

Society of St. Vincent de Paul
Milwaukee Archdiocesan Council
Safeguarding Policy

This document is a response to Resolution 189 passed at the Society's National Assembly on August 28, 2021 in Houston, Texas. It describes the policies which the Milwaukee Archdiocesan Council will follow to ensure that vulnerable individuals feel safe and empowered when they use the services which our Society provides, and that the human rights of all persons are not violated.

“The protection of minors and vulnerable persons is an integral part of the Gospel message that the Church and all its members are called to proclaim throughout the world. Christ himself, in fact, has entrusted us with the care and protection of the weakest and defenseless: “whoever receives one child such as this in my name receives me” (Mt. 18:5). Therefore, we all have the duty to welcome openheartedly minors and vulnerable persons and to create a safe environment for them, with their interests as a priority. This requires a continuous and profound conversion, in which personal holiness and moral commitment come together to promote the credibility of the Gospel proclamation and to renew the educational mission of the Church”

- Pope Francis

The policies outlined in this document incorporate the following general principles:

- The welfare of the people we assist is paramount.
- Concerns or allegations of abusive or exploitative behavior are always taken seriously, investigated and acted on promptly and as appropriate
- We support the participation of children, vulnerable persons, and all those we assist by valuing, listening to and respecting them and giving them a say in decisions that affect them.
- All personnel have access to and are familiar with safeguarding policies and procedures and know their responsibilities within those policies and procedures.
- All personnel and people being served, including children and vulnerable persons themselves, have access to information about how to report concerns or allegations of abuse.
- Recruitment practices help to ensure that we will not recruit personnel or other representatives that pose a known risk to the safety or well-being of those we assist, or children or vulnerable people with whom they otherwise come in contact.

- Our practices do not create or allow conditions in which children and vulnerable people are put at risk of abuse or exploitation.
- People in positions of responsibility, whether they be members, volunteers or employees, are responsible for actively promoting safeguarding and ensuring that safeguarding policies and procedures are complied with and are updated on a regular basis and circulated within their jurisdiction.

DESCRIPTION OF TERMS

“Minor,” “child,” or “young person” all denote a person who is under 18 years of age.

“Vulnerable adult” denotes all those that we serve.

“Vulnerable persons” means “minors” and/or “vulnerable adults.”

“Sexual abuse of vulnerable persons” includes any form of physical or psychological abuse of a sexual nature. “Sexual abuse of minors” also includes any form of sexual molestation or sexual exploitation of a vulnerable person or any other behavior by which an adult uses a vulnerable person as an object of sexual gratification, and which thus constitutes an external, objectively grave violation of the sixth commandment. “Sexual abuse of vulnerable persons” includes the acquisition, possession, and/or distribution of pornographic images of minors by whatever means of using whatever technology.

“Offender” means an individual who has committed one or more acts of sexual abuse of a vulnerable person.

“Victim,” “survivor,” or “victim/survivor” means an individual against whom an act of sexual abuse of a vulnerable person has been committed.

“Supervisor” means the person to whom an individual is directly responsible, e.g., the conference president for members of our Society, the store manager for staff, or the volunteer coordinator for volunteers.

“Prompt” and “promptly” mean within two business days, unless another time frame is evident from context or required by the nature of the matter.

“Civil” in this policy is used in the sense of “relating to the civil state or the civil state’s laws,” as opposed to “canonical”, which is used in the sense of “relating to the Church or the Church’s laws.” Unless it is otherwise apparent from context,

“civil” is not used in the secular legal sense of “relating to the legal action of one citizen against another,” or in distinction to “criminal.”

“Personnel” means employees, volunteers and members.

“Persons” refers to children and adults.

“Close contact” means personal engagement between personnel and those being served as a matter of the service being rendered.

Practice for existing personnel

Safeguarding practices for current personnel shall require time to implement. Within sixty (60) days of the approval of the Milwaukee Archdiocesan Council policy the safeguarding practices shall be put in force. The District Councils and Conferences shall adhere to the Milwaukee Archdiocesan Council safeguarding policy.

Within thirty (30) days of the pertaining policy approval, provided that the SVDP CMG Connect website is available and functioning correctly. ("Correctly" means there is a way that our website will automatically acknowledge Vincentian registration for an in- person Safeguarding Session and approval of background checks is available) the entity shall work with a 3rd party vendor to conduct appropriate background checks on all existing personnel who have contact with vulnerable persons, consistent with applicable state and federal law. By March 30, 2024, all existing personnel shall complete the required training in safe practice.

Engagement of new personnel.

When engaging new Personnel, there must be processes in place to help ensure that risks to vulnerable persons are identified and promptly addressed. In alignment with the objectives of the Milwaukee Archdiocese and the State of Wisconsin, as well as county and local officials, these measures shall include, but are not necessarily limited to, the following:

- background checks for all Personnel having close contact with Vulnerable persons;
- reference checks for designated employees;
- candidate interviews for employees; and
- training in safe practices for all Personnel.

Background checks and training in safe practices for new Personnel who have close contact with Vulnerable persons shall be completed prior to those Personnel beginning service that includes close contact with Vulnerable persons, and at the conditional offer stage.

All store employees involved in SVdP facilities are required to have a background check (no exceptions). All store employees are required to take the on-line safeguarding training; Safe Haven (part 2), Safe Side of the Line and Protecting Vulnerable Adults video series. All non-store employees, members and volunteers involved in SVdP facilities are required to have background checks (no exceptions) and take the on-line safeguarding training; Safe Haven (parts 1,2 and 3), Safe Side of the Line and Protecting Vulnerable Adults video series. All SVdP members are required to have background checks and take the on-line safeguarding training; Safe Haven (part1,2 and 3), Safe Side of the Line and Protecting Vulnerable Adults video series, except as noted in the next sentence. Volunteers and members that are not at a SVdP facility, and have no contact with those we serve are not required to have a background check or take safeguarding training. Recruitment practices should be robust enough to ensure that new members, volunteers or employees do not pose a known risk to the safety or wellbeing of those we serve.

These measures shall also be completed prior to volunteers beginning service that includes close contact with vulnerable persons, and prior to new staff members and/or volunteers participating in home visits or other charitable activities in which they may encounter Vulnerable persons.

When advertising for staff positions within SVDP, (Society of St. Vincent de Paul) job descriptions shall make clear that SVDP upholds safeguarding principles and practices, and that all staff must adhere to them. Job responsibilities should include information explaining what the responsibilities are regarding safeguarding, including the need to update training as relevant. During interviews with new job candidates who may have contact with Vulnerable persons, the following evaluation measures should be followed:

- questions asked during job interviews should be consistent for all candidates;
- gaps in work or life history should be investigated;
- candidates should be asked about their values as well as their skills, including the importance of service to neighbors in need and protection of Vulnerable persons;

- certifications and qualifications should be confirmed; and
- references shall be contacted as appropriate.

Who is required to undergo background checks?

Within the Milwaukee Archdiocese, the following individuals shall undergo a background check at the appropriate time(s), which may include prior to starting member, employment, or volunteer work and/or at appropriate intervals during that member, employment, or volunteer work:

- Active members of our Society, since it is assumed that they will at various times engage in charitable activities that bring them in close contact with Vulnerable persons (however, a one time exemption is allowed for new members to help them discern whether being a Vincentian is truly their calling, but in all such exemptions, a trained Vincentian must accompany such new member);
- Associate members of our Society who engage in charitable activities that bring them in close contact with Vulnerable persons;
- Volunteers who engage in charitable activities that bring them in close contact with Vulnerable persons;
- Staff who as part of their employment have occasion to encounter Vulnerable persons; and
- Interns, contractors, or others who have extended presence at a SVDP program or site at which Vulnerable persons are and/or are likely to be present. If their presence lasts for a shorter time than the time needed to obtain the results of a background check (estimated to be three weeks), they will not be required to undergo a background check. Either prior to or upon their arrival, contractors not requiring a background check shall sign an acknowledgment document that they understand and will comply with the Council's safeguarding policy.

Persons, other than Personnel, who visit SVDP facilities for reasons of family, friendship, business, duty or other casual presence less than ten (10) times a year shall be exempt from our safeguarding policy.

For members of our Society, conference presidents will make the determination as to whether a particular associate member needs to undergo a background check consistent with the policy standards herein, e.g., all members involved in SVDP facilities, or who do home visits, or who have close contact with Vulnerable persons will need to undergo a background check. For employees, this determination shall be specified in their job description.

Individuals who seek to find employment which places them in close contact with Vulnerable persons or who wish to become a member of our Society or volunteer in a capacity that places them in close contact with Vulnerable persons shall register a new account in the online safeguarding program. In this program they will read the safeguarding policy and attest to their having read and understood it. The third-party vendor will require a consent to complete the background check.

How are Background Checks Conducted?

Unless specifically exempted all Personnel subject to a background check will do so upon registering in the St. Vincent de Paul/Catholic Mutual Group (SVdP/CMG) system. The background checks are conducted by Selection.com. Initially, Waukesha District Council employees are not required to conduct their background checks in the SVdP/CMG system. Instead, they will have their background checks done through the vendor embedded in their HR system, with the requirement that the background checks are close to or greater in their comprehensiveness as compared to the parameters used by Selection.com.

If the background check for a current member or volunteer indicates a history of one or more sexual offenses, the individual shall be suspended from their Vincentian activity. Similarly, if a background check for a current member or volunteer indicates a felony level conviction for violent offenses, the individual shall be suspended from their Vincentian activity. An investigation shall proceed to determine whether the member or volunteer can continue their Vincentian service.

In the event a background check of a current employee indicates a history of one or more sexual or felony level violent offenses, that employee shall be suspended from any job activities which include contact with Vulnerable persons and their supervisor and/or management shall begin a further investigation, while observing the same procedural fairness as would apply in any other employment investigation. If Personnel has a conviction of one or more sexual or felony level violent offenses, they will be dismissed from Vincentian service.

Each district council can choose their own criteria for offering positions to prospective employees with convictions that are not of a sexual or felony level violent nature.

Who Pays the Cost of Background Checks and Training?

The cost of background checks and training for its members, employees and volunteers will be the responsibility of each district council. They may push the cost down to some or all of their conferences as the district board deems appropriate.

The Direct cost of the SVdP/CMG system will be paid for by the Milwaukee Archdiocesan Council. That cost will be recouped through the annual dues assessed to the district councils.

The Milwaukee Archdiocesan Council has no personnel of its own and shall not pay for background checks or training.

Any member or volunteer may choose to pay the cost of their own background check and training, but this must be done through the SVdP/CMG system unless specifically exempted (see Waukesha District Council exemption above).

Background checks shall be repeated at least every five (5) years on existing personnel.

Online training will be repeated at least every five years.

Risk Management

In spite of our best efforts to prevent people with histories of sexual predation from joining the ranks of our membership, volunteers and staff, it is still possible that dangerous individuals may enter the premises of a SVDP facility. Because of this risk, the following procedures must be in place to deal with situations that might arise.

Services should be provided in open areas with high visibility. When it is not possible to provide such open areas, video monitoring should be in place. If this is not economically feasible, in-person monitoring shall be regularly performed.

If an incident of sexual abuse occurs on the premises of a SVDP facility, the supervisor shall **immediately** report the incident to the county Child Protective

Services office (if a child was involved). Contact information for the Child Protective Services office of each of the 10 counties in our Archdiocese is provided in Appendix A. In addition, for any incident (whether or not involving a Vulnerable person), the supervisor shall complete the Form for Reporting an Incident of Sexual Abuse, which is provided in Appendix B.

Posters shall be prominently displayed in all SVDP premises describing our safeguarding policies and including contact information for reporting incidents of sexual predation or boundary violations. An example of such a poster is provided in Appendix C.

No fewer than two Vincentian members shall be present during any in-person meeting with those we serve. A single Vincentian member should not be alone with a Vulnerable person in the course of any Vincentian work without at least one other adult being present. Home visits by phone should be done by conference call with two Vincentians on the call.

If an incident of physical or sexual abuse occurs during a home visit or other form of ministry outside of the premises of a SVDP facility, the Vincentians involved shall immediately report the incident to the county Child Protective Services office (if a child was involved) or ADRC office if a vulnerable adult was involved. Contact information for both the Child Protective Services office and ADRC office (for vulnerable adults) of each of the 10 counties in our Archdiocese is provided in Appendix A. In addition, for any incident (whether or not involving a Vulnerable person), one of the Vincentians shall complete the Form for Reporting an Incident of Sexual Abuse, which is provided in Appendix C. If a family member contacts a representative of our Society to report an incident of sexual abuse committed by a Vincentian during a home visit or other form of ministry outside of the premises of a SVDP facility, the representative shall immediately notify the District Council President. The District Council President will contact the Archdiocesan President. The actions outlined in Response to Reports of Abuse below will then be followed. If one of the pair of Vincentians involved in a home visit witnesses their partner engaging in physical or sexual abuse of a family member, the observing Vincentian should object if there is no threat of injury for such objection, and as soon as possible, obtain and fill out the Form for Reporting an Incident of Sexual Abuse. This form will be sent to both the District Council President and the Archdiocesan Council President.

For circumstances in which an employee is providing case management or other direct services as part of their professional work, the employee shall prefer and offer the option for the Vulnerable person being served to have their case

manager from another agency be present during these meetings. If the meeting must be held one-on-one, the employee shall verify another staff member is on the premises, notify the staff member that a meeting is occurring and be open to a check-in at any time during the meeting by that staff member.

Conduct with Youth

Personnel working with youth shall maintain an open and trustworthy relationship between youth and adult supervisors.

A. Personnel must be aware of their own and others' vulnerability when working alone with youth. Use of a team approach to managing youth activities is recommended.

B. Physical contact with youth can be misconstrued and should occur: (a) only when completely nonsexual and otherwise appropriate; and (b) **never** in private.

C. Personnel shall refrain from: (a) the illegal possession and/or illegal use of drugs and/or alcohol at all times; and (b) the use of alcohol when working with youth.

D. Personnel shall not share private, overnight accommodation with individual young people including, but not limited to, accommodations in any Church-owned facility, private residence, hotel room, or any other place where there is no other adult supervision present.

- In rare, emergency situations, when accommodation is necessary for the health and well-being of the youth, the Personnel shall take extraordinary care to protect all parties from impropriety and the risk of harm, as well as the appearance of impropriety and risk of harm.

- Use of a team approach to managing emergency situations is recommended.

Harassment

Personnel shall not engage in physical, psychological, written, or verbal harassment of other Personnel or neighbors in need and shall not tolerate such harassment by others.

A. Personnel shall provide a professional work environment that is free from physical, psychological, written, or verbal intimidation or harassment.

B. Harassment encompasses a broad range of physical, written, or verbal behavior, including, without limitation, the following:

- Physical or mental abuse.

- Racial insults or jokes.
- Derogatory ethnic slurs.
- Sexual advances or inappropriate touching.
- Sexual comments, sexual gestures or sexual jokes.
- Requests for sexual favors used as a condition of employment, or to affect other personnel decisions, such as promotion or compensation.
- Display of offensive materials.

C. Employees shall additionally be required to follow the comprehensive Harassment policies as outlined in their Employee Handbook.

D. Harassment can be a single serious incident or a persistent pattern of behavior whose purpose or effect is to create a hostile, offensive, or intimidating work environment.

E. Allegations of harassment must be taken seriously and should be reported immediately to both the District Council President and the Archdiocesan Council President, preferably in writing. In the case that the District Council President is involved in the harassment allegation the Archdiocesan Council President is to be notified of the allegation.

Response to Reports of Abuse

When there is an allegation of sexual abuse of a minor or vulnerable person, the persons involved must have recourse, and the situation shall be evaluated and addressed in a manner that is just, compassionate, and understanding. To that end, the Milwaukee Archdiocesan Council has developed the following response to allegations of sexual abuse.

INVESTIGATION. The incident is to be investigated in a timely manner by the Supervisor, HR Director where available, or District Council President.

Assuming the complaint is credible, the following actions shall be taken immediately:

1. Provide effective and compassionate care to the alleged victim and the alleged victim's family.
2. Inform the accused individual of the investigation and give them the opportunity to respond. If the individual is paid staff, he or she shall be assigned to work that does not involve contact with the public. Regular salary and

benefits shall be provided. If the individual is a member or volunteer, they will be asked to refrain from Vincentian activity until the investigation has been completed.

3. The facts and details of an investigation should be kept as confidential as possible. The accused shall be promptly notified of the results of the investigation.

4. Whenever possible, the investigation shall include interviews with the alleged victim, the alleged victim's parent(s) or guardian for minors or vulnerable adults who have a guardian, the person making the initial report, the accused person, potential direct witnesses of the alleged incident(s), and any other person who may have knowledge of the situation.

5. The Archdiocesan Council shall cooperate with investigations by civil authorities in accord with applicable law. It is recognized that an investigation by civil authorities may delay the investigation anticipated above. In that situation a final determination may need to be delayed pending resolution of the investigation by civil authorities or even a civil criminal trial.

6. Once the investigation has concluded, the District Council President and the Archdiocesan Council President shall judge either that the accusations appear to be unfounded, and the case should be considered closed (pending the outcome of any civil investigation) or that there is credible evidence that abuse has been perpetrated by the accused. This decision shall be communicated in a decree to the person bringing the complaint and to the alleged victim. The District Council President and the Archdiocesan Council President shall determine whether punishment up to and including termination shall be needed.

7. Regardless of whether the investigation ultimately results in a finding that inappropriate conduct occurred, the investigator(s) shall prepare a written report of the investigation and the investigatory conclusions and place that report in a confidential file.

RECORD RETENTION

All reports that result from the background check shall be retained in a secure manner. Digital or paper copies of records shall be maintained in a secure manner with appropriate access granted for those who need access to these records. The records must be maintained in a secure manner, not in the possession of any individual nor at any location where access to the records may

be gained by an individual who should not have that access. An appropriate location to house paper records may be a safe deposit box at a bank.

Reports of incidents of sexual abuse shall be retained in the same manner and location as the background check reports. If the investigation results in an exoneration of the accused, the report shall be clearly marked as such and signed by the investigator of the incident.

The original copy of written reports of all stages of the investigation above shall be retained in the same manner and location as the other reports above.

The archdiocesan president shall have access to all records. The HR director or supervisor shall have access to employee records. Conference presidents or their designee shall have access to records of members of their particular conference. The CEO/executive director, where the position exists, shall have access to volunteer records. The district council president shall have access to all records within their district council.

All records related to this safeguarding policy shall be retained after Personnel leave their position with the Society of St. Vincent de Paul within the Milwaukee Archdiocesan Council. An oversight committee will be established to address the issue of which records shall be retained going forward and how long the records shall be retained.

MEDIA, AUDIO, AND VISUAL RECORDINGS

If any audio or visual recordings involve interviewing a neighbor in need, always ensure that the individual is at no risk of being endangered or adversely affected. This includes ensuring their privacy and not disclosing identifying information about a Vulnerable person. Such recordings should carefully avoid revealing their full names, home address, or identifying their home, host community, or general location. Display of street signs, advertising boards or any other background information that would indicate where the person may live should be avoided. Conferences and councils may not publish any story or image that might put a Vulnerable person or their family at risk, even when identities are changed, obscured, or not used. Use only a neighbor in need's first name or pseudonym and provide a general location such as a city or county to avoid identifying them.

Still photographs and videos shall never be demeaning or disrespectful of the dignity of the persons portrayed. The rights, safety, and well-being of the persons being portrayed shall always be protected. The gratuitous portrayal of

extreme suffering shall be avoided. Editing shall maintain the integrity of the photographic and video images' content and context. No changes shall be made that distort the context of the image, or that make a situation look worse than reality.

People shall always be adequately clothed. They shall never be portrayed in poses that could be regarded as suggestive, erotic or obscene.

POLICY REVIEW

The president of the Milwaukee Archdiocesan Council shall appoint an oversight committee consisting of board members and/or board officers. It shall be the responsibility of this oversight committee to review this safeguarding policy annually to provide a written report suggesting changes to the procedures outlined to take into account lessons learned, the extent of compliance with the policy within the archdiocesan council, the continued accuracy of the policy, for example, the contact information in Appendix A, changes in legislation, litigation involving safeguarding policies and new developing threats to Vulnerable persons we interact with including those who come to our facilities for assistance. The oversight committee shall review the record retention policy and adopt such changes as may be appropriate. In addition, the oversight committee shall endeavor to have this policy reviewed by legal counsel.

Appendix A.

The top table below provides phone numbers for the office of Child Protective Services in each county in our Diocese, both during normal business hours and after hours. The bottom table provides phone numbers for agencies (ADRC unless noted otherwise) protecting vulnerable adults.

County (minors)	Office Hours	After Hours
Dodge	920-386-3750	920-887-6713
Fond du Lac	920-929-3400	920-906-5555
Kenosha	262-605-6582	262-657-7188
Milwaukee	414-220-7233	414-220-7233
Ozaukee	262-284-8200	262-284-7172
Racine	262-638-7720	262-638-7720
Sheboygan	920-459-3207	920-459-3111
Walworth	262-741-3200	800-365-1587
Washington	262-335-4610	262-365-6565
Waukesha	262-548-7212	262-547-3388
County (Adults)	Phone #1	Phone #2 if any
Dodge	1-800-924-6407	1-920-386-3580
Fond du Lac	1-920-929-3446	
Kenosha	1-800-472-8008	1-262-605-6646
Milwaukee	1-866-229-9695	1-414-289-6874
Ozaukee	1-866-537-4261	1-262-238-8120
Ozaukee County Human Services*		1-262-284-9411
Racine	1-866-219-1043	1-262-833-8777
Racine County Crisis Services*		1-262-638-6741
Sheboygan	1-800-596-1919	1-920-467-4100
Washington	1-877-306-3030	1-262-335-4497
Waukesha	1-866-677-2372	1-262-548-7848

* Only use outside ADRC's normal hours of 8:00-4:30.

APPENDIX B

Milwaukee Archdiocesan Council Form for Reporting an Incident of Sexual Abuse

Today's date: _____

Name of person making this report: _____

Name of alleged abuse victim: _____

Name of alleged sexual abuser: _____

Dates of occurrence: _____

Age of alleged victim at time of abuse: _____

Place(s) alleged sexual abuse occurred:

Status of alleged abuser at time of occurrence:

(Staff person, volunteer, SVDP Member, etc.)

I would be willing to provide details

_____ **in writing**

_____ **telephone interview**

_____ **in-person interview**

Person allegedly sexually abused knows of this report: _____ **Yes** _____ **No**

Others who may corroborate this report:

How may we contact you (phone, mail, e-mail)

Please return this form to:

**The local District Council President of the Milwaukee Archdiocese
Society of St. Vincent de Paul**

The SVDP Milwaukee Archdiocesan Council supports the rights of individuals to report abuse directly to the proper public authority.

This facility of the Society of St. Vincent de Paul operates under the following principles:

- **The welfare of the people we assist is paramount.**
- **Concerns or allegations of abusive or exploitative behavior are always taken seriously, timely investigated and acted on as appropriate.**
- **We support the participation of children, vulnerable persons, and all those we assist by valuing, listening to and respecting them and giving them a say in decisions that affect them.**
- **All personnel have access to and are familiar with safeguarding policies and procedures and know their responsibilities within those policies and procedures.**
- **All personnel and people being served, including children and vulnerable persons themselves, have access to information about how to report concerns or allegations of abuse.**
- **Recruitment practices help to ensure that we will not recruit personnel or other representatives if they pose a known risk to the safety or well-being of those we assist, or children or vulnerable people with whom they come in contact.**
- **Our practices do not create or allow conditions in which children and vulnerable people are put at risk of abuse or exploitation.**
- **People in positions of responsibility, whether they be members, volunteers or employees, are responsible for actively promoting safeguarding and ensuring that safeguarding policies and procedures are complied with and are updated on a regular basis and circulated within their jurisdiction.**

If you believe that you have been abused or exploited, please contact the local District Council President of the Milwaukee Archdiocese of the Society of St. Vincent de Paul