

8.3 Informing the Diocese. In the event that an investigator or a police officer arrives to a school, a parish, or a Diocesan program unannounced, immediately inform the supervisor and contact the Director of Safe Environment. A police officer may not speak with a minor without parental consent. For all D.C.F. investigations, the Diocese should be made aware that an investigation is taking place on the premises and a second Adult should be present in the room or in view of the investigator who is with the minor. Request to see the photo I.D. of any Adult claiming to be a police officer or a D.C.F. employee and record the name and badge number of the person who is onsite.

8.4 Incidents involving two minors. In the case of an incident involving two minors, where one minor is suspected of inappropriate physical or sexual conduct with another minor, immediately notify your supervisor and the Victim Assistance Coordinator, and if directed, you should also notify D.C.F. or the police.

8.5 Risk of Harm to Self or to Others. If you suspect (through information reported to you or observed) that a person is in danger of physical harm to his or herself or to others, notify the police immediately and contact the Victim Assistance Coordinator (203) 650-3265 / (203) 241-0987. Mobile Crisis Services is a resource for a person experiencing a psychiatric emergency and can be reached by dialing 211.

8.6 Child Pornography. It is a crime to knowingly produce, distribute, receive or possess with intent to distribute child pornography. Personnel are required to report suspected child pornography to the police or to D.C.F. within 12 hours of becoming aware and to the Victim Assistance Coordinator of the Diocese of Bridgeport.

8.7 Vulnerable Adults. To report an allegation of abuse or neglect involving a Vulnerable Adult and for additional resources, immediately contact the police in the town where the alleged incident occurred. **Protective Services for the Elderly should also be contacted at the Department of Social Services 1 (888) 385-4225** After business hours or on weekends or state holidays, please call **Info-line at 2-1-1** For an allegation of abuse or neglect involving an individual with an intellectual disability between the ages of 18 and 59, call **1 (844) 878-8923**.

For questions or concerns relating to this Code of Conduct or the Safe Environment Program, please contact The Diocese of Bridgeport, Office of Safe Environment (203) 416-1406.

III. THE DIOCESE OF BRIDGEPORT ANTI-HARASSMENT POLICY

Personnel must not engage in physical, psychological, written, verbal, or any other form of harassment and must not tolerate such harassment by other Personnel.

Personnel of the Diocese of Bridgeport shall provide a professional work environment that is free from physical, psychological, written or verbal intimidation or harassment from the perspective of a reasonable person.

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

- Physical or mental abuse
- Comments about an individual's real or perceived disability and/or medical condition
- Racial insults
- Derogatory ethnic slurs
- Unwelcome sexual advances or touching
- Sexual comments or sexual jokes
- Requests for sexual favors used as a condition for employment or to affect other Personnel decisions, such as promotion or compensation
- Display of materials that would be found offensive to a reasonable person

The above examples of harassment apply to any form of communication including any form of electronic communication, texting, email, etc. Harassment can be a single severe incident or a persistent pattern of behavior whereby the purpose or the effect is to create a hostile, offensive, or intimidating work environment. Allegations of harassment involving two Adult employees and/or volunteers of the Diocese must be taken seriously and reported immediately to the Office of Human Resources (203) 416-1402.

Information related to Adult harassment involving a member of the Clergy must be immediately reported to the Vicar for Clergy (203) 416-1633. The ***Diocese of Bridgeport Anti-Harassment Policy*** will be followed to protect the rights of all involved.

IV. THE DIOCESE OF BRIDGEPORT POLICY AND PROCEDURES FOR BACKGROUND CHECKS

A. Policy

All members of the Clergy, Religious Sisters and Brothers, Seminarians, Candidates for the Diaconate, Lay Employees, Volunteers, Independent Contractors, Vendors and Tenants (age 18 and over) must clear a criminal background check prior to an assignment, commencing employment or volunteer work in the Diocese of Bridgeport and successfully clear a criminal background check on a renewal schedule of five (5) or ten (10) years based on their responsibility.

The items reviewed are determined by pre-established criteria for background checks as they relate to the position or services potentially being completed by the individual. The Office of Safe Environment evaluates background check criteria that are in addition to the USCCB Charter. In all

cases, a signed authorization to complete the check(s) which may be electronic must be obtained from the individual prior to initiating the process.

All contracts with any company that provide services in the Diocese of Bridgeport will include the requirement that the company providing the service has conducted criminal background checks on their employee(s) age 18 and over and are required to submit proof to the Diocese of Bridgeport that they have cleared a background check through their organization prior to initiating services with any entity of the Diocese of Bridgeport. All independent contractors, vendors or tenants will not be assigned to the Diocese unless they have successfully completed that check. In the event that the company does not have a process for completing criminal background checks, they may utilize the process in place within the Diocese of Bridgeport. The expense of these background checks will be the responsibility of the Contractor.

The Diocese and its entities have the right to deny an individual an assignment for a ministry, employment, the opportunity to volunteer or decline a contract employee based on the individual's failure or refusal to complete these items and/or adverse information obtained through the background check process. If an applicant is denied employment, the opportunity to volunteer, or the opportunity to provide services based on adverse information, the Diocese will send a Notice of Adverse Action to the individual along with the report and a copy of their rights, in compliance with the Fair Credit Reporting Act 15 U.S.C 1681-1681U, as amended by the Consumer Credit Reporting Reform Act of 1996.

B. Procedures

1.0 Clergy, Religious Sisters and Brothers, Men in Formation

1.1 This category includes the following:

- Active Diocesan Priests, Deacons and Religious Sisters and Brothers
- Retired Priests and Deacons who continue to celebrate occasional sacraments
- Visiting and International Priests to be assigned within the Diocese
- Religious Sisters and Brothers who are retired and continue to assist in the Diocese
- Diocesan Priests and Deacons incardinated in the Diocese of Bridgeport who are living outside of the diocese
- Religious Order Priests serving in the Diocese of Bridgeport
- Candidates for the Diaconate
- Seminarians of the Diocese of Bridgeport and Seminarians from other Dioceses residing in the Diocese of Bridgeport

Renewal Schedule:

Priests, Deacons, Religious Sisters and Brothers are required to complete a criminal background check every five (5) years. Clergy and Religious Personnel will be required to complete the background check for the Diocese of Bridgeport.

Procedures:

- (a) Prior to conducting any background check, a fully completed authorization form will be requested by the Office of Clergy and Religious Personnel at the time the person is assigned in the Diocese of Bridgeport.
- (b) The background check authorization form will be submitted to the Office of Safe Environment for completion.
- (c) Checks will include: State Conviction Records; National Crime Registry – searches all state sex offender registries, high crime registries and foreign national's registry; Social Security Number Trace; DMV Records; Credit Check and Employment History Verification.
- (d) Results will return to both the Director of Safe Environment and the Vicar for Clergy.
- (e) In the event the background check reveals a problem, the Vicar for Clergy will evaluate this information together with the appropriate Diocesan authority. Any results that divulge information regarding crimes against children or sex crimes will result in the person being prohibited from serving in the Diocese of Bridgeport under the USCCB Charter.
- (f) The Bishop and/or Vicar for Clergy will inform the individual and they will send an adverse action notice to the individual with a copy of the report and a copy of the individual's rights. If the individual believes that misinformation exists on the report, they should work through the investigative agency to resolve this.

The Vicar for Clergy will ensure the permanent and secure storage of all Clergy and religious Personnel background check results and authorization forms.

1.2 Visiting Clergy from Outside the Diocese

1. In response to the USCCB *Charter for the Protection of Children and Young People* and in accord with the *Safe Environment Handbook* of the Diocese of Bridgeport, it is the shared responsibility of the Diocese and of every cleric to ensure the safety of children and Vulnerable persons within the diocese on occasions when a priest or deacon from outside the diocese visits and serves in any ministerial capacity.
2. Any visiting priest or deacon not incardinated in the Diocese of Bridgeport who intends to serve at only one ministerial event (e.g., funeral or wedding) or more than one related ministerial events (e.g., ordination and Mass of Thanksgiving) and who will not stay overnight in lodging owned by the diocese, by the host parish or institution or by a host family, must provide a testimonial of suitability from his bishop, eparch (for an Eastern Rite priest) or religious superior.
3. Any visiting priest or deacon who will stay overnight in lodging owned by the diocese, by the host parish or institution or by a host family must also provide proof of background check and VIRTUS training and sign the Executive Summary of the *Safe Environment Handbook*.
 - All documents must be sent to the Office of Clergy and Religious for archival purposes (cf. Appendix A: "Authorization and Release for the Procurement of an Investigative Report" and Appendix B: "Executive Summary for Clergy and Men in Formation").
4. Any visiting priest or deacon not incardinated in the Diocese of Bridgeport who intends to provide regular and consistent ministerial assistance in the Diocese (e.g., regularly-scheduled celebration of sacraments) or who will remain for an extended time in the Diocese of Bridgeport, and any priest coming from a foreign country who intends to minister in any capacity (e.g. mission appeal) must:
 - Provide a testimonial of suitability from his bishop, eparch (for an Eastern Rite priest) or religious superior;
 - Provide proof of background check;

- Provide proof of VIRTUS training;
- Sign the Executive Summary of the *Safe Environment Handbook*.

All of this documentation must be sent to the Office of Clergy and Religious for archival purposes.

5. It is the responsibility of the host parish or institution:
 - To communicate all Safe Environment requirements beforehand to visiting priests or deacons;
 - To pay for any background checks for a visiting priest or deacon, including international background checks that can take up to five weeks to process.
 - To make sure that the visiting priest or deacon is made aware that in the State of Connecticut all clergy are mandated to report orally to the D.C.F. Careline within 12 hours of suspecting that a child has been abused or neglected (800-842-2288).
6. All testimonials of suitability must be signed within six months of the date of the ministerial event(s) to take place in the Diocese of Bridgeport.
7. All background checks must be administered through or approved by the Office of Safe Environment and have been conducted within the last five years.
8. These requirements apply to the celebration of weddings, funerals, Sunday, Holy Day and weekday Masses, ordinations, parish missions, retreats, confessions, baptisms and any act of ministerial function. It also applies to concelebrants as well as principal celebrants.

1.3 Diocesan Clergy Ministering Outside the Diocese of Bridgeport

1. Priests of the Diocese of Bridgeport who wish to travel outside of the diocese for ministry and who need a testimonial of suitability should request one from the Office of Clergy and Religious at least four weeks before the ministerial event. In the case of funerals, the request should be made as soon as possible. (See Appendix C: "Request for Testimonials and Statement of Suitability for Diocesan Clergy")
2. Letters of suitability and *celebrates* will only be provided to those priests who are up-to-date with VIRTUS training and a background check (required every 5 years) and who have signed the Executive Summary of the *Safe Environment Handbook*. No exceptions will be made.

1.4 Visiting Bishops: A letter of Suitability for Ministry should be provided to the Office of Clergy Personnel by the Vicar General along with proof of Safe Environment training and a criminal background check.

1.5 Seminarians and Candidates for the Diaconate:

Renewal Schedule:

Seminarians and Candidates to the Diaconate are required to clear a new background check at the time of their ordination and every five (5) years thereafter.

Procedures:

- (a) The Diocesan Director of Vocations must obtain a completed authorization form from all seminarians and is responsible for processing and evaluating all background check results.
- (b) The Vicar for Clergy, or his designee, obtains processes and evaluates all background check results for Candidates for the Diaconate.

- (c) Checks will include: Reference checks; Personality profiling; State Conviction Records; National Crime Registry – searches all state sex offender registries, high crime registries and foreign national's registry; Social Security Number Trace; DMV Records Credit Check; Employment History Verification
- (d) The Director of Vocations provides the adverse action notice to Men in Formation when negative results occur. These records will be maintained by the Director of Vocations for permanent storage.
- (e) All records related to background checks are to be transferred upon ordination to the Office of Clergy Personnel and a new background check will be conducted when the individual is ordained.
- (f) If the person is not ordained, the record will be maintained by the Director of Vocations for permanent storage.

2.0 Lay Employees and Lay Volunteers

Renewal Schedule:

All Lay Employees are required to complete a criminal background check every five (5) years. All Volunteers who hold a supervisory role or who work in scheduled contact with children or Vulnerable Adult is required to complete a criminal background check every five (5) years. Background checks will always be renewed when there is a gap in service or ministry. For educators, this does not include the summer break. All volunteers who do not work in scheduled contact with children or in a supervisory role are required to complete a criminal background check every ten (10) years.

Procedures:

- (a) Prior to working or volunteering, the office managing the employee or volunteer will inform the person that a background check is required.
- (b) All Lay Employees and Volunteers must submit a completed and signed written authorization to complete the criminal background check on an automatic renewal schedule at the time of hire or at the time of volunteering.
- (c) All completed authorization forms should be submitted to the Office of Safe Environment (This includes all written authorization forms as well as in a secure electronic format).
- (d) The areas to be investigated for current employees will be based on the position the employee holds. The areas to be investigated for any applicant will be based on the position for which he/she is applying. All searches will include State Conviction Records; National Crime Registry (searches all state sex offender registries) high crime registries; Social Security Number Tracing and foreign national's registry.
 - Positions requiring a specific degree: add Education Verification
 - Positions with Financial Responsibility: add Credit History
 - Positions with driving responsibility: add Motor Vehicle Report
- (e) Results return to the Director of Safe Environment. Employee results will be printed and provided to the Office of Human Resources. Adverse action notices will be sent to employees by the Director of Human Resources.
- (f) After completing the background check, the investigative agency will invoice the Diocese of Bridgeport for all completed background checks.
- (g) Background checks do not transfer from other Dioceses or from other institutions.

Volunteers: In all cases, a full name, date of birth and address history is required in order to initiate a volunteer background check search. If multiple results return with the same name and date of birth, the social security number is required for identity purposes in order to consider that person eligible

for volunteering. Volunteers who work with Vulnerable Adults and minors must provide their social security number in the first instance.

3.0 School Employees

Renewal Schedule:

School Employees complete a criminal background check through a Diocesan investigative agency every five (5) years. School Employees must also complete the State Fingerprint checks, FBI Fingerprint checks and D.C.F. Child Abuse and Neglect Registry check at time of hire or when there is a gap in service. School Principals are responsible for ensuring that every school employee has completed the fingerprint check and criminal background check before a person begins working or volunteering.

Procedures:

- (a) At the time of hire, the Office of the Superintendent will ensure that the applicant completes the fingerprint application and schedules an appointment at CES. The fingerprint appointment must occur no later than 30 days after the hire date. A written authorization form must be requested for all school employees.
- (b) All completed criminal background check authorization forms should be submitted to the Office of Safe Environment. (This includes all written authorization forms as well as in a secure electronic format).
- (c) Return results for all school employee and school volunteer background checks to the Director of Safe Environment. Employee results will be printed and provided to the Office of Human Resources.
- (d) Any checks that divulge information regarding crimes against children or sex crimes will result in the candidate not being eligible for employment or for volunteering. The Director of Safe Environment will notify the Principal/Pastor/Administrator or Site Supervisor of the decision and will send an adverse action notice to the individual with a copy of the report and a copy of the individual's rights. If the individual believes that misinformation exists on the report, they should work through the investigative agency to resolve this and notify the Director of Safe Environment informing them that they are disputing the information.
- (e) For any negative information outside of the USCCB Charter which results in the candidate not being eligible for employment or volunteering, the Office of Human Resources will notify the Principal/Pastor/Administrator or Site Supervisor of the decision and will send an adverse action notice to the individual with a copy of the report and a copy of the individual's rights. If the individual believes that misinformation exists on the report, they should work through the investigative agency to resolve this and notify the Office of Human Resources informing them that they are disputing the information. If a corrected and 'clean' report is obtained, the individual may be eligible for employment or volunteering. If a corrected or 'clean' report is not available, then the decision will stand and the individual is not able to be employed or volunteer.
- (f) After completing the background check, the investigative agency will send the invoice to the Diocese of Bridgeport for checks completed on their behalf. Individual locations will have the ability to review their monthly background check activity.
- (g) All correspondence relative to this process should be filed in the Office of Human Resources and in the Office of Safe Environment.
- (h) All records will be permanently retained in a secure electronic format.