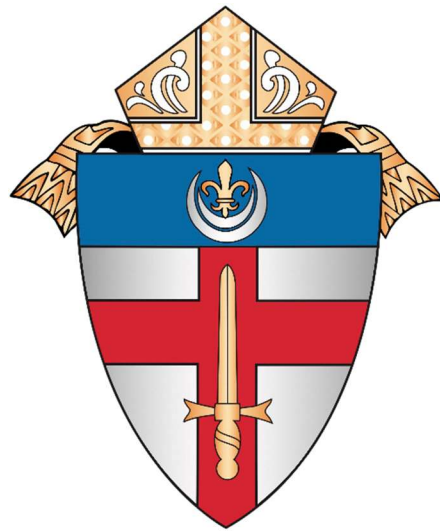


DIOCESE OF COVINGTON, KENTUCKY



Safe Environment
Policies and Procedures
For the Protection of Minors and
Vulnerable Adults

LOCAL CONTACTS

Julie Feinauer – Director, Office of Safe Environment and Victim Assistance Coordinator

(859)392-1515

<https://covidio.org> > Offices > Safe Environment

It is preferable that you call the county in which the abuse allegedly occurred.

Reporting CURRENT abuse of MINORS or VULNERABLE ADULTS:

Cabinet for Families and Children, Division of Protection and Permanency

Boone County (859)371-8832
Bracken County (606)735-2195
Campbell County (859)292-6733
Carroll County (502)732-6681
Fleming County (606)845-2381
Gallatin County (859)567-7381
Grant County (859)824-4471

Harrison County (855)306-8959
Kenton County (859)292-6340
Lewis County (606)796-2981
Mason County (606)564-6818
Owen County (877)597-2331
Pendleton County (859)654-3381
Robertson County (877)597-2331

Reporting ADULTS who were abused as MINORS:

Commonwealth Attorney

Boone County (859)586-1723
Bracken County (606)564-4304
Campbell County (859)292-6490
Carroll County (502)732-5841
Fleming County (606)564-4304
Gallatin County (859)586-1723
Grant County (502)732-5841

Harrison County (859)235-0387
Kenton County (859)292-6580
Lewis County (606)473-7978
Mason County (606)564-4304
Owen County (502)732-5841
Pendleton County (859)235-0387
Robertson County (859)235-0387

Kentucky Child Abuse Hotline
1(800)752-6200
Indiana Child Abuse Hotline
1(800)800-5556
Ohio Child Abuse Hotline
1(855)642-4453

National Child Abuse Hotline
1(800)422-4453
Kentucky Sex Offender Registry
<http://kspsor.state.ky.us/>

OTHER RESOURCES

Childhelp

<https://childhelp.org> > Get Help > More Resources

National Center for Missing and Exploited Children

www.netsmartz.org & www.kidsmartz.org

Cybertipline

<https://report.cybertip.org/>

VIRTUS

www.virtusonline.org > Resources

Catholic Charities, Covington

(859)581-8974

www.covingtoncharities.org

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SAFE ENVIRONMENT PROGRAM OVERVIEW FOR DIOCESAN ENTITIES – DIOCESE OF COVINGTON

ACKNOWLEDGMENT

The *Policies and Procedures* have been prepared as a guide for those working or volunteering in the Roman Catholic Diocese of Covington (**Diocese**). The information contained in this manual establishes rules and guidelines and shall not be construed in any way as a contract of employment or continued employment. The **Diocese** reserves the right to make changes in the content or application of this booklet and to implement those changes with or without notice.

MISSION STATEMENT

As Catholic **Adults**, we have a moral and legal responsibility to work toward providing a safe environment for all. We are especially entrusted by God with the spiritual, emotional, and physical well-being of **Minors** and **Vulnerable Adults**. All members of the **Diocese** are called to be informed individuals committed to understanding the reasons for and implementation of a safe environment for all.

PROGRAM PURPOSE

In order to comply with the *Charter for the Protection of Children and Young People (Charter)*, the **Diocese** shall implement a Safe Environment program to:

- i. strive to maintain a safe and secure environment within our **Diocese**
- ii. assist the **Diocese** in evaluating a person's suitability to work with **Minors** or **Vulnerable Adults**
- iii. educate those who have contact with **Minors** and **Vulnerable Adults** about the prevalence of abuse, the warning signs of concerning or inappropriate adult behaviors (grooming process), and behavioral cues traumatized youth may exhibit
- iv. provide a process to respond to **Victims** and their families, as well as the **Accused**
- v. protect against the possibility of false accusations against **Clergy, Employees, and Volunteers**

GLOSSARY

The following are operational definitions which support this document.

These definitions are based on Canon Law (can.) and the Kentucky Revised Statutes (KRS).

Accused – An individual who is suspected of sexual abuse, sexual exploitation, sexual harassment, or other kinds of abuse.

Adult – An individual who is 18 or older and of sound mind (KRS 311.621), (can. 97 §1).

Allegation – A complaint of sexual misconduct or other kind of abuse made against another.

Bishop – The Bishop of the ***Roman Catholic Diocese of Covington***.

Canon Law (can.) – The system of law followed internally by the Roman Catholic Church. The *1983 Code of Canon Law* is the constitution and bylaws governing the corporations, such as the Holy See, dioceses and parishes, etc., and members of the Roman Catholic Church.

Chaperone – A ***VIRTUS-Compliant Adult*** (21+) who has been appointed by the priest, principal, administrator, or ***Supervisor*** to take responsibility for a group of ***Minors*** or ***Vulnerable Adults***.

Charter for the Protection of Children and Young People (Charter) – A comprehensive set of procedures originally established by the USCCB in June 2002 to address ***Allegations*** of ***Sexual Abuse*** of ***Minors*** by Catholic ***Clergy***. The ***Charter*** mandates the creation of a permanent ***USCCB*** Committee for the Protection of Children and Young People, the National Review Board, and the Secretariat of Child and Youth Protection. The ***Charter*** also includes guidelines for reconciliation, healing, accountability, and prevention of future acts of abuse. It was revised in 2005, 2011, and 2018. This definition includes all future revisions.

Child Abuse or Neglect – The act of inflicting physical or emotional injury on a ***Child***, creating a risk of physical or emotional injury (non-accidental), engaging in a pattern of inability to parent due to drug or alcohol abuse, committing or allowing another to sexually abuse or prostitute the child, abandoning the child, or not providing a child with adequate care, food, clothing, shelter, education, or medical care (KRS 600.020). The definition also extends to the acts of any person 21+ who commits or allows to be committed an act of sexual abuse, sexual exploitation, or prostitution upon a child less than 16 years of age.

Cleric/Clergy – Men ordained to the Roman Catholic priesthood or diaconate (can. 266 §1) and includes:

- i. **Clerics** incardinated in the **Diocese**
- ii. **Clerics** who are members of institutes of consecrated life and are assigned to pastoral work or teaching in the **Diocese**
- iii. **Clerics** of other jurisdictions or other dioceses who are assigned to pastoral work or teaching in the **Diocese**
- iv. **Clerics** who seek incardination in the **Diocese**
- v. **Clerics** who are retired or who request canonical **Faculties** to do part-time or weekend-assistance ministry in the **Diocese**

Contractor/Contracted Employee – A person or company that undertakes a contract to provide materials or labor to perform a service or to do a job. Anyone working for a company contracted in the **Diocese** is a **Contracted Employee**.

Dependent Child (Dependent) – Any child, other than an abused or neglected child, who is under improper care, custody, control, or guardianship that is not due to an intentional act of the parent, guardian, or person exercising custodial control or supervision of the child (KRS 600.020(20)).

Diocesan Review Board – The confidential consultative body advising the Bishop in his:

- i. Assessment of allegations of sexual abuse of **Minors** and in his determination of suitability for ministry
- ii. Reviewing of **Diocesan** policies for dealing with sexual abuse of **Minors**
- iii. Offering advice on all aspects of these cases, whether retrospectively or prospectively (**Essential Norms** 4)

The policies and procedures governing this board can be found in the *Handbook for the Diocesan Review Board* (available at <https://covidio.org/safe-environment/>).

Diocese – The Roman Catholic Diocese of Covington.

Diocesan Entities – The parishes, schools, agencies, and institutions with direct accountability to the **Bishop**.

Director of Safe Environment – The individual who oversees, implements, and evaluates the Safe Environment Program and compliance by the **Diocese** and all **Diocesan Entities**.

Employee – Anyone who is on the payroll of the **Diocese**.

Essential Norms – The *Essential Norms for Diocesan/Eparchial Policies Dealing with Allegations of Sexual Abuse of Minors by Priests or Deacons*, issued by the United States Conference of Catholic Bishops (USCCB). These norms were originally approved by the Holy See's Congregation for Bishops on December 8, 2002, and subsequently revised in 2005.

Exploitation of Vulnerable Adult – Obtaining or using another person’s resources, including, but not limited to, funds, assets or property, by deception, intimidation, or similar means, with the intent to deprive the person of those resources (KRS 209.020(9)).

Faculties – In **Canon Law**, specific permissions or powers granted by competent Church authority, such as **Clerics**, bishops or prelates, to validly exercise certain acts of governance, sacramental ministry, or other ecclesiastical functions that require such authorization.

Harassment – Any conduct by way of words, actions, gestures, pictures, or other behaviors that create or have the potential to create an intimidating, hostile, or offensive environment for any individual or group of individuals.

Kentucky Revised Statutes (KRS) – A subject-based compilation of statutes using a decimal numbering system. The broadest subject grouping in the KRS is called a "title"; titles are made up of smaller subject units called "chapters". Chapters contain sections of the KRS, the individual laws. This definition includes all future revisions. View all statutes at <https://apps.legislature.ky.gov/law/statutes/>.

Local Coordinator – An individual who oversees, implements, and evaluates the Safe Environment Program of each **Diocesan Entity**.

Minor(s) – Any person(s) who has not reached the age of 18 (KRS.387.010) (can. 97 §1).

Neglect – See definition for **Child Abuse or Neglect**.

Office of Safe Environment – The office that serves the **Diocese** by assisting the **Bishop** in fostering an environment in which all people are treated with respect and dignity and protected from harmful and abusive behavior in all **Diocesan Entities**.

Parent – The legal guardian of a **Minor** for the purposes of this document.

Program (Youth) – Any on-going or one-time youth event sanctioned by a parish or the **Diocese**.

Sexual Abuse of a Minor/Vulnerable Adult – Any of the following:

- i. An offense against the sixth commandment of the Decalogue with a **Minor**, one who habitually lacks the use of reason, or one to whom the law recognizes equal protection (can. 1398 §1, 1°)
- ii. The act of grooming or inducing such a person to expose himself pornographically or to take part in pornographic exhibitions, whether real or simulated (can. 1398 §1, 2°)
- iii. The immoral acquisition, retention, exhibition, or distribution of pornographic images of **Minors** or of persons who habitually have an imperfect use of reason (can. 1398 §1, 3°)
- iv. Any sexual contact of a **Minor** or a **Vulnerable Adult**, or any sexual abuse as defined by KRS 510.110, 510.120, or 510.130.

Sexual Abuse of an Adult – The commission of an offense (**Adult to Adult**) against the sixth commandment of the Decalogue by force, threats, the abuse of authority, or the act of forcing someone to perform or submit to sexual acts (can. 1395 §3 and 1398 §2).

Sexual Exploitation – According to Kentucky Law, **Sexual Exploitation** “includes but is not limited to a situation in which a **Parent**, guardian, person in a position of authority or special trust, as defined in KRS 532.045, or other person having custodial control or supervision of a child or responsible for his or her welfare, allows, permits, or encourages the child to engage in an act which constitutes prostitution under Kentucky law; or a **Parent**, guardian, person in a position of authority or special trust, as defined in KRS 532.045, or other person having custodial control or supervision of a child or responsible for his or her welfare, allows, permits, or encourages the child to engage in an act of obscene or pornographic photographing, filming, or depicting of a child as provided for under Kentucky law” (KRS 600.020(63)).

Sexual Harassment – Any action by a **Cleric, Employee, or Volunteer** that:

- i. influences, offers to influence, or threatens the career, reputation, pay, or job of another person in exchange for sexual favors
- ii. makes deliberate or repeated unwanted offensive comments or gestures of a sexually explicit nature toward, or in the presence of, another person
- iii. displays or transmits to another person, without legal justification or lawful authorization, imagery of a sexually explicit nature

Sexual Misconduct (Cleric) on the part of a celibate **Cleric** is a canonical crime if it involves:

- i. an attempted marriage in which he persists after a warning (can. 1394 §1)
- ii. living in concubinage (can. 1395 §1)
- iii. a continued external sin against the sixth commandment of the Decalogue that causes scandal (*ibid*)
- iv. a public offense against the sixth commandment of the Decalogue (can. 1395 §2)

Sexual Misconduct (Religious) on the part of a religious in perpetual vows who is not a **Cleric** is a canonical crime if it involves an attempted marriage (can. 1394 §2). A religious may be dismissed from an institute due to repeated violations of the sacred bonds or grave scandal arising from the culpable behavior of the member (can. 696 §1).

Supervisor – Anyone who is a **Cleric, Employee, or Volunteer** of the **Diocese** that is 25+ and responsible for a one-time or re-occurring events including but not limited to the event’s participants, schedules, and/or funds e.g. activity or group leaders/chairpersons, children’s booth captains, etc.

United States Catholic Conference of Bishops (USCCB) – The assembly of Catholic bishops that exercises pastoral functions on behalf of the Roman Catholic Church of the United States.

Victim – A person who has alleged **Sexual Abuse, Sexual Misconduct, Sexual Harassment, or Sexual Exploitation** by a **Cleric, Employee, or Volunteer** of the **Diocese**.

Victim Assistance Coordinator (VAC) – The person who is designated by the **Bishop** to coordinate assistance for the immediate pastoral care of persons who report having been sexually abused as **Minors** by **Clergy, Employee, or Volunteer** (cf. **Charter** Article 2).

VIRTUS – The training and record keeping platform chosen by the **Diocese** to maintain Safe Environment information.

VIRTUS-Compliant Adult – An **Adult** who maintains active status in the **VIRTUS** system by meeting requirements of background checking, training and forms.

Volunteer – means any unpaid person involved in any function in the name of or on behalf of the **Diocese** or a **Diocesan Entity**.

Vos Estis Lux Mundi – is an apostolic letter by Pope Francis promulgated on May 9, 2019. It establishes new procedural norms to combat sexual abuse and ensure that bishops and religious superiors are held accountable for their actions. It establishes universal norms which apply to the whole Church. It was made permanent on March 25, 2023.

Vulnerable Adult – means “any person in a state of infirmity, physical or mental deficiency, or deprivation of personal liberty, which, in fact, even occasionally, limits his ability to understand, or to want, or to otherwise resist the offense” (*Vos Estis Lux Mundi*, art. 1 §2b); and, according to Kentucky Law, “is a person eighteen (18) years of age or older who, because of mental or physical dysfunction is unable to manage his or her own resources, carry out the activity of daily living, or protect himself or herself from neglect, exploitation, or a hazardous or abusive situation without assistance from others, and who may be in need of protective services” (KRS 209.020(4)).

Vulnerable Adult Neglect – means “a situation in which an adult is unable to perform or obtain for himself or herself the goods or services that are necessary to maintain his or her health or welfare, or the deprivation of services by a caretaker that are necessary to maintain the health and welfare of an adult” (KRS 209.020(16)).

Young Adult Aide – means an **Adult** ages 18-20 who serves as a role model and assists with **Program** needs. The individual can assist the **Supervisor** but shall not be counted as a **Chaperone** nor given supervisory responsibility.

TRAINING AND SCREENING PROCEDURES

CONFIDENTIALITY

P1010

Information obtained through the screening process—including the Safe Environment Application and Acceptance Form, reference information, interviews, and criminal background checks—is kept confidential. All material is to be kept in a locked file cabinet (or online) and access restricted to those who have a “need to know”. These materials shall not be destroyed or deleted but shall be archived indefinitely.

RESPONSIBILITY

P1020

Responsibility for adherence to the *Policies and Procedures* rests with the individual. Any person who violates the *Policies and Procedures* shall be subject to appropriate remedial action by the competent authority in each case. Corrective action may take various forms depending on the nature and circumstances of the offense. These actions include but are not limited to: oral or written citations, termination of employment or volunteer privileges, and canonical penalties as appropriate. Violations of the law shall be reported immediately to the proper authorities.

POLICIES FOR DIOCESAN ENTITIES TO CREATE A SAFE ENVIRONMENT

IMPLEMENTATION

P2010

Diocesan Entities shall implement the Safe Environment Program following the *Policies and Procedures* established/recommended by the **Diocesan Review Board** and approved by the **Bishop**.

COORDINATOR

P2020

Diocesan Entities shall appoint a local coordinator to maintain records.

RESPONSIBILITY OF COMPLIANCE

P2030

The pastor, principal, or administrator of each **Diocesan Entity** holds primary responsibility for maintaining compliance with the most current Safe Environment *Policies and Procedures*.

COMPLIANCE – CLERGY AND EMPLOYEES

P2040

Diocesan Entities shall ensure that all **Clergy** and **Employees** are **VIRTUS**-compliant.

COMPLIANCE – VOLUNTEERS IN SUPERVISORY ROLE

P2050

Diocesan Entities shall ensure that all **Volunteers** who have a **Supervisory** role are **VIRTUS**-compliant.

COMPLIANCE – VOLUNTEERS/CONTRACTED EMPLOYEES WORKING WITH MINORS/VULNERABLE ADULTS

P2060

Diocesan Entities shall ensure that all **Volunteers** and **Contracted Employees** who have direct and sustained (i.e. ongoing, continuous, or repeated) interaction with **Minors** or **Vulnerable Adults** are **VIRTUS**-compliant.

COMPLIANCE – CONTRACTED JANITORS

P2070

All contracted janitors shall be **VIRTUS**-trained and have yearly background checks through *Selection.com*. They are not required to read monthly bulletins.

FOR CLERGY, EMPLOYEES, AND VOLUNTEERS

POLICY ADHERENCE

P3010

All **Clergy**, **Employees**, and **Volunteers** who have a **Supervisory** role or who have direct and sustained (i.e., ongoing, continuous, or repeated) interaction with **Minors** or **Vulnerable Adults** in the **Diocese** shall read the *Policies and Procedures*. Each year these individuals shall sign the *Safe Environment Application and Acceptance Form* confirming they have read, understand, and agree to abide by the *Policies and Procedures* of the **Diocese**. This acknowledgement is completed digitally; a paper version is available upon request.

FORMATION OF CLERGY

P3020

All prospective **Clergy** are subject to the following:

- i. Interviews
- ii. Psychological evaluations
- iii. Reference checks
- iv. Observation and evaluation before progressing to ordination or final vows
- v. Criminal background checks upon entering formation programs, every five years thereafter, and prior to ordination

Written records for each prospective **Cleric are maintained in the appropriate office.*

SAFE ENVIRONMENT PROGRAM POLICY

VIRTUS REGISTRATION

P4010

The **Diocese** has adopted the **VIRTUS** program for promoting a safe environment *Protecting God's Children* for adults. Participants shall create an account in the **VIRTUS** system.

CRIMINAL BACKGROUND CHECK

P4020

Criminal background checks are conducted through the **Diocesan** approved vendor (currently *Selection.com*). This is completed in the *virtusonline.org* system. Additional checks may be carried out at the discretion of the **Office of Safe Environment**.

DIOCESAN POLICIES AND PROCEDURES

P4030

A printed copy shall be given to each **Cleric** and **Employee**. **Volunteers** can request a copy or access it from their **VIRTUS** account or the **Diocesan** website.

ACCEPTANCE FORM

P4040

All **Clergy**, **Employees**, and **Volunteers** shall complete the *Safe Environment Acceptance Form* agreeing to the *Policies and Procedures* of the **Diocese**. In addition, a Code of Conduct shall be signed annually.

REFERENCE CHECK

P4050

In order to bring on a new **Employee** or **Volunteer**, a reference check shall be completed by the pastor, principal, administrator, or **Local Coordinator**.

APPLICATION REVIEW

P4060

Each new applicant shall meet with the pastor, principal, administrator, or **Local Coordinator** to review the *Safe Environment Policies and Procedures*, as well as the individual's roles and responsibilities.

VIRTUS PROTECTING GOD'S CHILDREN TRAINING SESSION

P4070

An initial training session shall be attended in person. If an individual was active in **VIRTUS** in another diocese, that information shall be transferred to the **Diocese**. Information about this process is available by contacting the **Office of Safe Environment**.

BULLETINS**P4080**

Monthly bulletins shall be read on the **VIRTUS** website. Computer access shall be made available at each **Diocesan Entity** for those who do not have computer/internet access. An individual has 30 days to read a bulletin. If a bulletin is missed, a suspension shall be placed on the account until the **Local Coordinator** or the **Office of Safe Environment** releases it. Those who miss 12 bulletins shall be marked inactive. Individuals shall complete a new background check and updated *Safe Environment Application and Acceptance Form* to be re-activated.

FIVE-YEAR RENEWAL**P4090**

All **VIRTUS** users shall complete a background check, the *Safe Environment Application and Acceptance Form*, and required training (virtual or in-person) every five years.

TRAINING MODULES**P4100**

Additional online modules or requirements may be added as necessary to ensure that users have the most up-to-date information and training for the safety of **Minors** and **Vulnerable Adults**.

DATA**P4110**

The **Diocese** has the right to retain data for all users indefinitely.

SAFE ENVIRONMENT CHILDREN'S PROGRAM POLICY

PROGRAM OFFERING

P5010

In keeping with the **Charter, Diocesan** school and parish religious education programs shall offer the **VIRTUS Teaching Safety - Empowering God's Children** (EGC) curriculum.

LESSONS

P5020

Students in grades Pre-K through 11 shall receive two designated lessons annually, while students in grade 12 shall receive one video-based lesson.

EGC TEACHING

P5030

EGC lessons may be facilitated by certified teachers, counselors, or catechists.

ACCESS TO EGC LESSON PLANS

P5040

All EGC lesson plans shall be made available to these facilitators through their **VIRTUS** account and/or digitally.

PARENT NOTICE

P5050

A **Parent** shall be notified of the school or parish religious education program's intent to teach the EGC curriculum lesson at least one week prior to the lesson.

PARENT CHOICE

P5060

A **Parent** may choose to allow their children to participate, facilitate the training at home, or opt out of the lessons. The **Parent** shall sign a form if choosing to train at home or opt out. These forms are kept on file for one full Safe Environment Audit Cycle.

RESOURCES

P5070

EGC curriculum resources shall be made available to a **Parent** by the school or parish EGC facilitator. A **Parent** who chooses for their children to opt out of the training shall receive lessons to facilitate at home if desired.

TRAINING ONE TIMING

P5080

Training One shall be taught and a report logged in **VIRTUS** and filed with the **Office of Safe Environment** by December 1 of each school year. These forms are kept on file for one full Safe Environment Audit Cycle.

TRAINING TWO TIMING**P5090**

Training Two shall be taught and a report kept on file by April 1 of each school year. THIS TRAINING IS NOT LOGGED INTO **VIRTUS**. These forms are kept on file for one full Safe Environment Audit Cycle.

TRAINING AVAILABILITY**P5100**

Training shall be offered to EGC facilitators at least yearly to ensure that the lessons are being taught with fidelity to the program and data is accurate.

FACILITATOR REQUIREMENTS**P5110**

ECG facilitators shall be granted access to the Children's Training Tab and shall complete the certification module through **VIRTUS**.

SUPPLEMENTAL CONTENT**P5120**

Each school and parish religious education program is encouraged to offer additional information on abuse and related topics such as Theology of the Body, internet safety, bullying, drug/alcohol issues, suicide prevention, vaping, and other safety related topics. Follow the Speaker Policy for vetting outside speakers (see Policies and Procedures P7180).

PERSONAL AND PROFESSIONAL CONDUCT

ABIDE BY CIVIL LAWS

P6010

Clergy, Employees, and Volunteers shall abide by all moral principles, applicable professional codes of conduct, ethical norms, and civil laws.

ABIDE BY LAWS OF THE CATHOLIC CHURCH

P6020

Clergy, Employees, and Volunteers shall obey **Canon Law** and all laws of the Roman Catholic Church.

RESPECT FOR LIFE

P6030

Clergy, Employees, and Volunteers shall respect the rights, dignity, and worth of each person from conception to natural death, especially the most vulnerable.

STEWARDSHIP OF RESOURCES

P6040

Clergy, Employees, and Volunteers shall be responsible stewards of the human, temporal, and financial resources of the **Diocese** and **Diocesan Entities**.

DUTY OF COMPETENCY

P6050

Clergy, Employees, and Volunteers shall maintain a high level of competence in their designated role in the **Diocese** and prudently attend to the physical, spiritual, mental, and emotional well-being of those with whom they interact.

CHASTITY

P6060

Clergy, Employees, and Volunteers shall conduct themselves chastely according to their state of life.

HONESTY

P6070

Clergy, Employees, and Volunteers shall conduct relationships with others free of deception, manipulation, exploitation, or intimidation.

JUST TREATMENT

P6080

Clergy, Employees, and Volunteers shall work to ensure just treatment for colleagues, parishioners, and others with whom they interact.

FALSE ACCUSATIONS

P6090

Clergy, Employees, and Volunteers shall not knowingly make false accusations against another.

ENVIRONMENTAL ATTRIBUTES

P6100

Clergy, Employees, and Volunteers shall seek to provide an environment that is free from all forms of abuse and promotes respect, self-control, and personal safety.

CONFIDENTIALITY & PRIVACY

P6110

Clergy, Employees, and Volunteers shall protect the confidentiality and privacy rights of others, except when prohibited by Kentucky Law or **Canon Law**, such as when disclosure is required.

PROPER LANGUAGE

P6120

Clergy, Employees, and Volunteers shall refrain from speaking in a manner that is derogatory or demeaning while performing their work or volunteer activities. This includes refraining from swearing or using foul or sexually explicit language.

POSSESSION OF EXPLICIT MATERIAL

P6130

Clergy, Employees, and Volunteers shall refrain from possessing any sexually explicit or morally inappropriate materials (e.g., pornography) while on ecclesiastical property, during **Diocesan**-sponsored events, or while performing work or volunteer activities. This standard is particularly vital when in the company of **Minors** or **Vulnerable Adults**.

SEXUALLY OFFENSIVE HUMOR & CONVERSATION

P6140

Clergy, Employees, and Volunteers shall refrain from sexually offensive humor and inappropriate topics of conversation in any of the settings described in P6130. Such conduct is strictly prohibited, particularly in the presence of **Minors** or **Vulnerable Adults**.

PHOTO & MEDIA RELEASE FORM

P6150

Photos/videos of **Minors** shall only be taken with respect to **Parental** approval via a signed **Diocese Photograph and Media Release Form**.

INAPPROPRIATE MEDIA CREATION

P6160

Clergy, Employees, and Volunteers shall refrain from taking photos or videos of anyone while unclothed or dressing (e.g., in locker rooms, bathrooms, or bathing facilities). Photos or videos shall not be taken of **Minors** (excluding family) for personal purposes and shall never be posted on personal social media accounts.

CONDUCT WHEN WORKING WITH MINORS AND VULNERABLE ADULTS

MINOR RESIDENCE

P7010

Minors or **Vulnerable Adults** (excluding family) shall not reside or stay overnight in any church rectory or other living quarters of a priest.

SUBSTANCE PROHIBITION

P7020

Minors shall not be provided alcoholic beverages, tobacco, e-cigarette products, illegal or illicit drugs, or any substance prohibited by law.

PHYSICAL DISCIPLINE

P7030

Clergy, Employees, and **Volunteers** shall not engage in the physical discipline of a **Minor**. See (KRS 199.896(18)).

NO ADULTS ALONE WITH MINORS

P7040

Clergy, Employees, and **Volunteers** shall not be alone with a **Minor** in a residence, sleeping facility, locker room, dressing facility, or other closed room or isolated area.

GATHERINGS IN PUBLIC VENUES

P7050

Gatherings sponsored by **Diocesan Entities** shall take place on **Diocesan** property or at public/approved venues only.

GATHERINGS IN ONLINE SETTINGS

P7060

Online gatherings sponsored by **Diocesan Entities** shall be conducted via approved platforms and require active supervision by **VIRTUS-Compliant Adults**. These sessions require prior signed **Parental** permission and must never be conducted from private areas (e.g., bedrooms, bathrooms) or while any participant is in a state of undress.

TRAVEL RESTRICTIONS

P7070

Clergy, Employees, and **Volunteers** shall not travel alone with any **Minor** who is not a family member.

DRIVING & CARAVANS

P7080

Driving with **Minors** requires two **VIRTUS-Compliant Adults** per vehicle or coordinated caravan. In a caravan, at least one **VIRTUS-Compliant Adult** shall be in each car, and all vehicles shall stay together. Under no circumstances shall an **Adult** drive only one unrelated **Minor**, even within a caravan.

ADULT LODGING & SUPERVISION – OVERNIGHTS

P7090

Clergy, Employees, and Volunteers shall not sleep in the same room with a **Minor** or **Vulnerable Adult**. **Clerics** shall not stay on rental properties (e.g. Airbnbs or cabins) where **Minors** will be staying overnight; separate off-site accommodation shall be arranged. If a **Supervisor** shall enter a **Minor's** room, the door shall remain open, two **Supervisors** shall be present, and the **Supervisor** entering the room shall be of the same biological sex if possible.

YOUTH LODGING – OVERNIGHTS

P7100

Pre-school and elementary youths (Pre-K-grade 5) shall not attend overnight trips without a **Parent** present. Junior high (grades 6-8) and high school (grades 9-12) youths shall not room together unless they are siblings. Youths shall not room with anyone more than one grade level above or below them unless siblings. Those 18+ shall not room with anyone under 18 except for enrolled high school students who are 18+. Students of the opposite sex shall not room together. High school youths may request a private room with signed **Parental** permission. **Parents** assume any additional financial responsibility. This accommodation shall be made if possible. **Parents** shall be notified if the request cannot be fulfilled to determine the best course of action.

“LOCK-IN” AGE GROUP GUIDELINES

P7110

A “Lock-in” is defined as youths staying overnight together in a large facility, (e.g. gym, cafeteria, conference room, etc. Lock-ins shall be restricted to a single age group of either all junior high (grades 6-8) or all high school (grades 9-12). Elementary school lock-ins and mixed junior and high school lock-ins are prohibited.

“LOCK-IN” SUPERVISION GUIDELINES

P7120

Adults staying overnight must be **VIRTUS-compliant**. **Adults** shall not sleep next to youth or share bathing facilities with youth. **Adults** shall monitor and/or lock off-limit areas. Youth must sleep, at a minimum, at least 3 feet apart and may not share bedding. Youth pajamas shall meet the modesty guidelines of the organization. Event permission forms shall notify **Parents** if mixed genders will be present.

BOUNDARIES**P7130**

Clear professional boundaries shall be maintained. If the **Minor** or **Vulnerable Adult** challenges these boundaries, the individual should be referred to another **Supervisor** immediately.

ONE-ON-ONE PASTORAL CARE/ COUNSELING**P7140**

Excluding the Sacrament of Confession, meetings with **Minors** or **Vulnerable Adults** shall occur in high-visibility locations, such as rooms with windows or doors left open to allow a **VIRTUS-Compliant Adult** to monitor the session. Sessions shall be limited in length and frequency, with appropriate professional referrals made when necessary. Online meetings require signed **Parental** permission and must never be conducted from private areas (e.g., bedrooms or bathrooms) or while someone is in a state of undress.

OUTSIDE ENTITIES MEETING WITH CHILDREN**P7150**

External service providers (e.g., Child Protective Services, outside counselors, or private therapists) meeting with a child or group of children on-site must be escorted and monitored by a **VIRTUS-Compliant Adult**. These meetings must adhere to the same "high-visibility" accountability standards outlined in P7120. Individuals providing these services on a regular basis must be **VIRTUS**-compliant.

MEDICATION**P7160**

Medication shall not be administered without written **Parental** permission and must strictly follow the specific policy of the **Diocesan Entity**.

ELECTRONIC COMMUNICATION**P7170**

Communication with non-familial **Minors** shall be conducted via official parish, school, or agency platforms that can be monitored by administration and/or **Parents**. Texting or calling a **Minor's** personal cellular device is prohibited.

SOCIAL MEDIA**P7180**

The use of personal social media accounts to engage directly with **Minors** is strictly prohibited for **Clerics, Employees, and Volunteers**. Extreme care shall be used when utilizing social media.

REPORT INAPPROPRIATE PERSONAL COMMUNICATION**P7190**

Any inappropriate communication received from a **Minor** – especially a communication that is sexual in nature – shall be retained and reported immediately to civil authorities, the **Program Supervisor**, and the **Office of Safe Environment**.

ENTERTAINMENT RATING GUIDELINES

P7200

All media (films, games, software) must comply with standard rating guidelines. R-rated or objectionable content requires prior approval from the **Diocesan Entity** and signed **Parental** consent. Those seeking approval in **Diocesan** schools shall follow the approval procedure of the Department of Catholic Schools.

KEY POSSESSION

P7210

Clergy, Employees, and Volunteers shall not give **Minors** or **Vulnerable Adults** keys to any **Diocesan Entity** for any reason.

GUEST PRESENTERS, PERFORMERS & MINISTERS

P7220

Supervisors must utilize Verification of Good Standing (VOGS) forms for all visiting **Clergy**, religious, and laity to ensure fidelity to Church teaching and safety compliance. *The full VOGS policy, procedures, and screening application forms are available on the Chancery webpage (www.covdio.org/chancery) under "Speaker/Minister Verification of Good Standing." See Policies and Procedures 17000s for more information on the granting of faculties for extern Clergy.*

SUPERVISION PROCEDURES

NUMBER OF VIRTUS-COMPLIANT ADULTS

P8010

Two or more **VIRTUS-Compliant Adults** shall be present with **Minors** or **Vulnerable Adults**. This rule applies even if only one **Minor** or **Vulnerable Adult** is in attendance. **Young Adult Aides** of 18-20 years can assist a **Supervisor** but cannot be a **Supervisor** or act as a **Chaperone**. These ratios apply to parish and school activities (field trip, service, non-classroom events, retreats, ministry and activities). Two **VIRTUS-Compliant Adults** plus one additional **VIRTUS-Compliant Adults** for each of the following:

- | | | |
|------|------------------|--------------------------------|
| i. | Grades K-3 | 5 Minors |
| ii. | Grades 4-5 | 6 Minors |
| iii. | Grades 6-8 | 8 Minors |
| iv. | Grades 9-12 | 10 Minors |
| v. | Mixed age Groups | Use the lowest age group ratio |

INCREASE OF SUPERVISORS

P8020

In addition to the above minimum standards, **VIRTUS-Compliant Adult Supervision** shall increase in proportion in regard to the location, level of risk, number and age of **Minors** or **Vulnerable Adults**.

MINORS CANNOT SUPERVISE

P8030

Minors shall not supervise **Minors**. They are counted as **Minors** in all ratios and never as **VIRTUS-compliant Adults**

SCOUTING/CHARTERED ORGANIZATIONS SHALL BE VIRTUS COMPLIANT

P8040

Scouting or any organization using **Diocesan** property shall follow all *Policies and Procedures* including **VIRTUS** compliance.

VIRTUS COMPLIANCE FOR YOUTH FOCUSED TRAVEL

P8050

All **Adults** participating in youth-focused trips (travel, retreats, mission trips, campouts, etc.) sponsored by a **Diocesan Entity** with **Minors** or **Vulnerable Adults** shall be approved in advance and be **VIRTUS-compliant**, even if they are not serving as **Chaperones**. This includes those **Adults** staying in rooms provided by the **Diocesan Entity**.

SUPERVISION TIMEFRAME

P8060

Supervision is considered to extend to periods before and after an event, including when **Minors** and **Vulnerable Adults** are waiting for transportation outside the approved event entrance.

RELEASE MINORS TO PARENT

P8070

In the absence of written consent, **Supervisors** shall release elementary and junior high school (Pre-K to 8) **Minors** only to a **Parent**.

SIGNED FORMS

P8080

Supervisors are responsible for the distribution and collection of all necessary forms (paper or electronic), including but not limited to written permission for off-campus travel, Medical release forms, Photo/Media release forms, specific written approval for high-risk activities (e.g., swimming, spelunking, athletic events). It is the responsibility of the **Supervisor** to ensure that all forms are filled out correctly and signed by a **Parent**.

QUALIFIED DRIVERS

P8090

Only individuals who meet all state requirements to drive and possess a clean driving record may drive any vehicle (chartered, rental, personal vehicle) on behalf of a **Diocesan Entity**. Individuals with a driving “CAUTION” on their **VIRTUS** account shall not drive. No **Minor** shall drive other **Minors** on behalf of a **Diocesan Entity**. **Volunteers** shall submit a *Driver Form* to the respective **Diocesan Entity** for approval.

SUBSTANCE-FREE CONDUCT FOR YOUTH FOCUSED TRIPS

P8100

Any **Adult** participating in youth-focused **Diocesan** travel (domestic or abroad) involving participants under 21 shall remain entirely free of alcohol, tobacco, e-cigarette products, and recreational drugs for the entire duration of the event or trip.

FACILITY MONITORING

P8110

Supervisors shall monitor facilities during church services and all school or other activities where **Minors** or **Vulnerable Adults** are present and check “off limits” and secluded areas regularly.

SEARCH & SEIZURE

P8120

A **Supervisor** may inspect a person or his/her possessions to ensure safety. A second teacher/**Chaperone** shall be present as a witness during any search. If a **Supervisor** asks a student/participant to hand over something or take something out of his/her pocket, that is not considered a search. (Read the full *Search and Seizure Policy* in the appendix.)

INJURY OR ACCIDENT REPORTING**P8130**

In the event of an injury or accident, ***Supervisors*** shall contact the Business Manager at the respective ***Diocesan Entity*** and complete an *Incident Information Report* (see appendix) and submit it to the Office of Finance. If the parish does not have a Business Manager, the Pastor will be notified.

HARASSMENT OF MINORS OR VULNERABLE ADULTS

PERSONAL RESPONSIBILITY

P9010

Clergy, Employees, and Volunteers shall not engage in physical, psychological, written, or verbal **Harassment** of **Minors** or **Vulnerable Adults** and shall not tolerate such **Harassment** by others to any **Minor** or **Vulnerable Adults**.

HARASSMENT BEHAVIORS

P9020

Harassment encompasses a broad range of behaviors that can be physical, written, or verbal, including but without limitation, the following:

- i. Physical abuse
- ii. Mental abuse
- iii. Racial insults
- iv. Derogatory ethnic slurs
- v. Intimidation
- vi. Unwelcome sexual advances or touching
- vii. Sexual comments or sexual jokes
- viii. Requests for sexual favors

PROCEDURE FOR ADDRESSING HARASSMENT CLAIMS OF MINORS OR VULNERABLE ADULTS

REPORTING PARTY TO PROVIDE A WRITTEN STATEMENT

P10010

A party reporting **Harassment** shall prepare a written statement about the **Alleged Harassing** conduct. If necessary, an **Adult** shall assist a **Minor** or **Vulnerable Adult** with the creation and sharing of the report.

PROVIDE STATEMENT TO SAFE ENVIRONMENT OFFICE

P10020

In the case of **Harassment** by an **Adult** towards a **Minor** or **Vulnerable Adult** or **Harassment** by a **Minor** towards another **Minor** or **Vulnerable Adult** that is sexual in nature, the report shall be forwarded to the **Office of Safe Environment** using the *Safe Environment Incident/Disclosure Form* (see appendix).

DIOCESAN INVESTIGATION – ASSISTING PARTIES

P10030

The **Diocese** or **Diocesan Entity** shall investigate the complaint with the assistance of consultants, counsel, experts, **Diocesan** and parochial personnel, and any other person deemed appropriate.

PROMPT ACTION AS WARRANTED

P10040

The **Diocese** or **Diocesan Entity** shall take prompt action as warranted by the results of the investigation and shall have discretion to respond as the facts may reveal.

REMEDIAL PLAN OF ACTION

P10050

To the extent that remedial action is appropriate, the reporting party, the **Accused**, the pastor, the principal, and other church personnel may be involved as needed in working out a remedial plan of action.

WRITE AND REVIEW IMPLEMENTATION STEPS

P10060

Steps for implementing the remedial action shall be put in writing and signed by the reporting party, the **Accused**, and other appropriate individuals, e.g., the pastor, the principal, etc.

NO RETALIATION

P10070

There shall not be retaliation for reporting **Harassing** conduct.

INFORMATION TO REMAIN CONFIDENTIAL

P10080

The person to whom the ***Allegations*** are reported shall keep all information regarding the report and investigation confidential, except to the extent it is reasonably necessary to conduct the investigation and act on the results thereof.

CAUTION AND DEFAULT PROFILES

CAUTION PROFILE

P11010

If an individual has been determined to have criminal activity or noted behavioral indiscretions, they shall have a “CAUTION” placed on their **VIRTUS** account. A letter shall be sent to the individual, pastor, and, if appropriate, school principal, or agency administrator stating that the individual shall have a limited role or shall need additional supervision.

DEFAULT PROFILE

P11020

No person shall serve with **Minors** and **Vulnerable Adults** if he or she has been determined to be unsuitable to work or volunteer in the **Diocese**. This determination is based on the criminal background check that the individual completed and the recommendation of the **Director of Safe Environment** in conjunction with the **Diocesan Review Board** and **Bishop**. Any offense which, at the discretion of the **Diocese**, would have a negatively sustained impact to the safe environment or operations of the **Diocese**, would be a disqualifying offense. This individual’s **VIRTUS** account would carry the designation “DEFAULT.” A letter would then be sent to the individual, pastor, and, if appropriate, school principal, or agency administrator stating that the individual shall not be employed or volunteer. No restriction is placed on attending Mass or public events.

DEFAULT APPEAL PROCESS

P11030

Individuals that have a “DEFAULT” may appeal to the **Diocesan Review Board** for a repeal of the “DEFAULT” designation. These appeal requests shall be heard at the quarterly meetings. The offense must have been adjudicated, and all conditions of the court must have been met (proof shall be provided) at least five years prior. Appellants shall write a letter to the **Diocesan Review Board** explaining the incident, its impact, and how they have changed or grown since. The appellant shall provide letters of support for their appeal. Those who can are encouraged to seek expungement for their charge before appealing to the board. The **Diocesan Review Board** shall make a recommendation to the **Bishop** who shall make the final determination. Anyone who has a “DEFAULT” repealed shall carry a “CAUTION” on their account indefinitely.

WHEN ABUSE IS SUSPECTED OR A DISCLOSURE HAS BEEN MADE, CLERICS, EMPLOYEES, AND VOLUNTEERS MUST REPORT THE INCIDENT TO CIVIL AUTHORITIES.

Reporting Step 1: Report to Civil Authorities

Reporting Step 2: Report to the Office of Safe Environment

(See page two for contact information)

KENTUCKY LAW REPORTING PROCEDURES

MANDATORY REPORTING IN KENTUCKY

P12000

Kentucky is a mandatory reporting state of suspected abuse or neglect of a **Minor** or **Vulnerable Adult**. Any person who intentionally violates this reporting obligation is subject to criminal penalties (KRS 620.030(20)). Anyone who makes a report upon reasonable cause and in good faith shall have immunity from any liability, civil or criminal, that might otherwise be incurred or imposed (KRS 620.050). **Making a report to civil authorities shall be followed by making a report to the **Office of Safe Environment**.*

TYPES OF REPORTING OBLIGATIONS

P12010

There are two types of reporting obligations under Kentucky Law. Individuals shall report **Child Dependency, Neglect, or Abuse**; and individuals shall report **Adult Neglect, Abuse, or Exploitation**.

DUTY TO REPORT CHILD DEPENDENCE, NEGLECT, ABUSE

P12020

According to Kentucky Law, "Any person who knows or has reasonable cause to believe that a **Child** is **Dependent, Neglected, or Abused** shall immediately cause an oral or written report to be made to a local law enforcement agency or to the Department of Kentucky State Police, the Cabinet for Health and Family Services or its designated representative, the Commonwealth's Attorney, or the County Attorney by telephone or otherwise" (KRS 620.030 (1)).

DUTY TO REPORT ADULT ABUSE, NEGLECT, EXPLOITATION

P12030

Kentucky Law also requires that any person who has reasonable cause to suspect that an **Adult** has suffered **Abuse, Neglect, or Exploitation** shall report, either orally or in writing, to the Cabinet for Health and Family Services (KRS 209.030(2) and (3)). Anyone acting upon reasonable cause in making a report of **Adult Abuse, Neglect, or Exploitation** shall have immunity from any civil or criminal liability (KRS 209.050).

SAFE ENVIRONMENT REPORTING PROCEDURES

REPORT TO CIVIL AUTHORITIES

P13010

When abuse is suspected or has been disclosed, the duty to report to civil authorities takes precedence over the duty to report to the **Director of Safe Environment**. Making a report to the **Director of Safe Environment** is not a substitute for the duty to report to civil authorities.

REPORT POLICY AND PROCEDURE VIOLATIONS IMMEDIATELY

P13020

Clerics, Employees, and Volunteers shall immediately report any violation of the *Policies and Procedures* by a **Cleric, Employee, or Volunteer** via phone or email to the **Director of Safe Environment**. The report shall be followed by the submission of the *Safe Environment Incident/Disclosure Form* found in the appendix. (See page two for contact information.)

THE ACCUSED TO NOTIFY DIRECTOR OF SAFE ENVIRONMENT

P13030

Any **Cleric, Employee, or Volunteer** who has been accused of engaging in inappropriate conduct shall immediately notify the **Director of Safe Environment**.

ANTI-RETALIATION PROTECTION

P13040

Any person who makes a report in good faith to civil authorities and/or to the **Director of Safe Environment** shall be protected from retaliation. Any person found to have retaliated against an individual for reporting to civil authorities and/or to the **Director of Safe Environment** is subject to appropriate disciplinary action, up to, and including immediate termination.

VICTIM ASSISTANCE COORDINATOR

VICTIM ASSISTANCE COORDINATOR (VAC) DUTIES

P14010

The **VAC** manages assistance for the immediate pastoral care of persons who report having been ***Sexually Abused*** as ***Minors*** by ***Clergy*** or other church personnel (***USCCB*** Article 2). The journey to healing and wholeness for those who have been sexually abused by a representative of the church is of great importance. Anyone needing assistance in obtaining help on this journey is asked to contact the **VAC**. Assistance is offered with compassion and confidentiality.

COMPLAINT AND CONTACT INFORMATION PROCEDURE AVAILABILITY

P14020

Procedures for making a complaint to and contact information for the **VAC** are found in this document and are posted in the Messenger at least twice per year (***Charter***, Article 2).

TREATMENT OF PERSON MAKING ALLEGATION AND ACCUSED

P14030

Anyone making an ***Allegation*** is treated with dignity and respect, as shall be the ***Accused***, bearing in mind the ***Accused's*** right to a presumption of innocence.

CIVIL AUTHORITIES TO BE INFORMED

P14040

The **VAC** will inform civil authorities of any allegation of abuse of a ***Child*** or ***Vulnerable Adult***.

BISHOP TO BE INFORMED

P14050

The ***Bishop*** or his representative shall be informed if a report involves a ***Cleric***, ***Employee***, ***Volunteer***, or any ***Minor*** who is involved with a ***Diocesan Entity***.

PASTORAL SESSION WITH BISHOP/REPRESENTATIVE

P14060

A pastoral session with the ***Bishop*** or his representative is offered in person or virtually at the ***Bishop's*** discretion.

PRINCIPLES FOR INVESTIGATING COMPLAINTS OF SEXUAL ABUSE

PROMPT INVESTIGATION AND RESPONSE

P15010

The **Diocese** shall investigate and respond promptly to any **Allegation** that **Sexual Abuse** or **Sexual Misconduct** has occurred while respecting confidentiality, privacy, and the reputation of persons involved. The **Diocese** shall not interfere with investigations by civil authorities.

COOPERATION WITH AUTHORITIES

P15020

The **Diocese** shall cooperate with local authorities concerning investigations of a complaint of **Sexual Abuse** involving a **Minor** or **Vulnerable Adult** —even if the **Victim** is no longer a **Minor** — and shall conduct its own investigations with respect for civil law (**Charter**, Article 4).

RESPECT ALL PARTIES INVOLVED

P15030

The **Diocese** shall take care to respect and protect the rights of all parties involved, particularly those of the person alleging to have been **Sexually Abused** or **Harassed** and of the person against whom the charge has been made.

RESPONDING TO ALLEGATIONS OF ABUSE BY A CLERIC

VICTIM ASSISTANCE COORDINATOR (VAC) TO NOTIFY BISHOP

P16010

The **VAC** shall notify the **Bishop** and assist him regarding the manner in which to proceed, including the undertaking of a preliminary investigation.

BISHOP SHALL TAKE IMMEDIATE ACTION

P16020

The **Bishop** shall take immediate, appropriate action to prevent further acts of **Sexual Abuse** or harm to the **Victim** in accordance with civil law and **Canon Law**. Such action may include, but is not limited to, placing the accused person on administrative leave and withdrawing permission to engage in acts of ministry.

ASSIST VICTIM WITH CARE

P16030

The **Bishop**, **VAC**, or their designee shall promptly assist the **Victim** in securing appropriate pastoral and/or therapeutic care and support.

PRELIMINARY INVESTIGATION WHEN REQUIRED

P16040

The **Bishop** shall decree the initiation of a preliminary investigation when a complaint of **Abuse** of a **Minor** or **Vulnerable Adult** is determined not to be manifestly impossible. This investigation shall be carried out using the assistance of consultants, counsel, experts, **Diocesan** and Parochial Personnel, and any other person deemed appropriate.

BISHOP TO DETERMINE COMMUNICATION PLAN

P16050

The **Bishop** or his designee shall determine the manner in which this information is to be communicated to the **Accused** and any other persons. All investigations shall be conducted in accordance with **Canon Law**. During the investigation, the **Accused** enjoys the presumption of innocence (can. 1321 §1), and all appropriate steps shall be taken to protect his reputation. The **Accused** shall be encouraged to retain the assistance of civil and canonical counsel. An **Alleged** offending **Cleric** may be requested to seek and may be urged to comply with an appropriate medical and psychological evaluation at a facility mutually acceptable to the **Diocese** and to the **Accused**.

BISHOP TO RECEIVE REPORT WHEN EVIDENCE IS COLLECTED

P16060

The **Bishop** shall receive a report of all materials, facts, and findings from the **Director of Safe Environment** when all the evidence has been collected and the preliminary investigation is complete.

BISHOP TO SUBMIT REPORT TO THE APOSTOLIC SEE **P16070**

The **Bishop**, after consultation with the **Diocesan Review Board**, shall determine whether he believes that the accusation possesses a semblance of truth. If the accusation concerns a reserved delict, then the **Bishop** shall submit the results of the preliminary investigation along with his votum to the Dicastery for the Doctrine of the Faith. Otherwise, he shall decide whether to initiate a penal process.

PRECAUTIONARY MEASURES **P16080**

If the **Bishop** determines at any time that there is sufficient evidence that **Sexual Abuse** of a **Minor** or **Vulnerable Adult** by a **Cleric** has occurred, then he shall impose the precautionary measures mentioned in can. 1722, i.e., withdrawal of the accused from exercising the sacred ministry or any ecclesiastical office or function, imposition or prohibition of residence in a given place or territory, and prohibition from public participation in the Most Holy Eucharist pending the outcome of the process (**Essential Norms** 6).

CANON LAW TO BE OBSERVED **P16090**

In every case, the norms of **Canon Law** shall be observed.

ACCUSED MAY RETAIN COUNSEL **P16100**

The **Accused** shall be encouraged to retain the assistance of civil and canonical counsel.

BISHOP MAY REMOVE CLERIC/RESTRICT FACULTIES **P16110**

At all times, the **Bishop** has the executive power of governance, within the parameters of the universal law of the Church, through an administrative act, to remove an offending **Cleric** from office, to remove or restrict his faculties, and to limit his exercise of priestly ministry.

ACCUSED MAY REQUEST DISPENSATION FROM CLERICAL OBLIGATIONS **P16120**

The **Cleric** may at any time request dispensation from the obligations of the **Clerical** state.

BISHOP MAY REQUEST DISMISSAL OF PRIEST BY THE HOLY FATHER **P16130**

In exceptional cases, the **Bishop** may request of the Holy Father the dismissal of the **Cleric** from the **Clerical** state *ex officio*, even without the consent of the **Cleric**.

OFFENDER TO BE REMOVED FROM MINISTRY WHEN ABUSE ESTABLISHED **P16140**

When even a single act of **Sexual Abuse** of a **Minor** or **Vulnerable Adult** by a **Cleric** is admitted or is proven after an appropriate process in accordance with **Canon Law**, the offending **Cleric** shall be removed permanently from ecclesiastical ministry — not excluding dismissal from the **Clerical** state, if the case so warrants.

OFFENDER TO LEAD LIFE OF PRAYER AND PENANCE IF NOT DISMISSED

P16150

If the delict is proven, but the penalty of dismissal from the *Clerical* state has not been applied (e.g., for reasons of advanced age or infirmity), the offender shall lead a life of prayer and penance. Other penalties may be imposed upon the cleric, such as prohibition from exercising sacred ministry or from presenting himself as a priest.

RESTORE GOOD NAME

P16160

If an accusation is withdrawn or not proven, then every step possible shall be taken to restore the good name of the falsely accused.

RETURN FALSELY ACCUSED TO SERVICE

P16170

Every effort shall be made to return the falsely accused to ministry in the *Diocese*.

TRANSFERS AND RECEPTIONS FOR MINISTERIAL ASSIGNMENTS BETWEEN DIOCESES

PROHIBITION OF TRANSFER FOR OFFENDERS

P17010

No **Cleric** who has committed an act of **Sexual Abuse** of a **Minor** or **Vulnerable Adult** shall be transferred for a ministerial assignment in another diocese/eparchy.

MANDATORY DISCLOSURE FOR OUTGOING CLERICS

P17020

Before a **Diocesan Cleric** may transfer residence to another diocese, the **Bishop** shall forward to the receiving bishop, in a confidential manner, any and all information concerning any act of **Sexual Abuse** of a **Minor** or **Vulnerable Adult** and any other information indicating that he may pose a danger to **Minors** or others.

RECEPTION OF INCOMING CLERICS FROM ANOTHER DIOCESE/EPARCHY

P17030

Should the **Bishop** receive a **Cleric** from outside his jurisdiction, he shall obtain the necessary information regarding any past act of **Sexual Abuse** of a **Minor** or **Vulnerable Adult** by the **Cleric** in question.

RECEPTION OF INCOMING CLERICS FROM AN INSTITUTE OR SOCIETY

P17040

In the case of the assignment for residence of such a **Clerical** member of an institute or a society into a local community within the **Diocese**, the major superior shall inform the **Bishop** and share with him, in a manner respecting the limitations of confidentiality found in **Canon Law** and civil law, all information concerning any act of **Sexual Abuse** of a **Minor** or **Vulnerable Adult** and any other information indicating that he has been or may be a danger to **Minors** or **Vulnerable Adults** so that the **Bishop**/eparch can make an informed judgment that suitable safeguards are in place for the protection of such persons. This shall be done with due recognition of the legitimate authority of the **Bishop**; of the provisions of CIC, canon 678, (CCEO, canons 415 §1 and 554 §2), and of CIC, canon 679; and of the autonomy of the religious life (CIC, c. 586 §1).

TEMPORARY FACULTIES FOR EXTERN CLERGY

P17050

Bishops, priests, and deacons from outside the **Diocese** who wish to provide ministerial service on a short-term basis, including but not limited to the (con) celebration of Mass and other Sacraments (as applicable), speaking engagements, participation in spiritual activities such as retreats, days/evenings reflection, prayer services, etc., must be screened and cleared for ministry by the Chancery Office of the **Diocese** according to current Verification of Good Standing (VOGS) policy. Temporary faculties shall be granted for the specific date, location, and type of ministry once the proper documentation of good standing has been received by the Chancery from the **Cleric's** diocese or religious order. The screening process must be followed for every individual event or series of events, even if the prospective **Cleric** has provided service in the **Diocese** previously. Advertising for an event may not take place until good standing has been verified and clearance given to accept the services of the **Cleric**. *The full VOGS policy, procedures, and screening application forms are available on the Chancery webpage (www.covdio.org/chancery) under "Speaker/Minister Verification of Good Standing."*

ANNUAL FACULTIES FOR EXTERN CLERGY

P17060

Bishops, priests, and deacons from outside the **Diocese** who visit the **Diocese** on a regular, ongoing basis or reside in the **Diocese** temporarily, and who wish to provide ministerial service, may request faculties that are renewable annually. These faculties must be requested from the **Bishop**. If the request is accepted, the **Cleric** must complete a background check through the **Office of Safe Environment**, and the Chancery Office will request a Letter of Suitability and Good Standing (including verification of compliance with his diocese's safe environment policies) from the **Cleric's** diocese or religious order. Once the background check is complete and clear and the proper documentation has been received, faculties will be granted for the period of one year. The faculties can be renewed each year with an updated Letter of Suitability and clear background check. **Clergy** who have been granted annual faculties are not required to be screened and cleared through the VOGS process outlined above.

PERMANENT FACULTIES FOR EXTERN CLERGY

P17070

Priests and deacons from outside the **Diocese** who are assigned and reside within the **Diocese**, or who reside in or near the **Diocese** and wish to provide long-term ministerial service, receive permanent faculties. These faculties are granted by the **Bishop** after communication and mutual arrangement between the **Bishop** and the **Cleric's** bishop or religious superior, screening by the Chancery Office, as well as completion of all requirements of the Safe Environment policies of the **Diocese**, including participation in the selected safe environment program. **Clergy** who have been granted permanent faculties are not required to be screened and cleared through the VOGS process outlined above.

INCARDINATED PRIESTS LIVING OUTSIDE THE DIOCESE**P17080**

When a priest who is incardinated in the ***Diocese of Covington*** is living outside of the ***Diocese***, the ***Office of Safe Environment*** will correspond with the local Office of Safe Environment of the city of the priest's residence yearly regarding the status of the priest. This includes ***Allegations*** or substantiation of abuse, and whether the priest has faculties in that diocese or in the ***Diocese of Covington***. Appropriate procedures will follow if ***Allegations*** have been made.

PRIESTS LIVING IN THE DIOCESE INCARDINATED IN OTHER DIOCESES**P17090**

When a priest who is incardinated in a diocese outside of Covington is living inside the ***Diocese***, the ***Office of Safe Environment*** will correspond with the incardinated diocese yearly regarding the status of the priest. This includes ***Allegations*** or substantiations of ***Abuse*** and whether he has faculties in the ***Diocese of Covington*** or the incardinated diocese. Appropriate procedures will follow if allegations have been made.

RELIGIOUS ORDERS AND SAFE ENVIRONMENT PROTOCOLS**P17100**

Each year the ***Bishop*** will send a letter to all religious orders who have representation in the ***Diocese***. This letter will inform them of the policies and procedures the ***Bishop*** will follow if there is an allegation of abuse of a ***Minor*** or ***Vulnerable Adult*** by a member of their order while working in the ***Diocese***.

SUBSTANTIATED CLAIMS AGAINST NON-CLERICS

NO KNOWN ABUSER SHALL MINISTER, WORK, OR SERVE **P18010**

No person known to have **Abused** a **Minor** or **Vulnerable Adult** shall be permitted to minister, work, or serve in the **Diocese**.

CANONICAL PROCESS **P18020**

The **Bishop** begins a canonical penal process, if appropriate, when a person admits to or is convicted of the **abuse** of a **Minor** or **Vulnerable Adult** or when the claim of **Abuse** has been substantiated after an investigation.

ASSIST VICTIM WITH CARE **P18030**

The **Bishop, VAC**, or their designee shall promptly assist the **Victim** in securing appropriate pastoral and/or therapeutic care and support.

REMOVAL FROM MINISTRY **P18040**

The **Bishop** or his designee shall direct the appropriate **Supervisor** to remove the person from ministry immediately to prevent further acts of **Sexual Abuse** to the **Victim** in accordance with civil and/or Canon Law.

CONTRACT TERMINATION **P18050**

The **Bishop** or his designee shall terminate the contract of an **Employee** or independent **Contractor** or dismiss a **Volunteer** when an **Allegation** is substantiated.

COMMUNICATION OF PROHIBITIONS WITHIN ANY DIOCESE/PAROCHIAL ENTITY **P18060**

The **Bishop** or his designee shall direct the appropriate **Supervisor** to communicate the prohibitions from any future employment or service of the **Accused** in connection with any **Diocesan Entity**.

APPEAL OF DISMISSAL **P18070**

An appeal of a dismissal can be made by letter to the **Bishop** by submitting a letter to the **Diocesan Review Board** using the “DEFAULT” appeal process as outlined in this document (see *Policies and Procedures 11000s*).

RESTORE GOOD NAME**P18080**

If an ***Allegation*** is withdrawn or not proven, then every step possible shall be taken to restore the good name of the falsely ***Accused***.

RETURN FALSELY ACCUSED INDIVIDUAL TO SERVICE**P18090**

Every effort shall be made to return the falsely ***Accused*** to their position in the ***Diocese***.

RELEASE OF INFORMATION

SETTLEMENTS AND CONFIDENTIALITY

P19010

The ***Diocese*** shall not enter into settlements that bind the parties to confidentiality unless the ***Victim*** requests confidentiality and this request is noted in the text of the agreement (***Charter***, Article 3).

TRANSPARENCY AND PRIVACY

P19020

The ***Bishop*** and all ***Diocesan Entities*** charged with implementing the *Policies and Procedures* shall be transparent to the extent possible, with regard to civil law and ***Canon Law***, to the people in the relevant parish and community about instances of ***Sexual Abuse*** of ***Minors*** and ***Vulnerable Adults***, with respect always for the privacy and the reputation of the individuals involved.

Promulgated 6/2/26

APPENDIX

Safe Environment Incident/Disclosure Reporting Form

Diocese of Covington Driver Form

Diocese of Covington Photograph and Media Release Form

Diocese of Covington Medical Form *(to be added)*

Incident Information Report (Accident/Injury)

Search and Seizure Policy

** All forms are available on the Safe Environment webpage (<https://covidio.org/safe-environment>) in a fillable format.*

DIOCESE OF COVINGTON

OFFICE OF SAFE ENVIRONMENT

INCIDENT AND DISCLOSURE REPORTING FORM

ALL SUSPICIONS OR INCIDENTS OF ABUSE OR NEGLECT OF A MINOR OR VULNERABLE ADULT SHALL BE REPORTED TO CIVIL AUTHORITIES UNDER KENTUCKY LAW. IF YOU BELIEVE THAT ABUSE OR NEGLECT IS OCCURRING NOW, OR IS IMMINENT, DIAL 911 TO GET IMMEDIATE HELP!

This report is to be completed for every Safe Environment Incident/Disclosure involving:

- A minor (may or may not be a student or parishioner) on Diocesan property, or at a Diocesan event. This includes incidents incited or involving other minors.
- A vulnerable adult (may or may not be a student or parishioner) on Diocesan property, or at a Diocesan event.
- Anyone who is experiencing abuse, harassment, or discrimination at the hands of a cleric, employee or volunteer of the Diocese of Covington.

This form shall be filled out by the individual who received the disclosure statement or witnessed the incident. One report form shall be filed, but multiple witness statements may be attached to one report form.

GENERAL INFORMATION – WHO IS MAKING THIS REPORT	
(Legal) First:	Last:
Role: ☐ Cleric ☐ Religious ☐ Educator ☐ Employee ☐ Volunteer	
Job title or volunteer duties during Incident/Disclosure:	
INCIDENT INFORMATION	
Incident/Disclosure Date:	Incident/Disclosure Time:
Parish, School or Agency where Incident/Disclosure occurred. <i>If off-site, list sponsoring entity and address where incident/disclosure occurred:</i>	
Please describe the Incident/Disclosure:	
Additional witness statement/information attached? ☐ Yes ☐ No	
Was a report made to civil authorities? ☐ Yes ☐ No	Which agency?
Agency contact information:	If applicable, list the case or report number:

DIOCESE OF COVINGTON
OFFICE OF SAFE ENVIRONMENT
INCIDENT AND DISCLOSURE REPORTING FORM

ADDITIONAL ACTION TAKEN	
_____ Parent/Guardian notified: Copy of notification attached? _____ Yes _____ No _____ Student released to agency or authorities _____ Student transported via ambulance to hospital _____ Other: _____	
PERSON COMPLETING REPORT	
(Legal) First:	Last:
Signature:	Date:
PERSON SENDING REPORT	
(Legal) First:	Last:
Signature:	Date:

*The pastor, principal or director is responsible for filing the reporting form for school incidents/disclosures; the pastor is responsible for filing the reporting form for parish incidents/disclosures.

ORIGINAL: SCHOOL OR PARISH FILE

COPY: JULIE FEINAUER, OFFICE OF SAFE ENVIRONMENT (jfeinauer@covdio.org)

Revised: 4/29/26

DIOCESE OF COVINGTON

DRIVER FORM

Field Trip/Event Transportation Policy

Commercial carrier or contracted transportation is the most desirable method to be used for field trips and, whenever possible, this mode of transportation should be provided. The use of private passenger vehicles is discouraged and should be avoided if at all possible. If commercial carriers are used (i.e. commercial airlines, trains, or buses), no further information is required. However, if transportation is contracted, signed contracts should be executed with an appropriate hold harmless agreement protecting the parish/school and the Diocese of Covington. Also, contracted carriers should provide proof of insurance with minimum limits of liability of \$2,000,000 CSL (Combined Single Limit).

Leased Vehicles

If a vehicle is leased, rented, or borrowed to transport participants to and from the event, appropriate insurance should be obtained. Coverage can be purchased through the rental company or your local agent. If auto coverage is provided through Catholic Mutual, contact should be made with your Member Services Representative. **COVERAGE CANNOT BE AUTOMATICALLY ASSUMED FOR LEASED, RENTED, OR BORROWED VEHICLES.**

Private Passenger Vehicles

If a private passenger vehicle must be used, then the following information must be supplied and this information must be certified by the driver in question.

1. The driver must be 21 years of age or older.
2. The driver must have a valid, non-probationary driver's license and no physical disability that could in any way impair his/her ability to drive the vehicle safely.
3. The vehicle must have a valid and current registration and valid and current license plates.
4. The vehicle must be insured for the following minimum limits: \$100,000 per person/\$300,000 per occurrence.

A signed Driver Information Sheet for each driver must be obtained prior to the field trip. Each driver and/or chaperone should be given a copy of the approved itinerary including the route to be followed and a summary of his/her responsibilities.

Distance Limitations (For non-contracted transportation)

1. Daily maximum miles driven should not exceed 500 miles per vehicle.
2. Maximum number of consecutive miles driven should not exceed 250 miles per driver without at least a 30-minute break.

DIOCESE OF COVINGTON

DRIVER FORM

Driver Applicant Information

DRIVER															
Name:		Date of Birth:													
Address:	City:	State:	Zip:												
Home Phone:	Cell Phone:														
Driver's License Number:		Date of Expiration:													
VEHICLE TO BE USED															
Name of Owner:	Model of Vehicle:	Make of Vehicle:													
License Plate Number:	Date of Expiration:	Year of Vehicle:													
Address:	City:	State:	Zip:												
<i>If more than one vehicle is to be used, the aforementioned information must be completed for each vehicle.</i>															
INSURANCE INFORMATION															
Insurance Company:		Liability Limits of Policy*:													
(*Please note: The minimal, acceptable liability limit for privately-owned vehicles is \$100,000/\$300,000)															
In order to provide for the safety of our students or other members of the parish/school and those we serve, we must ask each volunteer driver to answer the following questions: <table style="width: 100%;"> <tr> <td style="width: 70%;">1. I have NOT had a conviction for an infraction involving drugs or alcohol (such as driving under the influence or driving while intoxicated) in the last 3 years.</td> <td style="width: 10%; text-align: center;">TRUE</td> <td style="width: 20%; text-align: center;">FALSE</td> </tr> <tr> <td></td> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> </tr> <tr> <td>2. I have NOT had two or more convictions for an infraction involving drugs or alcohol (such as driving under the influence or driving while intoxicated) in the last seven years.</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> </tr> <tr> <td>3. I have had no more than three moving violations or accidents in the last three years.</td> <td style="text-align: center;">_____</td> <td style="text-align: center;">_____</td> </tr> </table> Please be aware that as a volunteer driver your insurance is <u>primary</u>.				1. I have NOT had a conviction for an infraction involving drugs or alcohol (such as driving under the influence or driving while intoxicated) in the last 3 years.	TRUE	FALSE		_____	_____	2. I have NOT had two or more convictions for an infraction involving drugs or alcohol (such as driving under the influence or driving while intoxicated) in the last seven years.	_____	_____	3. I have had no more than three moving violations or accidents in the last three years.	_____	_____
1. I have NOT had a conviction for an infraction involving drugs or alcohol (such as driving under the influence or driving while intoxicated) in the last 3 years.	TRUE	FALSE													
	_____	_____													
2. I have NOT had two or more convictions for an infraction involving drugs or alcohol (such as driving under the influence or driving while intoxicated) in the last seven years.	_____	_____													
3. I have had no more than three moving violations or accidents in the last three years.	_____	_____													
CERTIFICATION															
I certify that the information given on this form is true and correct to the best of my knowledge. I understand driving for Church ministry is a profound responsibility and I will exercise extreme care and due diligence while driving. I understand that as a volunteer driver, I must be 21 years of age or older, possess a valid driver's license, have the proper and current license and vehicle registration, and have the required insurance coverage in effect on any vehicle used to transport students. I agree that I will refrain from using a cell phone or any other electronic device while operating my vehicle. Signature: _____ Date: _____															

Revised 4/29/26

DIOCESE OF COVINGTON
PHOTOGRAPH AND MEDIA RELEASE FORM

I hereby grant permission to the rights of my child's image, likeness and sound of my child's voice as recorded on audio or video without payment or any other consideration. I understand that my child's image may be edited, copied, exhibited, published, or distributed and waive the right to inspect or approve the finished product wherein my child's likeness appears. Additionally, I waive any right to royalties or other compensation arising or related to the use of my child's image or recording. I also understand that this material may be used in diverse settings within an unrestricted geographic area.

Photographic, audio or video recordings may be used for the following purposes:

- educational presentations or courses
- informational presentations
- promotional advertisements

By signing this release, I understand this permission signifies that photographic or video recordings of my child may be electronically displayed via the Internet or in public settings and/or in print materials. I will be consulted about the use of photographs or video recording for any purpose other than those listed above. There is no time limit on the validity of this release nor is there any geographic limitation on where these materials may be distributed.

PROGRAM (PARISH/SCHOOL/EVENT) INFORMATION

This release applies to photographic, audio or video recordings taken during the following program(s):

_____ associated with (parish/school) _____ of the Diocese of Covington.

CHILD AND PARENT CONTACT INFORMATION

Child's Name	Parent/Guardian Name	
Street Address/ P.O. Box		
City	State	Zip
Phone	Email Address	

PARENT/GUARDIAN CONSENT

By signing this form, I acknowledge that I have completely read and fully understand the above release and agree to be bound thereby. I hereby release any and all claims against any person or organization utilizing this material for educational purposes.

Parent/Guardian Name (Print): _____

Parent/Guardian Signature: _____ Date: _____



INCIDENT INFORMATION REPORT

This report is to be completed for every incident/accident involving

- a student, while under the responsibility of the school/parish
- an employee (or volunteer) acting at the direction of, or on behalf of, the school/parish that requires the attend of a doctor or hospital or requires absence from school or work for one-half day or longer
- **All incidents of employee injuries MUST ALSO be reported to AmTrust's AmCares 24/7 Nurse Line (888-239-3909)**
- a visitor while on school or parish premises that requires the attention of a doctor and/or hospital.
- The principal is responsible for the filing of the report for school incidents; and the business manager is responsible for the filing of the report for parish incidents. Actual completion of the report may be delegated.

WHO WAS INJURED?

Name: _____

Check ✓ one: ☐ Student ☐ Employee ☐ Volunteer ☐ Other ☐ (specify below)

If student, give grade and age: _____

If employee (volunteer), give job title or duties: _____

For Employee, also complete "Worker Compensation: First Report of Accident" and send AmTrust if you did not use the recommended and preferred 24/7 Nurse Line (not to State of Kentucky). For Volunteer, contact Finance Office, Diocese of Covington, for proper insurance form. Diocese of Covington, 1125 Madison Avenue, Covington Kentucky 41011-3115, Phone (859) 392-1500.

WHEN AND WHERE DID THE ACCIDENT HAPPEN?

Date: _____ Time: _____

Location (classroom, cafeteria, playground, gym, etc.): _____

WHAT HAPPENED?

Describe the accident: _____

Names of Witness(es): _____

WHAT KIND OF INJURY?

Part of body affected and type of injury: _____

WHAT ACTION WAS TAKEN?

_____ Parent/Guardian notified _____ Transported to doctor/hospital by school personnel

_____ Student released to Parent/Guardian _____ Emergency unit/ambulance called

Other: _____

Person completing report: _____ Parish/School: _____

Principal/Business Manager: _____ Date: _____

ORIGINAL: School or Parish Files

COPY: SCHOOL ACCIDENT: Department of Catholic Schools; Attn: Angie Smorey

NON-SCHOOL ACCIDENT: Finance Office; Attn: Andrea Pappas

NOTE: If a liability claim is anticipated, please send a copy of this report to Catholic Mutual

All employee injury incidents MUST ALSO be reported to the AmCares 24/7 Nurse Line (888-239-3909)

DIOCESE OF COVINGTON

SEARCH & SEIZURE POLICY

To safeguard all involved, a supervisory adult may feel the need to make a physical inspection of a person or his/her possessions. If a supervisory adult asks a student/participant to hand over something, that is not considered a search. If a supervisory adult asks a student/participant to take something out of his/her pocket, that is not considered a search. A supervisory adult will have another teacher/chaperone acting as an official witness if a student/participant is searched.

Diocesan Search and Seizure Policy states:

1. No search shall be conducted unless there are reasonable grounds to believe the search will reveal evidence of a violation of the Code of Conduct or the law.
2. Two adults must be present for a search. Searches shall only be conducted by those directly responsible for the person's conduct (e.g. Director/Coordinator of Faith Formation, youth minister, teacher/principal, parish chaperone, etc.) along with another adult witness.
3. When a search is conducted, either the conductor of the search or the adult witness must be the same gender as the subject of the search.
4. **Searches:**
 - a. **do not involve touching** the participant
 - b. **are limited to** his/her personal effects (e.g. handbags, backpacks, etc.)
 - c. may include requiring participant to empty pockets or personal items
 - d. may include requiring participant to pull pants legs up and pull socks down
5. Only legal authorities (i.e. police) have authorization to conduct pat-down searches.
6. No search shall be conducted in the presence of any other participant (except the parent/guardian of the person being searched, if he/she is in attendance).
7. Legal authorities, if appropriate, and parent/guardian will be notified immediately.
8. Items that may be seized are illegal items (e.g. weapons, drugs, etc.) and any other possessions reasonably determined by authorized personnel to be a safety / security threat.
9. Other items may be seized temporarily if they disrupt or interfere with the individual's or others' participation. Such items will be returned to the participant at the end of the activity. (Examples include cell phones and other electronic equipment, keys, etc.) If cell phones or personal electronic equipment are taken away, they must not be searched except by law enforcement personnel.
10. Those who fail to cooperate with search request shall be subject to other disciplinary action, up to and including dismissal or removal from the premises.

NOTE: School or parish property does not belong to the student / participant. It is recommended that schools and programs include a policy in the parent / student (participant) handbook that states "the school/parish is co-tenant of lockers and desks and reserves the right to search them at any time without notice."

Revised 12/2025