



## Diocese of Kansas City-St. Joseph

### Safety Plan Policy For Parishes, Early Child Care Centers, Elementary and High Schools

*Promulgated and made effective by Bishop James V. Johnston, Jr. on July 28, 2017*

NOTE - This policy replaces two previous safety plan policies: Safety Policy for Parishes regarding Sexual Abuse Allegation and Parish Involvement by Sex Offenders or Suspects *and* Sexual Offender Policy for Diocesan Early Child Care Centers, Elementary and High Schools, promulgated January 1, 2014.

#### **Introduction:**

This Policy mandates creation of a **permanent** Safety Plan for parish or school participation for anyone who: (1) is a registered sex offender, or has been convicted of a crime requiring sex offender registry; or (2) has a history of criminal conviction(s) showing harmful to a child or vulnerable adult.

This Policy mandates creation of a **temporary** Safety Plan for parish or school participation for anyone who: (3) has been recommended for monitoring by the Bishop or Independent Review Board; or (4) engages in crossing appropriate boundaries with a minor or vulnerable adult; or (5) is currently under investigation by civil authorities or the diocese for suspicion of sexual abuse of a minor or vulnerable adult.

Anyone seeking access to a diocesan parish and/or school, who falls into one of the above listed categories will be referred to as the 'Subject' in this policy. In this policy, reference to 'Pastors' includes Parochial Administrators or Pastoral Administrators.

*Note:* If a Subject has been exonerated of any crime or suspicious behavior with a minor, the Safety Plan may be revoked at the discretion of the Pastor, only after consultation with the appropriate diocesan oversight office.

#### **Purpose:**

The purpose of this policy is to protect children, youth and vulnerable adults from victimization, while promoting a safe and secure environment for the victim and victim's family, parish community, and the Subject. The first obligation of the Church with regard to victims is for healing and reconciliation. This policy is intended to allow a Subject to attend and participate in a liturgical service or the Sacrament of Reconciliation.

#### **Diocesan Oversight:**

Diocesan involvement with plans is as follows: The Office of Child and Youth Protection (OCYP) will provide oversight and support in developing plans when the Subject is an employee or member of the parish. The Catholic School Office (CSO) will provide oversight and support in developing plans when the Subject has had or desires to have access to the school. The Vicar General/Vicar for Clergy's Office will create, implement and manage plans when the Subject is a member of clergy. The Victim Services Coordinator

will be the liaison between the parish/school and the victim/family in cases where victim was abused by a cleric, employee or volunteer of the Diocese of Kansas City-St. Joseph.

Cases with Subjects who are minors are to be reviewed on a case by case basis by the OCYP and Diocesan School office, if applicable.

### **Plan Management:**

When determining the need for a safety plan, the first step is for the Pastor or Principal to contact their Diocesan Oversight Office. Responsibility for creation, implementation and management of the Safety Plan lies with the parish and/or school. If an employee or cleric at a parish or school has knowledge of a person who is a Subject as defined in this policy, a Safety Plan must be created. The Pastor or Principal is responsible for implementation of the Safety Plan. These people must be informed of the plan: Pastor, SEC, Principal, ECC Director, and point of entry personnel. To best protect children, the subject should be monitored at all times while on property.

### **Mass Attendance and Sacraments:**

While no one should be denied appropriate participation in liturgy, Subjects may only attend scheduled public liturgies as designated by the Pastor at their location (e.g. Mass, non-school Communal Penance Service, etc.).

The following precautions will be enforced, unless the Subject receives prior written approval from the Diocesan office of oversight, in consultation with the Victim Services Coordinator:

- Subjects may not attend the same parish as a known victim.
- Subjects may not be present on parish property other than to attend a scheduled public liturgy or scheduled appointment with the Pastor or Principal.
- Subjects must sit in the same assigned or designated area when attending a scheduled public liturgy.
- The Subject may not participate in any special role in the public liturgy (e.g. usher, lector, Extraordinary Minister of Holy Communion, etc.).
- The Subject may not be alone with minors or vulnerable adults in any restrooms at any time before, during, or after the public liturgy.
- Subjects may not participate in parish activities such as the social gathering following Mass, parish dinners, youth activities or any other activity other than public liturgy.
- Subjects may schedule a private appointment with the Pastor to receive individual Reconciliation.

It is the responsibility of the Subject to follow the Safety Plan. Further, it is the Subject's responsibility to know and comply with all registration, reporting and other laws.

At the discretion of the Pastor or his delegate(s), an usher or other responsible person may be alerted to the Subject's presence.

### **Activities Involving Diocesan Early Child Care Centers, Elementary and High Schools:**

Anyone who can be described as a Subject in this Policy has the responsibility to make himself/herself known to the School Principal, Early Childhood Center Director or the Pastor.

The following precautions will be enforced, unless the Subject receives prior written approval from the Superintendent of Schools in consultation with the Victim Services Coordinator:

- Subjects are not allowed to be on property of early child care centers, elementary or high schools within the diocese;
- Subjects are not allowed to be present at school activities regardless of whether those activities are held on or off school property;
- Subjects are not to provide transportation for school activities such as field trips, unless access is required by law.

Despite the prohibitions described in this section, the Superintendent, after consultation with the Principal (Pastor), and Diocesan Victim Services Coordinator, may grant permission for a Subject to be on early childhood center, elementary or high school property for the limited purpose of attending meetings with school staff or in other situations where the student may benefit, and will do so only in situations where the Subject is not expected to be alone with any minor.

**Addressing non-compliance with this policy:**

Subjects who violate this policy may have further restrictions added to their Safety Plan up to and including prohibition from properties within the diocese. Failure of a Subject to agree to the terms of this policy will result in prohibition from properties within the diocese. Once a person is banned from a parish, appeal can be made to the bishop or his delegate. The diocesan oversight office will notify Pastors and Principals by email of a banned subject.



## Diocese of Kansas City-St. Joseph

### Steps for Safety Plan Implementation (For Internal Use)

**Once a Subject (as defined in the KCSJ Safety Plan Policy) is known at a parish, center or school, the following guidelines must be implemented by the Pastor or Principal:**

1. Notify the appropriate Diocesan Oversight Office: OCYP, CSO or VG.
2. Notify the Subject that they may not be on properties within the diocese until a signed Safety Plan is in place.
3. Research the underlying offense - the Ombudsman may be contacted for assistance. The Ombudsman will determine if the Victim Services Coordinator (VSC) needs to be engaged in safety plan development or if the parish/school will provide support and care for known victim/family. If the parish or school chooses to research the offense without the aid of the Ombudsman, the Victim Services Coordinator must be notified. In researching the underlying offense or concern, the following should occur:
  - Determine whether the Subject is under supervision with civil authorities.
  - If the Subject is under supervision, contact should be made with authorities (i.e., probation and parole) in order to encourage a cooperative spirit of compliance and monitoring.
4. Communicate with the victim/victim's family (if identified) to be sure they are made aware of the Safety Plan creation and any public communication that may be made at the parish or school about the Subject. Listen to their concerns and incorporate into creation of the Safety Plan as appropriate.
  - When the Subject is a cleric, employee or volunteer of the diocese, the VSC must be contacted to be the key communicator with the victim/family regarding the development of the safety plan and to educate them on its intent and potential content. The VSC will notify the victim/family prior to any public communication from the parish/school/diocese.
  - When the Subject is not a cleric, employee or volunteer of the diocese, the parish or school is responsible for appointing a parish/school contact for coordination and care for the victim/family if known, and if they attend the same parish/school. This contact person will communicate with the victim/family regarding the development of the Safety Plan, educate them on its intent and potential content, and communicate their concerns during plan creation/review.
5. Determine alternative parish for Subject to attend if victim/victim's family belong to the same parish. Exceptions may be allowed as determined by the Vicar General in cooperation with the VSC in order to accommodate and support the physical, spiritual, and emotional safety of the victim/family.

6. Meet with parish and/or school officials who will be responsible for monitoring the Safety Plan. Review the policy, underlying offense and determine any specific conditions needed for the Safety Plan. Any alterations to the template must be approved by the applicable Diocesan Oversight Office. (Superintendent of Schools or OCYP Director).
7. Discuss expectations as related to management of the Safety Plan including who is responsible for monitoring, and steps to take in the event of a perceived violation of the plan. If a known victim/family is involved, determine contact person if they perceive a violation.
8. Finalize plan parameters.
9. Meet with the Subject and review the Safety Plan Policy for Parishes, Early Child Care Centers, Elementary and High Schools. Make sure that he/she clearly understands the terms of the Safety Plan.
10. Complete the *Safety Plan agreement*.
  - The Subject will sign and date the agreement.
  - The Pastor, Principal or Safe Environment Coordinator will sign and date the agreement.
  - The Diocesan representative of the appropriate oversight office will sign and date the agreement. (Vicar General, School Superintendent, OCYP Director)
  - Obtain a recent photo of the subject for the file.
11. If known victim/family, contact the VSC to apprise them of Safety Plan details that may impact them and/or provide comfort and support for their concerns.
12. When the form is completed, send a copy to the appropriate Diocesan oversight office – (OCYP or CSO).
  - Keep the original Safety Plan in a locked file at the Parish or school office.
  - The copy sent to the Diocesan offices will be kept in a secure database for future reference.
13. It is important to ensure continued oversight of the Safety Plan onsite.
  - Schedule dates for periodic review with the Subject.
  - If there are staffing changes, alert all those responsible regarding the Safety Plan.
  - If there are changes to the terms of the Safety Plan, notify all parties (including diocesan contact) and any known victim/family.



## Diocese of Kansas City-St. Joseph

### Template/Guidelines for Safety Plan Subjects in Parish and School Interactions

*(Review with Subject and provide a copy of this Template and  
policy to the Subject)*

*This policy is not meant to isolate or discriminate against any individual but to set in place protective boundaries in the school or parish environment for the safety of all children, teens, and adults.*

#### Part A: Guidelines for Mass Attendance/Public Liturgies

##### **Limitations:**

1. Subjects may only attend scheduled public liturgies at the time requested by the Pastor. (Mass, Communal Penance services, etc.). Parish activities such as the social gathering following Mass, parish dinners, or any other activity other than liturgical celebrations are prohibited. Holding a volunteer or employment position in the parish or school is not allowed. Subjects may never be alone in a restroom with a minor or vulnerable adult.
2. Subjects may not be present on the parish property at any time, other than to attend Mass, another public liturgy as previously agreed upon with the Pastor or private appointment with the Pastor for Reconciliation. The Pastor may assign another priest to meet for Reconciliation.
3. Subjects must refrain from being alone with minors or vulnerable adults, and from mingling with children (other than their own children) individually or in small or large groups, while on the property.

##### **Exceptions:**

1. Specific exceptions to the limitations outlined above can be added only with written approval from the appropriate Diocesan office of oversight. (Office of Child and Youth Protection Director, or Catholic Schools Office Superintendent.)
2. Appeals must be directed to the Vicar General.

#### Part B: Guidelines for Early Childhood Centers, Elementary and High School Interactions

##### **Limitations:**

1. Subject participation at the school or early childhood center will be limited to the drive-through drop off and pick-up. Subjects are to remain in the vehicle during these arrival and pick-up procedures.
2. In the event that a Subject has a sick child, the Subject must coordinate with the Principal to arrange delivery of the sick child to the Subject's vehicle in the school parking lot.

##### **Exceptions:**

1. Subjects may be granted the opportunity to attend a school event only with prior and specific permission from the Superintendent after consultations with the Principal. Thoughtful attention should be given to this accommodation in the event there is a known victim/family at the same event.
2. Appeals must be directed to the Vicar General.

## Part C: Notifications, Supervision, Violations

### **Notifications:**

It is required that school and parish staff (on a need to know basis as determined by the Pastor or the Pastor's designee) are made aware of all Subjects with Safety Plans. Subjects are expected to be conscious of their environment and reflective of how their movements could be perceived while on the property. Staff who are monitoring are free to speak directly with the Subject if they perceive a violation. These violations should be documented and shared with the Pastor or Principal for determination of any additional action.

### **Supervision:**

1. If any of the conditions above are violated, whether intentionally or unintentionally, the violation should be brought to the Pastor or Principal's attention immediately.
2. Violations should be addressed immediately with the Subject by the Pastor or Principal. The Pastor or Principal may consult with the appropriate Diocesan Oversight Office(s) for review and support in determining next steps when a violation of the Safety Plan has occurred.
3. This Safety Plan should be discussed periodically with the Subject. For example: three months after it is established with reviews every six months thereafter. A review/discussion of the safety plan can be initiated at any time with the Pastor, Principal, or with any of the staff familiar with the plan at the request of the Subject, Pastor or staff.

### **Violations:**

If the Subject of the Safety Plan violates this Policy, the Pastor or his designee may contact law enforcement and/or contact the appropriate Diocesan oversight office for further assessment and guidance. In such a situation, the Pastor or his designee may file a report or sign a compliant with law enforcement on behalf of the Diocese.



## Diocese of Kansas City- St. Joseph Safety Plan Agreement

Name: \_\_\_\_\_ Designated Parish/School: \_\_\_\_\_

Mass Time(s): \_\_\_\_\_ Pastor/Principal: \_\_\_\_\_

Parole Officer (if applicable): \_\_\_\_\_ Phone: \_\_\_\_\_

Date of victim/family notification: \_\_\_\_\_ By: \_\_\_\_\_

The Diocese of Kansas City-St. Joseph *Safety Plan Policy for Parishes, Early Childhood Centers, Elementary and High Schools* has been clearly explained to me and I agree to comply with each guideline.

I understand that failure to comply with the policy will mean that I may no longer be able to attend any public liturgy or school function at any parish or school in the Diocese of Kansas City-St. Joseph.

I understand that I remain responsible for following all rules, regulations, and statute, and other requirements imposed upon me by the state of Missouri, the county in which I reside or municipality in which I reside and associated with sexual offenders. Agreement to the terms of this Parish and School Safety Plan is in no way considered to be an admission of wrongdoing or guilt.

\_\_\_\_\_  
Signature of Subject

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Pastor

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Principal

\_\_\_\_\_  
Date

\_\_\_\_\_  
Signature of Diocesan Oversight Officer

\_\_\_\_\_  
Date

- Recent photo of subject obtained
- Ongoing care plan established for victim/victim’s family (if applicable)

*Original copy of signed agreement to remain at the Parish or school.*

*A copy of signed agreement will be sent to the diocesan oversight office: Catholic Schools Office or Office of Child and Youth Protection.*