

Grace Episcopal Church  
133 School Street  
New Bedford, MA 02740

## Policy for the Protection of Vulnerable Adults

November 2022

Adapted from [Model Policy for the Protection of Vulnerable Adults](#), The Episcopal Church, 2018

### I. THEOLOGICAL AND ETHICAL FOUNDATIONS

“And the Word became flesh and dwelt among us, full of grace and truth; we have beheld the Word’s glory, glory as of the only Child from God.”

— John 1:14 (*An Inclusive Language Lectionary*)

God expressed the fullness of humanity in Jesus of Nazareth, whom we worship as the Word made flesh. To be human is to live with God and the whole of creation in the fullness of freedom and the challenge of responsibility. The pattern of Jesus’ life, death, and resurrection resonates unreservedly with God’s call to perfect freedom and responsibility. In baptism, God, speaking through the Church, claims us in Christ. We become in Christ the community of God’s final purpose: justice and peace, love and plenty for the whole creation. This new community lives in Eucharistic fellowship with God and Creation, as a sign and instrument of God’s reconciling purpose in the world.

The Church is called to embody and advance God’s mission. Ministry is the vocation of the whole community: laypersons, deacons, priests, and bishops who together represent Christ and the Church in the world.

The obligation to seek and serve Christ in all persons and to respect the dignity of every human being is binding for all the baptized. The authority with which **leaders** — ordained persons and adults who minister with **vulnerable adults** — are entrusted, creates an inherent power imbalance in the **pastoral relationship**. This power imbalance derives from the leadership role and, in the case of clergy, the symbolic authority of an ordained person. Christian leadership is intended to provide occasions for guidance and grace, and its abuse is always and unequivocally wrong.

Ministry involves a necessary tension between a Gospel-based integrity and a Gospel-based intimacy as modeled by the life of Christ. A rigid adherence to a system of rules leads to an unproductive legalism. Yet, without the framework of the law, the intimate relationships into which Christ calls us risk distortion and harm. All the people of God are called to minister

attentively within this tension. These policies are intended to provide a pattern for attentive practice of ministry.

This document is a statement for Grace Episcopal Church, setting forth expectations for its leaders in their relationships with vulnerable people. The purpose of this policy is to foster the highest standards of behavior in ministry settings. The document refers to and/or includes:

- ***Safe Church Training Protocols*** (found in Appendix A of the Protection of Vulnerable Adults Diocesan Policy, as posted on the [Diocese of Massachusetts Safe Church Policies page](#)), which explain the level of training required before engaging in ministry with vulnerable adults;
- A description of requisite training that is specialized and tailored to ministry role and function;
- Behavioral standards designed to ensure that vulnerable adults and all who engage in ministry with them are treated with dignity and respect in all settings;
- ***Recommended Practices and Guidelines for Social Media and Electronic Communications for Vulnerable Adults*** (found in Appendix B of the Protection of Vulnerable Adults Diocesan Policy, as posted on the [Diocese of Massachusetts Safe Church Policies page](#)); which contain recommended Practices and Guidelines for Social Media and Electronic Communications; and
- ***Protocols for Public Records Checks and Screening*** (found in Appendix C of the Protection of Vulnerable Adults Diocesan Policy, as posted on the [Diocese of Massachusetts Safe Church Policies page](#)) which explain the level of screening required before engaging in ministry with vulnerable adults.

## **II. EXPECTATIONS AND LOCAL IMPLEMENTATION**

This policy sets forth statements of general expectations and guidelines of behavior for ordained and lay people in the church when engaged in ministry with vulnerable adults. This policy is mandated for all such activities sponsored by Grace Episcopal Church. The purpose of this policy is to create safe and welcoming space for all vulnerable adults and those engaged in ministry with vulnerable adults, and to prevent sexual abuse.

This policy presents best practices for creating such safe space. Circumstances for particular events may make some of these best practices difficult to implement or even unworkable. As a result, additions or revisions may be made in particular circumstances so long as they meet or exceed the requirements of this policy. This requires that leadership understand this policy thoroughly enough to make appropriate judgments about local circumstances. Any such additions or revisions must be submitted in writing for the approval of the *Rector and Wardens*. No provisions may be omitted from a policy adapted for a particular circumstance.

The *Rector and Vestry* and all leaders should understand these policies and all requirements thoroughly enough to make appropriate judgments, and should consult with the *Rector or Wardens* when unanticipated situations arise.

*No policy can foresee every possible circumstance to which it may be applied. Whenever applicable, questions of civil, criminal, and/or ecclesiastical discipline and employment offenses should be addressed with the relevant authorities immediately. Please contact the Office of the Bishop for consultation and resources if assistance is needed.*

### III. DEFINITIONS

*NOTE: These definitions reflect our understanding of terms describing gender identity and sexuality, which are evolving as these model policies are being written.*

**Adult:** Anyone who is 18 years or older and not in high school.<sup>1</sup>

**Adult Protective Services:** A social services program provided by state and local governments serving vulnerable adults and their families who are in need of assistance. Adult Protective Services receive and investigate reports of suspected abuse, neglect, and exploitation.

**Bullying:** Behavior that intimidates, humiliates, offends, degrades, or harms another person, whether verbal, psychological, social, physical, or otherwise.

**Cisgender:** An adjective describing a person whose sense of personal identity and gender corresponds with their gender or sex assigned at birth. This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.

**Gender Non-Binary:** An umbrella term for people who identify their gender as neither male nor female. These people might identify as both ("bigender"), neither ("agender"), a mix between the two ("genderfluid"), or they can be unsure of their gender ("genderqueer"). This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.

**Intake Officer:** The person(s) designated by each diocese to receive information regarding an offense for which a member of the clergy may be held accountable under *Title IV of the Constitution and Canons of The Episcopal Church*, which sets out the disciplinary process for clergy. Anyone may contact an Intake Officer to report concerns.

**Leader:** A person who, for the benefit of another, engages in ministry without responsibility for oversight of other adults engaged in that same ministry. Examples include: Eucharistic Visitors and members of pastoral care teams.

**LGBTQ+:** An acronym for Lesbian, Gay, Bisexual, Transgender, Queer/Questioning, and others. It refers to people whose gender identities vary from their gender or sex assigned at birth, or whose sexual orientations differ from the heterosexual majority. The "+" is an effort to include additional gender identities. This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.

---

<sup>1</sup> Ages established in accordance with generally accepted definitions in the United States. These ages may vary across the wider Episcopal Church.

**Mandated Reporter:** A person who is required by state law to report reasonable suspicions of abuse, neglect, and/or exploitation of vulnerable populations to the appropriate state agency. State laws vary greatly. It is imperative to know the requirements of applicable state laws. In Massachusetts, state law does not yet mandate that Members of the Clergy report suspected elder abuse or neglect to the Executive Office of Elder Affairs (EOEA) or abuse or neglect of disabled adults to the Disabled Persons Protection Commission (DPPC), though legislation which would include Members of the Clergy as mandated reporters has come before the legislature several times. Individuals who are not mandated to report suspicion of abuse may make a report to EOEA or DPPC as well, even though not legally required to do so. See the EOEA's guide for reporting elder abuse and neglect [here](#). See the DPPC's guide for recognizing and reporting abuse or neglect of disabled adults [here](#).

**Off-Site:** Any location other than the sponsoring Episcopal church or institutional facility or campus.

**Organizations:** All institutions for which the diocese or congregations have legal or fiduciary responsibility (examples: diocesan departments, commissions, conference & retreat centers, adult day care centers, retirement communities, religious orders, congregations, schools, etc.).

**Overnight:** Any event that starts on one calendar day and ends on a different calendar day.

**Pastoral Relationship:** Any relationship (1) between a Member of the Clergy and any person to whom the Member of the Clergy provides or has provided counseling, pastoral care, spiritual direction, or spiritual guidance, or from whom such Member of the Clergy has received information within the Rite of Reconciliation of a Penitent, or (2) between a lay minister and any person to whom the lay minister is offering prayer, ministry, and/or any person from whom the lay minister has received sensitive, personal, or confidential information in the course of offering ministry.

**Programs:** Official activities and programs sponsored by the Episcopal Church and its provinces, dioceses, and congregations.

**Public Record Check:** A search of documents and data available to the public including criminal and civil court records, credit reports, and driving records from the department of motor vehicles. Typically, such searches are conducted by a third party with expertise in this area.

**Residential Facility:** Any institutional or group home setting where a vulnerable adult resides on a permanent or temporary basis such as a nursing home, rehabilitation center, assisted living facility, treatment center, or memory care facility.

**Responsible Person:** The person designated as being accountable for compliance with this policy for an event or program.

**Sacramental Use:** Consecrated or unconsecrated wine used in the setting of Eucharist.

**Supervisor:** A person who has oversight responsibilities for a ministry program and/or leaders in a ministry program.

**Title IV:** A section of the *Constitution and Canons of The Episcopal Church* pertaining to clergy professional standards, accountability, and ecclesiastical discipline.

**Transgender:** An adjective describing a person whose sense of personal identity and gender does not correspond with the gender or sex assigned to them at birth. This is an evolving term, as our understanding and language around gender identity and sexuality expands and matures.

**Training:** Organized activity designed to provide information and/or instructions to strengthen and enhance the recipient's understanding, capacity, and exercise of ministry.

- **Universal Training:** A standard of training that will foster a culture of safety and inclusion for all people that includes a broad overview of issues of vulnerability, power, and healthy boundaries. This training is designed to equip all people to live out their Baptismal Covenant.
- **Specialized Training:** A standard of additional training that equips people who participate in or have oversight responsibility for ministries. In addition to Universal Training, a person will have access to training that is specialized and tailored to their role and ministry function.

**Vulnerable Adult:**

- Any adult at or older than the age designated as an elder by applicable state law, age 60 in Massachusetts;
- Any adult who is infirm or diminished in capacity due to age, illness, or disability;
- Any adult who is ministered to in their home (by Eucharistic Visitors, Pastoral Care Visitors, Stephen Ministers, or others);
- Any adult who is wholly or partially dependent upon one or more other persons for emotional, psychological, or physical care or support, such dependency may be temporary as in the case of an accident, illness, or birth of a child; and
- Any adult who by virtue of a crisis, experiences vulnerability leading to dependency on another or lacks agency in a pastoral relationship as in the wake of death of a family member or job loss.

**IV. APPLICATION AND SCREENING**

Grace Episcopal Church is required to train and screen all persons according to the standards in the *Screening and Safe Church Training Protocols* and *Public Records Checks and Screening Protocols*. These protocols can be accessed in appendices A and C of the Protection of Vulnerable Adults Diocesan Policy, as posted on the [Diocese of Massachusetts Safe Church Policies page](#).

. For some positions, screening consists only of a Public Records Check. For other positions there are additional screening requirements of a written application, interview, and reference verification.

#### A. Public Records Checks

- Grace Episcopal Church shall use a provider approved by the diocese to conduct public records checks. Such checks must be completed before the employee or volunteer begins programmatic interaction with vulnerable adults;
- Criminal public records checks shall include all available criminal records and sex offender registries;
- A Registry of Motor Vehicles (RMV) records check is needed if transporting vulnerable adults as part of, or an extension of, ministry of the Grace Episcopal Church or for a congregation-sponsored event;
- A credit check is required of treasurers and those with check signing authority; and
- Public records checks must be updated at least every **three** years.

#### B. Additional Screening Requirements

Written application, interview, and reference verification are required before serving in certain roles and ministries as specified in the **Public Records Checks and Screening Protocols** (found in Appendix C of the Protection of Vulnerable Adults Diocesan Policy, as posted on the [Diocese of Massachusetts Safe Church Policies page](#)). Where required, these components are generally conducted in the following order:

- Submission of a completed written application to serve in a specified role with a clearly defined, written “job description.” The application includes verifiable personal information;
- Personal interview;
- Reference verification conducted by Grace Episcopal Church to verify personal information and check references listed in the application (people who know but are not related to the applicant); and
- Maintenance of these records as described below.

Potential leaders or supervisors must be known and active in Grace Episcopal Church for at least six months before engaging in ministry with vulnerable adults unless they are required to have public records checks and reference checks pursuant to the **Public Records Checks and Screening Protocols** (found in Appendix C of the Protection of Vulnerable Adults Diocesan Policy, as posted on the [Diocese of Massachusetts Safe Church Policies page](#))

Grace Episcopal Church must keep and maintain all application and screening records secure and confidential in the congregation’s office. This includes a signature by each applicant verifying receipt of a copy of this policy, including any special procedures or variations approved for particular circumstances.

## **V. EDUCATION AND TRAINING**

Training shall be appropriate to each person's function according to the current ***Safe Church Training Protocols*** as found in Appendix A of the Protection of Vulnerable Adults Diocesan Policy and in the current Safe Church Modules chart, both posted on the [Diocese of Massachusetts Safe Church Policies page](#).

All Leaders shall have Universal Training that fosters a culture of safety and inclusion for all people and covers a broad overview of issues of vulnerability, power, and healthy boundaries. Universal Training is designed to equip all people to live out their Baptismal Covenant. All members of The Episcopal Church shall have access to this training.

In addition to Universal Training, all Supervisors and those with oversight responsibilities for ministry programs and/or other adults who engage in ministry with Vulnerable Adults shall have Specialized Training that is tailored to their role and ministry function.

### **Depending on role and responsibility, Specialized Training should include:**

- The prevention, identification, and response to all forms of abuse and neglect, including financial exploitation;
- Mandated and voluntary reporting of suspected abuse, neglect, and exploitation of vulnerable adults;
- Vulnerability within the pastoral relationship;
- An introduction to gender non-binary;
- The needs of aging LGBTQ+ individuals who often struggle to find care or residential facilities adequately equipped to meet their needs; and
- The ways that vulnerable adults can engage in self-advocacy.

Certification of training shall be renewed every **three** years.

Grace Episcopal Church shall keep records sufficient to evidence compliance with this policy.

## **VI. MONITORING AND SUPERVISION OF PROGRAMS**

All people who minister to vulnerable adults and/or have pastoral relationships with others must have ongoing supervision. Ongoing supervision should consist of regular check-ins by the Supervisor who may be a Member of the Clergy or a lay team leader. Such supervision shall review the scope, accountability, and responsibility of the ministry with the person engaged in the ministry. Each person engaged in such ministry should know who supervises their ministry and how to contact the Supervisor at all times.

Grace Episcopal Church shall ensure that all people who minister to vulnerable adults receive prior training as to the scope, accountability, and responsibility of the ministry.

Grace Episcopal Church shall maintain an up-to-date list of persons with their contact information approved to minister to vulnerable adults and/or engage in pastoral relationships with others. This list shall be kept in the congregation's office.

It is best practice for those ministering to vulnerable adults to document their visits, including time, place, and any observations or concerns. Such documentation is reviewed by the Supervisor. Confidentiality among clergy and lay ministers is required and all documentation is kept confidential. This documentation promotes continuity of care and transparency in ministry.

All new activities that include pastoral relationships and/or ministry to vulnerable adults shall have a Responsible Person to monitor and supervise all events to ensure appropriate behavior and healthy boundaries.

#### **A. Presence of Unrelated Adults Suggested**

While not required, it is best practice for those ministering to vulnerable adults, or in the homes of others, to do so with another trained adult minister present. Those engaged in such ministries should minister in pairs.

If circumstances result in a minister being alone with a vulnerable adult, that minister shall report this to the Supervisor as soon as possible.

#### **B. Creating Safe Space for Pastoral Relationships and/or Ministry with Vulnerable Adults**

To create a safe space, it is necessary to anticipate and avoid circumstances that could result in exposure of vulnerable adults to undue influence or exploitation. On-site and off-site settings for ministry with vulnerable adults and pastoral relationships and conversations should:

- Be in places where casual monitoring by others is convenient; and
- Convey safety and comfort.

#### **C. Inclusiveness**

No one shall be denied rights, status, or access to an equal place in the life, worship, and governance of any program or activity because of race, color, ethnic origin, national origin, marital status, sex, sexual orientation, gender identity and expression, differing abilities, socio-economic class, or age. To the extent possible, all spaces and settings for programs, activities and ministry shall be accessible.

The Episcopal Church seeks to support all persons by providing reasonable alternative arrangements regardless of state law to address safety and comfort.

Transgender, genderqueer, or gender non-binary adults who express the need or desire for increased privacy should be provided with reasonable alternative arrangements. Reasonable alternative arrangements may include the use of a private area, or a separate changing



schedule, or use of a single-stall restroom. Any alternative arrangement should be provided in a way that protects the adult's ability to keep their transgender status confidential, if they so desire.

Transgender, genderqueer, or gender non-binary adults should not be required to use a locker room or restroom that conflicts with their gender identity. Safe bathroom/shower facilities will be provided by gender (or specific times will be assigned for the use of a single facility).

#### **D. Violence**

- No one is to strike, hit, or otherwise physically threaten or harm anyone at any time.
- No one is to control or attempt to control another by bullying, intimidation, threats, verbal/emotional abuse, or isolation from others. Bullying of any kind by anyone is prohibited.
- Report suspected violations immediately. See ***Suspected Violations of this Policy*** (Section VII, B).

#### **E. Behavioral Standards for Ministry with Vulnerable Adults**

All who work with vulnerable adults are expected to model the patterns of healthy relationships. To this end, lay, and ordained ministers working with vulnerable adults shall:

- Take care not to unduly influence a person to whom they minister;
- Accept only token gifts from those to whom they minister. Ministers given gifts shall report those gifts in writing to their Supervisor or Responsible Person;
- Decline to accept loans of any kind from those to whom they minister;
- Decline to agree to be named as a beneficiary or to act as an administrator or executor in a will of anyone to whom they minister; and
- Inform Supervisor or Responsible Person of anything that causes concern for the safety or wellbeing of those to whom they minister.

#### **DO's**

All who minister to vulnerable adults are encouraged to:

- Have ongoing spiritual practices, which might include daily prayer, regular participation in corporate worship, and Bible study;
- Spend time with and listen to vulnerable adults, and advocate for their ministry within the Body of Christ;
- Offer appropriate physical expressions of affection, as long as they are welcomed by the recipient. These may include:
  - brief hugs;
  - pats on the shoulder or back;
  - kisses on the cheek;
  - handshakes;

- holding hands during prayer; and
- Maintain healthy boundaries when sharing personal information.

### **DON'Ts**

Adults shall not under any circumstances:

- Provide vulnerable adults with non-sacramental alcohol, marijuana, illegal drugs, cigarettes, e-cigarettes, vapes, or pornography;
- Arrive under the influence of alcohol, marijuana (even though consumption is legal in some cases in Massachusetts), illegal drugs, or misused legal drugs when they are responsible for, or ministering to, a vulnerable adult;
- Consume non-sacramental alcohol or illegal drugs or misuse legal drugs when they are responsible for, or ministering to, a vulnerable adult;
- Engage in illegal behavior or permit others to engage in illegal behavior; or
- Engage in any sexual, romantic, illicit, or secretive relationship or conduct with any vulnerable adult.

### **F. Visits to Private Residences**

The safety of all persons and healthy boundaries are essential when visiting a vulnerable adult in a private home.

- Avoid situations that might compromise privacy; common examples include:
  - Visiting behind closed bedroom doors;
  - Sitting on the bed of the person being visited; or
  - Visiting a person while they are not fully clothed.
- The best practice is to visit in teams of two or more. If it is not possible for another adult minister to be present, a member of the vulnerable adult's household should be present. If neither is possible, documentation of the time, duration of visit, general matters discussed, and any pastoral concerns shall be provided to the Supervisor or Responsible Person as soon as possible after the visit.

### **G. Visits to Residential Facilities**

The safety of all persons and healthy boundaries are also essential when visiting a vulnerable adult in a Residential Facility. Best practices include:

- Facility staff should be informed of the visitor's presence;
- If a visit takes place out of sight of staff, they should be notified in advance and informed when such meeting is concluded;
- The door to a resident's private room must remain open during visits;
- Visitors should be mindful that LGBTQ+ residents may not be safe to express their sexual identity or orientation, as staff members may not yet have been trained; and

- In the event of uncertainty about application of this policy, the visitor is encouraged to contact their Supervisor with the relevant queries.

## **H. Off-Site Visits, Events, and Programs**

Off-site programs, trips, and events are a welcome and often necessary means for spiritual, social, and emotional wellbeing of vulnerable adults. They also present additional challenges for maintaining best practices for safe and healthy ministry. The expectations for safe space, as described above, should be observed off-site.

In the event of uncertainty about application of this policy, the Responsible Person should contact their Supervisor with the relevant queries.

Because of the unique risks that can't always be anticipated, it is important to obtain permissions and manage documentation as described below.

### **1. Prior Approvals**

- Prior approval by the *Rector and Wardens* is required, and that approval shall be reflected in writing.
- These same prior approvals are required when the site is a private residence, hosting such events as cook outs, progressive dinners, etc.

In the event of uncertainty, the Responsible Person should contact the Office of the Bishop with the relevant information.

### **2. Registration, Waivers, and Release Forms**

Due to the unique risks of off-site visits, events, and programs that cannot always be anticipated, it is important to obtain permissions and manage documentation as described below:

- All participants shall complete and sign a registration, waiver, and release before participating in any program. Confidentiality must be preserved with respect to medical information.
  - There must be a signature on all release and waiver forms. If a person is unable to consent due to impairment or lack of agency, then the signature of that person's guardian, spouse, or other trusted family member is required. A digital signature is acceptable.
  - Completed release and waiver forms shall be maintained in a secure location on-site. Such forms may be saved electronically and shall be saved for a minimum of seven years.
- Permission slips shall be provided for each event and shall be signed by the vulnerable adult, guardian, spouse, or other trusted family member.

- Prior permission for an individual to be photographed or recorded on film, videotape, audiotape, or other electronic media is required.

### 3. First Aid and Medications

Current certification in First Aid, CPR, and Automated External Defibrillator (AED) is strongly encouraged for those who work with vulnerable adults.

- A first aid kit, appropriately stocked for the event and participants, shall be available in an easily accessible location.
- If a vulnerable adult requires assistance with medications of any type, then a record must be kept for all medication or first aid given to a participant. This record shall include the participant's name, the date and time of service, the name of the person administering medication or treatment, and a description of the medication, dosage and/or treatment given.
- All medications (prescription and over the counter) belonging to vulnerable adults requiring assistance with medications shall be given to the Responsible Person, unless otherwise agreed upon.
- Only the Responsible Person, or their adult designee, shall administer medications.

#### I. Transportation

For the health and safety of all participants, the following practices shall be followed:

- For events that originate and/or terminate at the parish's facilities, all drivers must be at least 21 years of age and provide proof of insurance and a current driver's license, a completed volunteer driver information form, and have a satisfactory RMV records check;
- A list of those approved to provide transportation to vulnerable adults shall be maintained in the Grace Church office;
- Anyone being transported must consent to such transportation beforehand. If a person is unable to consent due to impairment or lack of agency, then prior approval by that person's guardian, spouse, or other trusted family member is required; and
- All drivers and riders must comply with state laws including seat belt and cell phone usage.

#### J. Insurance for Overseas Pilgrimages and Mission Trips

- Short-term trip or supplemental insurance, available through [The Church Insurance Companies](#) as an added rider, must be secured at-least one month prior to travel.
- It is recommended that all travelers carry evidence of personal health insurance by virtue of a copy of the actual card provided to the insured person.
- Because not all individuals have access to affordable and adequate health insurance, it is recommended that health insurance be added to trip insurance.

### **K. International Considerations**

- Check in with the U.S. Department of State on travel requirements, including visas.
- Make certain that every traveler's passport is valid for at least six months beyond your return date.
- Determine whether or not vaccinations are required and/or recommended for entry into specific countries.
- Arrange to have at least two cell phones with the group that will have active coverage in your destination(s). Make a back-up plan for communication with your Responsible Person at home.

### **L. Conference and Retreat Centers**

All conference and retreat centers of the Diocese shall follow the guidelines for off-site Programming established in this policy. In addition, camps should aim to follow American Camp Association [standards](#) to the best of the camp's ability.

## **VII. RESPONDING TO CONCERNS**

### **A. Suspected Abuse, Neglect, or Exploitation of a Vulnerable Adult**

Anyone who has reason to suspect that abuse, neglect, or exploitation of a vulnerable adult has taken place, is strongly encouraged, and all mandated reporters are required to contact the [Executive Office of Elder Affairs](#) immediately.

In addition, anyone who has reason to suspect that abuse, neglect, or exploitation of a vulnerable adult has taken place within a facility or program of the Diocese, or one of its congregations or affiliated organizations, should immediately inform one of more or the following:

- The Bishop Diocesan or the Canon to the Ordinary in the case of a diocese;
- Member of the Clergy in charge or the senior warden in the case of a congregation;
- The director, head, or other governing officer in the case of other organizations; and/or
- The Intake Officer in case a Member of the Clergy is suspected of abuse, neglect, and/or exploitation.

### **B. Suspected Violations of this Policy**

Anyone who suspects a violation of these policies shall immediately report the violation to the Responsible Person and to the *Rector or Clergy person in charge, and the Wardens*.

The *Rector or Clergy person in charge and the Wardens* receiving reports of violations of this policy shall be responsible for providing appropriate pastoral care to all those affected. The *Rector (or Wardens, in the absence of a Rector)* shall provide appropriate remedial and/or

disciplinary action up to and including termination of employment or unpaid ministry with Grace Episcopal Church. If the Responsible Person is a lay person, they are responsible to ensure that appropriate pastoral care is provided for all.

Anyone who knows of a violation of these policies by a Member of the Clergy shall immediately report the violation to the Office of the Bishop and/or the Intake Officer. Anyone can make a report to an Intake Officer.

The Bishop, hearing reports of violations by a Member of the Clergy, shall be responsible for providing appropriate pastoral care to all those affected and appropriate remedial and/ or disciplinary action, up to and including canonical disciplinary action, as provided by Title IV of the Constitutions and Canons and/or termination of employment or unpaid ministry with the Diocese. In the case of violations by a lay person, the Office of the Bishop shall offer support to the *Rector and Vestry* in providing appropriate pastoral care to all those affected.

### **C. Local Resources for Response**

The parish shall provide a list of local resources that can give information and assistance to anyone concerned about circumstances that may violate this policy. Such resources with contact information shall include:

- The Reverend Melissa Howell, Bridge Priest of Grace Church: [revmelissahowell@gracechurchnb.org](mailto:revmelissahowell@gracechurchnb.org) 508-993-0547, ext. 103
- Jean Pitcairn, Senior Warden of Grace Church: [chaserdah@aol.com](mailto:chaserdah@aol.com)
- The Reverend Canon William C. Parnell, Diocesan Canon to the Ordinary: [bparnell@diomass.org](mailto:bparnell@diomass.org)
- The Right Reverend Alan M. Gates, Bishop of Massachusetts: [agates@diomass.org](mailto:agates@diomass.org)
- Diocesan Intake Officers:
  - Starr Anderson: [starrkanderson@gmail.com](mailto:starrkanderson@gmail.com)
  - The Reverend Thea Keith-Lucas: [revthea@gmail.com](mailto:revthea@gmail.com)
  - Ema Rosario-Nordalm: [erosero@bu.edu](mailto:erosero@bu.edu)
- [Massachusetts Executive Office of Elder Affairs](#)

## **VIII. POLICY ADOPTION, IMPLEMENTATION, AND AUDIT**

### **A. The Episcopal Church Adoption and Implementation**

The Episcopal Church shall ensure that all programs and events of the Episcopal Church involving vulnerable adults comply with the standards set out in this model policy.

The Episcopal Church shall also ensure that each diocese adopts a ***Policy for the Protection of Vulnerable Adults*** in accordance with this model policy by January 1, 2019.

### **B. Diocesan Adoption, Implementation, and Audit**

The Episcopal Diocese of Massachusetts Dioceses has adopted a ***Policy for the Protection of Vulnerable Adults*** that is consistent with and/or exceeds the requirements in this model policy.

Dioceses may adopt site-specific variations from this model policy, where permitted by their governing body, which shall be described in detail, including the circumstances under which those variations are to be permitted and their rationale.

The bishop or ecclesiastical authority for each diocese shall inform congregations and other organizations within the diocese of the contents of the diocesan policy, the requirement that each congregation or organization adopt a policy in accordance with the diocesan policy, and the vendor(s) approved by each diocese to conduct Public Records Checks.

***Safe Church Self-Audit:*** The Diocese of Massachusetts shall review its diocesan policy each year and conduct an audit of congregations and affiliated organizations every three years to ensure compliance with the requirements above.

#### **Procedures to be confirmed by audit will include (but are not limited to):**

- Existence of diocesan policy that is consistent with and/or exceeds the requirements of this model policy;
- Provision of accessible and appropriate training for all those who work with vulnerable adults in accordance with ***Safe Church Training Protocols*** as found on the [Diocese of Massachusetts Safe Church Policies page](#). Such training shall include, at a minimum, topics identified in this model policy;
- Verification that each congregation and/or organization within the Diocese has adopted a policy that is consistent with and/or exceeds the diocesan policy; and
- Verification that each congregation and/or organization has a process to ensure members access training and conduct public record checks.

### C. Congregation and Organization Adoption, Implementation, and Audit

Congregations and organizations must adopt a ***Policy for the Protection of Vulnerable Adults*** that is consistent with and/or exceeds the requirements in this model policy and the diocesan policy.

Congregations and organizations may adopt site-specific variations from diocesan policies, where permitted by vestries or governing bodies, which shall be described in detail, including the circumstances under which those variations are to be permitted and their rationale. This approval shall be recorded in the minutes of the vestry or governing body.

The ***Policy for the Protection of Vulnerable Adults*** shall be posted in an area where activities take place, and shall be given to all adults, guardians, and all paid and unpaid persons who minister to vulnerable adults. These policies shall include the names and phone numbers of the rector or clergy in charge, the senior warden, and a contact person in the bishop's office.

Each congregation and organization is required to conduct a ***Safe Church Self-Audit annually*** to confirm compliance with safe church policies, and to report such audit to the Office of the Bishop.

#### **Procedures to be confirmed by audit will include (but are not limited to):**

- Public records checks, application forms, records of screening, and reference verification of paid and unpaid persons engaged in ministry with vulnerable adults;
- Records of compliance with ***Safe Church Training Protocols*** and ***Public Records Checks and Screening Protocols***. Please refer to the [Diocese of Massachusetts Safe Church Policies page](#) for current protocols.
- Procedures for responding to concerns and incidents; and
- Evidence of compliance with "safe space" requirements.