Diocese of Austin

Ethics and Integrity in Ministry 101

A procedures manual for
EIM site administrators at parishes and schools

** to be used in conjunction with the Diocese of Austin *Policies on
Ethics and Integrity in Ministry*

2020

Welcome!

"Let the children come to me" (Mt 19:14). As Jesus' disciples, we are called to continue his invitation to our young people to be part of our community. The Diocese of Austin's Ethics and Integrity in Ministry program is intended to help our parish and Catholic school staff and volunteers provide a welcoming and safe environment for our children and others who might be vulnerable to those who wish to cause harm.

This manual explains the tasks required of specific parish and school staff members in order to be in compliance with the Diocese of Austin *Policies on Ethics and Integrity in Ministry*, as well as the USCCB *Charter for the Protection of Children and Young People*.

Much of this information is also available on our diocesan website, www.austindiocese.org; follow the link for Ethics and Integrity in Ministry. Please use this as a resource in your effort to support all who serve our children, youth and vulnerable adults. Contact the EIM Office at (512) 949-2447 if you have any questions or if you need assistance.

May God continue to bless you as you serve his people in so many ways.

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Table of Contents

EIM terminology and information

EIM: Ethics and Integrity in Ministry is the program for the protection of minors and vulnerable adults in the Diocese of Austin.

EIM site administrator(s): The individual(s) designated by the pastor at a parish (or principal at a Catholic school) to manage EIM compliance at the site.

EIM compliant: An individual or site (parish, Catholic school or diocesan agency) that has completed all EIM requirements and has made a commitment to follow the EIM policies of the Diocese of Austin. EIM compliance is required of all persons who serve in any ministry, program or organization that serves youth or vulnerable adults in any manner, or which functions at a time and place where minors or vulnerable adults are typically present.

EIM requirements for individuals: Complete an Application for Ministry (which initiates a background check), attend an EIM workshop every three years and sign (electronically) a Code of Ethics form, agreeing to support and abide by the EIM policies of the Diocese of Austin.

EIM requirements for parishes or schools: Verify the EIM compliance of employees and those volunteers in service to minors or vulnerable adults. Assist with individual compliance questions. Suspend from ministry those who are not compliant until they have taken corrective steps. Schedule and promote annual *Called to Protect for Youth* workshops for sixth and ninth grade students and the *Called to Protect for Children* curriculum to educate Kindergarten through fifth grade students about age appropriate personal safety information.

Application for Ministry: MUST BE SUBMITTED prior to serving in any ministry which requires EIM compliance, the application gathers particular information about any individual who wishes to serve in any ministry requiring EIM compliance. Submission of the form can be done online (most timely and secure) or using a paper application, and grants permission to the Diocese of Austin to conduct a criminal records check.

eAppsDB: The online electronic application and database system used by the Diocese of Austin for the Ethics and Integrity in Ministry program.

EIM Workshop: On August 1, 2016, the diocese began using a new education program which replaced our previous Basic/Refresher workshop format. The workshop uses a video titled *Fulfilling Our Commitment to Heal and Protect*, as well as discussions, to explain the experience of sexual abuse of minors and to teach the skills of prevention and response. In addition, our diocesan EIM policies are reviewed throughout the program and participants receive printed material to take home for reference and further information. EIM Workshop attendance is required every three years.

Called to Protect for Youth (**CTPY**): A three- to four-hour safety education and abuse prevention workshop for middle parish and high parish students. The Diocese of Austin requires every parish and Catholic school to schedule CTPY workshop(s) each year for their sixth grade and ninth grade students. Students who missed the program the previous year should also be included.

Called to Protect for Children (**CTPC**): A safety education and abuse prevention program for Kindergarten through fifth grade students. CTPC is required to be taught annually by the religious education teacher using the CTPC curriculum and activity pages. Students in each grade complete three simple, developmentally appropriate lessons each year; the topics build sequentially at each grade level.

Site: The general term used for a parish, Catholic school or diocesan agency.

The purpose of this manual

This EIM procedures manual was created to assist those that work in parish, Catholic school and diocesan agency ministries in the Diocese of Austin in understanding and complying with the EIM policies of the diocese. By providing guidelines on "how to 'do' EIM" at each site, each person responsible for ensuring compliance should feel more confident in understanding their role and be able to complete their required EIM tasks. Additionally, we hope that having this information in a manual format will assist during times of transition so that 'new folks' will know what their responsibilities are vis-à-vis EIM policies and procedures. Regarding format, each primary site leader has a version of this document devoted to their particular EIM responsibilities. However, as the bulk of EIM compliance tasks are performed by the EIM site administrator, many details are more fully specified in the EIM site administrator version.

EIM and confidentiality

*This specific section on confidentiality should be read by **all members** of the parish staff responsible for any aspect of the EIM program.*

We are called, as members of and workers in the vineyard of the Lord, to serve one another with justice and love. However, the very fact that we must have an Office of Ethics and Integrity in Ministry reminds us that some have abused the trust placed in them and that we must always strive to live as God calls us to.

The EIM Office is responsible for receiving and evaluating a great deal of information, and we are humbled by the trust placed in us to do so in a confidential and ethical manner. Over the years we have established and refined procedures so that EIM compliance requirements are not only as "user friendly" as possible, but also that the information provided is securely received, processed, evaluated and maintained. It is important that those of us entrusted to safeguard the information we receive treat it as we would want our own information treated.

At the site level we ask that the pastor or principal approve the individual(s) responsible for accessing sensitive EIM-related information and to help ensure that these persons understand the responsibility of confidentiality that they have in their position. Thus, at each parish or school there is at least one person assigned a User ID and Password to access the EIM database as the administrator. Only information needed to assist in verifying EIM compliance is accessible to those individuals assigned a User ID/Password. This information is to be used solely to verify EIM compliance and may not be discussed with anyone, other than the pastor/principal, for any other purpose. NOTE: the pastor or principal is the only person at the site who will receive specific information from the diocesan EIM Office about an individual regarding any issue pertaining to a background check or decision about compliance, and he or she may not discuss these specifics with any other person.

Following these guidelines, we will work together to achieve our Bishop's mandate that all who serve in any kind of ministry do so with great integrity and with the highest ethical standards. Thank you for your commitment to help keep all children safe from preventable harm and to support our diocesan policies concerning ethics and integrity in ministry.

Charter for the Protection of Children and Young People

The charter was created by the USCCB in 2002 in response to the numerous and serious allegations made by many victims of sexual abuse by clergy over many years and was revised most recently in 2018 to re-affirm the bishops' commitment to creating a safe environment within the church for children and young people. This was a challenging time for the bishops and priests, but throughout the process of developing the charter they emphasized their commitment to the protection of children, which must also be the work of all God's people.

The first articles of the charter address the needs of victims: outreach, healing and reconciling, and procedural requirements for each diocese related to responding to an allegation of abuse. The next articles address effective response to allegations: reporting allegations to civil authorities, removing clergy (temporarily or permanently) as warranted, establishing clear and well-publicized policies regarding boundaries, and communicating about allegations in a timely and transparent manner. The next four articles specify requirements for accountability to ensure the church is doing what it says it is doing. The final articles address issues of collaboration with various entities to help prevent harm from coming to children in the future.

Articles 12 and 13 most immediately affect the lay faithful, and the workings of our local church, because they address the training and background check requirements. These are the foundation for most of the policies and procedures that have been developed in our diocese since 2002. Please go to **http://www.usccb.org/ocyp/charter.pdf** to read the full text of the charter.

The Charter concludes with this message from the bishops:

Let there be no doubt
or confusion on anyone's part:
For us, your bishops, our obligation to
protect children and young people and
to prevent sexual abuse flows
from the mission and example
given to us by Jesus Christ himself,
in whose name we serve.

Since the charter was established, part of the accountability has been the completion of an audit every year by each diocese in the U. S. The audit is conducted by an outside firm and uses a standard audit instrument to ensure uniform information collection throughout the country. Within the diocese each parish and school completes an annual EIM Self Audit to help evaluate strengths and challenges.

Ethics and Integrity in Ministry for parishes and Catholic schools

The parish pastor or Catholic school principal is ultimately responsible for the compliance of the parish or schools with all Ethics and Integrity and Ministry policies. A pastor or principal that is supportive of the EIM program emphasizes to all members – clergy, educators and lay paid and volunteer persons – the importance of working together to ensure the safety of all youth and vulnerable individuals in the parish or school community. He or she sets an expectation of high standards of ethical and moral conduct for all parishioners or members of the school community, and that the integrity of those who lead and serve should be above reproach.

The pastor or principal typically designates a trusted, responsible member of their staff to implement the day-to-day tasks of EIM compliance. This person is called the EIM site administrator. But these are not the only individuals responsible for ensuring EIM compliance at a site. Additional partners in the EIM program are the director or coordinator of the religious education program and the youth minister at the parish, and perhaps the vice principal or religion coordinator at the school. The pastor or principal may also designate other or additional persons to assist with implementing the EIM program. Finally, the diocesan EIM Office is a valuable resource and is available to assist in implementation of EIM policies and procedures.

EIM compliance requirements for all clergy, paid staff and volunteers

Instated on Jan. 1, 2002, and revised in September 2018, Section 4 of Diocese of Austin Policies on Ethics and Integrity in Ministry requires the following adult individuals to maintain EIM compliance: clergy; seminarians and deacon aspirants and candidates; religious brothers and sisters; employees of any parish, Catholic school, or other diocesan agency; independent contractors who regularly provide services where minors, elderly adults, or adults with disabilities may be present; members of any Catholic school board; pastoral council members; finance council members; EIM Review Board members; any person who is considered to be a leader of a ministry, program, or organization; members of any independent Catholic organization that may serve youth of a parish, Catholic school, or other diocesan agency, even if the primary function of the organization is not necessarily to serve youth (e.g., ladies or men's clubs, Catholic Daughters of America, Knights of Columbus, Knights of Peter Claver, and organizations promoting vocations); and, individuals who serve in any ministry, program, or organization that provides services to or at which minors, elderly adults, or adults with disabilities may be present, including but not limited to: (1) any activity in a Catholic school; (2) religious education; (3) youth ministry; (4) parish nursery and mother's day out or pre-school programs; (5) parish or school sponsored scouting groups; (6) homeschooling organizations that use church property; (7) liturgical ministries (e.g., hospitality, ushers, extraordinary ministers of Holy Communion, lectors, choir, or music ministry); (8) homebound ministry; (9) St. Vincent de Paul Society conferences; and (10) hospital ministry; and, any other individual as required by a pastor, principal, or director of a diocesan agency (e.g., requiring EIM compliance of all who engage in any type of ministry).

Visit **eappsdb.com/austin** to complete the online Application for Ministry, to update an existing EIM account or to sign up to attend an EIM Workshop (required at least once every three years throughout individual's service in ministry).

EIM responsibilities for site administrators
(parishes and Catholic schools)

EIM site administrator CHECKLIST

Details about the tasks included on this summary list are explained more fully in the next section.

I. Maintain your own **EIM compliance** – attend an EIM Workshop as needed.
II. As **EIM site administrator,** secure and maintain your EIM administrator ID/password.
III. Verify **EIM compliance** of all persons affiliated with your site with all diocesan EIM policies and procedures; notify your pastor/principal of any persons who are not EIM compliant.
IV. Request and coordinate **EIM workshops** at your site as needed.
V. Complete annual **Self Audit** (parish or school) by May 15.
VI. **Report** suspected cases of abuse to the civil authorities and complete a Notice of Concern to document actions taken by you/the parish and to address matters to be reviewed by the diocese.

I. EIM COMPLIANCE – SITE ADMINISTRATOR
   A. Maintain your personal EIM compliance; complete the EIM Application for Ministry (one time only) and attend an EIM workshop every three years.

II. EIM SITE ADMINISTRATOR DESIGNATION
   A. The pastor/principal appoints a person (or persons) at the parish/school to serve as the liaison between the parish/school and the Office of Ethics and Integrity in Ministry. The designated person(s) is called the EIM site administrator.
   B. Upon designation by your pastor or principal as the EIM site admin, request and maintain your administrator login credentials from the EIM Office in order to access the EIM database (eAppsDB). The password that will expire every 90 days – you will be prompted to reset it a few weeks prior to expiration.
      1. It is recommended that two persons be designated in this role in the event that one of the persons is unavailable to addresses an EIM matter when needed. The pastor/principal may designate additional persons to have 'read-only' access to the EIM database in order to assist in monitoring compliance of parish/school personnel.
      2. It is critical that anyone designated to access the EIM database understand the responsibility of confidentiality this position requires. Through the database you will have access to information regarding EIM compliance of parish/school members, as well as their status based on their background check (approved, restricted or rejected); however, you will not have access to the details of a background check. All EIM information must be maintained in strictest confidence and in a secure manner.
      3. Each set of site administrator/read-only credentials is unique to the person, not the position and **cannot** be shared with any other person. If you leave your position, or role as EIM site administrator, notify the EIM Office to suspend that admin account; do not give your credentials to the next person.
      4. If it is determined that additional persons are needed at your site to access the database, the pastor/principal may contact the EIM Office to designate additional persons to be assigned their own User ID/ password. The "read-only" login credentials do not permit data entry into the database.
      5. An instruction set on using eAppsDB can be found at austindiocese.org/eim-site-admin.

C. With the pastor or principal, determine how your role as EIM site administrator is to be communicated to the parish/school community and how you may be contacted.

III. **EIM COMPLIANCE – PARISH/SCHOOL COMMUNITY**
   A. The pastor/principal is ultimately responsible for the compliance of all members of the parish/school community with all Ethics and Integrity and Ministry policies and procedures. This includes the removal of any persons from service to the community who do not follow EIM policies, including maintaining EIM compliance (i.e. those who have not completed the EIM application, are not current on workshop attendance or have a restriction based on the background check). The EIM site administrator supports the pastor/principal in this task.
   B. The primary responsibility of the EIM site administrator is to verify and support EIM compliance at the parish/school for all clergy, religious and employees, and adult volunteers who serve in ministry requiring EIM compliance. The site administrator notifies members (directly or through their ministry/organization leaders) who need to complete any aspect of the compliance requirements to do so immediately in order to begin/remain in their ministry. NON-COMPLIANT persons may not serve in any ministry which requires EIM compliance.
   C. ALL clergy, religious and parish employees, and adult volunteers serving in ministries which require EIM compliance MUST be EIM compliant at all times. Before any person begins employment or volunteering at the parish or school, they must submit the EIM Application for Ministry which permits the diocese to run a background check and creates their EIM account; application information is found at austindiocese.org/application. Applicants must attend an EIM Workshop within 60 days of submitting the application, and at least every three years thereafter to remain compliant.
   D. Criminal record background checks are run by the diocese for clergy, religious, seminarians, diocesan, parish and school employees, and volunteers serving in ministries requiring EIM compliance. This process is initiated when an individual completes the Application for Ministry using the online application system (eAppsDB); this is a secure, electronic process. Once the EIM Office receives the results of the background check, a determination is made to approve, restrict or reject an individual based on various factors. The site administrator is notified of a restricted or rejected status which is reviewed with the pastor/principal for final determination.
      1. The most secure and timely process for application completion is to do so through eApps. Individuals without access to a computer may complete a paper copy of the application.
         a. A Social Security number is not needed to submit the EIM Application. Individuals lacking a US driver's license still complete an application (on-line or paper). This information is used only to verify applicant identity in situations where there may be a common name or other identifiers. In the event that identity cannot be verified based on information provided by the applicant, the EIM Office will work with the parish or school to assist with verification. NOTE: personal information is secure in the eApps database and is not provided to any government entity.
      2. Persons new to the diocese, wishing to serve in ministry here, complete/submit the EIM Application for Ministry and attend the EIM Workshop in order to be compliant with diocesan EIM policies. As of August 1, 2016, verification of safe environment training from a previous diocese no longer serves as training in the Diocese of Austin.

E. All candidates for employment should be thoroughly screened during the interview process. When one or two final candidates for a position have been selected, a pre-employment background check should be done to verify if candidate is eligible to be hired; the EIM office can assist with this process by submitting the Background Check Worksheet found at austindiocese.org/eim-site-admin.

   1. When there is a question about a potential volunteer based on the criminal background check, or other issues, the pastor/principal or designee should complete an interview and reference check procedures prior to approving the applicant for ministry at the parish or school.

F. At the beginning of each school year, and at other times when there may be employee/volunteer turnover (i.e. 2nd semester/spring session), verify EIM compliance of all parish and school personnel. There are various approved methods for verifying EIM compliance of those within a ministry/organization/school (specific method may be determined by EIM site administrator):

   1. Every ministry/organization leader at the parish/school (DRE, youth minister, classroom teacher, nursery director, etc.) should periodically provide a list of their volunteers to the EIM site administrator to be compared to the EIM compliance list. The compilation of a master list of volunteers is the preferred and most efficient method of regularly checking compliance. Additionally, this method will provide the EIM site administrator with the minister/member numbers needed to complete the annual self-audit.

   2. The EIM site administrator can provide each ministry leader or program coordinator the EIM compliance list (background check approved and workshop date current) to verify compliance of their members. There is not a confidentiality issue with sharing such a list.

   3. If needed, and upon designation by the pastor/principal, a ministry leader may be given 'read only' login credentials by the EIM Office to access the database.

   4. REMEMBER: If someone is serving in a ministry which requires EIM compliance, and they are not compliant (no application, restricted status and/or no current workshop), they CANNOT SERVE IN MINISTRY which requires EIM compliance until they become compliant.

IV.   EIM workshops

A. EIM Workshops are scheduled based on requests by parishes/schools and are available across the diocese throughout the year. It is critical to encourage employees and volunteers to regularly monitor their own EIM compliance and plan ahead to attend a workshop before becoming **non-compliant** (past due). Once their workshop has expired, they MAY NOT serve in ministry.

B. **NOTE:** As of January 1, 2019, workshop attendees must pre-register/sign up at least 24 hours in advance to attend a workshop. The Roster will close 24 hours before the workshop start time, and walk-in attendees will no longer be admitted.

C. Parishes and schools that have an "in-house" or regular EIM Workshop facilitator schedule a workshop via an email from the EIM site administrator to the EIM office with the following workshop details: workshop language, facilitator name, date/time, name of the building/room where the session will occur, maximum number of persons the space can accommodate and the quantity of workshop workbooks currently on hand.

   1. If you need the EIM office to find a facilitator for your workshop, the EIM site administrator submits the Workshop Request Table found at austindiocese.org/eim-site-admin.

   2. Once all workshop details are received by the EIM office, a workshop confirmation email will be sent to the parish/school EIM site administrator and the workshop

facilitator with details specific to that workshop and additional instructions and information about the EIM workshops. It is important to check the workshop details for accuracy (the workshop will be posted to eApps within 24-48 hours after the confirmation email is sent) and to read the entire email to ensure all preparations are taken care of so the workshop goes well. The workshop may be advertised <u>after</u> the confirmation email is sent (a bulletin announcement that can be modified for your workshop is included in the confirmation email).

3. The workshop host parish/school is responsible for making arrangements to get workshop materials from the EIM Office. It is advised to do this well in advance of your workshop.

D. The confirmation email has all information/instructions needed for the workshop. Please read each confirmation email thoroughly.

E. The week of your scheduled workshop the EIM office sends an email to both the EIM site administrator and the facilitator that includes the various forms and information needed for the workshop, as well as a "cheat sheet" of how to use the workshop forms and what tasks must be completed at different times before, during and after the workshop. The site administrator and facilitator should contact one another during the week prior to the workshop to confirm details one more time.

1. Signage should be posted throughout the parish/school campus directing workshop attendees to the correct location of the workshop.

2. There **must** <u>be a designated person from your parish/school present</u> the day of the workshop – <u>for the duration of the workshop</u>. Duties include opening/preparing the room at least 30 minutes prior to start of session, having appropriate and working audio/visual equipment available for the facilitator, setting out the workshop materials in the room in which the workshop will be held and being available throughout the workshop in case of technical difficulties, taking care of the end of workshop paperwork and collecting all documents at the end of the workshop for the site administrator to process (this person does not have to be the site administrator, but the person needs to understand their duties – everything is included in the forms email).

3. After the workshop, follow instructions on both the confirmation and forms emails as to how to process workshop attendance – **this must be completed within 2 business days** of the workshop because this is the only way the workshop attendees receive credit for workshop attendance. Send required paperwork to the EIM Office ASAP.

V. PARISH/SCHOOL AUDIT

A. The Parish/School Audit is submitted **<u>annually, by every site,</u>** (separate versions for parishes and schools) to help each parish/school review its own compliance with diocesan EIM policies and assist in the accurate completion of the annual audit of our diocesan EIM program which verifies our compliance with the *Charter for the Protection of Children and Young People*. The Parish/School Self Audit should be completed and submitted to the EIM office between **May 1st and 15th**. The 2019-20 Audit form will be online this year and will be available at austindiocese.org/eim-site-admin during the audit window.

B. To complete some portions of the audit document you will need to request data from your business administrator, principal, ministry/organization leaders and others who are responsible for groups of individuals at your site that are required to be EIM compliant.

C. The EIM site administrator's role in reporting CTPY and CTPC data on the Parish/School Self Audit is limited to recording the information provided on the CTPY/CTPC Program Report – the site administrator should receive a copy of each report from the person(s) responsible for elementary, middle and high school religious education/youth group.

D. To assist in getting an accurate count of volunteers at your site, in July of each year please review your site membership in the EIM database and archive those individuals no longer

affiliated with your parish/school by using Archive by Lookup. This can also be done throughout the year as members move out of the parish or are no longer active in ministry.

E. The 'audit year' is July 1 to June 30. The annual audit of our diocesan EIM program is completed through document collection 2 of every 3 years; in the third year an outside audit firm conducts an on-site audit sometime between September and November. At these visits the audit team will select 4-6 parishes and schools in the diocese to visit and review for compliance; this selection is typically made less than a week prior to the on-site visit. Your completed Parish/School Self Audit will cover much of the information that auditors will be reviewing. The following types of "supporting documentation" should be kept in a file titled EIM AUDIT (year); since we don't always know which will be an on-site audit year, it is suggested that such information be collected annually:

1. Sample bulletins/newsletters that include announcements regarding EIM compliance requirements for members, victim assistance/support information and reporting procedures; flyers/brochures regarding EIM matters; a copy of a Catholic Spirit article regarding EIM matters; etc. Such announcements should be included in site publications at least quarterly.

2. Your Parish/School Self Audit – this will be used to verify EIM education/training for all your clergy/employees/volunteers and all youth. The auditors will review the curricula at the EIM Office – you do not need to provide a copy of the training materials. The Self Audit also verifies background check compliance of all members. You will need to be able to explain how this information was collected using the database.

3. Have a copy of the EIM policies available and be familiar with the EIM website and eAppsDB.

NOTE: The EIM office will provide assistance to each site to be audited. The pastor/principal, EIM site administrator, DRE, etc. can meet prior to the on-site audit to review what will occur during the audit. It is important that everyone know the EIM policies and procedures.

VI. **REPORTING ABUSE OR AN EIM VIOLATION – www.austindiocese.org/report-abuse**

A. Due to the nature of the topic of abuse, it is possible during the course of any of our education programs that an individual may recognize that they are a victim, or know a victim, and might need support. It is recommended that you determine what counseling resources you might have within your school community and encourage those persons to be available during EIM programs in case of need. The EIM Office is able to suggest resources or provide assistance.

1. If a minor discloses that they are being (or have been) abused, or you suspect abuse, you (or the person to whom they disclose) are required by law to report this information within 48 hours to the TX Department of Family and Protective Services. TDFPS maintains a 24-hour abuse hotline at (800) 252-5400; or a report may be made on their website at www.dfps.state.tx.us.

2. The minor may be reluctant to tell you about their situation. It is important to listen openly, but you must notify them at the beginning that you will have to make a report to authorities to ensure that the abuse stops – you can't keep this secret. This may be difficult, but it is an important step in beginning the healing process. You are not responsible for any investigation.

B. The process for reporting concerns and/or allegations of any EIM violation, including abuse, are specified in the EIM policies. A copy of the current policies should be available at the parish/school and may be found at austindiocese.org/eim-policies.

C. A Notice of Concern should be completed for any allegation of abuse or policy violation. This assists the individual with the concern to clearly describe the situation or occurrence. The Notice of Concern may be found on the EIM page of the diocesan website.