



# **Safeguarding Policy and Procedures**

Toledo Diocese

Council of the Society of St. Vincent de Paul

Effective

October 1, 2024

## SAFEGUARDING SVdP POLICY AT A GLANCE

1. As Vincentians, the nature of our work means that there is often a power imbalance when we encounter a person in need; a person's circumstances, whereby they are seeking help, and our position as a provider of financial, material, or personal support, creates a risk and renders vulnerable the person seeking help.
2. The Diocese of Toledo SVdP has established minimum guidelines and standards that will require certain individuals to:
  - Sign our Code of Conduct
  - Receive training on a Safeguarding Policy
  - General Requirements for Volunteers, Employees, Contractors and Visitors
  - Completing Virtus Training
  - Undergo a background check
3. The Society of St. Vincent de Paul Toledo Council has authorized and approved the Safeguarding Policy, to be effective immediately at all SVdP facilities in the Council region and for all employees, volunteers, contractors and visitors engaged with SVdP.
4. The following pages provide more detailed information and definitions about the policy and Code of Conduct (page 9) that Vincentians and certain volunteers will be required to read and sign.
5. Page 6 provides a table that defines volunteer statuses and policy requirements.
6. There needs to be an understanding in the SVdP of Toledo Council and all Conferences of:
  - What safeguarding is
  - Why it is important
  - Why the Society is making this a priority
  - What can be done to ensure application of this safeguarding policy

## Introduction

### What is Safeguarding?

As Vincentians, the nature of our work means that there is often a power imbalance when we encounter a person in need; a person's circumstances, whereby they are seeking help, and our position as a provider of financial, material, or personal support, creates a risk and renders vulnerable the person seeking help.

Safeguarding is the act of protecting vulnerable people from harm. In the context of the Society of St. Vincent de Paul, safeguarding means minimizing the risk of abuse or neglect to the people we serve. This policy seeks to address safeguarding as it applies to children or adults who could be vulnerable to abuse or neglect by reason of their age, physical or mental disability, or poverty and reliance on support services.

In committing to safeguarding, SVdP is not just seeking to ensure that abuses are prevented, reported, and acted upon; we are also seeking to create safe and respectful environments.

### Why is SVdP Committed to Safeguarding?

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 weak 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 – Apostolic letter issued *motu proprio* on the protection of minors and vulnerable persons. 26 March 2019)

The National Council and its members also look to the nation's Bishops for leadership guidance in the area of Safeguarding to create a safe environment for all, which can be found here: <https://www.uscb.org/topics/catholic-safeguards>.

### The Rule, Our Mission, and Our Value

Charity, as lived by the Society's over 800,000 volunteers throughout the world, is inspired by the example of St. Vincent de Paul, a great apostle of charity in his day and the Society's patron saint. SVdP members live the Gospel message by serving Christ in the poor. Inspired by the spirituality of St. Vincent de Paul, members strive to deepen their faith by meeting real needs, undertaking concrete action in neighborhoods, villages, and communities. In that work, we are called to embody these values:

- **Empathy** – to listen to and understand those we assist and to work together as members to support those in need.
- **Simplicity and Humility** – treating each other, and those we assist, as equals in a fraternal relationship.
- **Justice** – respecting people's convictions and beliefs and helping them to regain and retain their autonomy and human dignity.

## Definitions

**Child/Minor:** An individual who has not yet reached their 18<sup>th</sup> birthday.

**Child Abuse:** Any form of intentional or malicious infliction or injury that damages a child's physical, moral, or mental well-being. Child abuse includes sexual abuse of, or sexual misconduct with a child or other individual who is legally incompetent.

**Endangered Adult:** An individual who is at least eighteen (18) years of age and is incapable by reason of mental illness, mental retardation, dementia, or other physical or mental incapacity of managing or directing the management of the individual's property or providing or directing the provision of self-care.

**Fiduciary Relationship:** A relationship of trust in which one person places complete confidence in another. The relationship can be formal and legal as well as moral and personal. In a fiduciary relationship, one party, call the fiduciary, possesses superior knowledge or training compared to the other party whose trust the fiduciary enjoys.

**Grooming Behavior:** The process of an individual building an emotional connection with a child, endangered adult or vulnerable adult and/or family members/guardians and the relevant institution to gain their trust for the purpose of committing sexual abuse or misconduct.

**Professional Relationship:** A relationship between a cleric, religious, employee, or volunteer working or ministering on behalf of SVdP and any person to whom such cleric, religious, employee or volunteer provides counseling, pastoral care, spiritual direction, spiritual guidance, mentoring, teaching, or any fiduciary relationship in which the parties to the relationship receive or exchange confidential or privileged information.

**Reason to Believe:** A person is said to have "reason to believe" an accusation when evidence that, if presented to individuals of similar background and training, would cause those individuals to believe it is more likely than not that the person had been abused.

**Sexual Abuse:** Sexual abuse refers to any type of illegal or coerced sexual conduct against another individual. A variety of different offenses fall into this category, which is not limited to physical contact alone. Instead, sexual abuse includes acts of sexual harassment, rape, indecent exposure, forcing another individual to view or participate in pornography, and contributing in any way to the commercial sexual exploitation of children. Sexual conduct is criminal if it is not consented to, either because the perpetrator used force or because the victim is not capable of providing consent.

**Sexual Exploitation:** The development of, or attempt to develop, a sexual relationship between a cleric, religious, employee, coach, volunteer, or youth and any person with whom he or she has a pastoral, counseling, mentoring, or other fiduciary relationship. Sexual exploitation exists whether or not an individual consents to the relationship. Sexual exploitation includes, but is not limited to, activities such as intercourse, kissing, touching breasts, genitals, or buttocks; dating during the course of a professional relationship; verbal suggestions of sexual involvement; or sexually demeaning comments.

**Sexual Harassment:** Unwelcome or offensive behavior between individuals because of gender where there is a pastoral, employment, mentoring, fiduciary, counseling, coaching, or peer relationship. Such behavior includes but is not limited to sexually oriented humor or language, questions, or comments – unrelated to a professional relationship – about sexual behavior or preference, undesired physical contact, inappropriate comments about physical appearance, or repeated requests for social engagement that create an intimidating, hostile, demeaning or offensive environment defined by a physical relationship.

**Sexual/Boundary Violations:** Any behavior that can reasonably considered a violation including but not limited to unauthorized communications with children, endangered adults or vulnerable adults through social media.

**Sexual Misconduct:** Conduct that includes sexual abuse of children, endangered adults, or vulnerable adults, sexual exploitation, child pornography, sexual/boundary violations or sexual harassment.

## **SVdP Toledo Safeguarding Policy**

**Vulnerable Adult:** A person eighteen years of age or older who is unable or unlikely to report abuse without assistance because of impairment of physical or mental function, emotional status or deprivation of personal freedom, which may be due to an abuse of power, even if the relationship is between adults that in fact, even occasionally, limits their capacity to intend to or want to in any way resist the offense.

### **A National Commitment to Minimum Standards**

This policy recommends minimum guidelines and standards for the safeguarding of children and vulnerable people served by SVdP entities or personnel. SVdP entities or personnel include employees, contractors, volunteers, and visitors. In cases where SVdP works through partners and vendors, our partners and vendors also have a responsibility to meet these minimum standards for those served in their programs.

The International and National Society are committed to protecting the rights of all people, and to ensuring that vulnerable persons of all ages are protected from physical and mental violence, injury, abuse, and exploitation, including sexual abuse.

The Society acknowledges that different jurisdictions set different definitions or age limits for children in their local legislations, e.g., laws dealing with legal age of majority, age of sexual consent, voting age, etc. These differences do not alter the inherent vulnerability of children or other persons with whom the Society works and relates.

## **A Safeguarding Policy for the Diocese of Toledo Council and Its Conferences**

### **A Toledo Council Commitment to Minimum Standards**

The Diocese of Toledo SVdP has established these minimum guidelines and standards for the safeguarding of children and vulnerable people within the care of SVdP entities or with whom SVdP personnel might come into contact through their Vincentian works. In cases where we work through partners and vendors, they also have a responsibility to meet these minimum standards for those served in their programs.

The SVdP Toledo Diocese will require certain individuals to:

- Sign our Code of Conduct
- Receive training on a Safeguarding Policy
- Complete Virtus Online Training;” Protecting God’s Children Awareness Session 4.0” and “Vulnerable Adults 2.0” at the expense of the SVDP Toledo Council.
- Undergo a background check through Core Screening, at the expense of the SVDP Toledo Council.

### **General Requirements for Volunteers, Employees, Contractors and Visitors**

The matrix shown in Table 1 indicates the role requirements for awareness, agreements, training and background checks for the persons engaged with SVdP, at SVdP facilities and individuals representing SVdP in the community. Additional details are included in the sections below.

**Additional Policies for Employees** All advertisements and job posting for employees must include a required commitment to the Safeguarding Policy. Solicitations for volunteers should also include a reference to this policy.

**SVdP Toledo Safeguarding Policy**

**Code of Conduct** SVdP has developed a Code of Conduct to be signed by all employees, contractors and certain public-facing volunteers to include Home Visitors and Vincentians meeting with neighbors in any fashion. The Code is included in Attachment A.

**Table 1. Roles Awareness, Agreement, Training**

<b>Role</b>	<b>Safeguarding Policy Awareness</b>	<b>Code of Conduct Signature</b>	<b>Training</b>	<b>Background Check</b>
<b>Employee</b>	Required	Required	Required	Required
<b>Contractor</b>	Required	Required	Required	(from contractor)
<b>Key Volunteer<sup>1</sup></b>	Required	Required	Required	Required
<b>Home Visitor</b>	Required	Required	Required	Required
<b>Public-Facing Volunteer<sup>2</sup></b>	Required	Required	Required	Required
<b>Frequent Volunteer<sup>3</sup></b>	Required	Required	Required	Required
<b>Occasional Volunteer</b>	Required	Optional	Required	Not Required
<b>Conference Member<sup>4</sup></b>	Required	Required	Required	Required
<b>Vendor</b>	Required	Not Required	(from Vendor)	Not Required
<b>Visitor</b>	Required	Not Required	Not Required	Not Required

<sup>1</sup>Volunteers with organizational responsibility including Presidents and Treasurers

<sup>2</sup>Volunteers in a capacity that faces those we serve on a regular basis, including stores, pantry intake and home delivery

<sup>3</sup>Volunteers participating at least monthly

<sup>4</sup>Includes both active and associate members

**Virtus Training** All employees, Vincentians, and Public-Facing Volunteers MUST Complete Virtus Online Training;” Protecting God’s Children Awareness Session 4.0” and “Vulnerable Adults 2.0”. These online trainings will be at the expense of the SVDP Toledo Council.

Training can be accessed by clicking here: [www.virtusonline.org/](http://www.virtusonline.org/)

When prompted for location select: Society of St. Vincent de Paul Toledo Council.

**Background Checks** All employees and certain volunteers in positions of responsibility or high-risk environments will be required to have background checks. The breadth and depth of these checks will depend on the role on the employee or volunteer performs for SVdP and their history of employment and residences.

All potential employees will have a background check after an offer of employment with SVdP, where the offer is contingent on an acceptable background check. The scope of this background check will depend on the previous employment and residence history of the potential employee as well as their particular job duties should they be hired or accepted as a volunteer.

Background checks already completed within three years will meet this need; individuals need only supply proof of a background check from the agency that completed the check.

## SVdP Toledo Safeguarding Policy

Volunteers in a position of responsibility (such as President, Treasurer, etc.) will also have background checks consistent with employment and residence history.

Volunteers who work in a team environment in SVdP facilities, as well as Conference members, will in general not be required to have background checks. Home Visitors who work in pairs, **will** be required to have background checks.

## Training

All employees, public-facing volunteers, regular volunteers and contractors who work at SVdP facilities in the Council region must have Safeguarding training. Regular volunteers are those who volunteer at least once per month. Employees and contractors will be trained during onboarding or orientation as appropriate. Training must be refreshed annually for all employees and contractors, and at least every three (3) years for volunteers.

For volunteers and conference members where training is optional, this Policy will be communicated through emails as well as visible signage in all facilities.

## Monitoring Compliance and record Keeping

Ongoing monitoring and evaluation will indicate the extent to which safeguarding is being effectively implemented and any need in training for employees, contractors, members and volunteers. The Council office will keep records to track the process of:

- Orientations and training provided in safeguarding, including the numbers attending and dates
- All safeguarding concerns and disclosures reported, including details of all follow-up action
- Recording any employees, members or volunteers found to have breached safeguarding, committed abuse, or failed recruitment process because of risks/issues flagged about their conduct so that those people are not inappropriately engaged in some other role where they might do harm
- Job descriptions and postings/ads, in order to confirm that they all contain the commitment to the safeguarding policy,

## Two Adult Rule

The Rule of SVdP “two adult rule” (Rule Part III, Statute 8) serves to keep vulnerable adults and children safe, and to protect against false/malicious allegations being made against Vincentians and others providing services. Whenever possible no fewer than two Vincentians should always be present during any meeting with those we serve, and a volunteer should not be involved with a vulnerable adult or child in the course of the Vincentian work without another adult being present. It is preferred that the second adult should not be a spouse or partner.

If for some reason a one-on-one discussion must take place, the interaction should be conducted in as open and observable a way as possible. In any circumstances where one-on-one is part of the role or is anticipated, it is important to consider and mitigate any safeguarding risks and to ensure that such conduct is identified to leadership to ensure they are aware of it and the actions being taken to safeguard the vulnerable adults or children involved.

- **High Risk Environments** A high risk environment is one where a vulnerable adult or child would be alone with an employee or volunteer. Another might be a volunteer working alone with a vulnerable adult or child out of sight from other workers in a facility. Care must always be taken to recognize high risk environments and avoid them if possible.

## SVdP Toledo Safeguarding Policy

- **Specific Policies for Home Visitors** Home visitors must always visit in pairs. Each Home Visitor should have a background check completed. The two home visitors should remain together during the entire visit. Observations should be shared after the visit. Should one or both home visitors observe an abusive situation in the home, they are required to report this to local authorities.

## Communicating the Safeguarding Message

The Council/Conferences ensure that a hard or electronic copy of the safeguarding policy is provided or made available in each office or headquarters within their jurisdiction and available to and acknowledged by members, employees, volunteers, people being served.

Safeguarding will be maintained for employees, members, and volunteers by including short sessions on the policy or related safeguarding matters during meetings, other trainings and via regular communications. All material will include clear information about whom a vulnerable person or witness should report to, or seek advice from, if they feel they or another person has been violated or offended in any way.

## Policy Review

The safeguarding policy will be reviewed by the Council at least every three years, with new processes, changes in legislation and guidelines and practices to be incorporated in accordance with best practices and lessons learned.

**The Toledo Council requires that all Conferences and members agree to and sign-off to these minimum Safeguarding Policy. Councils may include additional standards in a locally developed policy if necessary.**

**ATTACHEMENT a. Code of Conduct**

**Society of St. Vincent de Paul Toledo Diocese Council  
Code of Conduct**

As a community of faith dedicated to service, we are committed to safeguarding those we serve. The following rules and regulations reflect our commitment and apply to all employees, contractors and frequent and public-facing volunteers\*.

**I will:**

- Safeguard children, endangered adults, and vulnerable adults\*\* entrusted to my care at all times.
- Treat everyone with respect, patience, integrity, courtesy, dignity, and consideration.
- Complete Safeguarding training as required and read policies.
- Avoid situations where I am alone with a child, endangered adult, or vulnerable adult when engaged in SVdP activities and meet them in areas that are visible and accessible to other adults.
- Refrain from giving in appropriate, personal gifts to children, endangered adults and vulnerable adults.
- Avoid all unnecessary physical contact, especially when alone with a child, endangered adult, or vulnerable adult.
- Always maintain a professional attitude when dealing with children, endangered adults, and vulnerable adults avoiding emotional attachment and maintaining professional boundaries.
- Report suspected abuse to civil authorities (Ohio Protective Services hotline: 855-642-4453) or to a local law enforcement agency and to the Council.
- Cooperate fully in any investigation of abuse of children, endangered adults, or vulnerable adults.

**I will not:**

- Use, possess, or be under the influence of alcohol when engaged in SVdP service work.
- Be alone with minors in a residence, sleeping facility, locker room, rest room, dressing facility, other closed room or isolated area that is inappropriate to a ministry relationship.
- Use, possess, or be under the influence of illegal or recreational drugs.
- Allow children to have and/or use alcohol or illegal or recreational drugs.
- Use profanity or engage in behavior that is harassing or degrading to others.
- Acquire, use, possess, or assist others, including children, to gain access or distribute any material that is pornographic in nature including child pornography. This includes, but is not limited to: Pictures, videos, movies, social media, websites magazines, or written material.
- Contact a child or endangered adult, or vulnerable adult via social media or post pictures, video, or other information that may identify them.

Signature: \_\_\_\_\_ Date: \_\_\_\_\_

Printed Name: \_\_\_\_\_

## SVdP Toledo Safeguarding Policy

\**Frequent and public-facing volunteers* are volunteers who volunteer at least once per month or who volunteer in a capacity that faces those we serve on a regular basis. This includes stores, pantry intake and home delivery.

\*\**Endangered adults* are defined as “at least eighteen (18) years of age and incapable by reason of mental illness, mental retardation, dementia, or other physical or mental incapacity of managing or directing the management of the individual’s property or providing or directing the provision of self-care”.

*Vulnerable adults* are defined as “a person eighteen years or older who is unable or unlikely to report abuse without assistance because of impairment of physical or mental function, emotional status or deprivation of personal freedom, which may be due to an abuse of power, even if the relationship is between adults that in fact, even occasionally, limits their capacity to intend to or want to in any way resist the offense”.

### Conference Agreement

Our Conference acknowledges and agrees to implement and operate by the Toledo Council of the Society of St. Vincent de Paul and its Conferences Safeguarding Policies and Procedures regarding the protecting of minors and vulnerable persons as part of my service with the Society of St. Vincent de Paul. We further agree to comply to all rules, regulations, and policies at St. Vincent de Paul.

We have read and understood the above.

Name: \_\_\_\_\_

Conference: \_\_\_\_\_

Date: \_\_\_\_\_

Witness: \_\_\_\_\_