RC ACTIVITIES, INC.
(Regnum Christi Federation)

Safe Environment Program Policies and Procedures

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PREFACE

We must ensure that children and youth who worship, study, or participate in activities sponsored therein can do so in the safest and most secure setting possible. Parents must have confidence in us before they will allow their children to become involved in activities organized or sponsored by us. "Safe environment programs" designed to assist institutions in instilling that confidence are encouraged by insurance and risk management companies as well.

ARTICLE 12. *Dioceses are to maintain "safe environment" programs which the diocesan bishop deems to be in accord with Catholic moral principles. They are to be conducted cooperatively with parents, civil authorities, educators, and community organizations to provide education and training for minors, youth, parents, ministers, educators, volunteers, and others about ways to make and maintain a safe environment for minors and young people. Dioceses are to make clear to clergy and all members of the community the standards of conduct for clergy and other persons in positions of trust with regard to minors.* ***Charter for the Protection of Minors and Young People. USCCB.***

PURPOSE, DEFINITIONS AND REQUIREMENTS

The purpose of this Safe Environment Program is to communicate principles, guidelines and obligations for public life for all who perform their work responsibilities with minors. This program states clear requirements for relationship between staff, volunteers and contracted personnel, ("personnel") and those minors with whom they work. Where preventive education and screening may fail, strong sanctions for violations of this program must necessarily follow. While this program applies to all professional and volunteering relationships, the child molestation crisis within the church calls us to be particularly attentive to minors and to those working with them and their families.

It is required to carefully consider and comply with each standard contained in this Safe Environment Program. It is likewise, the responsibility of all personnel, whose work involves access to minors, to comply fully with the Safe Environment Program,

DEFINITIONS

TYPES OF ABUSE:

- Physical abuse is injury that is intentionally inflicted upon a minor

- Sexual abuse is any contact of a sexual nature that occurs between a minor and an adult or between two minors. This include any activity that is meant to arouse or gratify the sexual desires of the adult or the other minor.
- Emotional abuse is mental or emotional injury to a minor that results in an observable and material impairment in the minor's growth, development, or psychological functioning.
- Neglect is the failure to provide for a minor's basic needs or the failure to protect a minor from harm.
- Drug use and alcohol use is strictly prohibited at all RC Activities sponsored events. In the event a participant is known to be using drugs or alcohol, parents / guardians must be called immediately to pick their child up from the program. If the illegal drugs are found on the premises, the local authorities should be contacted.

BULLYING:

Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength. Bullying can take on various forms, including;

- Physical bullying is when one engages in physical force against another, such as by hitting, punching, pushing, kicking, pinching, or restraining another.
- Verbal bullying is when someone uses their words to hurt another, such as by belittling or calling another hurtful names.
- Nonverbal or relational bullying is when one person manipulates a relationship or desired relationship to harm another person. This includes social exclusion, friendship manipulation, gossip, or intimidating another by using gestures.
- Cyberbullying is the intentional and overt act of aggression toward another person by way of any technological tool, such as email, instant messages, text messages, digital pictures or images, or website postings (including blogs). Cyberbullying can involve:
    - a. Sending mean, vulgar, or threatening messages or images;
    - b. Posting sensitive, private information about another person;
    - c. Pretending to be someone else in order to make that person look bad; and
    - d. Intentionally excluding someone from an online group.
- Hazing is an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers that person regardless of that person's willingness to participate.
- Sexualized bullying is when bullying involves behaviors that are sexual in nature. Examples of sexualized bullying behaviors include sexting,

bullying that involves exposures of private body parts, and verbal bullying involving sexualized language or innuendos.

ORGANIZATION PERSONNEL:

For the purposes of these policies, the following are included in the definition of personnel:

- All paid employees, including those who contract their services to RC Activities, Inc.
- All unpaid volunteers

ORGANIZATION:

Shall mean RC Activities, Inc. (Regnum Christi Federation) and programs that operate under the umbrella or sponsorship.

SAFE ENVIRONMENT REQUIREMENTS:

Shall mean the Personnel Screening, selection and training Process, acknowledgement of receipt of any and all policies promulgated, including the Code of Conduct, and the completion of the Safe Environment Training appropriate to their position and location.

SAFE ENVIRONMENT REQUIREMENT IN ALL POLICIES AND PRACTICES

All RC Activities, Inc. programs whose work involves access to minors shall incorporate the Safe Environment Requirements into their personnel policies and practices, and they shall constitute a condition of employment and voluntary service for all those whose work involves access to minors.

SAFE ENVIRONMENT COORDINATOR

Each of the federated entities (RC Activities, Inc. - RC Federation, Legion of Christ, Consecrated women of Regnum Christi) have a safe environment coordinator,

The Safe Environment contact information for RC Activities, Inc. is

- RC Activities, Inc.: Safe Environment Coordinator
  Todd Brechbill
  Email: SafeEnvironment@rcactivities.com
  tbrechbill@rcfed.org
  (260) 438-3042

The Safe Environment contact information for entities affiliated with RC Activities, Inc. include:

- Legion of Christ: Safe Environment Coordinator
  Nikki Hittle, MSW
  Email: nhittle@arcol.org
  Phone: (770) 802-0058
- Legion of Christ: Program Coordinator for Pastoral Care
  Abby Foley
  Program Coordinator for Pastoral Care
  Email: afoley@arcol.org
  Phone: (678) 467-9348
- Consecrated Women of Regnum Christi: Safe Environment Coordinator
  Naoise Johnson
  Email: njohnson@regnumchristi.net
  Phone: 401-575-3380

Some individual tasks or responsibilities in connection with the Safe Environment Program may be delegated by the Safe Environment Coordinator, yet the director bears ultimate responsibility for the implementation of the program in the organization.

It is the responsibility of each RC Local Director and Section Director to ensure the implementation and adherence to the Safe Environment Program as detailed in this document. Any questions or concerns should be directed to the Safe Environment Coordinator noted above.

PERSONNEL COVERED BY THE SAFE ENVIRONMENT PROGRAM

The Organization is fully committed to implementing the Bishops' Charter for the Protection of Minors and Young Persons. To do so effectively, it is necessary to determine which personnel have "direct or assisted access to minors". In most cases, this determination is very easy, but in others, it will be necessary to examine the degree to which there is “access” to minors.

PERSONNEL WITH "DIRECT ACCESS TO MINORS"

It shall be considered to have “direct access to minors” if there is access to minors on a routine or on-going basis, particularly if involvement would permit to be alone with a minor. Certain job descriptions should always be deemed to have “direct access to minors” including but not limited: organization administrators, teachers, teacher aides, substitute teachers, organization or classroom volunteers, guidance counselors, organization custodians, catechists, catechist aides, youth ministers, athletic coaches and volunteers. Any involvement in any overnight activity with a minor, even if only on one occasion, shall be deemed to be as of a “direct access to minors”. This includes parents who will be involved in the overnight activity with their own children, and/or if the activity also involves any other minors whose parents will not be present.

PERSONNEL WITH "ASSISTED ACCESS TO MINORS"

It should be deemed to have “assisted access to minors” if the access to minors is only on a supervised, isolated, occasional basis, or the involvement in the activity would not permit it to be alone with a child. Such personnel may include, for example, family members of minors who assist during one-time events under constant supervision of a trained director, or cooks and helpers at an event.

Personnel, whose only access to minors is in the course of the sacred liturgy, should not, in the absence of other factors, be deemed to have “direct access to minors”, such as: lectors, Eucharistic ministers, ushers, music ministers and leaders of song.

FACTORS TO CONSIDER IN DETERMINING IF PERSONNEL HAVE "DIRECT ACCESS TO MINORS"

To determine whether access to minors is “direct”, the following factors should be considered. If the answer to one of these questions is “yes”, then it should be considered to have “direct access to minors”.

1. Is the access to minors direct, usual, or frequent (as opposed to incidental, indirect, occasional or infrequent)?
2. Do duties frequently bring them into an organization, or the location of a religious education program or youth program?
3. Do duties permit to have private face-to-face dealings with minors?
4. Do duties enable to come into physical access to minors?
5. Is there an opportunity to be with minors in private?
6. Is there direct directory responsibility over minors?
7. Do minors typically come into the person’s private workspace?

PERSONNEL WHO ARE IN DIRECT ACCESS TO MINORS, BUT ARE UNDER THE AGE OF 18

Anyone under the age of 18 (16-17) may be in direct access to minors only if they are under the direct supervision of an adult who is in full compliance with the Safe Environment Requirements and who is actually present with them at the time and place of their service. And must also comply with the Safe Environment Requirements.

NON-ORGANIZATION PERSONNEL

As with any organization, it must on occasion rely on the expertise of outside personnel through an outside agency or entity in providing services. These are not considered part of the Organization personnel. There is no employment relationship created by the agreement between the Organization and the agency or entity.

When entering into a relationship of this sort, the director in consultation with the supervising management member (i.e. BM) will assess the access, if any, that the personnel will have to minors and apply the appropriate screening, selection and training requirements. This includes contracted bus drivers or instructors during an activity.

THE SAFE ENVIRONMENT REQUIREMENTS

SCREENING AND SELECTION

Personnel who are 18 years of age and older with direct access and assisted access to minors must fully comply with the following standardized screening and selection processes:

- Complete a volunteer application online
- Acknowledging and signing receipt of the appropriate Code of conduct, Safe environment policies and procedures training, and volunteer policies and procedures.
- Submitting to a county criminal background check, a multi-state criminal background check with SSN trace and Alias search, and a national sex offender registry check.
- Complete local diocesan Safe Environment training (VIRTUS) and provide a certificate of completion to the local director of the program or event.
- Face to face interviews administered locally by the program or event director.

The Volunteer Processes must be completed **prior** to the start of the employment, contracting services, or volunteering obligations at https://rcactivities.com/volunteers.

The director of local events shall ensure that all volunteers and personnel staff have completed the screening and selection process by providing a valid *RC Activities Volunteer Certificate*, and ensure each volunteer and personnel staff has completed all local diocesan requirements for Safe Environment training by providing a valid certificate of completion issued by the diocese. The national office shall retain the completed file of all volunteer and personnel in their files and the local program or event director shall retain a copy of the volunteer certificate on file for all volunteers in the program.

TRAINING REQUIREMENTS

The RC Local Directors and Section Directors must work with local program and event organizers to ensure all volunteers and personnel working with minors in the section has complied with all local diocesan Safe Environment Training by the volunteer, by:

- Providing a valid Safe Environment training course completing certificate
- Participate in all diocesan continuing education and training updates

The local diocesan Safe Environment training requirements has two components:

- Initial training, and
- Continuing education

Local diocesan training should be completed within 30 days of start of service in programs or events.

CONDUCT WITH MINORS

Expectations should be clearly established that a safe environment will be maintained. Volunteers and personnel should have a welcoming and friendly demeanor and will be asked to respect verbal and physical boundaries, by never using derogatory, foul language or by inappropriately touching a minor, and should not disclose their own problems, difficulties or sexual issues. Minors must be treated as who they are, and not be invited to the volunteer's or personnel's private life as a type of confidant. This will help protect the personnel from any accusations of sexual misconduct while with a minor.

Volunteers and personnel should prefer environments that are open and transparent. They are to avoid situations that are isolated, and favor locations that are visible to others and well-trafficked. Volunteers and personnel must avoid being alone with minors, except for an emergency and when administrators have knowledge of the situation. Whenever personnel must meet with a minor in a 'one on one' situation, it is important to do so in a place not too isolated and visible to others.

GENERAL CONDUCT

Volunteers and personnel should avoid any form of excessive familiarity, inappropriate language, or any situation and conduct that exploits or could give the appearance of exploiting a minor.

Minors may seek to routinely spend time with or express affection to an adult they admire. Encourage minors to be balanced in their association with others.

No minor may be left alone or in the care of another minor. Always use an adequate number of adult Volunteers and personnel pursuant to organization policy. Any activities that the minors fulfill on their own will be monitored by one of the staff at least periodically. Always use an adequate number of adult Volunteers and personnel pursuant to organization policy.

No one without written consent and executed permission form/release from the minor's custodial parent(s) or legal guardian may administer medication. Anyone that has not completed appropriate training (e.g. CPR and first-aid certified) may not provide medical attention (other than in emergencies where the minor's or vulnerable adult's life is in imminent danger)

No minor is allowed to engage in hazardous activities without the written consent and executed permission to participate form/release from the minor's custodial parent(s) or legal guardian.

No minor is to be denied necessary food, water or shelter under any circumstances.

No runaway minor is to be given sanctuary without making a timely report concerning the minor's safety and whereabouts to the custodial parent(s), or the authorities. For purposes of this provision, timely shall mean within two (2) hours or as soon as reasonably practicable.

PHYSICAL CONTACT

Volunteers and personnel should not use physical or corporal discipline in any way for behavior management of minors. No form of physical discipline is acceptable. This includes but is not limited to spanking, slapping, pinching, shaking, hitting or any other physical force as retaliation or correction for inappropriate behavior of a minor.

- Do not touch a minor or vulnerable adult against his or her will.
- Do not touch a minor on any portion of their body that would be covered by a bathing suit.
- Do not touch a minor during a religious ceremony or rite except as prescribed by the Church.
- Respect a minor's boundaries of comfort relative to physical and emotional displays of affection.

The following table has been provided as a guide to distinguish between appropriate and inappropriate physical interactions between Volunteers and personnel and minors.

Appropriate Physical Interactions	*Inappropriate Physical Interactions*
• Side hugs • Shoulder-to-shoulder or “temple” hugs • Pats on the shoulder or back • Handshakes • “High-fives” and hand slapping • Verbal praise • Pats on the head when culturally appropriate • Touching hands, shoulders, and arms • Arms around shoulders	• Full frontal hugs • Kisses • Touching bottom, chest or genital areas • Showing affection in isolated areas of the building • Volunteers and personnel sleeping in a bed with a minor • Touching knees or legs inappropriately • Wrestling • Piggyback rides • Tickling • Allowing a minor to cling to a Volunteers and personnel’s leg • Any type of massage given by or to a minor

	• Any form of affection that is unwanted by the minor or the staff • Compliments that relate to physique or body development • Texting, "sexting" and other forms of electronic correspondence

Volunteers and personnel are prohibited from using physical punishment for the behavior management of minors. No form of physical discipline is acceptable. This prohibition includes spanking, slapping, pinching, hitting, or any other physical force as retaliation or correction for inappropriate behaviors by minors. Volunteers and personnel will have age-appropriate expectations and guidelines that minimize the need for discipline.

VIRTUAL INTERACTION

When participating in virtual meetings or communications through online video meeting platforms such as ***Zoom*** or ***Go To Meeting***, the program and event directors should follow the general conduct guidelines while meeting with minors, in addition to yet not limited to the following:

- RC Activities permission forms should be obtained and explicit permission authorized by parents / guardians for minor's participation in video conferencing.
- At least two adults who have a valid RC Activities volunteer certificate should be present and visible on the video call.
- A recording of the meeting should not be made.
- It is recommended that the organizer include some of these ground rules when inviting participants to a video conference call.

Appropriate Virtual Interactions	*Inappropriate Virtual Interactions*
• Positive reinforcement • Appropriate jokes • Encouragement • Praise • Appropriate video view of the room member are in • Appropriate dress	• Recording of video meeting • Inappropriate view in video background • Inappropriate dress of participants • Name calling • Discussing sexual encounters or in any way involving minors in the personal problems or issues of staffs • Cursing • Telling off-color or sexual jokes • Shaming • Belittling • Making derogatory remarks

	• Using harsh language that may frighten, threaten or humiliate minors • Making derogatory remarks about the minor or about his/her family

VERBAL INTERACTION

Volunteers and personnel are prohibited from speaking to minors in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Volunteers and personnel must not initiate sexually oriented conversations with minors.

The following table has been provided to distinguish between appropriate and inappropriate verbal interactions between staff and minors.

Appropriate Verbal Interactions	*Inappropriate Verbal Interactions*
• Positive reinforcement • Appropriate jokes • Encouragement • Praise	• Name calling • Discussing sexual encounters or in any way involving minors in the personal problems or issues of staffs • Telling secrets • Cursing • Telling off-color or sexual jokes • Shaming • Belittling • Making derogatory remarks • Using harsh language that may frighten, threaten or humiliate minors • Making derogatory remarks about the minor or about his/her family

ONE ON ONE INTERACTION (SPIRITUAL AND HUMAN FORMATION DIALOGUE)

Most abuse occurs when an adult is alone with a minor. One on One interaction introduces higher risks for false allegations. Volunteers and personnel should aim to eliminate or reduce these situations and private one-on-one interactions should be eliminated unless approved in advance by directors and parents.

In those situations, where one-on-one interactions are approved, Volunteers and personnel should observe the following additional guidelines to manage the risk of abuse or false allegations of abuse:

Additional Guidelines for One on One Interactions
• An official RC Activities, Inc. permission form signed by the parent or guardian of all minors must be obtained prior to one-on-one interaction. • When meeting one on one with a minor, always do so in a public place where you are in full view of others. • Avoid physical affection that can be misinterpreted. Limit affection to pats on the shoulder, high-fives, and handshakes. • If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by. • Inform other Volunteers and personnel (i.e., administrators, other adults) that you are alone with a minor and ask them to randomly drop in. • Document and immediately report any unusual incidents, including disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted.

INTERACTION OUTSIDE ESTABLISHED FACILITIES

Many cases of abuse occur outside of established facilities. This contact outside of regularly scheduled activities may put Volunteers and personnel and minors at increased risk.

The following forms of outside contact are appropriate and inappropriate: When outside contact is unavoidable, ensure that the following steps are followed:

Appropriate Outside Contact	*Inappropriate Outside Contact*
• Taking groups of minors on an outing • Attending sporting events • Attending functions at a minor's home, with parents present • Home visits with parents present	• taking a minor(s) on an outing without parental written permission • Visiting minors at home without a parent present • Entertaining a minor(s) in a home of Volunteers and personnel • A lone minor spending the night with Volunteers and personnel

When outside contact is unavoidable, ensure that the following steps are followed:

1. Directors should identify for Volunteers and personnel what types of outside contact are appropriate and inappropriate.
2. Ensure that Volunteers and personnel have the parents' permission to engage in outside contact with the student. Consider requiring the parents to sign a release-of-liability statement.

ZERO TOLERANCE FOR VIOLENCE AGAINST MINORS AND / OR ADULTS

The safety of RC Activities' employees, participants, and volunteers is an important concern to the organization. Threats, threatening behavior or acts of violence against employees, participants, volunteers or others while at RC Activities sponsored events while, planning, conducting business or receiving services from RC Activities won't be tolerated. Violations of this policy will lead to disciplinary action, possible dismissal and revocation of the RC Activities Volunteer Certificate, and criminal prosecution as appropriate.

RC Activities, Inc. prohibits disrupting, interfering, or preventing normal work functions or activities; making physical or verbal threats; or endangering the health or safety of any individual.

- Disruptive behaviors include yelling, using profanity, waving arms or fists, verbally abusing others, and refusing reasonable requests for identification.
- Threatening behavior includes physical actions short of actual contact or injury (moving aggressively into another's personal space), general oral or written threats to people or property ("You better watch your back." "I'll get you."), and implied threats ("You'll be sorry." "This isn't over.").
- Violent behavior includes any physical assault, with or without weapons; behavior that a reasonable person would interpret as being potentially violent (throwing things, pounding one's fist on a desk or door, or destroying property), or specific threats to inflict physical harm (a threat to shoot a specific person: "I'm going to shoot you, Eustis.").

REPORTING POTENTIAL THREATS

All personnel and volunteers staff should take responsibility for notifying management of any threats that they've witnessed, received, or have been told that another person has witnessed or received by completing an Incident Report. This form submitting to the RC Activities Safe Environment Coordinator at SafeEnvironment@rcactivities.com.

Even without an actual threat, staff members should also report any behavior they've witnessed or messages they have received that they regard as threatening or violent, when that behavior or communication is job related.

Personnel and volunteers are responsible for making this report regardless of the relationship between the individual who initiated the threat or threatening behavior and the person/persons who were threatened or were the focus of the threatening behavior.

Personnel and volunteers should report the presence of a weapon immediately to a manager, a supervisor, or if appropriate, to the police by calling 911 (or other emergency number in the jurisdiction).

INVOLVING LAW ENFORCEMENT

If there is any possibility that the threat to harm to property or personnel is real, call in the next level of defense. Follow the chain of command in your organization — unless the threat is imminent. If the person threatens and immediately follows through, staff members should be instructed to call 9-1-1 (or the variation of this emergency number in the community). If the staff member has a wireless device, the person should leave the building and make the call. If the individual can safely call from within the building, he/she should call from there. Instruct personnel to calm down by taking several deep breaths, then speaking slowly, say what the threat is (man with a gun; ticking package, etc.), give his/her name, the address of the building and the number of people on the scene (in the building, on the playing field, etc.)

THREAT OF PHYSICAL HARM

When one of your employees or volunteers has been threatened with physical harm, it is important to take immediate action to protect the employee or volunteer. First, meet with the person to obtain details of the threat and assess their feelings about its seriousness and fear level. Next, discuss with the individual what steps the organization might take. Some of the steps that you might agree on include:

- Requiring that visitors to the office be identified and then “buzzed” in rather than leaving your front office door open;
- Restricting the employee’s or volunteer’s work hours to times when other staff members will be in the office;
- Providing an escort for the employee or volunteer from the office to his or her vehicle;
- Allowing the employee to take unscheduled leave;
- Setting up a meeting with a representative of the local police department and the employee or volunteer

ELECTRONIC COMMUNICATIONS

Electronic communication between Volunteers and personnel and minors via non-sponsored applications/devices, including, but not limited to, the use of private social networking sites and

instant messaging is strictly prohibited. Volunteers and personnel who electronically communicate with minors may only communicate appropriate and necessary event-related communications via sponsored applications/devices, as long as the messaging/email is brief, appropriate and necessary, and copying a director or the minor's parent when called for. For example, text messaging between Volunteers and personnel and minors should only be done in a group text, not individually. In the case of minors that are 15 years of age and over, written permission must have been provided by the parents through an official RC Activities, Inc. permission form for individual communication.

PHOTOGRAPHING MINORS

The RC Activities, Inc. permission form signed by parents does authorize RC Activities, Inc. to use the image and likeness of minor participants in photograph or video form whether taken by or commissioned by RC Activities, Inc. in its promotional materials and for its promotional purposes associated with its nonprofit activities. This authorization shall extend to use of the participant's image and likeness on the website of RC Activities, Inc., or its successor in operation or affiliated organization(s) upon written consent of RC Activities, Inc. Parents and or Guardians understand that this authorization shall survive the end of their child's participation in the activities referenced on this form.

SOCIAL MEDIA

Social media is defined as any web-based and mobile technologies, including apps, which are designed to turn communication into interactive dialogue. This includes, but is not limited to, the use of blogs/wikis, mobile phone, computer and tablet "apps," message boards/forums, Facebook, Instagram, Tiktok, X, YouTube, Vimeo, LinkedIn, Tumbler, Snapchat, GroupMe, etc.

A minimum of two adult employees (parish, school, mission staff) should have full administrative access to every social media account operating under the organization. These individuals should receive alerts of any page activity sent to their assigned email account (this allows for a quicker response time to urgent requests and helps to ensure that all postings are appropriate). At no time should minors be granted administrative privileges.

Official sites should contain no personal views, photos or personal information of the administrator and/or staff.

Parents and guardians should be made aware of all social media accounts for the organization.

In the event that your social media account is hacked, change your password and contact the social media platform right away and disable viewing of your account until erroneous information is removed.

Post the following "rules of conduct" established by USCCB for visitors to your Facebook page: *"All posts and comments should be marked by Christian charity and respect for truth. They should be on topic and presume the good will of other posters. Discussion should take place primarily from a faith perspective. No ads please."*

When photographing minors at an event, the following company policies should be followed:

- **DO NOT** post pictures of minors on social media or website without a signed permission form on file from their parent or guardian.
- Event Organizers, volunteers, and staff **SHOULD NOT** post pictures of minors at an RC Activities sponsored event to their personal social media account(s) unless you are a parent or guardian of the minor being photographed.
- **DO NOT** post pictures of adults or minors in swimsuits, wet clothes, or pajamas.
- **DO NOT** post pictures of adults or minors in their bedrooms or while sleeping
- **DO NOT** post any pictures of adults or minors that could be misconstrued or misunderstand and possibly cause harm or bring the reputation of the minor or adult volunteer into question.

SUPERVISION

Monitoring and supervision are critical functions of abuse prevention and provide protection to volunteers, personnel, and minors. When interactions are monitored, allegations of abuse or wrongful acts are more easily and accurately investigated and resolved.

GENERAL SUPERVISION

Event and program directors should be present at all activities to ensure that they are well managed and that policies are observed by all in attendance.

RATIOS

Programs will follow the ratio requirements that are directly related to the goals of the program and the design of the facility. This means providing reasonable and prudent supervision that is equal to or exceeds the supervision reasonable parents would give their own children.

The Organization must evaluate ratio requirements for each program or event based on the level of "Risk"; however, there must ALWAYS have a minimum of two cleared and trained volunteers and / or personnel at any event.

For off-premises programs or events, the risk would generally be considered higher and therefore a higher ratio would be necessary. (Note: a ratio of 2 volunteers to 10 minors is considered "higher" than a ratio of 2 to 20.) When the activity takes place in a secure area of the building where no one will be accessing the area except for volunteers and personnel, the risk may be lower than if in a public access area with adults coming and going constantly through. A weekend hike in the wilderness might actually require a lower ratio than handing out bag lunches to homeless people in an inner-city setting.

Other things to consider when deciding on the number of Volunteers and personnel required to supervise the event might be:

- Will the group be split into smaller groups which might be meeting separately for a period of time in different areas?
- Are restrooms accessible only to the group or are they open to the public?
- Will the group go outside for part of the time to a playground or volleyball area, for example?
- Will the parking lot need to be monitored for minors driving their own vehicles?
- Will there be a set time for beginning and ending the event or will it be a come-and-go type of event?
- What type of transportation would be used to get to the event, charter bus, or multi-purpose buses?
- What is the possibility that a minor might get sick or injured and need to be transported away from the group to a medical facility? Is the ratio enough that Volunteers and personnel could be used to transport the minor and still have enough to cover the rest of the group?

Volunteers and personnel must be at least 21 years of age to be counted in the Volunteers and personnel/minor ratio. Those who are 18-21 would be considered 'Volunteers and personnel-in-training' and given tasks and responsibilities that are within their capabilities based on their level of maturity and experience. It is always prudent to include Volunteers and personnel in the discussion and decision making process.

MIXED AGE GROUPS

In most incidents involving one minor abusing another minor, the children are from different age groups. Guidelines must be stablished for additional monitoring and supervision of activities that involve minors from different age groups. Volunteers and personnel must be aware that close

line-of-sight supervision is required when monitoring programs that mix age groups. Examples of particular times and locations where mixing age groups typically occurs include: Locker rooms, lunch times, recess, and before and after organization.

NEW PROGRAM DEVELOPMENT

Volunteers and personnel are not permitted to develop new programs for minors without prior review by two levels of management, with the final approval given by the organization's director. Requests to develop new programs should be submitted in writing.

FACILITY/SITE MONITORING

Buildings and site architecture can increase or mitigate the risk of an incident or accident, especially when shared with other groups. Because most incidents of sexual behavior occur in private, the extent to which privacy is managed, risk is managed. In order to ensure that all of the buildings and facilities are properly and consistently monitored, designation of a director(s) who will complete the site-inspection checklist at various times throughout the day should be arranged.

Additional Guidelines for Facility Monitoring
• All unused rooms, storage areas, and closets must be kept locked at all times. • All unused buildings and areas are designated, posted, and enforced as off-limits to minors. • All minors are required to remain in facility areas that are easily viewed by volunteers and personnel. • Classrooms, meeting rooms, and any rooms where minors have access should have windows that permit observation. • All facilities are required to utilize open doors, open blinds, and unobstructed windows. • Stage curtains should remain open. • All access to keys must be controlled for all facility areas.

SHARED FACILITIES

Concerns arise when facilities (e.g., organizations, retreat buildings, camps) are being shared with other Organizations. In this case great care must be taken to ensure that minors are protected from any access to members of the general public.

Organization facilities in which programs with minors are being held are not public places. The only people who are permitted to be in these areas are those who are directly involved in the activity, or who are otherwise authorized to be present (e.g., parents, maintenance workers, etc.).

Members of the general public are never permitted to have unsupervised access to any facility or area in which minors are taking part in any event.

In many cases, this is ensured by strictly limiting access to the facility. For example, organization buildings should have locked doors, with access overseen by Volunteers and personnel who screen visitors to ensure that entrance is granted only to those who are properly on the premises and who will be supervised by Volunteers and personnel.

A high degree of vigilance is required when the facility is being shared with other activities to which the public has access (e.g., an organization building that also hosts other outside programs). If possible, there should be clear physical boundaries that restrict any access by the public to the areas used by the minors. For example, there should be separate entrances, separate bathrooms, locked doors between floors, etc.

If complete physical separation is not possible, access must be limited by human measures that are very rigorously enforced. For instance, hall monitors must be placed at access points to ensure that minors do not come into access to the other persons on the premises, and areas used by minors as entrances and exits should be supervised by staff members to ensure that minors are not interfered with.

HIGH RISK ACTIVITIES

CO-ED EVENTS

Due to the unique formation of RC Activities programs, RC Activities sponsored events for youth are gender specific, which includes participants and volunteer staff as well. Any co-ed activity for youth, including event volunteers or staff, must be approved in advance by the RC local director or college.

BATHROOM ACTIVITIES

Most abuse occurs in bathrooms. Volunteers and personnel should be aware of the unique bathroom policies within the organization on and outside of established facilities.

- If privacy can be preserved, the bathroom doors should remain open.
- Instruct minors which bathrooms to use.

- Minors who have histories of behavioral disruptions and/or sexual acting out behaviors should never be sent to the bathroom with other minors, and should always be escorted to the bathroom by volunteers and personnel.
- If possible, volunteers and personnel should use staff-only bathrooms or use the bathroom when minors are not around.
- Minors in pre-organization and elementary levels should be escorted to the restrooms and a director should monitor from the outside and ensure minors are coming out in a timely manner.
- Minors in middle and high organization levels should be monitored during transition periods to ensure that minors are not lingering in the bathroom. For bathroom use during events a hall pass or similar technique should be used to ensure their timely return.

LOCKER ROOM ACTIVITIES

Volunteers, personnel, and minors must shower at different times. Create schedules that will permit supervision of the minors while volunteers and personnel shower.

While minors change clothes and shower, at least one volunteers or personnel should stand in the locker room doorway and within earshot of the minors. Ensure that only one minor is in each shower (Consider installing shower curtains that do not go all the way to the floor, so that Volunteers and personnel can easily see how many minors are in each shower stall).

TRANSITION TIMES AND FREE TIMES (INCLUDING BEFORE AND AFTER EVENTS)

Transition and free times, including those before and after organized events, pose a higher risk for incidents because during these times, Volunteers and personnel may not be assigned a particular group of minors to supervise. To decrease the risk of incidents, implement the following supervision guidelines:

- Designate certain areas at events as off-limits during these times by setting specific and narrow geographic boundaries in the program areas.
- Depending on the age of minors, ensure that Volunteers and personnel are assigned specific areas to supervise during transition times and free times. This “zone monitoring” ensures that all accessible areas are monitored. Assign more volunteers and personnel to high-risk areas and activities (i.e., playgrounds, isolated areas, etc.). For example, in organizations with playground areas, assign volunteers and personnel to certain “zones” and around the perimeter of the area. If the playground includes play structures that limit line-of-sight supervision (such as tunnels, slides, or jungle gyms), assign volunteers and personnel to these areas as well. Volunteers and personnel should not be standing or sitting in groups while minors play on the playground.
- Create specific bathroom procedures during transition times and free times. Then, designate which bathrooms will be available to minors. Volunteers and personnel should be posted at (or responsible for spot-checking) each available bathroom to actively monitor the minors.

- Require directors to conduct periodic sweeps of the entire activity area. If minors are lingering outside of the planned activity area, the director should encourage these minors to return to the designated areas.
- Require the presence of an upper-level director during transition and free times (including before and after activities).

EVENING EVENTS AND ACTIVITIES

Night games, movies, and evening activities are often high risk because minors of mixed ages interact in a less structured environment. The following guidelines can help to decrease those risks:

- Apply the same procedures used to monitor transition and free times, as listed above.
- Any movies, YouTube videos, music videos, social media clips or other video platforms to be shown at a youth event must be listed on the permission to participate form under the nature and duration of activities. All movies that have a Motion Picture Association film rating of R or higher are strictly prohibited. Any movies that fall within the rating guidelines that have a sexual references or innuendos are strictly prohibited.
- Ensure that volunteers and personnel are assigned to supervise specific areas during both night games and the transition times before and after the events. For example, while minors are waiting in a large group before the night games, volunteers and personnel should be spread out in a "zone monitoring" formation – i.e., one volunteers or personnel in each corner of the area, one or more volunteers or personnel posted near the exits, etc. This "zone monitoring" ensures that all accessible areas, adults, and minors are monitored.
- Conduct head counts at random intervals throughout the activity. At some point during night games, volunteers and personnel should formally ascertain that all of minors are present. Create roll sheets that counselors must turn in at the end of the night.
- Require the presence of a volunteer and personnel during night games.

OVERNIGHT ACTIVITIES

Overnight stays present unique risks to minors and Volunteers and personnel. They often involve changing clothes, groups of both genders and different ages in a more intimate atmosphere than usual, more unstructured activities, and increased supervision demands for Volunteers and personnel.

Goals for Volunteers and personnel ratio on domestic trips are 1:10 and on international trips are 1:6. Actual ratios may need to vary either upward or downward based upon individual trip factors. Target ratios will be used unless an alternate is approved by the organization.

Minors must always: be under direct personal supervision by adults; be advised of all safety measures; and be able to be in access to their parent or guardian.

Minors are to be supervised at all times. They must be accompanied by volunteers and personnel at all times that they are not in their rooms/dorms. On occasions, there may be times and areas in which minors may need to be unaccompanied by Volunteers and personnel. In such instances, Volunteers and personnel must ensure the following:

- Physical boundaries are clearly defined;
- Minors must comply with instructions;
- Minors should not leave the area without notifying Volunteers and personnel

SLEEPING ARRANGEMENTS

- Overnight stays at private homes of lay families are prohibited
- No minor is permitted to sleep in a bedroom with an adult, except in the case of a youth sleeping in the room of their own parent or guardian. Connecting rooms may only be occupied by minors of the same sex.
- Male and female minors will not share the same bedroom, showers, changing rooms or bathrooms. When separate changing rooms, showers and bathrooms are not available, separate times for male and female use of should be scheduled, posted and enforced.
- A lone Volunteer and personnel may never enter a bedroom, shower, changing room or private bathroom being used by a minor, except in the case of an emergency to ensure safety or health, or to preserve order.
- Minors who are staying in private rooms (e.g., hotel rooms) should be periodically checked by adult chaperones. Room checks may never be conducted by a lone adult.
- Each minor must be provided their own separate bed; bed sharing is prohibited.
- Volunteers and personnel are to directly check rooms until after lights out. All doors are to remain unbolted and without security locks so that Volunteers and personnel can enter with the room key unannounced at any time and minors can exit to the hall and security guard/Volunteers and personnel at any time. All keys are to be retained by Volunteers and personnel. Taping of doors is recommended when possible.
- Volunteers and personnel may never be in a state of undress in the presence of a minor.
- Volunteers and personnel are prohibited from showering with minors.
- Volunteers and personnel and minors may sleep in a dormitory or a large single room (e.g., a gym), provided there is a minimum of two adults and two minors present. In these situations males and females must be separated in a separate area from youth, but in a place that allows them to monitor their activity. If it is not possible to arrange a separate but close sleeping location, that provides for adequate supervision (as stated above), then at least two adults should be in the dorm to provide for the minor's security.
- Male and female Volunteers and personnel must have separate sleeping facilities. Married couples may share the same room if appropriate facilities are available.
- Group organizers must always evaluate the trip for safety prior to departing, and must develop a specific plan to address any safety issues.

- These rules must be presented to the minors and Volunteers and personnel chaperones prior to departure. All persons on the trip must be aware of the rules and agree that they will abide by them.
- Group organizers shall enforce these rules by appropriate action, including requiring a person who has violated these rules to return home immediately.
- Volunteers and personnel are on duty at all times. There is no time off on an overnight trip. Volunteers and personnel are required to be active directors of the minors and not passive observes.
- All Volunteers and personnel are to be on duty in the halls or cabins at night until after lights out and all rooms quiet. Night security is required and Volunteers and personnel may retire after night security is on duty. Night security may not be released until relieved by Volunteers and personnel.

DRIVING ARRANGEMENTS

- Parents or legal guardians are responsible for arranging transportation for their children to and from events. Volunteers and personnel are not allowed to drive participants who are minors

VOLUNTEER DRIVER CERTIFICATION PROCESS

This document is an overview of the Volunteer Driver Registration process and company policy concerning the use of transportation and volunteer drivers during an RC Activity, Inc. sponsored event.

Please read the **Company Policy on Transportation and Volunteer Drivers** on page 27-30 of this document in its entirety, and complete the following process.

1. Complete the online volunteer certification process to request a background check
   a. Complete the web form at https://rcactivities.com/volunteers and click SUBMIT
   b. On the confirmation page, click the link and you will be redirect to the ***Sterling Volunteers*** website to complete your online application for a background report
   c. All processing fees will be paid online to ***Sterling Volunteers***
2. Complete the online volunteer DRIVER certification process
   a. Volunteer drivers are only approved per-event upon approval from the RC Federation Territorial Administration Office
   b. Event Director must contact customerserivce@rcfed.org for approval for your event to have coverage for volunteer drivers
      i) If approval is granted, the event director will receive the certification process instructions to share with all potential drivers

ii) Inform applicants being considered as volunteer drivers that they are **not eligible** if they have had any traffic violations within the past **5 years** or a **DUI within the past 10 years**
iii) After providing the certification instructions to potential drivers, submit a list of those applicants to the RC Federation Territorial Administration Office for driver verification
iv) Upon approval, the certified driver will receive an email with a ***Volunteer Driver Certificate*** for the **dates of the event only**. At this time, each driver and/or chaperon should receive a copy of the approved itinerary from the event director, including the route to be followed and a summary of his/her responsibilities.

NOTE: Volunteer Driver Certificates are issued on a per event basis only. If a volunteer would like an additional volunteer driver certificate for a different event within a 12-month period after initial certification, please contact customerservice@rcfed.org.

Company Policy on Transportation and Volunteer Drivers (Transporting minors for events/activities)

1. Means of transportation

The organizer of an event must submit an event application at https://rcactivities.com/node/add/local-event. The event application must be validated prior to considering the options below.

The following list is in order of levels of risk to liability exposure. Please consider carefully.

A. Primary Option: (least risk/liability)

The best way to reduce the Organization's liability exposure in this area is to establish a "Meet you there" policy. Transportation to and from all activities is the responsibility of the parent/guardian. The organization MUST not be involved in the management or arrangement of carpooling among parents/guardians. Ensure to plan well in advance, and let the parents organize it themselves. The event begins at the location and ends at the location, and the RC Activities, Inc. permission forms must state the default under point #4: "Not Applicable. No transportation provided…"

B. Secondary Option: (very low risk/liability)

When this is not feasible, public, commercial or contracted transportation is to be provided by licensed and insured carriers for all youth ministry events. When commercial carriers are used (e.g., commercial airlines, trains, or public transportation buses), no further information is required. The use of 10-15 passenger vans, even commercially or contracted, are strictly prohibited. However, if transportation is contracted, contracts must be sent to the national office for review and signature under RC Activities, Inc. by a corporate authorized signer. It must include an appropriate hold harmless agreement protecting the organization. In addition, contracted carrier must provide proof of insurance with minimum limits of liability of $2,000,000 CSL (Combined single limit), and a certificate of insurance must be requested

naming the organization RC Activities, Inc. as additional insured. RC Activities, Inc. Permission forms should list the transportation company that will be providing the services.

C. Rental Option: (high risk/liability)

Renting a vehicle is an option if the two above are simply not feasible. In order to drive, all volunteer drivers must be certified and go through the volunteer driving process (See #4 in this section). Two adults must be present at all times in the vehicle while transporting youth and the protocol as outlined below in Section #2 must be followed and strictly adhered to. The rental of 10-15 passenger vans is prohibited, no exceptions as they are not covered under the RC Activities, Inc. general liability insurance. Copies of the rental agreement must be forwarded to the national office for record retention.

D. Privately Owned Vehicles: (very high risk/liability)

This should be a last resort option, and last minute planning or budget impediments should not dictate that this option be used. Extreme caution should be exercised with the option to ensure limiting the liability exposure for the adult volunteers and the safety of the youth. The protocol in section #2 must be followed and adhered to completely, no exceptions.

2. Protocol for Volunteer Drivers using hired, rented or privately owned vehicles

The following are mandated requirements.

A. Vehicles:

i. **THE USE OF 10-15 PASSENGER VEHICLES IS STRICTLY PROHIBITED IN ANY CASE (Commercial, Rental or privately owned).**

ii. School bus or multifunction school activity bus. (commercially hired only with professional driver)

a) Must meet MFSAB safety standards. An MFSAB is a vehicle which complies with the Federal Motor Vehicle Safety Standards (FMVSS) applicable to school buses for crash survivability and mirrors, but does not meet the FMVSS which applies to crash prevention (warning lamps, stop arms, etc.) If used for the transportation of children, these vehicles must meet FMVSS 111; FMVSS 220; FMVSS 221; and FMVSS 222. (See below). As stated above, this is also recommended to apply to the transportation of adults.

1. FMVSS 111 * Fulfills the safety requirement for the rear-view and cross-view visibility.
2. FMVSS 220 * Establishes requirements for the school bus body structure in rollover accidents.
3. FMVSS 221 * Regulates the strength of body panel joints in school buses.
4. FMVSS 222 * Establishes occupant protection requirements for school bus passenger seating and barriers.

iii. Rental vehicles (cars, mini-vans and SUV's)

a) Appropriate insurance should be obtained. Coverage can be purchased through the rental company or by contacting CCAS. If auto coverage is provided through CCAS, contact should be made with the national office.
b) Mini-bus or bus rentals are prohibited.

iv. Privately owned vehicles
a) The vehicle must have a valid and current registration and valid and current license plates.
b) The vehicle must be insured for the following minimum limits: $100,000 per person/$300,000 per occurrence.
c) The vehicle should be in good operating condition with no pending repairs.

v. Transportation in the open bed of truck is strictly prohibited.

B. Driver:

A volunteer driver MUST comply with the following requirements:

i. Volunteer process including: volunteer registration, Background check, completing a Driver History Form, and Safe Environment training. See Section #4 below. *(Must be completed 2 weeks prior to event for ample processing time required)*

ii. Must be 25 years of age or older, and be able to assist in medical emergencies.

iii. In transporting minors for a trip, two adults should be present in each vehicle; if that is not possible, the minimum required is one adult and two or more minors; a youth may never ride in a vehicle alone with an adult, except for their own parent/guardian. Even if permission is provided verbally or in writing by the parents, it is strictly prohibited.

iv. A single minor may only be driver alone in an emergency, especially when it involves the health or safety of the minor. In such case, the minor's parents should be informed as soon as possible.

v. 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.

vi. Each driver should be given a copy of the approved itinerary including the route to be followed and a summary of responsibilities.

vii. Minors should be properly assigned to each individual vehicle, depending upon its capacity (number of seat belts).

viii. The use of cell phones or other electronic devices is prohibited while driving.

ix. Volunteer driving is limited to a specific event location, date and time and not valid other than the period specified on the Volunteer Driver Certificate.

3. Legionaries, Consecrated and Staff

The protocol listed above applies to all Legionaries, Consecrated and Staff (members), with the exception of needing to fulfill the Volunteer Driver Process. However, drivers must also have the approval of their local superior.

A. Community cars are not considered "Privately Owned Vehicles" in section 2 above. Community cars are to be driven only by members, and are prohibited from lending them or renting them to lay volunteers drivers.
B. A member may drive a single minor alone only if he or she is a direct relative, with the consent of his or her parent. Even if parental permission is given verbally or in writing, it is strictly prohibited.
C. ECYD Mission corps is an exception to this policy, as Legionaries, Consecrated and Staff become temporary legal guardians of the missionaries for 4-6 weeks. (Parental permissions and policies are built into the program)
D. RC Mission Corp missionaries are strictly prohibited from driving minors at any time.

REPORTING SUSPICIOUS BEHAVIOR OR POLICY VIOLATIONS

The dedication to maintaining zero tolerance for abuse must be priority number one. It is imperative for volunteers and personnel to participate actively in the protection of minors. In the event that volunteers and personnel observe any suspicious or inappropriate behaviors on the part of other Volunteers and personnel or any other person, it is their personal responsibility to immediately report their observations directly to the RC Activities, Inc. Safe Environment Coordinator at SafeEnvironment@rcactivities.com.

Examples of suspicious or inappropriate behaviors could include; policy violations, neglectful supervision, seeking private time with minors, taking minors off-premises without adhering to procedures, buying gifts for minors, poor role modeling, swearing or making suggestive comments to minors.

All reports of suspicious or inappropriate behaviors with minors will be taken seriously. Procedures will be carefully followed to ensure that the rights of all those involved are protected.

VOLUNTEERS AND PERSONNEL RESPONSE

In the event that volunteers and personnel witness suspicious inappropriate behaviors or policy violations from other volunteers and personnel, volunteers and personnel should do the following:

- Interrupt the inappropriate behavior and remind of the correct policy or procedure for interacting with minors.
- Report the behavior to the Volunteers and personnel's immediate director and/or make a report to SafeEnvironment@rcactivities.com
- If no action is taken in response to reporting to the personnel's immediate director, notify the RC Activities Safe Environment Coordinator at SafeEnvironment@rcactivities.com.

DIRECTOR OR ADMINISTRATION RESPONSE

In the event that a director receives a report of suspicious or inappropriate behaviors or policy violations from Volunteers and personnel, the director or administrator completes the following:

- Investigate and immediately respond to the incident(s):
  - Notify the RC Activities Safe Environment Coordinator at SafeEnvironment@rcactivities.com.
  - Report concern to the next level of management.
  - Conduct a formal internal incident review.
  - Determine the appropriate administrator to respond to the behavior
  - Review the staff's file and determined if similar complaints exist about the staff
  - Document the behavior on the appropriate form
- Determine what action is required:

- Increase monitoring or supervision of the staff or program
- Speak with the staff
- Initiate the progressive disciplinary process
- If appropriate, notify civil authorities
- If appropriate, notify parents and/or guardians
- Follow up with the staff who reported the behavior to let the staff know that the report is being taken seriously

ORGANIZATIONAL RESPONSE

After the internal review of the suspicious or inappropriate behaviors or policy violations, the Organization completes the following:

- Review the need for additional supervision.
- Review the need for revised policies or procedures.
- Review the need for additional training.

REPORTING STUDENT TO STUDENT SEXUAL ABUSE AND SEXUALIZED BEHAVIORS

The thought that one minor may sexually abuse another student does not occur to many people. Unfortunately, abuse between peers has increased alarmingly in the past few years. Minor-to-minor sexual activity and sexualized behaviors often remain unreported in organizations because Volunteers and personnel are not comfortable documenting these situations, or may not know how.

MINOR-TO-MINOR INTERACTIONS

Most serious incidents of minor-to-minor abuse are preceded by more subtle incidents such as name-calling, taunting, or roughhousing. Interrupting these interactions early and establishing and communicating standards of conduct can keep the school environment safe. The organization recognizes that the following interactions are high risk and should be prohibited:

- Hazing, Bullying, Derogatory name-calling, games of trust or dare, singling out one minor for different treatment, ridicule or humiliation.

In order to adequately respond to and track incidents within the organization, all sexual activity between students and sexualized behaviors of minors must be consistently documented.

VOLUNTEERS AND PERSONNEL RESPONSE

In the event that a Volunteers and personnel sees a student exhibit sexualized behaviors or suspect minor-to -minor sexual activity, the Volunteers and personnel is instructed to do the following:

- Interrupt the behavior and separate the minors (Do not investigate)

- Notify the RC Activities Safe Environment Coordinator at SafeEnvironment@rcactivities.com
- Report the behavior to a director or administrator
- Document your report with factual information only

DIRECTOR OR ADMINISTRATOR RESPONSE (SAFE ENVIRONMENT COORDINATOR)

In the event that a director or administrator receives a report of minors' sexualized behavior or minor-to-minor sexual activity, the director should do the following:

- Notify the authorities of abuse as required by state reporting mandates
- Notify the RC Activities Safe Environment Coordinator at SafeEnvironment@rcactivities.com
- Determine the appropriate administrator to conduct an internal review of the incident
- Notify the parents of all minors involved
- Document the incident and the organization's response
- Develop a written corrective action or follow-up plan in response to the incident

ORGANIZATIONAL RESPONSE

After the internal review of the sexualized behavior or minor-to-minor sexual activity, the organization will determine what can be done to prevent a reoccurrence, such as:

- Review the need for additional supervision
- Review the need for revised policies or procedures
- Review the need for additional training
- Alert others in the organization

REPORTING SUSPECTED ABUSE AND INVESTIGATION

Allegations of sexual abuse may come from a variety of sources, including alleged victims, family members, volunteers and personnel, other persons, or from the perpetrators themselves. Because each case is distinct, these procedures to handle abuse allegations will need to be applied and adapted according to the facts and circumstances of each individual case. These procedures may, from time to time, need to be reviewed and if needed, changed to accommodate new procedures and/or changes.

An individual is presumed innocent until proven guilty. The presumption of innocence does not preclude from taking immediate, prudent action to protect the alleged victim and the community in response to complaints and before an investigation is complete.

OBLIGATION TO REPORT SUSPECTED ABUSE OF A MINOR AND REPORTING PROCEDURES

Volunteers and personnel must be familiar with any and all reporting requirements currently in place at the state and local level where events or activities take place.

As required by mandated reporting laws, volunteers and personnel must report any suspected abuse or neglect of a minor—whether on or off a facility event or whether perpetrated by volunteers and personnel or others—to state authorities. Reports may be made confidentially or anonymously. A person who mistakenly reports suspected abuse is immune from civil or criminal liability as long as the report was made in good faith and without malice. *Refer to your state's specific mandated reporting requirements for more information.

In addition to reporting to state authorities, volunteers and personnel are required to report any suspected or known abuse of minors perpetrated by Volunteers and personnel directly to the local diocesan office of Safe Environment, then follow-up with the RC Activities Safe Environment Coordinator at SafeEnvironment@rcactivities.com so that immediate and proper steps may be taken to ensure the safety of alleged victims and others who may be at risk. Reports of suspected or known abuse may be made confidentially to the following: Immediate Director, Administrators, and local Safe Environment Coordinator.

All allegations of sexual abuse or misconduct must be received seriously and there should be commitment to work in cooperation with civil authorities in any criminal investigation stemming from an allegation. Communicate with the authorities as to who will perform the internal investigation. When administrators contact the authorities, the authorities may advise to perform an internal investigation, or authorities may perform their own investigation. The organization will decide how the internal investigation should be completed. If authorities request that the organization take no action, document the request and proceed in accordance with it. If authorities do not request that the organization take no action, proceed with an internal investigation.

In the absence of concrete evidence, if information reported gives reasonable cause to suspect abuse of a minor and causes to be required to report to a governmental agency, it should be reported. It is preferable to err in favor of over reporting, rather than under reporting. The law with regard to the reporting of abuse makes it mandatory that concerns over minors' health and safety are paramount. From time to time, an accusation may ultimately turn out to be false, but it is up to the government agencies to determine the validity of accusations. An organization must report as the law requires.

When an allegation of abuse is first received sufficient information should be gather to complete an initial report. The basic information shall include to the extent possible the following:

- Name of the alleged victim,
- Age of the alleged victim,
- Address and phone number of alleged victim,

- Name of the alleged perpetrator,
- Current location and contact information of the alleged perpetrators,
- Approximate dates of the alleged abuse,
- Nature and location of alleged abuse,
- Any additional relevant details.

The director or safe environment coordinator shall immediately inform the Board of Directors, the Risk Management Department who will alert the legal department as well as the insurance provider.

The director or safe environment coordinator of the accused volunteers or personnel shall advise him/her of the allegation and pursuant to policy will ensure that he/she is immediately removed from any responsibilities and from any situations that could pose a possible threat to minors until the investigation is completed. Anonymous allegations will be taken seriously and investigated thoroughly. Volunteers or personnel will be promptly informed that the allegation has been received. The director or safe environment coordinator should limit himself/herself to informing the volunteers or personnel of the allegation but refrain from questioning him/her about it, since the latter could be construed as an obstruction of justice.

Regarding criminal and civil penalties involved in these types of claims/allegations, the following are to be taken into account:

- Criminal and civil penalties are always personal.
- An organization can be held liable if through negligence they have permitted policy violations, abuse or crimes or, when these occur, if they did not act with prudence and speed or if they do not follow the established procedures.
- The failure to observe the reporting laws of the local and state jurisdiction may result in legal penalties for an organization since such failure may be construed as complicity, cover up, or obstruction of justice.
- Generally, any person who, pursuant to the law, reports abuse or neglect or testifies in minor abuse hearing resulting from such a report is immune from any criminal or civil liability as a result of such action. Any person who knowingly fails to report suspected abuse or neglect pursuant to the law may be subject to criminal prosecution.
- Severity of the criminal sanctions in addition to possible civil liability varies from jurisdiction to jurisdiction.

OBLIGATION TO REPORT SUSPECTED ABUSE OF A MINOR TO THE ARCH/DIOCESE

After informing the civil authorities, the volunteer must inform the Arch/Diocese that an allegation has been made and that it has been reported to the appropriate authorities, and that policies and procedures are being followed.

Most, if not all, Arch/Dioceses also provide guidelines assisting individual and organizations in the reporting and handling of a suspected abuse of a minor. It is the duty of the organization to ensure that Volunteers and personnel are familiar with any and all reporting requirements currently in place in the Arch/Diocese an organization is located in.

INTERNAL HANDLING OF REPORTS OF INCIDENTS INVOLVING A MINOR (INTERNAL INVESTIGATION)

It is understood that civil authorities must respond to and investigate reports of abuse. The organization will at all times fully cooperate with the authorities.

Upon receipt of a complaint of sexual abuse the organization will refer the matter to civil authorities and the local diocesan office of Safe Environment, then begin an internal investigation according to established procedures and, if the accused is clergy, in accordance with canon law and/or the order's or Arch/Diocesan internal procedures. When civil authorities are conducting a criminal investigation, the organization will defer to that investigation process until it is concluded.

The internal investigation should be carried out in a thorough and objective manner, so that its conclusions will be as reliable and as definitive as possible.

The director or safe environment coordinator of the organization will appoint an internal investigator to take charge of all aspects of the inquiry. If required by the circumstances, the organization may retain the services of a professional investigator or company to assist in the inquiry. There can be considerable advantages to having an internal investigator work in tandem with a professional investigator, among others:

- Because the internal investigator knows the norms and culture of the organization, he will be in a very good position to facilitate the discovery of possible anomalies that the professional investigator-as an outsider-might miss.
- The presence of the internal investigator can help to ensure that the investigation is as respectful as possible to the alleged perpetrator's right to privacy, to the honor owed to his/her person and good name, to the welfare of the organization as a religious family, and to the organization's spirit.
- An independent professional investigator will help to ensure the quality and ultimate credibility of the inquiry.

In some cases, when civil authorities have carried out an investigation and produced a report, that may be deemed sufficient to attain the goal of an objective, third party inquiry, such that the internal investigation could be carried out solely by the internal investigator.

The internal investigator will try to establish all the facts concerning the alleged abuse. Either personally, or through the professional investigator, he/she will interview the alleged

perpetrator, the alleged victim, and any other persons mentioned by the alleged victim in his/her accusation or anybody else he/she considers may have relevant information concerning the case.

The internal investigator will advise all parties he/she interviews that he/she is acting as the representative of the organization and that any conversation with him/her are not subject to attorney/client or pastoral privilege. He will also advise the parties that, although pastoral care is available, he/she will not be the person providing that care.

In the case of verified or undisputed allegations, the organization will try to identify any other potential victims and they will be interviewed by the Investigator.

In the course of the investigation, the Investigator will periodically keep the organization informed regarding status.

All elements of the investigation will be documented and will be presented to the organization by the investigator and professional investigator in the final report. These documents will be stored in the office of the organization. They are the property of the organization and will remain with that office when a new director or safe environment coordinator is appointed. The report will also be stored in the Volunteers and personnel file who is the subject of the investigation.

The director or safe environment coordinator will maintain contact with the accused Volunteers and personnel throughout the entire investigation process by appropriate and pastoral means. When the director or safe environment coordinator has received the completed report, he will present the results of the investigation for his/her response.

After receiving the final report of the internal investigation, the director or safe environment coordinator will convene the Board of Directors as soon as possible. The Board will study attentively the documentation and the results of the investigation presented to them, and will provide their written opinion on the case. The Board shall at all times maintain and preserve confidentiality of the information received on any such cases. The director or safe environment coordinator of the organization will also provide the results of the report to the competent Volunteers and personnel at the Arch/Diocese the organization is located in, if required be Arch/Diocese standards and/or procedures.

THE VICTIM

The organization will offer pastoral, psychological, and spiritual support to victims and their families. Such assistance is pastoral and shall not, in any way, be considered as an indication that the Organization is legally responsible for the actions of the accused staff.

The organization may coordinate such assistance through the outreach to victims' office of the

Arch/Diocese the organization is located in. The organization or the Arch/Diocese will designate a competent lay assistance coordinator to organize and direct outreach to victims and the delivery of victim assistance and support services to persons who claim to have been sexually abused.

The organization and/or the Arch/Diocese will/may:

- Be respectful of all persons bringing a complaint.
- Provide and advocate/advisor upon request.
- Help victims obtain counseling support.
- Provide information about support groups.
- Help victims and families obtain spiritual direction
- Help bring concerns to the proper Church officials.

OUTCOME OF INVESTIGATION

Volunteers and personnel admitting to, who do not contest allegations, is found guilty of a disqualifying offense, not just those involving a minor, or it appears that an alleged claim is sustained or where an existing settlement agreement comes to light, concerning said Volunteers and personnel, whether confidential or otherwise, shall be immediately terminated and barred from further activity with the organization.

If, after any governmental investigation is completed, it is determined that the alleged claims are false, or if the complaint is withdrawn, or it appears that there is a lack of evidence to support the claim and pending the outcome of the internal investigation, the individual may resume their duties with the organization without prejudice unless later civil or criminal action against the individual mandates a different course of action. Even if a criminal investigation has been dropped, the internal investigation may discover policy or boundary violations committed short of abuse which may impose limitations on activities, including termination of employment or suspension of services.

Upon conclusion of the internal investigation the director or safe environment coordinator of the organization will exercise judgment in delivering an appropriate response. If the accused Volunteers and personnel has admitted to the substance of the allegation, or in those cases where the allegations have been established the director or safe environment coordinator's response may include but is not limited to termination or suspension of staff services.

In case where the allegation has been established, the director or safe environment coordinator will contact the appropriate arch/diocesan offices to communicate the nature of the allegation and to inform the arch/diocese of the procedure followed and the response of the organization to the allegation.

If an allegation is deemed to be without merit, the director or safe environment coordinator will coordinate communication with all appropriate parties so that reconciliation can take place where possible and reparation of damage to reputations can be undertaken.

In all instance, the final decision of concerning the internal investigation rests with the director or safe environment coordinator of the organization upon review of the facts, investigative report, and board of Directors recommendations, always recognizing Volunteers and personnel's rights to appeal to the organization.

It is the responsibility of the director or safe environment coordinator of the organization to communicate his/her conclusions and decisions to the person that made the complaint, to the staff involved, and to other parties, as necessary and appropriate. All such communication should be documented.

If at any time during the course of implementing these procedures, civil or criminal proceedings are initiated against an accused Volunteers and personnel, these internal procedures may be suspended immediately to be resumed, if deemed necessary, only after the completion of the civil or criminal proceedings. In such a case, the director or safe environment coordinator shall recommend to the Board of Directors a possible course of action with respect to the accused staff, in keeping with the intention of these procedures and in the interests of justice.

Should an allegation prove to be unsubstantiated, the Volunteers and personnel will be returned to normal services and the director or safe environment coordinator will work towards the restitution of his/her good name. This would include such actions as letting the Arch/Diocese know of the outcome, extensive oral and written communication with other Volunteers and personnel who had come to know about the original accusations.

PROCEDURES FOR COMMUNICATING EMPLOYEES AND PARENTS ABOUT ALLEGATIONS OR INCIDENTS OF ABUSE

In order to protect the rights, reputation, and integrity of all individuals involved and to ensure the veracity of the investigation by both the civil authorities and the organization, the investigation of any allegations or incidents of abuse will be handled as confidentially as possible. Only the following will have access to the information concerning an allegation: The civil authorities investigating the allegations or incidents of abuse, the Director of the organization, the Board of Directors, the Safe Environment Office of the Parent Organization, The parents of the minor involved, and the person responsible at the Arch/Diocese responsible for the investigation of allegations or incidents of abuse.

The organization will withhold public announcements concerning allegations received or incidents of abuse, investigations in progress, or administrative processes until completion of the investigation. If an allegation or incident of abuse becomes public knowledge, the organization,

through its office of communication, will make nonpublic comments other than to confirm that an allegation has been received, that a report has been filed with the proper civil authorities, and that the allegation is under investigation following the procedures called by the Organization and civil law.

The organization will provide timely information relevant to the process and to actions taken by the organization to individuals involved.

At the conclusion of the process, the Director and the office of communication will coordinate the announcement of the outcome of the investigation, including any restrictions to be placed upon the accused individual or any steps to be taken to restore the individual accused responsibilities.

REPORTING POTENTIAL THREATS OF DISCLOSURE OF SELF-HARM

All personnel and volunteers staff should take responsibility for notifying management of incidents of self-harm or disclosure of self-harm by a minor while attending an RC Activities sponsored event

Even without an actual immediate threat of self-harm, staff members should also report any behavior they've witnessed or messages they have received that they regard as threatening of self-harm.

Personnel and volunteers are responsible for making this report regardless of the relationship between the individual who initiated the self-harm threat or threatening behavior.

When a disclosure of discovery of self-harm or threat of self-harm is first received, the organization's Safe Environment Coordinator at SafeEnvironment@rcactivities.com should be contacted immediately to assist in the reporting process.

Gather sufficient information to complete an initial incident report. The basic information shall include to the extent possible the following:

- Name of the minor
- Date-of-birth
- Address and phone number
- Approximate date(s) of self-harm
- Any additional relevant details.

Contact the parents immediately to inform them of the discovery. If the child is currently at an event, request the parents to pick their child up as soon as possible. Inform the parents that a

report has been filed and provide the parents with professional counseling options, unless the child is already under professional counsel. Follow-up with the parents in three weeks after the report is made to ensure the minor is receiving proper professional support.

Follow-up with the Safe Environment Coordinator after contacting the parents and report the follow-up plan is being followed by the parents.

REPORTING SUSPECTED DRUG AND ALCHOL USE

All personnel and volunteers staff should take responsibility for notifying management of incidents of drug or alcohol use by a minor while attending an RC Activities sponsored event.

Even without an actual immediate threat of drug or alcohol use, staff members should also report any behavior they've witnessed or messages they have received of past drug or alcohol use.

Personnel and volunteers are responsible for making this report regardless of the relationship between the individual.

Personnel and volunteers are not allowed to drink alcohol at any RC Activities events in which minors are present.

When a disclosure of discovery of drug and alcohol use is first received, the organization's Safe Environment Coordinator at SafeEnvironment@rcactivities.com should be contacted immediately to assist in the reporting process.

Gather sufficient information to complete an initial incident report. The basic information shall include to the extent possible the following:

- Name of the minor
- Date-of-birth
- Address and phone number
- Approximate date(s) of self-harm
- Any additional relevant details.

Contact the parents immediately to inform them of the discovery. If the child is currently at an event, request the parents to pick their child up as soon as possible. Inform the parents that a report has been filed and provide the parents with professional counseling options, unless the child is already under professional counsel. Follow-up with the parents in three weeks after the report is made to ensure the minor is receiving proper professional support.

Follow-up with the Safe Environment Coordinator after contacting the parents and report the follow-up plan is being followed by the parents.

VOLUNTEER OR EMPLOYEE DISQUALIFYING OFFENSES

It is the duty of the organization to assure that Volunteers and personnel are familiar with disqualifying offenses that would prevent them from rendering any kind of services, and is in full compliance with child protection policies currently in place at the organization and in the Arch/Diocese the organization is located in. The following disqualifying offenses supersede any less stringent Arch/Diocesan policies or standards.

The organization is called to protect minors from any and all possible harm. Even in the cases where forgiveness has been sought and reconciliation has occurred there are some offenses so serious that they disqualify an individual from service even after such healing has been found.

Disqualifying offenses include but may not be limited to the following:

- Violations of any policy and procedure including boundary violation
- A felony or misdemeanor classified as an offense against the person whether an adult or a minor.
    - Offenses against the person include, but are not limited to murder, assault, battery, sexual assault, injury to a child, and abandoning or endangering a child.
    - Offenses against the family include, but are not limited to, bigamy, incest, interference with child custody, enticing a child, and harboring a runaway child.
- A felony or misdemeanor classified as an offense against public order.
- Pending charges of a felony or misdemeanor classified as an offense against public order
- Offenses against public order include but are not limited to obscenity, sexual performance by a child, possession or promotion of child pornography.
    - A felony or misdemeanor violation of any law intended to control the possession or distribution of any substance included as a controlled substance by a governing or law enforcement agency.
- A felony or misdemeanor classified as an offense against property, to the extent that those offenses are related to threats or risk of harm or violence. Examples: Offenses against property include robbery, burglary of a habitation, and arson. Offenses such as theft by check or fraud would not automatically be considered Disqualifying Offenses unless the employee/volunteer has a role that involves or directly supports fundraising, money, finance, financial reporting, handling monies, etc.
- A felony computer crime of online solicitation of a minor.
- A Felony or misdemeanor offense against public health, safety and morals, involving illegal possession or use of weapons. Examples: Disqualifying offenses would include

unlawful weapons charges, including illegal weapons, bombs and illegal carrying of weapons.

- Any pending charges of above offenses will disqualify an applicant and volunteer's certificate may be revoked if charges are filled during volunteer tenure until such charges are cleared and the applicant is found innocent.
- While a serious offense, driving while intoxicated may not be a disqualifying offense for employment but must disqualify someone from driving at any RC Activities, Inc. sponsored activities or events and must disqualify someone from transporting minors to and from a RC Activities, Inc. event.
- Civil or criminal cases for damages, or settlement agreements whether confidential or otherwise, for any of the foregoing types of acts or omissions may also be disqualifying offenses for purposes of these policies.

CONCLUSION

United with one another in the living Gospel, the organization embraces these policies as a means of shared requirements, expectations, and understanding of appropriate professional and personal relationship context. It is part of the Organization's mission to truly protect and nurture minors. It is hoped that these policies will further that mission. Any person having questions at any time regarding these policies should please contact the organization management.

As with all the organization's programs, the organization reserves the right at any time to amend the program and policies contained in the Safe Environment Program

APPENDIX A – CODE OF CONDUCT

As part of the Safe Environment Program requirements, the organization adopts an Adult Code of Conduct. The organization will incorporate the following Code of Conduct into all the organization sponsored programs and events in which adults and minors participate. It may be preceded or followed by additional language.

The Arch/Diocese the Organization is located in may also require Volunteers and personnel, whether under direct authority and/or control or not to adhere to its own Adult Code of Conduct. Such requirements will supersede any lesser requirements under the organization's Code of Conduct.

Young people are among the most important gifts God entrusts to us. As an adult participant in a the organization sponsored event or program, I promise to strictly follow these policies and the following standards as a condition of my providing services to the organization

I will:
Conduct myself in a manner that exhibits the highest Christian ethical standards and avoids even the appearance of impropriety, and therefore I will:

1. Report suspected abuse of any minor to the appropriate authorities.
2. Cooperate fully in any investigation of abuse of minors.
3. Develop and maintain the level of skill required to be competent.
4. Be knowledgeable of and adhere to all applicable aspects of *the Safe Environment Program of the Organization.*
5. Complete training in minors' protection through VIRTUS or any other acceptable means, and in my Arch/Diocese if required.
6. Treat everyone with respect, loyalty, patience, integrity, courtesy, dignity, and consideration.
7. Honor the equality of all people, avoiding all forms of discrimination and respecting the dignity of each person without regard to economic status, age, gender, race, ethnicity, religion, or physical or mental abilities.
8. Use positive reinforcement and communication rather than criticism, unhealthy competition, or comparison.
9. Become thoroughly familiar with the objectives and guidelines of the program in which I am participating and strive to achieve these objectives and communicate them appropriately.
10. Be aware of and adhere to emergency plans and evacuation routes appropriate to the program in which I am participating.
11. Be responsible and/or accountable for stewardship of all resources entrusted to my care.
12. Uphold the authority of those responsible for the program or activity in which I am participating and assist them in every way to encourage learning and to conduct fair and impartial events.
13. Avoid situations where I am alone with minors, always following the two adult rule. When I need to have an individual conference with a minor, I will do so in a place that is visible to others and well-trafficked.
14. Avoid any form of excessive familiarity, inappropriate language, or any situation and conduct that exploits or could give the appearance of exploiting another.
15. Follow practices that consistently exhibit no tolerance for any form of abusive behavior.

16. Follow practices that demonstrate appropriate relationships between Volunteers and personnel and minors that are important for a child's development and a positive part of work.
17. Not provide false or misleading information on the Safe Environment Questionnaire.
18. Establish and at all times maintain appropriate relationship with youth/minors I come into contact with. This includes not establishing texting relationships, sharing personal cell phone information, etc.

I will not:

1. Use physical affection to initiate inappropriate contact with minors.
2. Touch a minor in a sexual or other inappropriate manner.
3. Smoke or use tobacco products in the presence of minors.
4. Drink alcohol at any time during an RC Activities event in which minors are present.
5. Purchase tobacco products for or distribute tobacco products to minors.
6. Use, possess, or be under the influence of alcohol while supervising minors or while participating in an organization event for minors.
7. Purchase alcohol for or distribute alcohol to anyone under the age of 21.
8. Use, purchase, possess, distribute, or be under the influence of illegal drugs at any time.
9. Purchase, download, possess, or distribute pornography at work.
10. Pose any known health risk to minors (i.e., no fevers or other contagious situations).
11. Humiliate, ridicule, threaten, demean, nor degrade minors or others nor tolerate such behavior in the environment for which I am responsible.
12. Use physical discipline in any way for behavior management of minors. No form of physical discipline is acceptable. This includes but is not limited to spanking, slapping, pinching, shaking, hitting or any other physical force as retaliation or correction for inappropriate behavior of a minor.
13. Use profanity in any form in the presence of minors.
14. I will not give full frontal hugs to students
15. I will not show affection in isolated areas of the building, such as closets, adult only areas, or other private rooms.
16. I will not allow a student to lay his/her head on the shoulder.
17. I will not put the arms around the waist of another person or walk around with arms around the shoulders of another student.
18. I will not share the bed with a student.
19. I will not touch the knees or legs of a student, unless for a medical emergency reasons.
20. I will not wrestle with students.
21. I will not tickle or give piggyback rides to students.
22. I will not allow a student to cling to the legs.
23. I will not give any type of massage
24. When using any organization sponsored electronic application/device:
    a. I will not use harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating comments.
    b. I will not engage in sexually oriented conversations.
    c. I will not post inappropriate comments on pictures.
    d. I will not sent private messages between Volunteers and personnel and minor.

APPENDIX B – PROCESS FOR REPORTING SUSPECTED ABUSE AND INVESTIGATION

Allegations of sexual abuse may come from a variety of sources, including alleged victims, family members, volunteers and personnel, other persons, or from the perpetrators themselves. Because each case is distinct, these procedures to handle abuse allegations will need to be applied and adapted according to the facts and circumstances of each individual case. These procedures may, from time to time, need to be reviewed and if needed, changed to accommodate new procedures and/or changes.

An individual is presumed innocent until proven guilty. The presumption of innocence does not preclude from taking immediate, prudent action to protect the alleged victim and the community in response to complaints and before an investigation is complete.
Please refer to the entire policy on reporting abuse. Below is an overview of the first steps to follow when reporting suspected abuse:

INITIAL REPORTING STEPS TO FOLLOW

The following initial steps should be followed first when suspected abuse is reported:

1. As required by mandated reporting laws, volunteers or personnel must report any suspected abuse or neglect of a minor—whether on or off a facility event or whether perpetrated by volunteers and personnel or others—to state authorities first, then the local diocesan office of Safe Environment.

2. The safe environment coordinator will notified of reporting in item 1 and maintain contact with the accused Volunteers or personnel throughout the entire investigation process by appropriate and pastoral means. When the director or safe environment coordinator has received the completed report, he will present the results of the investigation for his/her response.

3. After receiving the final report of the internal investigation, the director or safe environment coordinator will convene the Board of Directors as soon as possible. The Board will study attentively the documentation and the results of the investigation presented to them, and will provide their written opinion on the case.

APPENDIX C – COMPANY POLICY CONCERNING BACKGROUND CHECKS

Conducting background checks is an indispensable tool for creating a safe environment. These checks can identify those whose background poses a substantial risk to minors. They can also ensure that the identity of all Volunteers and personnel of the Organization has been fully verified. Background checks and their results must be handled with the highest degree of discretion, in order to protect the privacy of all Volunteers and personnel, and to ensure that negative information is not improperly revealed. At the same time, any information that suggests a risk to minors must be treated very seriously.

BACKGROUND CHECKS REQUIRED FOR ALL VOLUNTEERS AND PERSONNEL

All volunteers and personnel of the Organization who are 18 years of age and older and whose position or duties place them in direct or assisted access to minors must submit to a background check. If the event is an overnight event and minors are in attendance, all who are 18 years of age and older must submit to a background check. The Director or safe environment coordinator of each Organization shall ensure that all volunteers and personnel have submitted to a background check. Failure to submit to a background check through *Sterling Volunteers*, refusal to supply a valid Social Security number and any false statement made, shall constitute grounds for termination of services and immediately being barred from any access to minors in any program or activity of the organization.

RC Activities, Inc. is committed to protecting the children and youth they serve, and providing an environment suitable for their religious, moral, and human development.
In order to fulfill this commitment, RC Activities, Inc. requires that each of its volunteers who will have regular contact with children and youth as part of their ministry to undergo a thorough but reasonable background check.

MATERIALS FOR BACKGROUND CHECKS

Each volunteer will receive the following materials:

- Company Policy Concerning Background Checks
- “A Summary of Your Rights Under the Fair Credit Reporting Act.”
- A “Volunteer Policy and Procedure Manuel” and “Volunteer Agreement”.

Because RC Activities, Inc. will request that a criminal background check be conducted on volunteers who have regular contact with children and youth as part of their ministry, Federal Law requires that these volunteers be informed of their rights concerning this background check under the Fair Credit Reporting Act. Each volunteer should read carefully the attached “Summary of Your Rights Under the Fair Credit Reporting Act” before proceeding any further.
Volunteers should understand that RC Activities, Inc., in order to comply with the commitments stated above, would request the following review for each volunteer:

- Verification of Social Security Number

- National Criminal File Search
- State Sexual Offender Search

Each volunteer should review and agree to the ”Volunteer Agreement” online, and complete a background check through *Sterling Volunteers* by following the instructions provided when registering as a volunteer online.

APPENDIX D – PROCEDURE FOR BACKGROUND CHECKS

All volunteers 18 and over at an overnight event or are in direct or assisted access to minors are required to complete the Volunteer Certification process online at: https://rcactivities.com/volunteers

RC Activities, Inc. has arranged for an outside company, *Sterling Volunteers*, to conduct the background checks. Each volunteer will be required to pay a fee to *Sterling Volunteers* in order to complete the check.

After the check is complete, *Sterling Volunteers* will notify the National Director of RC Activities, Inc., of the results.

- If the background check reveals any seriously negative information about the applicant that involves the sexual abuse of children or young people, the National Director may not hire this volunteer.
- If the background check reveals any seriously negative information about the applicant that does not involve the sexual abuse of children or young people, the National Director will consult with legal counsel. This insures that any assessment or further action is consistent with Federal and State law.
- If the background check reveals any seriously negative information about the applicant that results in the Director's decision to reject an applicant for volunteer service, *Sterling Volunteers* will make this same information available to the applicant, consistent with the attached document "A Summary of Your Rights Under the Fair Credit Reporting Act."
- The information that the applicant provides to *Sterling Volunteers* explaining the negative information will be a part of any assessment that is made.
- The information of each applicant will be used with care and discretion.

APPENDIX E – VOLUNTEER CERTIFICATION PROCESS

In order to begin serving in your volunteer role or to attend an activity with youth, you will to need to acquire a Volunteer Certificate by completing the certification steps outlined on the Volunteer Certification page at https://rcactivities.com/volunteers. Volunteer certificates are valid for 3 years and must be presented to your local event coordinator or director before the event begins. Even if you have a valid certificate from your local diocese, RC Activities requires that you complete this process which is mandated by our insurance carrier. The certification process typically takes 1-2 weeks for processing, so please ensure that you register early prior to your participation in the event.

COST

Volunteers will need to register and apply through our external vendor "Sterling Volunteers". Processing fees are approximately a base price of $22.75 + State and local fee (fees vary and are subject to change by State and County - typically an additional $5-$10. ME is $26 and NY is $65)

Volunteer applicants will be required to download and read the following documents:

- Safe Environment Policy
- Code of Conduct
- Volunteer Agreement, Company Background Check Policy, FCRA

Volunteers will receive an email notification once the background check is cleared and an RC Activities Volunteer Certificate has been issued at which time the volunteer is required to present this certificate to the program / event leader.

All Volunteers are required to complete Safe Environment Training in their local diocese

RENEWING BACKGROUND CHECKS

Organization Volunteers and personnel will be required to renew their background checks every (3) three years. At that time, Volunteers and personnel will be required to submit to a new background check through *Sterling Volunteers*.

RECORD-KEEPING

Each Organization shall retain the completed volunteer certificate for all Volunteers and personnel in their files.

HOW NEGATIVE RESULTS WILL BE HANDLED

The RCA National Safe Environment Office shall evaluate whether the nature of the negative report warrants possible action, and verify that the report does indeed relate to the applicant. Any action taken with regard to any negative report shall comply with state and federal law, and the Organization Policy Regarding Sexual Misconduct.