



POLICY FOR THE PROTECTION OF MINORS & VULNERABLE ADULTS

Effective May 2022

1. INTRODUCTION:

1.1. **The Policy.** The Diocese of the Central States of the Reformed Episcopal Church is committed to providing a safe and secure environment for those participating in all our ministry activities—especially Children, Youth, and Vulnerable Adults. We also seek to minimize the likelihood of unwarranted accusations of improper behavior that our organization, volunteers, and employees may experience as they fulfill their ministerial duties. To fulfill these commitments as fully as possible, the leadership of the Diocese of the Central States (“the Diocese”) has adopted the following procedures to be used, unless exception is granted by the Ecclesiastical Authority of the Diocese, by all Workers when supervising Children, Youth, and Vulnerable Adults and selecting ministry volunteers and new employees. Violation of this policy or non-compliance with the procedures set forth below may be the basis for adverse employment action, termination of volunteer service, or discipline under the applicable canons.

1.2. The Purpose and Biblical Basis for the Policy

- 1.2.1. The purpose of this document is to give instruction to the clergy, laity, and churches of the Diocese that will inform our decisions and methods regarding safeguarding the Children, Youth, and Vulnerable Adults entrusted to us, and instruct us, providing minimum standards of care and vigilance.
- 1.2.2. The Diocese accepts with deep gratitude and seriousness the trust given us by God to nurture and care for his people, especially those who are most vulnerable and in need of protection. This is never more true than when caring for our Children and Youth.
- 1.2.3. Current statistics regarding child abuse are alarming and indicate that many boys and girls are sexually abused before age eighteen. Physical and emotional abuses continue to be serious problems in our society. The effects of such abuse can damage Children at the core of who they are, and often follow them into adulthood. Abused Children are children at risk. They often become adults who suffer from low self-esteem, who are unable to form and keep healthy relationships, and who struggle to maintain healthy boundaries. As the Church, we declare that we will work together to see that proper love and care are extended to the Children entrusted to us.
- 1.2.4. Jesus teaches explicitly that Children are of much value in Kingdom terms, and

that to cause one to sin has the gravest of consequences. Caring for our Children and Youth is a sacred trust.

- 1.2.5. At that time the disciples came to Jesus, saying, “Who is the greatest in the kingdom of heaven?” And calling to him a child, he put him in the midst of the and said, “Truly, I say to you, unless you turn and become like Children, you will never enter the kingdom of heaven. Whoever humbles himself like this child is the greatest in the kingdom of heaven. Whoever receives one such child in my name receives me, but whoever causes one of these little ones who believe in me to sin, it would be better for him to have a great millstone fastened around his neck and to be drowned in the depth of the sea.” (Matthew 18:1-6 ESV)
- 1.2.6. Mark, in his Gospel account, adds the dimension of Jesus taking the children in his arms and blessing them (Mark 10:16).
- 1.2.7. As Christian adults we are called to establish a secure environment where the perfect love of God works to cast out all fear (1 John 4:18) and the nurture and love of God are made known to all, especially to our Children and Youth. In this way we can fulfill the biblical mandate to train up our children in the way they should go (Proverbs 22:6).
- 1.2.8. May God be glorified in all we do.

2. DEFINITIONS

- 2.1. **Child or Children**—Any minor under 13 years of age.
- 2.2. **Ecclesiastical Authority**—As defined by Article IV of the Constitution of the Diocese, ordinarily the Standing Committee and the Bishop Ordinary together.
- 2.3. **Employee**— A paid staff member of any diocesan or parish Ministry Activity.
- 2.4. **Ministry Activity**—Any activity undertaken within the diocese by a properly- designated ministry supervisor in furtherance of the diocesan mission and in accordance with the Constitution and Canons of the Reformed Episcopal Church and the Diocese of the Central States. This includes activities at the diocesan, parish, and mission level.
- 2.5. **Ministry Supervisor**—A Bishop, Rector, Minister-in-Charge, or any other person or body designated by the Ecclesiastical Authority of the Diocese to oversee any diocesan or parish Ministry Activity.
- 2.6. **Minor**—Any person under 18 years of age or any 18-year-old still enrolled in secondary school.
- 2.7. **Private Area**—The genitalia, anus, buttocks, or areola or nipple.
- 2.8. **Sexual Activity**—Includes but is not limited to the following Worker activities:
 - 2.8.1. Intentional exposure of a Worker’s unclothed Private Area to a

Specially Protected Person;

- 2.8.2. Photographing or recording by any means the unclothed or underwear-clad Private Area of a Specially Protected Person;
- 2.8.3. Intentionally communicating indecent language to a Specially Protected Person by any means, including via any communication technology; or
- 2.8.4. Any indecent conduct, intentionally done with or in the presence of a Specially Protected Person, including via any communication technology, that amounts to a form of immorality relating to sexual impurity which is grossly vulgar, obscene, and repugnant to common propriety. This includes showing pornographic images or recordings to a Specially Protected Person or viewing pornographic images or recordings in the presence of a Specially Protected Person, whether or not the Specially Protected Person is aware of the viewing.

2.9. **Specially Protected Persons**—Children, Youth, or vulnerable adults, as defined by this policy.

2.10. **Volunteer**—A non-child performing services or donating time or effort without compensation who is authorized by the Ministry Supervisor to work with Specially Protected Persons.

2.11. **Vulnerable Adult**—Any person 18 years of age or older who is unable to control or understand one's actions in an age-appropriate fashion or is otherwise susceptible to coercion or abuse in a way that is apparent to the reasonable observer. This may include individuals who are mentally or physically disabled as well as the elderly.

2.12. **Worker**—A non-child volunteer or employee of any organization within or affiliated with the Diocese who works with a Specially Protected Person.

2.13. **Youth**—Any minor 13 years of age or older. An 18-year-old who is still enrolled in secondary school is considered a Youth for the purposes of this policy.

3. PREVENTION

3.1. Screening

3.1.1. No prospective Worker may begin service in any diocesan ministry that involves direct contact with Specially Protected Persons unless the appropriate Ministry Supervisor or a designee certifies that the prospective Worker is qualified and suitable for ministry with Specially Protected Persons.

3.1.2. The Ministry Supervisor or designee making the certification must consider the following:

3.1.2.1. The prospective Worker's resume or application.

3.1.2.2. The recommendations of at least two individuals with knowledge of

the character and experience of the prospective Worker.

- 3.1.2.3. A criminal background and sexual offender registry check on the prospective Worker completed no more than 90 days prior to employment. When appropriate in light of local circumstances and the nature and extent of anticipated contact with Specially Protected Persons, Ministry Activities should consider fingerprint-based background checks that search for applicants in various criminal databases to create a more complete criminal history profile of an applicant than is typically provided through a conventional "name-check" investigation.
- 3.1.2.4. A face-to-face interview conducted by the Ministry Supervisor or a designee, which will specifically include the question as to whether the candidate has committed, been arrested for, or convicted of, any crime involving physical or sexual abuse or child neglect, accused of physical or sexual abuse in a civil proceeding, or have been diagnosed with any paraphiliac psychological condition, including, but not limited to, pedophilia, voyeurism, or exhibitionism.
- 3.1.2.5. Recommendations rendered verbally and interviews not otherwise recorded will be summarized by a person with knowledge of the interaction and the summary document will be retained in accordance with the records retention requirements prescribed by this policy.
- 3.1.3. When screening procedures indicate that the candidate is a potential or actual threat to any Specially Protected Person or such persons generally, the candidate will not be further considered for any ministry position involving Specially Protected Persons.
- 3.1.4. In addition to these requirements, no person may be considered for service as a volunteer in a diocesan ministry or activity that involves Specially Protected Persons unless the person has been regularly involved for at least six consecutive months in the Ministry Activity in which the person intends to volunteer.
- 3.1.5. Ministry Supervisors will ensure that criminal background and sexual offender registry checks are conducted biannually on all Workers after completion of the first two years of service or employment.
- 3.1.6. A Ministry Supervisor or Worker must inform the appropriate supervisor and withdraw from any ministry with Specially Protected Persons when the Ministry Supervisor or Worker has committed, been arrested for, or convicted of, any crime involving physical or sexual abuse or child neglect, accused of physical or sexual abuse in a civil proceeding, or have been diagnosed with any paraphiliac psychological condition, as defined by the American Psychiatric Association, including, but not limited to, pedophilia, voyeurism, or exhibitionism. Failure to inform the appropriate supervisor of the occurrence of any of these events will

constitute a violation of this policy and be the subject of adverse personnel actions or other discipline.

- 3.1.7. A prospective Ministry Supervisor or Worker who is determined or admits to have knowingly made a false statement during the screening process may be terminated or have an offer of employment withdrawn without further process, except as otherwise required by the Constitution or Canons of the Church or the diocese, or by federal, state, or local law.
- 3.1.8. A Ministry Activity may supplement the screening procedures outlined above in accordance with section 5.1 of this policy as necessary to reflect local governance practices and to ensure notice and involvement of governing bodies, e.g., a parish vestry or a school board, when appropriate.

3.2. Active Protection

3.2.1. *Basic Rules.*

- 3.2.1.1. Two-Adult Rule. Except as noted below, at least two screened adult Workers must be present at every function or program involving Specially Protected Persons. This includes each classroom, vehicle, or other enclosed area. One or more of these adults must be 21 years of age or older. An additional adult should be present when the number of Specially Protected Persons exceeds 12.
- 3.2.1.2. Rule of Three. In limited circumstances when the Two-Adult Rule cannot be implemented, at least three individuals must be present, with at least one being a screened adult employee or volunteer. The Rule of Three may not be implemented without the approval of the Ministry Supervisor and may not be used in lieu of the Two-Adult Rule when any of the Specially Protected Persons under supervision are under six years of age.
- 3.2.1.3. Prohibited Activities for Ministry Supervisors and Workers.
 - 3.2.1.3.1. Sexual activity or contact of any sort with one or more Specially Protected Persons.
 - 3.2.1.3.2. Corporal punishment or other physical discipline of a Specially Protected Person, except as expressly authorized by a parent or responsible custodian of a Specially Protected Person, applicable state law, and any local policy for disciplinary purposes in educational settings.
 - 3.2.1.3.3. Use of language or conduct toward or in the vicinity of Specially Protected Persons in a way that is or could be construed by any reasonable observer to be profane, lewd, lascivious, indecent, vulgar, harsh, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.

- 3.2.1.3.4. Use, possession, or being under the influence of tobacco products, mind-altering medication or substances, alcohol, or any illegal drugs while traveling with or in the presence of Specially Protected Persons or their parents, during church or school sponsored activities, or while working with or supervising one or more Specially Protected Persons. Use or possession of prescription medication, tobacco products, or alcohol may be authorized by a ministry supervisor in appropriate circumstances.
- 3.2.1.3.5. Distribution or sharing of tobacco products, mind-altering medication or substances, alcohol, or any illegal drugs with any Specially Protected Person.
- 3.2.1.3.6. Disclosure of observations or allegations of abuse, neglect, or non-compliance with the procedural requirements of this policy by means other than those authorized in this policy or to persons not expressly authorized by the policy to receive reports of policy violation.
- 3.2.1.3.7. Obstruction of any investigation stemming from alleged violation of this policy, including making knowingly false statements or concealing evidence of policy violation.

3.2.2. *Check-In/Check-Out Procedures*

- 3.2.2.1. Workers should arrive at least 10 minutes before a scheduled activity and must remain at the location of the activity until all Specially Protected Persons in their care have been picked up by an authorized person as described in section 3.2.2.2 of this policy. No Children may be released to find their parents or allowed to wait unattended for transportation.
- 3.2.2.2. Workers may release Children in their care only to parents, guardians, or persons specifically and previously authorized to pick up the child.

3.2.3. *Discipline and Physical Contact of Specially Protected Persons*

- 3.2.3.1. Physical restraint should only be used in a situation where it is reasonably necessary to protect an individual from imminent physical harm.
- 3.2.3.2. A Worker should also avoid the appearance of any impropriety—such as sitting a minor over six years of age on one’s lap, or inappropriately kissing, hugging, or embracing any Specially Protected Person.
- 3.2.3.3. A Worker must report any disciplinary problems concerning a Specially Protected Person to the Ministry Supervisor and to the appropriate parent or guardian.

3.2.4. *Illness or Injuries*

- 3.2.4.1. Persons who are ill (with a fever, or a communicable disease that can be

transmitted by cough or by touch) may not participate in any Ministry Activity.

3.2.4.2. Only a suitable Worker—one who has been previously approved through our ministry screening process—may take the place of a Worker who is ill.

3.2.4.3. Specially Protected Persons who are discovered to be ill should be returned to their parent or guardian as soon as practicable. If immediate return is not possible, then the person who is ill should be isolated in a manner that allows a Worker to monitor the Specially Protected Person until s/he can be returned to a parent or guardian.

3.2.4.4. A Worker will take reasonable steps to avoid contact with blood, saliva, or other bodily fluids.

3.2.4.5. A Worker or Ministry Supervisor who becomes aware of an injury to a Worker or Specially Protected Person will take steps to ensure that proper medical attention is given to the injured person and provide for continued monitoring of the remaining activity participants. The Ministry Supervisor will ensure that notice of an injury to a Specially Protected Person is provided as soon as practicable and in a manner consistent with this policy.

3.2.4.6. A Worker may assist a Specially Protected Person who has an injury that is obviously minor. In any event, the Worker with responsibility for an injured Specially Protected Person will inform the individual's parents or guardians of the injury when they pick up the injured person.

3.2.5. *Internet and Social Media*

3.2.5.1. Ministry Activities must employ an Internet filter that blocks access to pornographic and other “adult” websites, e-mail, chat, or other Internet-based communications. Filters may be installed on the servers of an Internet Service Provider or proxy service, as part of a local area network, or on individual computers, based on local needs and the services available.

3.2.5.2. Social Media such as Twitter, Instagram, Snapchat, What's App, and other social media avenues can be effective ways for youth ministry staff and volunteer leaders to connect with students. Having personal interactions in this venue allows adults to model appropriate behavior in social media, and it forms valuable connections with students. Any Ministry Activity using Social Media in connection with Specially Protected Persons will have a proactive policy for social media and other forms of electronic communication in the context of ministry with Specially Protected Persons.

3.2.6. *Restroom Procedures*

3.2.6.1. For Children age 6 or older, at least one Worker should accompany

the child to the restroom. The Worker should check to make sure the facility is safe and then wait outside the restroom for the Children. If assistance is required during transit, the presence of a second adult escort is also recommended. If assistance is required in the restroom itself, the Two-Adult Rule always applies.

3.2.6.2. For Children age 5 or younger (boys and girls), the Two-Adult Rule always applies. Children should be assisted as needed in the restroom by an adult female, with the bathroom door ajar with a second screened Worker nearby for additional accountability.

3.2.6.3. Workers may not touch the private areas of a Specially Protected Person except when necessary for safety or hygiene, as in the case of changing a diaper.

3.2.7. *Secluded Areas.* Ministry Supervisors must ensure that access to secluded areas, such as unused rooms, closets, and outdoor structures, and other areas that are difficult to properly supervise, is limited and that those areas are kept locked with limited key access whenever practicable.

3.2.8. *Travel.* A Worker should avoid traveling in a vehicle one-on-one with a minor unless there is an emergency that requires such travel and the Worker informs the parents/guardians or supervisors when leaving and arriving.

3.2.9. *Youth Counseling.* A Ministry Supervisor may authorize a Worker to have one-on-one interaction with a Youth for the purposes of spiritual counsel and mentoring. Any one-on-one interaction must take place in a location where the Worker and the Youth are both visible to others. Any planned one-on-one meetings must also have the prior written approval from parents/guardians. The duration and frequency of approved one-on-one meetings may not exceed three occasions for no more than 30 minutes at a time.

4. RESPONSE

4.1. Reporting

4.1.1. Any Worker who learns of or observes a possible violation of this policy or non-compliance with the procedures prescribed above must report the suspected violation or non-compliance to the Ministry Supervisor as soon as practicable except as follows: if a Ministry Supervisor is suspected of violation or non-compliance with this policy, the Worker will directly inform the Ecclesiastical Authority as soon as practicable. The Worker should collect and assemble the following information about the violation or non-compliance: who is involved; what is alleged to have happened; where it allegedly happened; when it allegedly happened; and how it came to the attention of the Worker. Ministry Activities

may use a standardized reporting form developed locally if desired.

- 4.1.2. A Ministry Supervisor who learns of or observes a possible violation of this policy or non-compliance with the procedures prescribed above, either of which involves the neglect or physical, sexual, or verbal abuse of a Specially Protected Person, will notify the Ecclesiastical Authority as soon as practicable. The Ministry Supervisor reporting the allegations to the Ecclesiastical Authority will provide any information received or collected by the Ministry Supervisor from Workers or other persons with knowledge, and in any event will include the information specified in paragraph 1 above. Technical or harmless violations or non-compliance need not be reported to the Ecclesiastical Authority but should be noted in the personnel or employment records of the Worker determined to be responsible for the violation or non-compliance.
- 4.1.3. Failure of a Worker or Ministry Leader to report a possible violation of this policy or non-compliance with the procedures prescribed above is itself a violation of this policy and may be the subject of adverse personnel action or other discipline.
- 4.1.4. The Ministry Supervisor will also notify the parent or guardian of the person who is the object of the neglect or abuse unless the parent or guardian is the suspected perpetrator, in which case the Ministry Supervisor will defer to local law enforcement authorities or social work services as to whether to notify the parent or guardian.
- 4.1.5. Ministry Supervisors and Workers will also comply with any applicable state or local reporting requirements concerning the suspected neglect or abuse of Specially Protected Persons except as otherwise limited by applicable canon law or evidentiary privilege in the jurisdiction in which the Ministry Activity is located.
- 4.1.6. In a situation involving suspected neglect or abuse of a Specially Protected Person that is not subject to a state or local reporting requirement, a Ministry Supervisor may not report the suspected activity to law enforcement or social work services until the following conditions are satisfied:
 - 4.1.6.1. The Ministry Supervisor notifies the Ecclesiastical Authority of the intention to report the neglect or abuse to the authorities.
 - 4.1.6.2. The Ecclesiastical Authority consults with the Chancellor, if one be appointed, or otherwise obtains legal advice concerning the allegations and the propriety of discretionary reporting under the circumstances. If practicable, this consultation will be completed within 72 hours of receiving notice of the allegations.
 - 4.1.6.3. The Ecclesiastical Authority authorizes the Ministry Supervisor to report the allegations to law enforcement authorities or social work services,

as appropriate. In the alternative, the Ecclesiastical Authority may direct the Chancellor or another legal representative to report the suspected abuse or neglect.

4.1.7. Ministry Supervisors and the Ecclesiastical Authority must promptly notify or cause to be notified the Ministry Activity's insurance carrier (general and/or professional liability insurance) upon notice of neglect or abuse proscribed by this policy.

4.1.8. Ministry Supervisors should refrain from publicly identifying or confirming the identity of the victims and subjects of any allegation or investigation or the nature of the allegations at issue. Media inquiries should be directed to the Ecclesiastical Authority.

4.1.9. A Ministry Activity may supplement the reporting procedures outlined above in accordance with section 5.1 of this policy as necessary to reflect local governance practices and to ensure notice and involvement of governing bodies, e.g., a parish vestry or a school board, when appropriate.

4.2. Investigation

4.2.1. The Diocese considers any allegation of abuse or neglect a serious matter, and each allegation will be fully investigated.

4.2.2. Any Ministry Supervisor or Worker who is suspected of abuse or neglect will be suspended from ministry with Specially Protected Persons during the pendency of any investigations being conducted by civil authorities or the diocese and will be instructed to avoid contact with the alleged victim(s) while suspended.

4.2.3. Allegations reported to civil authorities will be investigated by the responsible law enforcement organization or social work services. Ministry Supervisors and Workers are expected to cooperate with the investigating authorities.

4.2.4. Upon completion of the investigation of allegations of abuse or neglect of a Specially Protected Person by civil authorities or, if there is no investigation by civil authorities, the Ecclesiastical Authority will, as soon as practicable, appoint a Board of Inquiry constituted as provided under the Canons of the Reformed Episcopal Church ("the Church"). The Board will inquire into the content, cause, and validity of the allegations at issue and report its findings to the Ecclesiastical Authority within the period allotted by canon. The Board may rely upon previously conducted investigation by the civil authorities or the Ministry Activity, independently collect statements and evidence, hire an outside investigator, or some combination of these investigatory options. The Ecclesiastical Authority may also direct additional investigation into matters not addressed by the civil authorities in their investigation. Upon receipt of the report of the Board, the Chancellor or other legal

counsel will review it to ensure that the Board's findings are supported by a preponderance of the evidence in the record and will forward the result of the legal review to the Ecclesiastical Authority as soon as practicable.

- 4.2.5. A Ministry Supervisor or Worker who admits to abuse or neglect of a Specially Protected Person will ordinarily be terminated from employment or volunteer service immediately unless entitled to other due process under the Canons of the Church or the Diocese. The Ecclesiastical Authority will, after consultation with the Chancellor or other legal counsel, determine whether further investigation or additional proceedings are necessary considering the nature of the allegations and content of any admission.
- 4.2.6. A Ministry Supervisor or Worker who has been found by a Diocesan Board of Inquiry to have abused or neglected a Specially Protected Person will be terminated from employment or volunteer service immediately upon completion of the legal review of the report unless entitled to other due process under the Canons of the Reformed Episcopal Church or the Diocese, or if the Ecclesiastical Authority determines otherwise.
- 4.2.7. Upon receipt of a report of substantiated allegations of abuse or neglect from a Board of Inquiry or a presentment alleging abuse or neglect of a Specially Protected Person, the Ecclesiastical Authority will proceed as provided in Title II of the Canons of the Reformed Episcopal Church.
- 4.2.8. Substantiated non-compliance with this policy that does not amount to abuse or neglect may nevertheless be the basis for adverse personnel action or other discipline as determined to be appropriate by the Ministry Supervisor (in the case of a Worker) or the Ecclesiastical Authority (in the case of a Ministry Supervisor).
- 4.2.9. If the Board of Inquiry determines that allegations of abuse or neglect are unsubstantiated and the Chancellor or other legal counsel concurs with that determination, the record of the review and determination will be retained by the Ecclesiastical Authority in accordance with the retention requirements prescribed in this policy. In the case of unsubstantiated allegations of abuse or neglect, the Ecclesiastical Authority will inform or cause to be informed any Ministry Supervisor or Worker that was the subject of unsubstantiated allegations and inquiry. The Ecclesiastical Authority will confer with the Ministry Supervisor of the entity in which the allegations arose as to the most appropriate means of informing the affected community of the results of the investigation.

4.3. Pastoral Care

- 4.3.1. The Ecclesiastical Authority will ensure that all parties to the allegations receive any necessary pastoral care and assistance.
- 4.3.2. If necessary due to the nature or breadth of the allegations, the Ecclesiastical

Authority may authorize clergy from other ministry activities to provide pastoral care to affected persons.

- 4.3.3. Neither the Bishop nor any Ministry Supervisor who is the Presbyter to the affected community should hear confession or engage in any rite of reconciliation of a penitent with an individual who has been accused of abuse or neglect of a Specially Protected Person; in that circumstance, the Ecclesiastical Authority will designate another Presbyter to provide appropriate pastoral care to the affected individual.

5. ADMINISTRATION

5.1. Supplementation

- 5.1.1. Ministry Activities may supplement sections 3, 4, and 5 of this policy as necessary to reflect local conditions, governance structures, personnel, and programs.
- 5.1.2. Any supplementary provisions must be consistent with this policy and may not purport to rescind any requirement established by the policy.
- 5.1.3. Any supplement must be approved by the governing authority of the Ministry Activity to which the supplement will apply, and the approved supplement will be provided to the Ecclesiastical Authority as soon as practicable after enactment.

5.2. Exceptions

- 5.2.1. The Ecclesiastical Authority may grant a partial exception to this policy upon the request of a Ministry Activity covered by this policy.
- 5.2.2. Any request for an exception to this policy must include the following:
 - 5.2.2.1. Reference to the specific provision(s) of this policy from which relief is sought;
 - 5.2.2.2. A description of the specific circumstances of the Ministry Activity that necessitate the exception to policy;
 - 5.2.2.3. An explanation of the alternative means by which the Ministry Activity will adequately safeguard Specially Protected Persons if the exception is granted;
- 5.2.3. The exception request may extend to multiple provisions of this policy, but should also be narrowly tailored and consistent with the protective framework established by this policy.
- 5.2.4. The Ecclesiastical Authority may grant the request in whole or in part, or entirely deny the request.

5.3. Publication.

- 5.3.1. Each Ministry Supervisor will ensure that this policy and any local supplementation is readily available to all persons who participate in or are otherwise involved in each Ministry Activity under their supervision and is provided to each new Worker covered by this policy.
- 5.3.2. Toward this end, a copy of this policy and any local supplementation will be posted and readily accessible on any website or social media platforms maintained by the ministry activities within the diocese.

5.4. Training

- 5.4.1. All Ministry Supervisors and Workers will review this policy before engaging for the first time in any activity with Specially Protected Persons in a particular Ministry Activity and biannually thereafter.
 - 5.4.1.1. The Ecclesiastical Authority may direct a Ministry Supervisor or Worker to review the policy or complete other training, when necessary and appropriate.
 - 5.4.1.2. Ministry Supervisors may also direct a Worker to review the policy or complete other training, when necessary and appropriate under the circumstances.
- 5.4.2. Ministry Supervisors will ensure that they and all Workers and other Ministry Supervisors are aware of any state or local mandatory reporting requirements that are applicable to the Ministry Activity. Ministry Supervisors may obtain assistance in interpreting state or local reporting requirements by consultation with the Ecclesiastical Authority or legal counsel
- 5.4.3. Ministry Supervisors may obtain or conduct additional training relevant to the protection of Specially Protected Persons as necessary and appropriate. Examples include, but are not limited to, the National Children's Advocacy Center's "Child Sexual Abuse 101" or "Recognizing & Responding to Suspicions of Child Maltreatment" from Prevent Child Abuse North Carolina at preventchildabusenc-lms.org.
- 5.4.4. Upon completion of the required review of this policy, each Ministry Supervisor and Worker will certify in writing completion of the review as provided by the policy of the specific Ministry Activity.

5.5. Records

- 5.5.1. Each Ministry Supervisor will store any application materials received—application form, background checks, reference check, notes from interviews, etc.—in a secure location for at least five years after receipt or the termination of employment or volunteer services for a particular person, whichever is later.

5.5.2. Each Ministry Supervisor will maintain or cause to be maintained the necessary certification records of initial, annual, or ad hoc review of this policy as completed by each Worker and other Ministry Supervisor for at least 30 years after the termination of employment or volunteer services for a particular person.

5.5.3. The Ecclesiastical Authority will maintain or cause to be maintained the records and determinations relating to any Board of Inquiry appointed and convened under this policy for at least 30 years after the inquiry is completed.

5.6. Revision

5.6.1. The Ecclesiastical Authority, with the assistance of the Chancellor or other counsel, if necessary, will regularly review this policy and the procedures established within it. If necessary, the policies and procedures may be modified in accordance with the Constitution and Canons of the Church and the diocese. When changes are made, Ministry Supervisors will communicate them to all Workers affected by the policy changes.

5.6.2. The Ecclesiastical Authority may appoint an ad hoc committee to assist in its review of this policy and its implementation within the Diocese. The committee should be composed of spiritually mature persons, lay and ordained, with expertise in matters concerning Specially Protected Persons, education, administration, training, and the law.

5.7. Interpretation

5.7.1. Nothing in this policy shall be interpreted to be in conflict with or to eliminate or limit in any way the constitutional, statutory, regulatory, and canonical responsibilities and obligations of the Ecclesiastical Authority in whole or in part, a Rector or Minister-in-Charge, or a parish Vestry or equivalent body.

5.7.2. Nothing in this policy shall be interpreted to be in conflict with or to eliminate or limit in any way the statutory and regulatory responsibilities and obligations under federal or state law of the governing bodies of any non-parochial Ministry Activities covered by this policy.