Sexual Abuse Allegation Protocol
- III. Bullying & Harassment Policy
- IV. Volunteer Position Descriptions

Preamble

Vox Estis Lux Mundi (extract, Pope Francis, Motu Proprio 2019)

"You are the light of the world. A city set on a hill cannot be hidden" (Mt 5:14). Our Lord Jesus Christ calls every believer to be a shining example of virtue, integrity and holiness. All of us, in fact, are called to give concrete witness of faith in Christ in our lives and, in particular, in our relationship with others.

The crimes of sexual abuse offend Our Lord, cause physical, psychological and spiritual damage to the victims and harm the community of the faithful. In order that these phenomena, in all their forms, never happen again, a continuous and profound conversion of hearts is needed, attested by concrete and effective actions that involve everyone in the Church, so that personal sanctity and moral commitment can contribute to promoting the full credibility of the Gospel message and the effectiveness of the Church's mission. This becomes possible only with the grace of the Holy Spirit poured into our hearts, as we must always keep in mind the words of Jesus: "Apart from me you can do nothing" (Jn 15:5). Even if so much has already been accomplished, we must continue to learn from the bitter lessons of the past, looking with hope towards the future.

This responsibility falls, above all, on the successors of the Apostles, chosen by God to be pastoral leaders of his People, and demands from them a commitment to follow closely the path of the Divine Master. Because of their ministry, in fact, Bishops, "as vicars and legates of Christ, govern the particular churches entrusted to them by their counsel, exhortations, example, and even by their authority and sacred power, which indeed they use only for the edification of their flock in truth and holiness, remembering that he who is greater should become as the lesser and he who is the chief become as the servant" (Second Vatican Council, Dogmatic Constitution Lumen Gentium, 27). What more closely concerns the successors of the Apostles concerns all those who, in various ways, assume ministries in the Church, or profess the evangelical counsels, or are called to serve the Christian People. Therefore, it is good that procedures be universally adopted to prevent and combat these crimes that betray the trust of the faithful.

I desire that this commitment be implemented in a fully ecclesial manner, so that it may express the communion that keeps us united, in mutual listening and open to the contributions of those who care deeply about this process of conversion. (Click here to read the full document)

Preface of Protecting Minors from Sexual Abuse (extract, CCCB 2018)

The protection of minors has been a major priority of Catholic leadership in Canada and the faithful in general since the 1980s. While the historical engagement of the Canadian Conference of Catholic Bishops (CCCB) in the area of prevention remains relevant and valuable to this day, important changes effectuated by the Holy See in 2010 regarding the canonical response to cases of sexual abuse perpetrated by clergy would require the updating of diocesan norms. A Circular Letter issued by the Congregation for the Doctrine of the Faith on 3 May 2011 made it clear that episcopal conferences were to assist dioceses with the implementation of these new canonical procedures. Attentive to the lessons learned through the experience of the Catholic Church in Canada in dealing with sexual abuse, and responding to the call of the Circular Letter, the bishops of Canada established in September 2014 an ad hoc committee to elaborate a new CCCB document. This document would bring the Conference's current norms up to date with a unique emphasis on the priority of protection as well as prevention, emphasizing the need for a proactive rather than a reactive response. (Click here to read the full document)

About the Responsible Ministry and Safe Environment (RMSE) Logo

The RMSE logo depicts four separate areas, each a different colour and each representing a different aspect of RMSE:

- Diocese of Victoria (blue)
- Parishes and Schools (pink)
- Clergy, Employees, and Volunteers (yellow)
- Persons who are Vulnerable (green)



The areas, which themselves represent people looking up to God, are linked by the central theme of the Cross, which joins people in unity.

The overall shape is reminiscent of a butterfly, which is a symbol of resurrection, change, rebirth and hope.

Prayer for a Healthy Workplace in our Parishes and Schools

Good and Gracious God,

We entrust our parishes, schools and workplaces to you. Help us to remember you are always present in every space and place. We desire to speak your peace, your grace, your mercy, and your perfect order in our Diocese. We acknowledge your power over all that will be spoken, thought, decided, and done within our places of work.

Lord, we thank you for the gifts with which you have blessed us. We commit to using them responsibly in your honour. Give us the strength, energy and enthusiasm to do our tasks big or small. May all of our endeavours and projects bring you glory.

Come, Holy Spirit and fill our churches and schools so they will continue to be places of welcome and light. Dispel all darkness as we open our hearts to your healing love.

May the service and work we do and the way we do it bring faith, joy, and hope to all whom we encounter.

We humbly ask this through your Son, Jesus Christ.

Amen.

St. Andrew, patron saint of our Diocese...

Pray for us.



A. Guiding Principles

As a local faith community of the Catholic Church, the Diocese of Victoria upholds and promotes the values expressed in the Gospel of Jesus Christ and in the teachings and laws of the Catholic Church. This means, among other things, that the Diocese takes a stance of deep respect for the dignity of all persons and commits itself to the well-being of all persons.

In the Diocese this is demonstrated by the provision of carefully planned activities for children, young people and adults; the careful selection and appointment of those working with children, young people and people who are older and more vulnerable; supporting individuals and families under stress; caring for those hurt by abuse in the past; and ministering to and managing those who have caused harm.

The Diocese upholds the fundamental goodness of all that God has created. The Diocese holds, further, that through the death and resurrection of Jesus all humanity has been redeemed, lifted up, and transformed. We are also deeply aware of the continuing weakness of human beings, and the sinfulness present in humanity. We acknowledge that we must take seriously the possibility of misconduct – even among our own clergy, religious, employees, and volunteers – and so the Diocese has put in place the Responsible Ministry and Safe Environment policies and procedures outlined in this document. These guidelines are designed to assist the Church in safeguarding children and adults who are vulnerable, and responding with charity and justice to situations that involve misconduct.

The RMSE Policy is first and foremost a document intended to guide the work of clergy members, religious, employees, and volunteers in the protection of children and those who are vulnerable within the Diocese. This policy also seeks to prevent and provide protection from bullying and harassment in our faith community, and furthers our commitment to providing a place of safety and solace for all.

The RMSE Policy is also an objective, accountable, transparent, and compassionate response to all who may be involved in a misconduct or abuse allegation. It sets out instructions and procedures (civil and legal) to be followed by the Diocese, its clergy, religious, employees, or volunteers in the event abuse or a dangerous situation is suspected. If you suspect a child may be in need of protection, you are required to report this to the Ministry of Children and Family Development of B.C. All those employed by the Diocese are expected to be familiar with and to comply with applicable child protection reporting requirements in the Province of British Columbia.

In addition, we have a similar legal and moral obligation to adults who are vulnerable; that is, persons above the age of majority with disabilities (mental, emotional, or physical) and/or the elderly. If you suspect an adult may be in need of protection, follow the procedures outlined in this document and advise the proper authorities as defined by RMSE Policy.

Abuse of children and adults who are vulnerable will not be tolerated. Any person under investigation for abuse of children or adults who are vulnerable will be removed immediately from ministry until all investigations are complete. Those convicted of abuse or who pose an actual or suspected risk to children or adults who are vulnerable will have their employment terminated and will not return to active ministry.

As a guiding principle, the Diocese promotes volunteer training as a vital way of safeguarding the people of God entrusted to our care, particularly children and adults who are vulnerable. All clergy members, religious, employees, and volunteers must be screened, trained, and oriented to their

position prior to commencing work with the Diocese. Screening, training and orientation procedures will vary depending upon the level of responsibility of the position and the potential risk to children or adults who are vulnerable. They need to know that measures are in place if boundaries are overstepped. *See Section E. Volunteer Screening.*

A.1 Ethical Responsibilities

In every situation or allegation of misconduct by clergy, religious, a staff member, or a volunteer of the Diocese of Victoria, the Diocese will respond swiftly and compassionately, investigating all allegations, providing assistance to those in need of healing and reconciliation, and taking any and all means to prevent a future occurrence of misconduct. Adhering to civil and canon law, the Diocese will provide a thorough and comprehensive response to resolve allegations of misconduct. The primary concern will be the well-being of all persons involved – both the one(s) who suffer the effects of misconduct and the one(s) who might be guilty of misconduct. The Diocese has a particular concern about the health and well-being of children and adults who are vulnerable who might be affected.

The Diocese will always act in accordance with the laws of Canada, and of the Province of British Columbia. This Policy reflects the existing law of the Province of British Columbia, the laws of Canada, and current canonical norms. This Policy applies to all clergy, religious, employees, and volunteers of the Diocese.

A.2 Policy Objectives

This Policy sets out:

- employee and responsible ministry procedures;
- tools for evaluating ministry risks;
- clear definitions of what constitutes misconduct by clergy, religious, employees, and/or volunteers of the Diocese;
- procedures to be followed if an incident report of misconduct is made; and,
- the discipline that may be imposed.

The Policy is intended to provide a fair, objective, accountable, transparent, and compassionate response to all who may be involved in a misconduct allegation.

Incident Reports will, so far as is reasonably possible and in accordance with applicable laws, be received, investigated, and determined in confidence in order to respect the privacy of those involved.

Abuse of children and adults who are vulnerable is of special concern and will not be tolerated. Any person under investigation for, or found guilty of the abuse of children and adults who are vulnerable will be removed immediately from any ministry until all investigations are completed. If proven guilty, the offender will not return to active ministry.

A.3 Policy Not Exhaustive

People suspecting that a child may be in need of protection – as defined under the laws of the Province of British Columbia – are required to report this to civil authorities. Clergy, religious, employees, and volunteers of the Diocese are expected to be familiar with, and to comply with applicable child protection reporting requirements in the Province of British Columbia.

The procedures outlined in this Policy do not preclude a complainant from pursuing civil or criminal remedies, or from seeking legal counsel. If notice is received that the complainant intends to seek a civil or criminal remedy, the response of the Diocese under this Policy may be suspended in whole or in part so as not to jeopardize the process and investigation.

B. Definitions

Abuse

Any physical, verbal, emotional, or sexual conduct towards any person that causes that person to have concern or fear for his or her physical or emotional safety or well-being. Such activity may or may not be criminal in nature. Child abuse, as defined under the child protection legislation of the Province of British Columbia, also constitutes abuse under this Policy. Abuse is the violation of the physical or psychological integrity or trust of another person. Abuse may consist of just one incident or it may happen repeatedly.

From Vox Estis Lux Mundi by Pope Francis (7 May 2019):

- forcing someone, by violence or threat or through abuse of authority, to perform or submit to sexual acts;
- performing sexual acts with a minor or a person who is vulnerable;
- the production, exhibition, possession or distribution, including by electronic means, of child pornography, as well as by the recruitment of or inducement of a minor or a person who is vulnerable to participate in pornographic exhibitions.

Abuse of Adults who are Vulnerable

Any act, or failure to act, that endangers the health and/or well-being of the person who is vulnerable. Such action or inaction is especially harmful when it occurs within a relationship where there is an expectation of trust. The abuse referred to would include physical, emotional, financial or sexual abuse.

Adult who is Vulnerable

An adult who is vulnerable is any person 19 years of age or over who is in need of protection by reason of disability, age, or illness. An adult who is vulnerable is unable to take care of or protect themselves against significant harm or exploitation. Some common examples include: physical disability, hearing or speech impairment, diminished mental capacity including dementia, developmental disability, brain injury or severe mental illness including bipolar disorder, major depressive disorder, substance abuse disorder, psychosis.

Bullying and Harassment

- Includes any inappropriate conduct or comment by a person that would cause humiliation or intimidation, but
- Excludes any reasonable action taken by an employer or supervisor relating to the management and direction of others.

Examples of conduct or comments that might constitute bullying and harassment include verbal aggression or insults, calling someone derogatory names, harmful hazing or initiation practices, vandalizing personal belongings, and spreading malicious rumours.

Child Abuse

<u>The Child, Family, and Community Services Act of BC</u> imposes a legal obligation on all residents of the Province to report child abuse. The Act defines a "child" as a person under the age of nineteen. The abuse referred to would include physical, emotional as well as sexual abuse and neglect.

Diocesan Responsible Ministry Coordinator - DRMC

A delegate, appointed by the Bishop, who represents him in administering this Policy by receiving complaints and conducting investigations of alleged misconduct.

Exploitation

Any abuse of power, betrayal of trust or exploitation of the power imbalance that is inherent in a relationship between a member, employee or volunteer of the Diocese and a person with whom she or he has a ministerial relationship. Because of the imbalance of power, between the person offering ministry and the person to whom ministry is offered, the apparent consent of a possible victim-survivor does not in itself determine whether or not there has been an abuse of power, a breach of trust or an act of exploitation. For ordained ministers it never does.

Faculties

Faculties in Roman Catholic Church as defined by Canon Law confer ecclesiastical authority, granted by the diocesan bishop or his delegate to exercise ministry and celebrate the Sacraments within the diocese or religious institute.

Historical Child Abuse

Historical child abuse can refer to any type of abuse of children: physical, sexual, or emotional. This term commonly refers to abuse that has occurred in the past when the victim-survivor was a child, and where the victim-survivor is now an adult. Historical child abuse need not be reported to police or child protection authorities unless there is a possibility of current or future abuse. Under Canadian criminal law there is no statute of limitations on this type of abuse. A criminal prosecution can be brought against an alleged perpetrator if they are still living.

Ministerial Relationship

This is a relationship involving trust and confidence that is based primarily upon the ministry offered by a clergy or deacon, or other minister to another person. Examples of ministry include counselling, spiritual guidance, and the celebration of the sacraments.

Misconduct

This is an overarching term that encompasses abuse (physical, sexual or verbal), bullying and harassment, or an exploitation of a ministerial relationship, including financial exploitation. Misconduct could be failure to provide responsible ministry. This includes such serious performance issues such as alcohol abuse, misappropriation of funds, negligent handling of funds, undue influence in obtaining funds or gifts, lack of response to community needs, and other inappropriate behaviours.

Parish/School Responsible Ministry Coordinator - RMC

The Responsible Ministry Coordinator (RMC) is accountable and responsible for the administration of the Responsible Ministry Policy within the parish/school, working closely with the Diocesan Responsible Ministry Coordinator.

Pornographic Offence

Pornographic offence is the possession, creation or distribution of any photographic, film, video, or other visual representation that shows a person who is depicted as engaged in inappropriate sexual activity; and any written material that advocates or counsels inappropriate sexual activity.

Power Differential/Abuse of Power

Power differential in the Church context usually refers to the difference in perceived or actual power between a member of the clergy and the laity. Such a differential can also occur between a lay minister or employee of the Church, and the laity. Abuse of this power occurs when the priest or person in a position of authority uses this power over others for their own purposes. The priesthood/ministry and other leadership roles in the church is a service and not a position of privilege or human power over others.

This power differential is most critical when seen in the context of children and adults who are vulnerable. The difference in power between a child and an adult is fairly obvious: knowledge, experience, authority, cognitive ability, resources, and safety. The power differential between adults can be more subtle: emotional vulnerability due to a faith crisis, marital problems, and grief/loss. This adult-to-adult power differential can also be more obvious: cognitive deficit, illness, and physical disability. Abuse can occur when sacramental power becomes too closely aligned with power in general (e.g. clericalism).

Public Misconduct

Public misconduct is misconduct that becomes public or known. This could include actions that are considered to be crimes, such as indecent exposure or lewd activity. It might also include immoral actions that may not be crimes but which become known.

Sexual Abuse

Sexual abuse is the sexual involvement or attempted sexual involvement with a person identified by the local jurisdiction as a minor, understood in British Columbia as a person younger than 19 years of age.

Sexual Abuse Prevention Training

A comprehensive online abuse prevention program for the Diocese of Victoria that every priest, religious, employee, or volunteer in the Diocese must complete. The number and type of course(s) required will vary depending on the nature of the person's position.

Sexual Exploitation

Sexual exploitation is use of one's position of power or trust to have sexual contact or attempted sexual contact with another person. Sexual exploitation includes, but is not limited to, such activity as intercourse, kissing, touching of breasts or genitals, dating during the course of a counselling relationship, verbal suggestions of sexual involvement, or demeaning sexual comments. The apparent consent of a possible victim-survivor does not determine whether there has been sexual exploitation, because the imbalance of power between the pastoral care giver and the person in a pastoral relationship undermines the validity of an apparent consent.

Sexual Grooming

Sexual Grooming is a wide variety of behaviours, such as spending large amounts of time with a particular person, affording special privileges, or providing gifts, trips and other expressions of special attention. These behaviours are often designed to establish a special bond of trust and affectionate understanding between the groomer and the person who is the object of his/ her attraction. These behaviours can also lead the person to feel indebted to the groomer for all these kindnesses. Once this bond of trust and indebtedness is established, the stage may be set for sexual advances. Because the pattern of grooming is made up of observable behaviours, these behaviours need to be challenged or reported. Sexual Grooming, whether intentional or not, is by its very nature seductive behaviour. As well as being a signal of possible future sexual activity, grooming is in itself inappropriate.

Sexual Harassment

Sexual harassment is unwanted sexualized conduct or language with others. This conduct entails unwelcome sexual advances, request for sexual favours, or other verbal or physical conduct of a sexual nature when submission to or rejection of this conduct explicitly or implicitly affects an individual's status such as employment, when it unreasonably interferes with an individual's performance, or when it creates an intimidating, hostile or offensive environment.

C. Administrators

C.1 Bishop

The Bishop will appoint a delegate who represents him in the administration of the RMSE policy. The Diocesan Responsible Ministry Coordinator (DRMC) will receive reports of complaints of sexual abuse from the Independent Reporting Agency, will receive complaints and conduct investigations into breaches of the RMSE policy and will be responsible for the administration and implementation of all RMSE policies and procedures.

C.2 The Diocesan Responsible Ministry Coordinator (DRMC)

The DRMC will be responsible to the Bishop and consult with the Bishop and/or the Chancellor, in administering this Policy. All complaints of alleged misconduct under this Policy will be forwarded to the DRMC. Complaints of sexual abuse will be made directly to the Independent Reporting Agency. In the event that the DRMC is the subject of an Incident Report, the Bishop will appoint an independent investigator.

The DRMC will consult with, and report to an Advisory Committee. The DRMC will conduct an independent assessment of any Incident Report pursuant to the Policy.

The DRMC is not the sole adjudicator of an Incident Report. The DRMC will consult with and make recommendations to the Bishop and/or Chancellor or other senior manager as to what action, if any, will be taken at the completion of the investigation.

C.3 Alternate Diocesan Responsible Ministry Coordinator

In cases where there is a conflict of interest (actual or perceived) or for other compelling reasons, the Bishop may, on his own initiative or upon the request of the DRMC, Advisory Committee, the complainant, or the respondent, appoint an Alternate DRMC.

The Alternate will either:

- act as a consultant to the DRMC; or
- act in place of or on behalf of the DRMC.

C.4 Independent Investigator

If the DRMC, in consultation with the Bishop and/or Chancellor, deems it necessary, an independent Investigator will be appointed who will have the same duties and responsibilities as the DRMC in the course of the investigation and will submit a written report of the findings to the DRMC.

C.5 RMSE Advisory Committee

The Bishop will appoint a RMSE Advisory Committee. This committee will oversee the RMSE policy and will be the primary consultative body in providing guidance and direction to the Bishop and the DRMC.

C.6 External Case Review Committee

The Bishop may a appoint an External Case Review Committee composed of representatives from the legal profession, law enforcement, social work, counselling, or other appropriate professional group. Committee members will not have a direct affiliation with the Diocese. This committee will review all reports or files related to complaints of sexual abuse to ensure transparent, impartial, and unbiased review, investigation, and adjudication of each case.

C.7 Parish/School Responsible Ministry Coordinator

Pastors in each parish and School Principals will appoint a Responsible Ministry (RMC) Coordinator who is accountable and responsible for the day-to-day administration of the RMSE Policy within the parish/school and will work closely with the DRMC.

The RMC's general areas of responsibility include:

- providing orientation and education regarding the RMSE Policy to the parish/school;
- managing the processing of documents for screening staff and volunteers;
- referring complaints to the DRMC
- assisting in adoption and evaluation of the RMSE Policy
- engaging in ongoing training as needed.

C.8 Confidentiality

The Diocese will maintain the confidentiality of the complainant and the respondent during the processes covered by this Policy to the extent that it is possible. However, should the complaint or the circumstances surrounding it become public, the DRMC will liaise with the media spokesperson appointed by the Bishop's Advisory Council.

The DRMC will ensure that the media spokesperson:

- has a copy of this Policy;
- understands the sensitivity of the issues involved and the desire of the Diocese to maintain confidentiality at all times; and,
- is kept apprised of new developments in the case.

C.9 Accountability

The Diocese will ensure a proactive approach is taken for the safety and well-being of parishioners, clergy, religious, employees, and volunteers within the Diocese through the function of the RMSE Advisory Committee.

C.10 Procedure

All clergy, religious, employees, and medium/high risk volunteers of the Diocese will:

- complete the Diocesan <u>Volunteer Application Form</u> or appropriate employment application form;
- participate in orientation/training programs provided by the Diocese appropriate to their ministry;

- familiarize themselves with the RMSE Policy;
- participate in available prevention education, and/or training programs offered by the Diocese as appropriate to their ministry;
- complete online abuse prevention training;
- complete the volunteer or employee screening process;
- obtain a criminal record check every five years; and,
- read, understand, and sign the <u>Covenant of Care Agreement</u> which ensures that those working for the Diocese clearly understand the accepted behaviour that all must follow.

Low risk volunteers of the Diocese will:

- complete the Diocesan <u>Volunteer Application Form;</u>
- familiarize themselves with the RMSE Policy;
- participate in orientation or training programs provided by the parish/school as appropriate to their ministry;
- complete the volunteer or employee screening process;
- read, understand, and sign the <u>Covenant of Care Agreement</u> which ensures that those working for the Diocese clearly understand the accepted behaviour that all must follow.

D. RMSE Overview

D.1 How is the RMSE Managed?

The Bishop will appoint a delegate who represents him in the administration of the RMSE policy. The Diocesan Responsible Ministry Coordinator (DRMC) will receive reports of complaints of sexual abuse from the Independent Reporting Agency, will receive complaints and conduct investigations into breaches of the RMSE policy and will be responsible for the administration and implementation of all RMSE policies and procedures.

The DRMC will be responsible to the Bishop and consult with the Bishop and/or the Chancellor, in administering this Policy. All complaints of alleged misconduct under this Policy will be forwarded to the DRMC. Complaints of sexual abuse will be made directly to the Independent Reporting Agency. In the event that the DRMC is the subject of an Incident Report, the Bishop will appoint an independent investigator.

The Bishop will appoint an Advisory Committee for Responsible Ministry that will be responsible to him through the DRMC who, together, will monitor and review the efficacy of implemented Diocesan RMSE policies and protocols.

The Bishop, working with the Pastor/Administrator and Principal in each parish or school, will appoint a Responsible Ministry Coordinator (RMC) who is accountable and responsible for the day-to-day administration of the RMSE Policy within the parish or school, and will work closely with the DRMC.

D.2 Reporting Suspected Abuse

Any cleric, religious, employee, volunteer, or lay person who has reason to believe that a child or adult who is vulnerable may be abused, neglected or is for any other reason in need of protection, must first report this to a child welfare worker. Please refer to <u>The Child, Family, and Community</u> <u>Services Act of BC (Ministry of Children and Family Development of BC)</u> or the MCFD handbook: <u>Responding</u> <u>To Child Welfare Concern: Your Role In Knowing When and What to Report.</u>

Reports of suspected child abuse can be phoned in to 1-800-663-9122 at any time, day or night. If a child is in immediate danger, call the police at 911. If you are a child or youth and would like to talk to someone, call the Helpline for Children at 310-1234 (no area code required). Reports of suspected abuse of an adult who is vulnerable may be phoned in to: Victim Link BC 1-800-563-0808.

Subject to the advice of the appropriate authorities, the person reporting suspected abuse will also report this information to the Diocesan Responsible Ministry Coordinator (DRMC) through the Chancery Office at 1-250-479-1331, extension 223 or toll-free at 1-877-237-7233. This confidential voice mailbox is checked regularly. An <u>Incident Report Form</u> must also be sent directly to the DRMC. Should a priest, principal, or Responsible Ministry Coordinator (RMC) become aware that anyone is reporting suspected abuse, they must follow up to ensure the appropriate Office or Ministry has been informed.

E. Volunteer Screening

In order to protect those who provide and benefit from ministry, potential volunteers must follow formal screening steps designed to create and maintain a safe environment. This process involves identifying any activity or any ministry position that could place children, youth or other persons who are vulnerable at risk of being harmed.

The screening process involves discerning the suitability of an individual for a volunteer position. It ensures that the most appropriate match is made between the volunteer and the position. Volunteers serve at the invitation of the parish, school, and/or the Diocese and there is no obligation to bring on or retain volunteers in ministry positions.

Volunteer screening will be conducted by the Responsible Ministry Coordinator (RMC) in consultation with the Pastor/Principal/Administrator.

Parents and family members attending parish functions in support of their children or family members are not considered formal volunteers and are therefore not subject to screening.

E.1 Determining Risk

The nature of the ministry and the inherent level of risks involved dictate the need for screening. Consequently, the greater the risk, the greater the degree of screening that is to be completed. All positions are to be classified as low, medium, or high risk. When in doubt, a position will be categorized as high risk.

The criteria used include: the participant, the setting, the nature of the activity, and the level of supervision. The need for screening reflects the nature of a given ministry and the inherent risks, not the volunteer. All high-risk activities that cannot be mitigated even with the volunteer and employee screening policies must be stopped immediately (e.g. in home catechetical instruction by someone other than parents or local guardians).

E.2 Position Descriptions

The pastor, principal, administrator, RMC, and leaders of the various ministries and roles in consultation with the DRMC will develop position descriptions for every ministry and role within the parish or school. The position description describes the level of risk, outlines the tasks, and establishes the ground rules for participants in that particular ministry. Sample position descriptions are provided in the document *Volunteer Ministry/Role Position Descriptions*.

If a volunteer position is not accurately reflected in the sample positions descriptions provided, or is significantly different from the descriptions provided, please develop and submit a ministry position description to the RMC for review and approval. The RMC will then submit the position description to the Office of Responsible Ministry and Safe Environment for further review and approval.

E.3 Forms

A <u>Volunteer Application Form</u> is to be completed for all ministry volunteers. This form collects basic information such as the individual's name, address, phone number, and any previous experience as a volunteer. It also provides first level screening for volunteers who may have a

criminal offense, since the applicant has a duty to disclose on <u>Volunteer Application Form</u> if they have a criminal record.

All volunteers are required to complete an online abuse prevention training program.

For low risk positions, the RMC is responsible for reviewing the <u>Volunteer Application Form</u>, providing the volunteer with a position description and obtaining a signed <u>Covenant of Care</u>. <u>Agreement</u>. If there is a potential criminal record flagged on the Volunteer Application Form, an interview must be conducted to determine the nature of the offense and suitability of the potential volunteer. These forms are to be kept in a confidential file at the parish or school.

Likewise, for medium and high-risk positions, the RMC is responsible for reviewing the <u>Volunteer</u> <u>Application Form</u>, providing the volunteer with a position description and a signed <u>Covenant of</u> <u>Care Agreement</u>. In addition, the RMC will ensure that interviews are conducted, references are verified, and a criminal record check is obtained and filed. In order to ensure that all the information has been gathered a checklist and forms are provided.

E.4 Interviews

In a parish and school community there are ordinarily two procedures under the RMSE Policy when conducting interviews with volunteers. Firstly, when being interviewed by the pastor and/or coordinator for a particular ministry in the parish or school, the potential volunteer provides an opportunity to speak about his or her background, talents, skills, interests and availability thus helping determine the suitability of the volunteer for a particular ministry or role. Secondly, the RMC, having reviewed the contents of the interview will discuss and explain the RMSE Policy with the volunteers regarding responsibilities, boundaries, and expectations of the position. The meeting need not be long or difficult but must include questions directly related to risk concerns such as an individual's attitude and interpersonal style with children or adults who are vulnerable.

E.5 Reference Checks

Reference checks are to be conducted for all those who volunteer in medium and high-risk positions. These provide further information about the background and skills of the applicant as well as another opinion on the suitability of the person for a particular ministry. Reference checks may be the most effective screening step that is undertaken during the screening process. No exceptions are to be made. The information provided by a reference is confidential and not available to the volunteer without the referee's consent. A written record of the reference check is to be documented on the <u>Volunteer Application Form</u> and placed in the applicant's confidential file. At least two references must be checked for each volunteer.

E.6 Covenant of Care Agreement

The Diocese is committed to providing a safe and secure environment for everyone. The specialized nature of church/school volunteering can, in many cases, place providers and recipients of services in vulnerable situations. Because a degree of vulnerability exists when clergy, religious, employees, and volunteers are working with a child or adult who is vulnerable, those involved in this work must think and act carefully to avoid situations which could lead to embarrassment, accusations, or allegations of abuse. The safety and well-being of children and adults who are vulnerable is dependent, in part upon the honesty and integrity of all clergy, religious, employees, and volunteers.

The <u>Covenant of Care Agreement</u> makes clear the expectations of behaviour for clergy, religious, employees, and volunteers. Everyone is required to sign the <u>Covenant of Care Agreement</u> before beginning their ministry, employment, or volunteer position.

E.7 Criminal Record Check

All new volunteers for ministries considered medium or high risk must authorize the Criminal Record Review Program (CRRP) to conduct a Criminal Record Check and suitability assessment before being accepted as a volunteer. Police Criminal Record Checks are not acceptable for volunteer work except in exceptional circumstances. All volunteer Criminal Record Checks must be conducted by the Criminal Record Review Program in order to obtain a Clearance Letter.

Existing volunteers are required to renew their volunteer approval by updating their volunteer application and applying to the CRRP before the expiry date of their current Criminal Record Check. A valid Clearance Letter must be on the volunteer's file in order for them to work as a volunteer in the Diocese.

All clergy, religious, and employees working within the Diocese must provide a current Criminal Record Check before being hired. An application for a criminal record check is made through the RCMP or their local municipal police force.

General Information for Volunteers

- A Criminal Record Check is required for medium- and high-risk volunteer positions only;
- A Criminal Record Check under the Criminal Record Review Program (CRRP) is required at least once every five years and must be completed prior to commencement of volunteer employment with the Diocese, parish, or school.
- A Criminal Record Check completed under the CRRP is sufficient to allow volunteers to work with any parish, school, or other Catholic organization that falls under the auspices of the Diocese. Criminal record checks completed under this program can also be shared with other organizations registered with CRRP.
- There is no fee charged for Criminal Record Check application made to the CRRP. Where clergy, religious, and employees are charged a fee for a police Criminal Record Check their costs will be reimbursed.

Criminal Record Review Program (CRRP)

All personal information remains confidential. The Diocese, parish, or school will not share this information in any way with any other agency, parish, school, diocese, or person unless requested to do so by the volunteer.

The Diocese is enrolled in the Criminal Record Review Program (CRRP) Applicant-based Online Service provided by the BC Ministry of Justice. Under this program, volunteers consent to the CRRP checking for records of criminal charges and convictions to determine if the volunteer has a conviction or outstanding charge for any relevant or specified offences under the Criminal Records Review Act. CRRP then makes a determination as to whether an applicant presents a risk to children or adults who are vulnerable and provides a suitability recommendation to the Diocese. The CRRP also reviews offences related to financial management (i.e. theft, breach of trust, forgery, robbery, fraud, etc.)

CRRP process

- The volunteer obtains a Criminal Record Check as part of the Volunteer Application process;
- The RMC or School Principal/Secretary will provide the web address and unique organizational access code. This code is required when completing the on-line application;
- The volunteer completes the application form on-line and submits to the CRRP. The application can be completed and submitted manually to the DRMC if the applicant cannot complete it on-line. For people who do not have access to a computer or who are unaccustomed to the on-line process, please contact your Parish Secretary, RMC, or school staff for assistance;
- The CRRP will review the application and provide a thorough analysis. In some cases, the CRRP will require fingerprinting to confirm identity.
- Once the CRRP has reviewed the application, there are three possible outcomes:
 - CRRP determines that there is no risk, and the volunteer is approved to work with children and adults who are vulnerable;
 - Adjudication if risk is determined;
 - Rejection of the volunteer's application on the grounds that the person represents a threat or unacceptable risk to children or adults who are vulnerable, or has a criminal background that would make them unsuitable for work with finances.
- If the CRRP determines that there is no risk, then an approval email will be sent to the DRMC who will provide a copy to the parish or school for the volunteer's file. Approval by the CRRP does not mean approval for the volunteer position. The applicant will still need to meet the other requirements of the volunteer application process.
- If the CRRP determines that there is risk and further assessment is needed, then they will send the applicant a letter advising of the decision and clarifying what further information might be required. The CRRP will also advise the DRMC of the decision to adjudicate the application. The DRMC will, in turn, advise the parish or school.
- If the CRRP finds that there is an unacceptable risk to children or adults who are vulnerable, then the applicant and DRMC will be notified. The DRMC will, in turn, notify the parish or school. The applicant can request that the Registrar of the CRRP reconsider the decision. The request must be in writing and it must be received by the Registrar no later than 30 days after the decision has been received. If the applicant disagrees with the Registrar's decision, a judicial review (appeal) may be filed with the Supreme Court of British Columbia. The applicant bears the cost of this appeal.

If there is a refusal to obtain a Criminal Record Check

The RMC or School Principal/Secretary will explain that it is the policy of the Diocese that all clergy, religious, employees and volunteers, must obtain a Criminal Record Check and that it is not a question of their credibility. If the applicant chooses not to obtain a Criminal Record Check, they will not be permitted to work or volunteer in that ministry.

E.8 Child and Youth Volunteers

The Diocese supports and encourages youth involvement and leadership in the Church. We seek to support and mentor youth as they grow in their faith, and mature into full participation in the church and community.

For the purposes of this policy, a child is defined as a person 12 years of age or younger. A youth is defined as a person between the ages of 13 and 18 years. An adult is a person 19 years of age or older.

Children are not normally accepted for formal volunteer service except in the case of altar servers.

Children who volunteer as Altar Servers are required to complete a <u>Volunteer Application Form</u> and <u>Covenant of Care Agreement Form</u> co-signed by their parent or guardian. They should be mature enough to understand their responsibilities and basic RMSE guidelines.

Youth are not normally to be given significant or onerous responsibility until they are fully qualified adult volunteers. Ordinarily this would mean that youth would volunteer in General Risk positions, or as assistants to adult volunteers. Youth volunteers may be approved to work in Medium or High Risk volunteer positions at the discretion of the pastor in consultation with the DRMC.

All youth volunteers must complete a <u>Volunteer Application Form</u> (co-signed with a parent), read and sign a <u>Covenant of Care Agreement Form</u> (co-signed with a parent) and complete the assigned abuse prevention training provided by the Diocese. Youth working in a leadership role with children or other youth must be fully screened including the completion of a criminal record check.

Youth volunteers who have been approved for a low risk position will be supervised by at least two qualified adult volunteers. Where this is not feasible, they may be supervised by one qualified adult volunteer but extra transparency precautions must be taken (e.g. Open/clear glass doors, public accessible meeting area, parents nearby, etc.). Adult leaders must ensure that youth volunteers are aware of and adhere to the RMSE policy of the Diocese.

E.9 Supporting Volunteers

Orientation, training, and participant follow-up are ongoing screening measures. Orientation and training are the next steps in providing ongoing support and management of risk. This step gives the parish/school an opportunity to observe the volunteer while working. People who are skilled manipulators in one-to-one interviews may reveal different behaviour in group settings. Volunteers need to be given information and support so as not to put themselves, the participants, or the Diocese, school, and the parish at risk. It is dangerous to assume that the risks end when a volunteer has been screened. The screening process is ongoing throughout the volunteers' involvement in ministry.

Online Abuse Prevention Training

Volunteers are required to complete an online sexual abuse prevention training program. The number and type of course(s) required will vary depending on the nature and risk level of the volunteer's position.

Orientation

To be effective, all RMSE Policies and procedures must be clearly communicated to all clergy, religious, employees and volunteers. This must be done both verbally, during an orientation session, and in writing.

Training

In addition to orientation, volunteers are to receive training specific to the volunteer position. Some volunteers perform very straightforward tasks, while others carry out quite complicated or demanding ones. Volunteers must learn how to perform their activities without putting themselves or others at risk. During training, volunteers are to be informed of the limitations and boundaries of their role. Discussing the rationale for these limits ensures volunteers understand them. They need to know that measures are in place if boundaries are overstepped. Training provides new volunteers with an opportunity to interact with current volunteers and ask questions.

Flowchart: Recruiting Volunteers

	STEP 1		
	• The potential volunteer will complete a <u>Volunteer Application Form</u> .		
	STEP 2 (For Medium- and High-Risk Positions)		
	 Provide a Letter of Introduction to the volunteer. 		
	• The volunteer completes a criminal record check application on-line using the code provided in the Letter of Introduction.		
	STEP 3		
Follow these	• The parish/school RMC, Pastor, Administrator, or Principal will conduct an interview with the volunteer to determine suitability for ministry.		
Follow these	• Inform the volunteer of the expectations of the ministry position.		
steps when	STEP 4		
recruiting volunteers	• The RMC/Principal ensures that the <u>Volunteer Application Form</u> , <u>Covenant of Care Agreement Form</u> , and where applicable, a criminal record check, references, and interview are completed.		
	STEP 5		
	 The RMC/Principal/Administrator provides the volunteer with the RMSE Policy. 		
	STEP 6		
	 The volunteer attends and participates in the ministry training and orientation program 		
	• The volunteer familiarizes themselves with the policies on misconduct, and the role of the volunteer in the prevention and detection of abuse, bullying and harassment.		

E.10 Criteria for Rejecting a Volunteer Applicant

Grounds include:

- They have been rejected by the Criminal Record Review Program;
- They pose a danger to others;
- They are not able to dedicate the necessary time commitment;
- They do not have the skills to carry out the responsibilities as outlined in the Ministry Position Description;
- Other Ministry Position Description requirements cannot be met; and/or
- The Pastor has some information that would prevent the applicant from participating.

The information that a volunteer applicant has been rejected must never be made public. If there is uncertainty about selecting a person, the Pastor and DRMC must be consulted.

E.11 Notifying Unsuccessful Volunteer Applicants

When a person is believed to be unsuitable for the position for which they applied, this information must never be made public; this information is CONFIDENTIAL. Report the findings only to the Pastor, or his delegate, and provide him with the relevant information needed.

- When presented with a potentially inappropriate applicant, assess the reasons objectively. Is it due to the applicant's lack of credentials or is there something intangible that alerts the need for caution? As it is with hiring employees, screening volunteers requires all the techniques of personnel management.
- The potential need to turn down an applicant is why it is important to make it clear from the beginning that all applicants are required to undergo the entire screening process. It is harder to notify unsuccessful applicants if the mandatory volunteer screening process is not clearly stated as a requirement.
- Prior to notifying an unsuccessful applicant, review the interview notes for positive attributes along with areas that need further development. Avoid providing only negative feedback. Find ways to provide positive and balanced feedback.
- It is vital not to evade notifying the unsuccessful applicant by saying, "we'll call you" and then not doing so. Be honest in notifying applicants that they have been unsuccessful. Be supportive if the applicant qualifies to volunteer in general risk ministry positions instead, and assist in their search for the right volunteer placement.

Often, when a reputation for setting standards and not accepting every candidate who wishes to volunteer develops, the opportunity to serve others becomes a gift and a privilege. This will be a boost to ongoing recruitment efforts for the parish and school.

E.12 The Volunteer Complaint Resolution Procedure

The Diocese is committed to open and on-going communication between volunteers and their supervisors. It is anticipated that most issues will be resolved within the parish/school at the personal level. Volunteers should feel free to discuss any concerns they may have.

When there is a complaint or a disagreement, misunderstanding or expressed dissatisfaction on the part of a volunteer relating to the conditions of their ministry position, the purpose of these

procedures is to provide volunteers with a uniform process for a prompt and equitable resolution when a complaint or dispute exists.

The Incident Report resolution process is not intended to be adversarial in nature. The objective of this process is to resolve disputes in a cooperative Christian atmosphere. Volunteers are assured freedom from restraint, interference, coercion, discrimination, or reprisal in their pursuit of resolution through the complaint resolution process. Retaliation, of any kind, is absolutely prohibited. Efforts should be made to resolve the issue through discussion with the Pastor, Administrator, or Principal.

F. Protocols for Providing a Safe Environment

F.1 Physical Contact

- Always maintain clear boundaries in all situations involving persons who are vulnerable. All physical contact must be completely non-sexual and based only on the individual's needs.
- Never engage in corporal punishment of any person. Discipline problems will be handled in coordination with the immediate supervisor and the parents/care providers.

F.2 The Rule of Two

- Always ensure there is a team of at least two approved volunteers present during ministry work. For example, there will be two volunteers in addition to the communicant when bringing the Eucharist to those at home.
- Always ensure there are two approved volunteers present when supervising children or adults who are vulnerable. The doors to rooms will be left open if one of the volunteers, clergy, or employees has to leave the room temporarily. Examples of such activities include catechism instruction and youth group gatherings.
- Clergy, religious, employees, and volunteers are never to be alone with a child or adult who is vulnerable in a sleeping facility, locker room, dressing facility, or any other enclosed area.
- In situations such as counselling sessions where one-to-one meetings are necessary, the sessions must take place in rooms and locations that are open to public view.
- No single child or adult who is vulnerable is to ever stay overnight in the private accommodation or residence of a cleric, religious, employee, or volunteer.
- Where possible, leaders/workers of the same gender(s) as the children/youth are required to be present during any type of ministry work.
- Overnight trips and other special events require special planning and care by the leadership team, and may require written permission from a parent or guardian for the individual who is attending.
- All adults responsible for the transportation of children, youth, and adults who are vulnerable are to avoid driving them when alone.

F.3 Photography

- Written consent for taking photographs of children and adults who are vulnerable must be obtained from a parent or a legal guardian prior to taking pictures.
- Ensure no child or adult who is vulnerable is photographed in a way that diminishes their dignity.

F.4 Provision of Substances

- Children or adults who are vulnerable will never be provided with alcohol, tobacco, drugs, or anything prohibited by law.
- Written parental/care-giver permission must be obtained before administering medication to any person who is vulnerable.

F.5 Facilities

- Attendance at all sessions will be recorded and appropriately filed.
- Where possible, activities will occur in a room with a window in the door, or always leave • the door open.
- All staff and volunteers working with persons who are vulnerable must wear name tags clearly identifying themselves.
- Children and persons who are vulnerable are not to be dropped off without a leader • present.
- Parents or adults who are not leaders are not to enter a classroom/activity room without • permission.

F.6 Transportation

A leader/volunteer who drives children/youth/adults who are vulnerable must have a valid driver's license, valid insurance, and one seatbelt per person in the vehicle.

All adults responsible for the transportation of children, youth, and adults who are vulnerable are to avoid driving them when alone. If transportation using personal cars is considered high risk by your insurance company, the liability might be transferred by opting for a professional bus service to transport children/vouth/adults who are vulnerable.

Please refer to the document Volunteer Ministry Position Descriptions: Volunteer Driver, for more information.

F.7 Leader and Participant Ratios

The activity and age of children/youth affects the ratio of children/youth to staff. The management of the program as well as concern for safety, care, and social interaction are some of the factors to take into account when establishing adequate ratios. If there are not enough leader and adult volunteers, consider whether the program or activity will be held. Volunteer helpers who work under the supervision of a screened, trained volunteer are welcome additions.

While the rule of having two adults at all times in a group is encouraged, there are occasions when only one leader is present. In such an occasion, the leader must know what to do if they are alone with a child. Where possible, the two adult leaders will be unrelated.

The child/youth/adult who is vulnerable ratio to leaders in a regular program are listed below. Having additional adults can be helpful if one adult needs to leave the program temporarily.

- 0 - 18 months 2 adults to 6 children 2 adults to 10 children 18 months - 2 years
- 2-5 years

Ages 5 – 18

- 2 adults to 12 children
- 2 adults to 15 children
- Adults who are vulnerable 2 adults to 10 adults who are vulnerable

F.8 The Diocesan Responsible Ministry Coordinator (DRMC)

The DRMC will be responsible to the Bishop and consult with the Bishop or the Bishop's delegate in administering this Policy. Complaints of sexual abuse will be reported to the Independent Reporting Agency. All other complaints of alleged misconduct under this Policy will be forwarded to the DRMC. If the DRMC is the subject of an Incident Report, the Bishop will appoint an independent investigator.

The DRMC will consult with and report to an Advisory Committee. The DRMC will conduct an independent assessment of any Incident Report pursuant to the Policy. If the DRMC or the Advisory Committee determines that it is necessary, they will appoint an Investigator to conduct an independent investigation into the Incident Report.

The DRMC is not the sole adjudicator of an Incident Report. The DRMC and the Advisory Committee will make recommendations to the Bishop as to what action, if any, will be taken at the completion of the investigation.

Responsibilities

The DRMC will:

- be the Diocesan contact person in all matters relating to an allegation of misconduct made against a clergy, religious, lay employee, or volunteer of the Diocese;
- ensure all volunteers, employees and clergy have a Criminal Record Check/Clearance Letter, and documentation;
- manage the Diocesan response to a complaint of misconduct from the time a complaint is received until it is resolved;
- ensure any applicable child and adults who are vulnerable laws are complied with and cooperate with the police and judicial authorities conducting their separate investigations;
- designate individuals, if necessary, to conduct the internal investigation of the complaint and provide them with the necessary resources;
- notify the Advisory Committee of all investigations and complaints;
- make use of such consultants as may be considered necessary, including medical doctors, psychologists, mental health professionals, canonists, media spokespersons, and legal counsel to the Diocese;
- be responsible for record keeping. Complaints received by the DRMC, and copies of all files, records, or reports pertaining to any complaint and investigation will be maintained in the DRMC's records at the RMSE Office;
- receive all "positive" criminal record checks for employees, and remove all identifying information before presenting the situation to the Advisory Committee for recommendations regarding the person's suitability for ministry or employment;
- submit regular reports to the Advisory Committee.

Qualifications

- Professional qualifications and professional registration
- Background in social work or counselling
- Familiarly with Catholic Church teachings and culture
- Actively involved in their parish
- Respected in the community
- Knowledge, good judgement, wisdom and tact

- Discrete and trustworthy
- Collaborative approach to problem solving
- Excellent interpersonal skills
- Excellent communication skills; verbal and written

G. Assistance for Individuals

The Diocese will offer appropriate care for those reporting abuse and the respondents during an investigation under this Policy. Provision of such care is within the discretion of the DRMC and may include:

- assistance with therapy fees for those reporting abuse. Such assistance will be provided for pastoral reasons and does not constitute an admission of responsibility, or an admission that the facts as alleged occurred.
- assistance with therapy for the respondent. Such assistance is provided for pastoral reasons and does not constitute an admission of responsibility, or that the facts as alleged occurred.

Individuals seeking private counselling sessions will be provided with names of qualified counsellors.

- The first appointment will assess the individual's concerns relating to the issues, and a recommendation will be made if further counselling is required.
- After the initial session, the counsellor will provide the DRMC with an evidence-based summary assessment briefly outlining the treatment, psycho-social impacts, methods that will be used to assist the person, and expected timeline for therapeutic outcomes.
- Based on the initial evidence-based assessment and recommendations, the Diocese will reimburse the counsellor directly for the recommended sessions up to a maximum of 12 sessions. Extensions may be considered in exceptional circumstances.
- If an individual is in an existing therapeutic relationship, that person may request that their counsellor approve them for service. Such approval will be at the discretion of the DRMC based on evidence summary reports.

The Diocese is strongly committed to keeping all counselling sessions private and confidential. The counselling service provider will hold all names and personal information in strictest confidence with only a file number and non-identifying summary information being submitted to the Diocese. The Diocese will reimburse the counselling provider directly based on invoices, file number, and the brief summary reports.

H. Care for Communities at Risk

The Diocese will provide care and information for the community where misconduct is alleged. The Diocese will maintain the confidentiality of the complainant, the respondent, and their families to the fullest extent possible.