

SAFEGUARDING OUR PEOPLE



Safeguarding Our People:

A Policy for the Protection of Children and Adults

Approved Sept 2024

Table of Contents

Overview.....	2
Bishop's Address	
Policy Summary	
Definitions	
Awareness.....	11
Awareness of Procedural & Financial Misconduct	
Screening & Training	
Interaction.....	16
Communication	
Counseling	
Spiritual Direction	
Physical Interaction with Minors	
Supervisory Plans for Children/Youth	
Reporting.....	30
Decision Tree	
Allegations Against Laity	
Allegations Against Clergy or Diocesan Employees	
Allegations Against Bishop	
Compliance.....	36
Policy Oversight	
Compliance Documentation	
Resources.....	39
Appendix A: Certification of Compliance	
Appendix B: Individual Acknowledgement of Policies	
Appendix C: Sample Supervisory Plan	
Appendix D: Sample Incident Report	
Appendix E: Submission of Church Policy Addendum	
Appendix F: Caring for the Community	
Appendix G: Volunteer Handout for Training	

SAFEGUARDING OUR PEOPLE



Overview



OVERVIEW

This document serves as recommendations for the churches in the Gulf Atlantic Diocese (GAD) of the Anglican Church in North America (ACNA), as approved by the Bishop. This policy outlines zero tolerance for abuse and its recommendations are provided as necessary reading and acknowledgment for all church leadership and ministry groups. It is also expected that all individuals associated with the Diocese in any capacity, clergy or lay, volunteer or leader,¹ of the Diocese or its churches² and ministry groups will read, learn, and apply its content regarding the protection of our people.

BISHOP'S ADDRESS

To the Clergy, Wardens, Vestry Members, Staff, Volunteers, and People of the Gulf Atlantic Diocese,

It is with great gratitude that I offer you this revised *Safeguarding our People* policy. Moral theologian Richard Gula has written, “We are most at risk of ethical misconduct when we minimize or ignore our power,” (Gula, as cited by Scazzero, *The Emotionally Healthy Leader*, Zondervan Press, 2015, p. 242). May this policy better equip us as church leaders to understand our power and the huge responsibility we have to safeguard God’s people, especially those most vulnerable.

St. Paul writes in 2 Corinthians 5:17, “Therefore, if anyone is in Christ, he is a new creation. The old has passed away; behold, the new has come.” As a new creation in Christ, we are called to honor God with our bodies (I Cor.6:20). Furthermore, as those redeemed by Christ, we are a part of his Church, which honors the heart, mind, and body of each of its members. Scripture teaches that the Church is to be a community of truth and justice, administered with mercy and compassion, always seeking reconciliation if possible. “I therefore, a prisoner for the Lord, urge you to walk in a manner worthy of the calling to which you have been called, with all humility and gentleness, with patience, bearing with one another in love, eager to maintain the unity of the Spirit in the bond of peace,” (Ephesians 4:1-3).

In company with the Bishops and people of the Anglican Church in North America, the churches of the Gulf Atlantic Diocese affirm:

- that every human being is created in the image of God and we are called to be stewards of God’s creation;
- that sexuality is good, blessed, and purposeful; sexuality is understood to be a gift that is celebrated by sexual union within the bond of love found within the covenant of heterosexual marriage;
- that this understanding of sexuality calls for equal respect for all men, women, and children as persons made in God’s image, and for everyone’s right to sexual and physical integrity;

¹ See definition of these terms on page 6.

² See definition of church on page 7.



- that children, adolescents, the infirmed, and elderly are particularly vulnerable to the tragic consequences of broken covenants and abusive treatment, and special care must be taken to protect their individual rights and personal integrity;
- that all types of abuse (verbal, physical, neglect, and sexual misconduct) will be taken seriously by the Diocese and, when required by law, will be reported to the appropriate local, state, and/or federal agency;
- that the protection of the vulnerable shall be of utmost concern;
- that the Church has consistently recognized that those chosen for ordained ministry bear a particular responsibility to pattern their lives according to Jesus' teaching. Bishops, priests, deacons, and lay leaders are called to be faithful examples of the Christian life. Any moral offense by clergy or laity entrusted with pastoral and educational ministries is especially hurtful because it betrays the trust committed to each by the Church to nurture and care for every member.

This policy outlines the guidelines developed to respond to the issue of misconduct/abuse and to confront the reality of inappropriate behavior by members of the clergy, lay employees, and volunteers, as well as to explain the issues related to misconduct/abuse with special concern for the prevention of incidents and the protection of those potentially harmed. **It is necessary reading for all church leaders, including, but not limited to, all affiliated clergy, vestry members, all church employees, and all Youth Volunteers/teachers for children/youth.** The policy is also recommended to the people of the Diocese for comprehensive understanding of the issues involved with misconduct/abuse and the ramifications of engagement therein.

Appropriately, this policy asks us to *Choose the Light*. It is taken from I John 1:5-7, "This is the message we have heard from him and proclaim to you, that God is light and in him there is no darkness at all. If we say that we have fellowship with him while we are walking in darkness, we lie and do not do what is true; but if we walk in the light as he himself is in the light, we have fellowship with one another, and the blood of Jesus his Son cleanses us from all sin." As the Body of Christ, we are called to walk in the light, uncovering that which is done in the darkness, and to protect the vulnerable. We are grateful for your ministry and your commitment to choosing the Light.

In Christ,

+Alex Farmer
Bishop, Gulf Atlantic Diocese
Anglican Church in North America



POLICY SUMMARY

The Gulf Atlantic Diocese requires that each church (see definition) is expected to have in place these four procedures (or their equivalent) for preventing misconduct and/or abuse of both adults and children. This minimum standard applies even if there are no children currently in attendance at church events. All churches must comply to be prepared for children/youth to join their congregation. Below are the key points to remember from this policy:

AWARENESS

- Level 2 Leaders (see page 12) and Youth Leaders must be screened, background checked, and trained on this policy within 6 months of service;
- Level 2 Leaders and Youth Leaders must complete the Safeguarding Our People online courses required for training before service;
- Documentation for laity kept at the church; Diocese keeps documentation for clergy.

INTERACTION

- Two-adult rule (or rule of 3) should be used at all times;
- Pastoral counseling limited to 6 sessions or fewer per person;
- Keep verbal interaction kind, clean, legal, and age-specific;
- Level 1 volunteers (see pg 6) cannot touch children or help with bathroom/diapering;
- All remain hands off, especially with restroom policies, affection, and discipline; remain in public view; two-adult-rule is recommended; kids are never alone; be open to parents being present; follow plans (medical, restroom, transportation, overnight, off-campus, responding, and reporting); provide a safe environment; follow the recommended ratio of leaders to students.



REPORTING

- All churches (pg 6) should post the #ChooseTheLight poster in a visible location to encourage reporting.
- Any report of a person in danger, or a written allegation of abuse, should be reported to the proper authorities immediately (see pg 31);
- Allegations against the Bishop or clergy are to be reported directly to the Intake Officer through the hotline, email, or website (see pg 31);
- Allegations against all lay persons are to be reported directly to senior church leadership (Rector, priest-in-charge, or Senior Warden).

COMPLIANCE

- Churches are responsible for all documentation regarding screening, training, and implementation for non-clergy Level 2 Leaders, in compliance with this policy and with their insurance carrier's requirements.
- Diocese is responsible for all documentation regarding screening, training, and implementation for clergy, in compliance with this policy and with the diocesan insurance carrier's requirements.
- Documentation is to be completed, submitted, and filed no later than Mar 31st each year.



DEFINITIONS

The Bishop and the Diocese strictly prohibit all types of abuse (as defined in this document), by any member of the clergy, anyone pursuing ordained ministry, any lay employee, staff person, or by any Youth Volunteer (as defined) working in any capacity for the Diocese or any diocesan related institution/church in this Diocese.

For the purpose of this policy, please note the interpretation of the following terms:

- **Level 2 Leaders:** includes clergy, those seeking ordination or transfer, employees, vestry, and Youth Volunteers. These are individuals who have some level of authority over others.
 - **Level 1 Volunteers:** volunteers who do not serve regularly, or they do not have any supervisory capacity over others. These individuals should not have physical access to children/youth while serving. All Level 1 Volunteers must serve alongside a screened, trained Level 2 Leader at all times. It is recommended that Level 1 Volunteers complete training whenever possible.
 - **Youth Volunteers:** volunteers who regularly serve in an ongoing capacity in children/youth activities in diocesan institutions, programs, and churches. These are individuals who serve regularly and should be aware of protection policies. This should include lead teachers in Sunday school classrooms or discipleship groups; it should include anyone who has regular, repeated access to children in a supervisory capacity even if they are not the primary teacher. All supervision of minors must include two adults (and at least one youth volunteer or Level 2 Leader at all times), in every room.
-
- **Abuse:** actions that include unwanted physical, sexual, psychological, or emotional, that are intentionally taken to disadvantage another, including neglect. See your state's statutes for the legal definition of abuse in your state.
 - **Advocates:** persons appointed by the Bishop to assist the complainant(s) in understanding and participating in the disciplinary processes of the church, including obtaining assistance to formulate and submit an appropriate charge and in obtaining assistance in spiritual matters. Advocates are not to serve as legal advisors or pastors. Each church should consider a congregational list of advocates not employed by the church or Diocese. The selection of the advocate may take into account the complainant's needs/requests.
 - **Bishop:** this includes the Bishop of the Diocese, but also includes the ecclesiastical entity authorized to act in the absence of the Bishop, the Standing Committee.
 - **Child or Youth:** any unmarried person under the age of state majority (age 18 in GA and FL; age 19 in AL and 21 in MS) who has not been emancipated by order of the court. In most cases, child refers to infants through elementary school, and youth refers to middle/junior high through high school-aged minors.
 - **Child Abuse:** any willful act or threatened act resulting in any physical, mental, or sexual injury or harm that causes, or is likely to cause, the child's physical, mental, or emotional health to be significantly impaired. Abuse of a child includes acts and/or omissions. Corporal discipline of a child by a parent or legal custodian for disciplinary purposes does not in itself constitute abuse when it does not result in harm to the child. Each church within the Diocese should review and be familiar with the relevant laws within its jurisdiction. This



information is easily obtained through the Department of Children and Families, or like entities, within each state.³

- **Church:** all fellowships, congregations, parishes, church plants, and any other worshipping entity affiliated or in association with the Diocese.
- **Clergy:** for the purposes of this document clergy includes those pursuing ordained ministry (including aspirants, postulants, candidates, ordinands, and transfers).
- **Complainant:** the person making an allegation (can be the survivor).
- **Consent:** Consent is when someone agrees, gives permission, or says yes to sexual, romantic or emotional activity with another person. Consent is always freely given and all people in a sexual, romantic, or emotional situation must feel that they are able to say yes or to stop the sexual, romantic, or emotional activity at any point. Any inappropriate, emotionally intimate, or sexual relationship between two individuals of unequal weight in power (including ecclesial authority) is considered inappropriate and may undermine the validity of consent. Similarly, the imbalance of power between a supervisor and a subordinate employee may undermine the validity of the consent. The fact that sexual activity is initiated by someone other than the church worker does not relieve that worker of responsibility, nor does it make sexual activity under those circumstances acceptable.
- **Consultants:** person(s) appointed by the Bishop to consult with and advise the member of the clergy accused of misconduct/abuse and his or her legal advisors at reasonable times prior to the issuance of a Presentment. The consultant shall explain the rights of the member of the clergy and the alternatives. The selection of the consultant may take into account the complainant's needs/requests.
- **Dating Relationships:** consensual relationships of clergy or employees with a parishioner in which two parties are exploring a consensual relationship that may lead to a Christian marriage. In such situations, the relationship is to be conducted with the knowledge of the Rector (or Bishop in the case of clergy). Consensual dating between individuals not involved in supervisory relationships are excluded from the definition of sexual exploitation.
- **Director of Safeguarding:** the Director of Safeguarding oversees the Safeguarding Team which includes all policies, training, prevention, and response.
- **Intake Officer:** the Intake Officer is an unbiased receiver who is trained to respond to allegations of misconduct/abuse made through the hotline, website, or email address. They are trained to deploy predetermined notification policies, depending upon the written allegation submitted.
- **Misconduct:** any intentional misuse of procedures, policies, practices, or processes by an individual or group to improperly control or manipulate others within an organization.
- **Pastoral Abuse:** This document deals with conduct within the church. As such, the issue of pastoral abuse must also be considered. Pastoral abuse may be found when a person with spiritual authority demonstrates a pattern of control, intimidation, manipulation, coercion, isolation, elitism, censorship of decision making, exploitation, or the use of the name of God to get someone to do something not outlined in our foundational documents. This pattern

³ As a helpful resource, recognizing such laws can change over time, please visit the following website to view links to the child abuse reporting laws in each jurisdiction: <https://www.childwelfare.gov/topics/systemwide/laws-policies/state/?hasBeenRedirected=1>



may include the use of spiritual truths or Scripture to harm others. There is a potential for any abuse in the church to be considered pastoral abuse as it can damage a survivor's relationship with the Lord. Pastoral abuse is unacceptable in our churches (see Matthew 7, Matthew 11, Matthew 23; see the [National Association for Christian Recovery](#) or the [Allender Center](#) for more information). Any accusation of pastoral abuse must fall into one of the four categories outlined in the ACNA canons (see pg 20 in this document) and should follow the reporting procedures found in the Reporting section of this document (pg 29).

- **Pastoral Relationship:** a relationship between a member of the clergy, and any person to whom such member provides formal counseling, pastoral care, spiritual direction, or spiritual guidance, or from whom such member has received a confession or confidential or privileged information.
- **Privileged Relationship:** a relationship between a person and a member of the clergy in which communications between the person and the member of the clergy are deemed confidential.
- **Rector:** the person in charge of a parish, including instances where such person has a title other than Rector (such as vicar, priest-in-charge, deacon, or church planter).
- **Respondent:** anyone who is accused of misconduct or abuse.
- **Survivor:** anyone who has experienced abuse in any form.
- **Safeguarding Team:** team drawn from psychologists, counselors, attorneys, and members of the clergy or other persons appointed by the Bishop to oversee the policies and procedures regarding misconduct or abuse in the Diocese. The Safeguarding Team will oversee policy changes, training, prevention methods and resources, inquiries, and help handle responses to crises.
- **Sexual:** includes a range of unwelcome and unwanted sexual conduct, including grooming; verbal, emotional, and/or physical sexual harassment; sexual assault; molestation; and all forms of sexual violence. Sexual misconduct is not restricted to intercourse but includes a wide range of inappropriate behaviors including inappropriate emotional intimacy, as well as the following:
 - **Sexual misconduct against minors/vulnerable adults:** Sexual misconduct against any person, including but not limited to, any sexual involvement or sexual contact with a person who is a minor or are a vulnerable adult.
 - **Sexual malfeasance** is defined by the broken trust resulting from sexual activities within a professional ministerial relationship that results in misuse of office or position arising from the professional ministerial relationship. This can include emotional misconduct where inappropriate emotional intimacy is encouraged, coerced, forced, or implied as necessary.
 - **Grooming** is a technique used to break down barriers of protection. Abusers will use grooming techniques to gain trust. Recognize the pattern of continual testing of boundaries in such a way that inappropriate behavior seeps into the relationship without consent or even acknowledgement. Grooming usually includes gaining access through trust, targeting a particular type of person as a victim, slowly eroding boundaries, and methods to keep the victim quiet.
 - **Sexual harassment:** unwelcome sexual advances, requests for sexual favors, quid pro quo behavior, sexually motivated physical contact or other unwelcome verbal or physical conduct or communication of a sexual nature; including but not limited to, sexually



- oriented humor or language, questions or comments about sexual behavior or preference, undesired physical contact, inappropriate comments about clothing or physical appearance, or repeated requests for social engagements. This applies with children as well as any situation where there is an employment, mentoring, or collegial relationship between the persons involved. This might include:
- Unwelcome and intentional touching;
 - Sexually oriented comments about an individual's body;
 - Sending sexually explicit or offensive communications (e.g., text messages, emails, social media messages or posts);
 - Voyeurism, including viewing or displaying objects or pictures that are sexual in nature;
 - Submission to such sexual conduct is made either explicitly or implicitly a term or condition of an individual's employment, or their continued status in an institution;
 - Submission to, or rejection of, such conduct is used as the basis for employment decisions affecting such an individual;
 - Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance by creating an intimidating, hostile, or offensive working environment; or
 - An individual is subjected to unwelcome sexual jokes, unwelcome or inappropriate touching, or display of sexual visuals that insult, degrade, and/or sexually exploit men, women, or children.
- **Sexual coercion:** the use of physical or emotional power to gain sexual gratification.
 - **Sexual exploitation of adults:** including but is not limited to, the development of or the attempt to develop, a sexual relationship between a member of the clergy, employee, or volunteer affiliated with the GAD and a person with whom he/she has a pastoral relationship, whether or not there is apparent consent from the individual. Sexual exploitation includes activity during the course of a pastoral relationship such as sexual involvement or sexually demeaning comments. The apparent consent of a possible victim to the sexual or romantic relationship seldom determines whether there has been sexual exploitation. Consensual dating between individuals not involved in supervisory relationships are excluded from the definition of sexual exploitation.
 - **Sexual exploitation of children:** including, but not limited to, obscene or pornographic photographing, filming or depiction of children for commercial purposes or exploitation, the employment, use, persuasion, inducement, enticement, or coercion of any child to engage in or assist any other person to engage in any sexually explicit conduct, or any simulation of any sexually explicit conduct for the purpose of producing any visual depiction of any sexually explicit conduct, or the rape, molestation, incest, prostitution, or other form of sexual exploitation of children.

For the purposes of this policy, please assume:

- The Diocese has zero tolerance for abuse and allegations of misconduct/abuse within the church will be taken seriously, and deserve a timely response from the Diocese.
- The Bishop holds both pastoral and disciplinary responsibilities. The Bishop and the Safeguarding Team may provide additional care to respondent(s), complainants, and



church(es) involved. He may also utilize advocates and consultants to share in pastoral care for them.

- The Safeguarding Team is committee under the authority of the Standing Committee. The Safeguarding Team members will be appointed by the Bishop in consultation with the Standing Committee and Director of Safeguarding.
- A person can be wrongly accused of misconduct or abuse.
- Whenever a parent/guardian is in the presence of their minor child, full responsibility for that child belongs to the parent/guardian, even if Level 2 Leaders and/or a Youth Volunteer are also present.
- The Bishop cannot be the only one to actually assess or evaluate the substance of allegations. Please read the Reporting section of this document carefully to understand the procedure for inquiries and investigations (pg 29).
- Leaders who learn of misconduct or abuse of colleagues, even if the information is gained in a counseling setting, have an ethical responsibility to follow up on this information by reporting the information to the appropriate legal and ecclesiastical authorities.

SAFEGUARDING OUR PEOPLE



Awareness

AWARENESS

While being aware that the existence of misconduct is only a portion of what must be understood in order to build an environment that protects adults and children from abuse, awareness and clarity about various aspects of misconduct are essential to create a healthy church that seeks to protect its people. It is important that all Level 2 Leaders understand procedural misconduct, financial misconduct, appropriate screening measures, and what is expected in training for safeguarding our churches.

PROCEDURAL MISCONDUCT

Part of awareness includes measures taken to ensure accountability and a healthy balance of authority. According to Canon XIX each parish is governed by by-laws and led by a Rector and Vestry (of 5-12 persons). Each Vestry will consist of a Senior Warden (appointed), as well as a Junior Warden, Treasurer, and Secretary (all elected). In order to provide healthy accountability, it is recommended that no one on the Vestry be related to any clergy or church staff. These precautions protect churches against procedural misconduct (or the appearance of such) by striving to decentralize power and control, ensuring it is not improperly utilized by an individual or group. This decentralization will help protect against procedural abuse and financial abuse. If necessary, consider using a Conflict of Interest Policy for situations where a decision-making situation must include persons who may experience a conflict of interest due to position, relation, or other reasons that may prevent an unbiased process (see Appendix I).

It is also recommended that the Vestry conduct annual 360-degree reviews with the Rector. A 360 review solicits feedback from the staff, the Vestry, and the Rector and compares the results in identical categories. Consistent opportunities for open feedback in all leadership areas helps protect environments from becoming hostile or inhospitable. Annual feedback sessions for all employees is recommended as well.

FINANCIAL MISCONDUCT

Part of awareness includes measures taken to ensure accountability in financial matters. Financial misconduct is a form of fraud, or gross negligence or intentional misrepresentation. In a church setting, proper financial accountability includes protection against inappropriate expenses or reimbursements, stolen contributions, theft of church property, check forgery, inaccurate payroll reporting, blackmail (extortion or coercion), or inappropriate control of a person's ability to use resources to which they are entitled. Churches should build in opportunities for regular evaluation and auditing of all financial procedures.

It is recommended that all churches develop internal controls such as: regular reviews of financial statements, regular reconciling of bank statements, utilize two unrelated people to count donations, setup safe methods of storing and securing collections, and require two signatures on all disbursements.

SCREENING

One of the foundational steps to protecting our people from abuse is careful screening of Level 2 Leaders. Screening is designed to bring into the light any potential concerns regarding high-risk offenders before they ever step foot in one of our ministries. This should include background checks, reference checks, interviews, and minimum attendance periods. These efforts are completed to do all we can to create a safe environment for our people.

To help understand who must be screened, by when, and where to keep documentation:

		Screening			
		Background Check		App/Ref/Int	
	Role	Req'd?	When	Req'd	Who Keeps Record?
Level 2	Clergy	Yes	Before; 5yr renewal	Yes	Diocese
	Clergy Transfers & Postulants	Yes	Before; 5yr renewal	Yes	Diocese
	Employees	Yes	Before; 5yr renewal	Yes	Church
	Vestry	Yes	Before; 5yr renewal	No ⁴	Church
	Youth Volunteer	Yes	Before; 5yr renewal	Yes	Church
	Camp Directors	Yes	Before; 5yr renewal	Yes	Church
Level 1	Volunteer (non-lead)	--	--	--	--

Screening includes the following procedures:

- **Background checks**– this includes all Level 2 Leaders in diocesan institutions, programs, and congregations. Background checks should be completed prior to serving, in compliance with the insurance carrier’s requirements.
 - Non-clergy Level 2 Leaders can complete their background checks through [Protect My Ministry using the ACNA negotiated rate](#) of \$17 or \$25/person, or through an equivalent program.
 - Credit Bureau Record Check is also required for clergy, treasurers, bookkeepers, check signers, and those having access to church credit cards only.
 - Clergy seeking canonical residence or license must be background checked through Oxford Document Management (ODM) prior to the acceptance of Letters Dimissory or issuance of a License. It is the responsibility of the church to notify the diocesan office to begin a background check as soon as the vestry has decided who they would like to call. A call should not be considered final until the results of the background check are received. The church is responsible for the cost of the background check; however, assistance may be requested in special cases.
 - Clergy background checks will include:
 - Inquiries of all Bishops having past or present canonical authority over the

⁴ It is assumed that those considered for vestry would already be screened prior to sitting for election, and therefore may not need additional screening beyond background checks.

individual, all schools attended by the individual during the past five years, and all employers of the individual during the past five years. If the individual has had more than one employer for over five years, then inquiries will be made of the two most recent employers. In the case of clergy, “employer” shall be the senior wardens of congregations served during the past five years.

- Motor Vehicle record check and Credit Bureau check.
- Sexual Misconduct and Criminal Record Check.
- NOTE: ODM will not divulge, furnish or make accessible to any person, or use in any other way, any confidential information other than as specifically set forth by written instruction of the Diocese. Completed background checks will be evaluated, protected, and stored on behalf of the Bishop. ODM retains and stores all records under lock and key for a minimum period of five years, unless instructed otherwise by the Diocese. Congregations may use the services of ODM or other equivalent agencies at congregational expense to conduct background checks.
- Local criminal history records check through local law enforcement agencies.
- Statewide criminal history records check through the appropriate state law enforcement agencies.
- References will be secured from immediate supervisors at the three most recent places of employment and results documented.
- When available, a thorough [social media search](#) will be conducted.
- Each member of the clergy domiciled or licensed in the Diocese will be required to update and pay for (currently \$150) their background check on a five-year rotating schedule to be administered by the Diocese. Their church may choose to pay this fee.
- **Membership**– Level 2 Leaders should complete a six-month minimum attendance prior to appointment, which includes active participation in Sunday morning worship and church programs.
- **Application**– the host church should:
 - (1) conduct a face-to-face interview;
 - (2) check the applicant’s references;
 - (3) have the applicant fill out a complete application ([see samples online](#)) which includes:
 - (a) whether or not they have been convicted of, pled nolo contendere, had adjudication withheld, or have an active arrest for any crime involving abuse or neglect;
 - (b) whether or not they have been diagnosed with any paraphiliac psychological condition;
 - (4) cross-reference the National Sexual Offender Registry with the applicant information;
 - (5) secure references from immediate supervisors at the three most recent places of employment and results documented;
 - (6) when available, a thorough [social media search](#) should be conducted.
- It is recommended that churches familiarize themselves with effective screening practices and recognizing high-risk applicants. *Protect My Ministry*, *Brotherhood Mutual*, and *Ministry Safe* offer such a training on skilled screening for employees.
- **Prior Offenders:** The Diocese strictly prohibits interaction with children and youth under the age of 18 at any church-sponsored or church-related activity or program, on or off church property, by anyone with a civil or criminal record of child sexual abuse or other sexual crime(s), or who has admitted committing prior sexual abuse, as defined in this policy.

TRAINING

Level 2 Leaders must be properly trained to care for those they serve in ministry. This training includes job functions but also training on recommended practices outlined in this policy to ensure the environment is safe for our people. This training includes policies, the online training, and anything an individual church might need that is specific to their congregational context as it seeks to protect against abuse.

To help understand who must be trained as well as the timeline for training:

		Safeguarding Our Children online course			Safeguarding Our People in-person training		
	Role	Req'd Prior?	When	Who Keeps Record?	Req'd?	When	Who Keeps Record?
Level 2	Clergy	Yes	Before; 2yr renewal	Diocese	Yes	W/in 6 mo; 2yr renewal	Diocese
	Clergy Transfers & Postulants	Yes	Before; 2yr renewal	Diocese	Yes	W/in 6 mo; 2yr renewal	Diocese
	Employees	Yes	Before; 2yr renewal	Church	Yes	W/in 6 mo; 2yr renewal	Church
	Vestry	Yes	Before; 2yr renewal	Church	Yes	W/in 6 mo; 2yr renewal	Church
	Youth Volunteer	Yes	Before; 2yr renewal	Church	Yes	W/in 6 mo; 2yr renewal	Church
	Camp Directors	Yes	Before; 2yr renewal	Church	Yes	W/in 6 mo; 2yr renewal	Church
Level 1	Volunteer (non-lead)	Voluntary, but recommended; must serve alongside a Level 2 Leader at all times.			Voluntary, but recommended; must serve alongside a Level 2 Leader at all times.		

- **Safeguarding Our Children: Course 1 Training:** The first portion of the safeguarding training is currently completed through *Safeguarding Our Children*, the course offered through the diocesan Learning Management System (LMS) and will be completed online. This training must be renewed every two years and must be completed prior to service for Level 2 Leaders.
- **Safeguarding Our People Training:** The second portion of safeguarding training will be offered in person by your church's Safeguarding Coordinator. This training covers the content in this policy specifically geared toward protecting adults, and must be renewed every two years.
- Churches are responsible to submit to the diocesan office the evidence of completion (see Compliance on pg 35) and should be proactive in sending their Level 2 Leaders to training.

SAFEGUARDING OUR PEOPLE



Interaction

INTERACTION

Christian ministry relies primarily on interacting with those in the church and in the community. All allegations of misconduct or abuse will likely result from personal interactions and therefore it is important to establish communities of health that reinforce appropriate boundaries, build trust, demonstrate care and respect, and seek justice for those who abuse these things. This section outlines guidelines for communication, counseling, spiritual direction, interaction with minors, and supervisory procedures for minors.

All interaction with minors should include two adults at minimum; one must be a L2 Leader or Youth Volunteer.

COMMUNICATION

Verbal interactions among Level 2 Leaders should be edifying, respectful, and should refrain from inappropriate topics. Specifically, the following are unacceptable:

- **Intimidation:** behavior directed toward an individual with the intention of causing fear, including forcing someone to do something they do not want to do out of fear.
- **Nonverbal Harassment:** Includes distribution, display or discussion of any written or graphic material that ridicules, denigrates, insults, belittles or shows hostility, aversion or disrespect toward an individual or group because of nationality, national origin, race, color, religion, age, gender, sexual orientation, pregnancy, appearance, mental or physical disability, marital or other protected status. This includes but is not limited to graphic gestures, unwanted staring, and making sexual gestures through hand or body movements.
- **Verbal Harassment:** Includes statements or comments that are offensive or unwelcome regarding a person's nationality, national origin, race, color, religion, age, gender, sexual orientation, pregnancy, appearance, mental or physical disability, marital or other protected status. This includes but is not limited to epithets, slurs and negative stereotyping.
- **Hostile Work Environment:** when harassment, bullying, or unfair treatment of an individual is based on race, color, religion, sex (including sexual orientation, gender identity, or pregnancy), national origin, age (over 40), disability, or genetic information. This harassment can be verbal or written.
- **Inappropriate Use of Technology:** Sending sexually explicit or offensive communications (e.g., text messages, emails, social media messages or posts) is included in the definition of harassment and will not be tolerated (see diocesan [social media policy](#) available on the website). Use personal interactions on social media avenues to model appropriate behavior and language, both on and off social media. Church leaders should be aware that their behavior reflects Christ and the Church.
 - **Pornography:** printed or visual material containing the explicit description or display of sexual organs or activity, intended to stimulate erotic rather than aesthetic or emotional feelings. All clergy are required to avoid viewing pornography at all times, not just while working or in church facilities. Any clergy struggling in this area should reach out to the Rev. Sam Pascoe (904-553-0017) for an assessment and help with recovery. This is offered without the involvement of the Bishop unless clergy fail to follow through with recovery plan.
 - It is never appropriate to view pornography on church property. When this includes

a person under the age of legal majority (18/19), it is considered child abuse. There is never an expectation of personal privacy when using technological equipment owned by a church or church entity or within the context of ministry.

Sexuality and Gender: Every effort should be made to treat all people as individuals made in the image of God. It is essential that we strive to build an environment that does not harass, discriminate, intimidate, or devalue God’s creation. We recognize that same-sex sexual relationships have often been a sin upon which the Church focused, while other sins have been discounted or even ignored, such as pornography, adultery, greed, and disregard for the poor. The call to pastoral ministry includes the charge to lead with gentleness, scriptural clarity, and a desire to seek the lost. To be both pastoral and orthodox can be difficult. We must remember that, “Humanity’s essential identity is found in communion with God and not in sexual activity.”⁶

In order to provide pastoral ministry to those facing same-sex attraction or gender dysphoria, therefore, the following are recommended whenever necessary:

- Throughout history, most Christians have not defined themselves according to sexual desires. For this reason, we seek to ensure we are placing our identity in Christ, and in being a Christian first, and therefore recommend that any adjective describing sexual attraction should be used following the term Christian, rather than before it.
- Additionally, it is recommended that leaders use an individual’s name rather than using gendered pronouns whenever an individual is expressing gender dysphoria. Be sure to communicate acceptance of the individual without the need to accept or deny their current sexual or gender narrative.
- For overnight events, it is recommended that the church’s leadership team, and the parent/guardian of the student, outline an agreed upon Supervisory Plan designed to safeguard all participants.
- Churches should consider utilizing individual restrooms (rather than gendered) and mixed-gendered small groups whenever necessary, in order to be sensitive to all participants in any church event.
- Churches, L2 Leaders, and Youth Leaders should endeavor to make sure students who identify as part of the LGBTQ community do not feel isolated, but rather included, welcomed, valued, and respected. This is essential, especially at meals, morning and evening scheduled events, and spontaneous moments. Ongoing and open communication with parents of students who identify as LGBTQ is encouraged.

Additional considerations for communication with children: Verbal interactions between leaders and children should be encouraging, constructive, and mindful of their mission of aiding parents in the spiritual growth and development of children.

⁵ This information is based on the statement put forth by the ACNA’s College of Bishops; for more information, see: “Sexuality and Identity: A Pastoral Statement from the College of Bishops,” Jan. 19, 2021.

⁶ ACNA, “Sexuality and Identity: A Pastoral Statement from the College of Bishops,” Jan. 19, 2021.

To this end, Level 2 Leaders should avoid talking to children or parents in a way that is, or could be, construed by any reasonable observer as harsh, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. In addition, clergy, staff members, and volunteers are expected to refrain from using vulgar language in the presence of children. Concerns about children should be directed to parents, legal guardians, the appropriate ministry leader, or the clergy.

Level 2 Leaders should avoid engaging in any sexually-oriented communications with children, and should refrain from discussing any inappropriate or explicit information about their own personal relationships, dating, or sexual activities with any child in the program. Level 2 Leaders should report any sexually-oriented communications involving a child to the appropriate ministry leader or clergy.

- **Sexually-Oriented Materials:** Staff members and volunteers may employ (subject to limitations imposed by the Rector) age-appropriate materials when leading discussions dealing with human sexuality/sexual abuse prevention. Any prospective material should be made available for review for the parents of participants. Prior to introducing these materials, notice should be provided to parents in order to allow an opt-out should there be concerns or objections.
- **Technology and Youth:** Social media avenues are important ways for youth ministry staff and volunteer leaders to connect with students. Their world is often constructed around social media, for better or worse. Having personal interactions in this venue allows adults to model appropriate behavior in social media, and it forms valuable connections with students.
 - The Diocese strongly recommends that each church have a proactive policy for social media and other forms of electronic communication in the context of children's and youth ministry. Clergy, staff members, and volunteers shall refrain from connecting with students on social media when students are younger than the minimum age as established by each social media outlet (usually 13).
 - Virtual spaces are to be treated the same as in-person spaces. This means two adults must be online with one youth (known as the two-adult rule), participants must be appropriately clothed, and conversation must be within 'public' view. For online conference calls, this means calls are not completed in the bedroom, and the parents are aware that the student is in conversation with the leaders. Use group apps rather than private messages. If a situation arises where only one adult is present, a minimum of two students must also be present.
 - For those students under 13 (this is the usual minimum age for social media platforms by the platforms themselves), get parent permission for any communication and welcome the parents into that environment.
- **Photography:** Photos of children will not be used contrary to parental wishes and must not contain any personally identifying information about children either online or in print publications without prior parental permission. This is easily handled by including a consent statement on programming registrations that are signed by the parent/guardian.

COUNSELING

One of the expectations of all clergy and other pastoral caregivers serving in the Diocese is that they offer pastoral counseling to members of the congregation if/when necessary and appropriate.

Pastoral counseling occurs when church personnel offer spiritual direction or advice concerning moral or spiritual matters. This counseling is recommended to be offered for a maximum of six (6) sessions per person. Fees or donations for pastoral counseling are prohibited. If there is a need for ongoing counseling, church personnel must refer to a professional if the church personnel are not certified or licensed.

Any person charging fees for counseling outside the scope of church employment must possess appropriate professional credentials and proof of separate professional liability insurance, including coverage for sexual misconduct, at all times. Persons offering spiritual direction or professional counseling to members of the congregation or outside the congregation that includes additional compensation shall submit that ministry for approval by the Bishop.

During these pastoral counseling sessions, clergy and pastoral caregivers are expected to maintain an environment that minimizes any existence, or appearance, of potentially inappropriate behavior or exploitation. It is also advised that clergy secure [a release form](#) from parishioners seeking pastoral counseling that disables clergy privilege when illegal activity is reported during a session.

Exploitation occurs when church personnel take advantage of the pastoral counseling relationship for the benefit of the pastoral counselor. Sexual exploitation is sexual contact between church personnel and the recipient of the pastoral counseling services, regardless of who initiates the contact. A conflict of interest occurs when church personnel take advantage of pastoral counseling relationships in order to further their own interest. If available, counseling in triads of participants is recommended to minimize these risks.

All clergy, employees, and volunteers are encouraged to maintain healthy boundaries and to strive for emotionally healthy relationships. Each congregation's leadership is asked to consistently bring awareness to this issue by normalizing the following principles:

- **Choose the Light:** whether it is porn addiction, gossip, an affair, bullying, sexual jokes or comments, flirting, etc., bringing the issue into the light is always the path toward healing, accountability, sanctification, and emotional health.
- **Transparency:** it is a difficult thing to clearly state what you think/feel/see happening, but it is a sign of emotional health. No one can improve or eradicate the inappropriate behavior without understanding the issue. Avoid triangulation and protection for individuals who are acting inappropriately.
- **See Something, Say Something:** if something is a concern to you bring it to the appropriate leadership detailed within this document (see page 31); including multiple leaders in the discussion will ensure accountability, transparency, and appropriate resolution.

Pastoral counseling should always be respectful and consistent with the intent to provide a safe and comfortable environment. Pastoral counseling should be conducted in appropriate settings at appropriate times and should not be held at places or times that would cause confusion about the nature of the relationship for the person being counseled.

Additionally, all Level 2 Leaders should maintain a physical environment that minimizes any appearance of potentially inappropriate behavior at all times including when traveling or participating in events held at the church after business hours. It is wise to remain in public view when possible. It is recommended for this reason that the doors to rooms used for pastoral care contain windows. It is generally not recommended that employees share a hotel room when traveling. No pastoral counseling should be conducted in private living quarters.

Pastoral abuse: Pastoral abuse occurs when a spiritual leader in a position of power relative to the receiving party utilizes their position (or perceived position) of spiritual authority to justify misconduct or other forms of abuse. This includes, but is not limited to, patterns of abuse such as manipulation and exploitation, intimidation, censorship, requirements for secrecy and silence, coercion, control through the use of sacred texts or teaching, requirements of obedience to the abuser, the suggestion that the abuser has a ‘divine’ position in order to maintain power or control, isolation as a means of punishment, superiority and elitism, and patterns of behavior such as blaming, shaming, or shunning. It is unacceptable for any diocesan clergy to pastorally abuse their parishioners as it is considered conduct unbecoming to the sacred calling of one in holy orders.

Regarding discipline, clergy are subject to disciplinary action upon committing one of the following offenses (see the Anglican Church in North America’s *Constitution and Canons*, and the diocesan *Constitution and Canons*):

- Teaching any doctrine contrary to the doctrine of the Anglican Church in North America;
- Willful or negligent dereliction of any duty of the clergy;
- Conduct unbecoming to the sacred calling of one in holy orders;
- The commission of any other canonical offense by means of an abuse of ecclesiastical office.

Occasionally, members of a congregation may find they disagree with clergy, or find themselves subject to accountability (which is, in and of itself, a healthy part of discipleship). This does not equate to pastoral abuse. It is expected that clergy would teach and uphold the doctrinal expectations of those in their care. Please consult the following for more information regarding the expectations of clergy:

- *The Book of Common Prayer* (2019): The ordination vows (found under Episcopal Services) outline the expectation for faithful diligence in upholding the doctrine and discipline of Christ.
- *To Be a Christian* (2020): The ACNA Catechism outlines confession, absolution, and forgiveness, as well as describes the Church’s authority.
- *The 39 Articles of Religion*: The ACNA upholds the 39 Articles of 1571 and their amendments which explain our views on the Sacraments as well as the expectation of clergy. In particular, the recognition that clergy are imperfect and should be examined carefully and removed if necessary.
- *The Jerusalem Declaration*: this 2008 declaration outlines our beliefs and expectations regarding Christian living, Sacraments, the authoritative standard of clerical orders, stewardship, unity, and our fidelity to orthodoxy.

SPIRITUAL DIRECTION

As Christians, we are encouraged to seek discipleship opportunities. This frequently manifests in 1:1, 1:2, or 1:3 relationships where participants meet regularly for a long-term partnership. This is not the same situation as pastoral counseling, which is intended for a singular focus and therefore is limited in scope. Pastoral counseling typically covers singular issues or questions, conflict management, confession, crisis counseling, pre-marital counseling and marriage counseling. If those crises seem to linger beyond six sessions, refer congregant(s) to a professional, as described above.

If a partnership of spiritual direction is entered into long-term, consider these safeguards:

- Ensure this relationship is brought into the light among the leadership team of the church by informing multiple people of this partnership;
- If there are multiple people offering long-term spiritual direction in your church, consider meeting every quarter to discuss the process and its benefits to the church, as well as accountability;
- If one clergy person is offering long-term spiritual direction to another clergy person, bring the arrangement into the light by informing the office of the bishop of the relationship;
- Meet in a public place, not in one another's private living quarters;
- It is recommended that it be conducted by same biological sex participants in groups of at least 3 people total whenever possible;
- Follow guidelines regarding interaction and physical contact;
- Define the parameters of the relationship at the first meeting, articulating how one might discontinue the relationship without further explanation at any time; [this waiver](#) may help outline expectations, specifically protecting clarity regarding confession confidentiality and mandatory reporting;
- Communicate to whom the participant should report if they have any concerns (including the names and numbers of senior leadership, the bishop, or the #ChooseTheLight reporting hotline);
- Include prayer and the study of Scripture in your regular time together.

In order to protect the emotionally healthy spirituality of all clergy, it is recommended that clergy also seek regular spiritual direction to ensure accountability and a strong support system.

Spiritual Direction with Youth: If spiritual direction with a youth is entered into long-term, consider these safeguards in addition to those above:

- Gain the parent/guardian's consent;
- Meet in a predictable location at a predictable time (same time/place each occurrence);
- Guidelines outlined in this policy for interaction with youth (regarding awareness, screening, interaction, and reporting) must still be followed.

In order to protect the emotional health and spirituality of all, it is recommended that Youth Directors and Children's Ministry Directors also seek regular spiritual direction to ensure accountability and a strong support system.

PHYSICAL INTERACTION WITH MINORS

Level 2 Leaders serve to maintain a powerful relationship of trust with the people to whom they minister. Betrayal of that trust through violation of sexual boundaries causes great emotional and spiritual harm. Such behavior is a denial of our calling as Christians and may be a violation of the law. We must take every step to prevent it, and to respond with swift justice should misconduct or abuse occur.

Physical contact should be for the benefit of the child, and never be based upon the emotional needs of a Level 2 Leader. It is the diocesan policy that all L2 Leaders are prohibited from using physical discipline in any manner for behavioral management of children. No form of physical discipline is acceptable.

This prohibition includes spanking, slapping, pinching, hitting, or any other physical force as retaliation or correction for inappropriate behaviors by children. Children are to be disciplined using time-outs and other non-physical methods of behavior management. In some circumstances physical restraint may be used to prevent self-injury by the child and/or harm to others or to property. Uncontrollable or unusual behavior should be reported immediately to parents, the Children’s Ministry Director, Youth Director, and/or clergy.

Appropriate physical affection between L2 Leaders and children is important for children’s development and is generally suitable in the church setting.

Appropriate physical affection may include:	Inappropriate physical affection may include:
High-fives	Wrestling
Handshakes	Tickling
Fist bumps	Sitting in laps (except nursery-aged children)
Thumbs up	Kissing in any form
Side hugs	Full frontal hugs
Smiling	Commenting on children’s bodies
Pats on the back	Forcing unwanted affection

Inappropriate touching and inappropriate displays of affection are forbidden. Any inappropriate behavior by anyone must be reported immediately to 1) the Rector and/or clergy in charge, **and** 2) the Senior Warden. If the allegation is against the Rector, notify the Warden and the Supervisor or other clergy. Any suspected abuse should be reported to law enforcement as well as the Rector and Warden.

Physical contact and affection should be given only in observable places. It is much less likely that touch will be inappropriate or misinterpreted when physical contact is open to observation. Physical contact in any form should not give even the appearance of wrongdoing. The personal behavior of L2 Leaders in youth and children’s ministries must foster trust at all times. Personal conduct must be above reproach.

Do not force physical contact, touch, or affection on a reluctant child. A child’s preference not to be touched must be respected at all times.

SUPERVISORY PLANS FOR CHILDREN/YOUTH EVENTS

The purpose of the supervisory plan for any given activity is to give direction to Level 2 Leaders, to ensure appropriate measures are in place to meet the diocesan standard for supervision. All L2 Leaders for the activity need to be informed of the contents of the supervisory plan. It is recommended that a copy of the plan be provided for leaders (and parents, depending on the activity), and that the plan be posted in a visible location. Three versions of a [Sample Supervisory Plan](#) are available online.

On-site Supervisory Plans should include the following:

- A description of the nature of the activity
- The details of the registration process and registration form
- The personnel responsible for running the activity
- The following is the recommended ratio of adults to children, (recommendation based on Florida standards and *Ministry Safe* standards; each congregation should consult their individual state's recommended ratios):
 - **Infants:** 2 adults for up to 8
 - **Young toddlers:** 2 adults for up to 12
 - **2 and 3 years:** 2 adults for up to 16
 - **4 years:** 2 adults for up to 20
 - **School age:** 2 adults for up to 40
 - **Mixed age group:** ratio for the youngest child in the group
- The physical environment
- Bathroom procedures, including showering procedures if applicable
- First aid and medication procedures
- The reporting of discipline concerns
- The release of children

Off-site Supervisory Plans should include all of the items listed above in the on-site supervisory plan, plus the following:

- Offsite transportation plan
- Dining arrangements
- Sleeping arrangements
- Showering procedures

Monitoring Procedures

Monitoring helps detect problems before they turn into an incident of abuse and helps adults avoid wrongful allegations of abuse where none has occurred. Research confirms that off-site activities increase the risk of abuse. Vestry, clergy, staff, and Youth Volunteers must be diligent in monitoring and supervising children's and youth activities in all settings at all times.

Monitoring procedures should include, but are not limited to:

- All children and youth activities shall be designed to be supervised by two or more leaders, preferably not related to each other (known as the two-adult rule). It is required that one, at minimum, be a Level 2 Leader;

- No Level 1 Volunteer will ever serve without a screened and trained L2 Leader, and L1 Leaders may not physically touch children or youth at any time;
- No child will ever be left unattended in the building or on the property before, during, or following a church activity;
- Level 2 Leaders should not conduct unobserved meetings or interactions with children. In a discipleship or mentoring relationship, the interactions should take place in a public place or where other persons are present;
- Watching for policy violations;
- An open invitation for parents to visit at any time unannounced;
- A careful review of new programs and/or significant changes to a program structure;
- Keeping interaction with children in full view of others at all times. Keeping unused rooms locked whenever possible;
- Keeping children and youth in supervised areas within the church building;
- An onsite or offsite written Supervisory Plan (see below) shall be in place for all educational, pastoral, recreational, or other programming that involves youth or children.

Restroom Use

Because preschool, nursery, and special needs children may require complete assistance with their bathroom activities, all Level 2 Leaders will observe the following policies:

Diapering

- Only screened and trained nursery workers or the child's parent or legal guardian will undertake the diapering of children of either biological sex. (Churches are encouraged to be sensitive to the fact that nationally one out of every four women has survived some form of child sexual abuse, typically by a male offender. To build trust and to minimize exposure based on statistical research, churches may determine that diapering, toilet training, and restroom monitoring will only be done by screened and trained female staff/volunteers or the child's parent/guardian.)
- Changing of diapers should be done in plain sight of other nursery workers; children should not be left unattended while being changed.
- Children should be re-diapered and re-clothed immediately upon the completion of changing their soiled diaper.

Toilet Training

- No child will be forced to toilet train.
- Only screened and trained nursery workers or the child's parent or legal guardian will participate in toilet training efforts with children.
- When children are assisted in bathrooms the stall door will be left partially open.
- Preschool-aged children will never be left unattended in bathrooms.
- Children may be assisted in straightening their clothing before returning to the room with other children, if necessary.
- Accidents should be handled by reassuring the child and completing the changing of diapers or underwear and clothing.

Elementary Aged Children

- Elementary-age children may be accompanied to the restroom for supervision and assistance when needed. (However, children should receive the minimum amount of assistance needed based upon their individual capabilities.) Triads of the same-aged/biological sex buddy system may also be used.
- L2 Leaders should take steps to avoid being alone with one child in the restroom. If an L2 leader must go into the restroom to check on an individual child, he or she should seek out another worker to accompany him/her. If another worker is not available to accompany, he/she should go to the exterior bathroom door, knock, and ask if the child needs assistance. If the child requires assistance, the worker should leave the exterior bathroom door open when entering the bathroom area and try verbally to assist the child in completing his/her activities, while the child remains behind the door of the bathroom stall.

First Aid and Medication

If possible, medication should be administered by the child's parent. Medication may be given to a child by an L2 Leader as authorized by the parent. The medication must be in the original packaging, including over-the-counter medication.

When medically necessary, medication or first aid may be given to a child by an L2 Leader consistent with the Supervisory Plan. Parents should be notified whenever medication or first aid has been administered.

The Release of Children

Any time that a child has been entrusted to an L2 Leader, the church incurs responsibility for the safety and well-being of the child, including the release of the child back to the parent/guardian. L2 Leaders are responsible for releasing children in their care at the close of services or activities only to parents, legal guardians, or other persons designated by parents or legal guardians. It is presumed that a person who drops off a child or student has authority to pick up the child.

In the event that L2 Leaders are uncertain of the propriety of releasing a child, they should immediately contact their supervisor before releasing the child.

Transportation

L2 Leaders may from time to time be in a position to provide transportation for children. The following guidelines should be observed during the transportation of children whenever possible:

- Level 2 Leaders responsible for driving minors to a sponsored activity must provide to the church copies of valid driver's licenses, vehicle registration, and proof of insurance.
- It is understood that the L2 driving the child must have undergone an insurance approved background check including a DMV record check (this is a small add-on charge). Use of child safety seats that meet federal standards is required. Churches are advised to consult with their insurance provider regarding the minimum age for adult drivers. Under no circumstances should anyone under the age of 18 be allowed to drive children/youth as part of an event.

- Traveling with minors in a vehicle should follow the two-adult rule or rule-of-three at minimum (except in a parent/child or other familial situation). Seatbelts are ALWAYS required. If there is an extenuating circumstance causing only one adult and one child to travel together in an automobile, permission must be obtained by a parent or legal guardian of the child. This permission should be written, should include details regarding when/where, and should be signed by the parent/guardian or documented by the volunteer if only verbal consent is obtainable. The child or youth should be transported in the back seat of the vehicle in such circumstances.
- No cell phones, including hands-free devices, may be utilized by the driver while driving church-owned vehicles, unless in an emergency, with the exception of GPS navigation.
- Children should be transported directly to their destination. Unauthorized stops to a non-public place should be avoided. Stops for meals, refueling, and restroom breaks should be done as a group. Staff members and volunteers should avoid transportation circumstances that leave only one child in transport.
- Adults should avoid physical contact with children while in vehicles.
- No one under age 25 may drive vehicles rented by a church unless explicitly allowed by the rental agreement.
- No drivers under age 25 may drive church-owned vehicles unless explicitly covered by the church's auto insurance policy.
- In special circumstances these may be altered for emergencies. In these cases, the children/youth director (or supervisor) should be notified immediately.
- If a family situation necessitates a special circumstance, the family may sign a waiver stating the deviance from the diocesan or church policy; this policy should note the family's acceptance of responsibility.

Home Group Procedures

The Diocese and its churches do not exercise control or responsibility over home groups (defined as a small group meeting in a home for discipleship such as Bible study, worship, fellowship, etc.). The care and protection of children in such settings is always the responsibility of the parents/guardians of each child. Leaders of home groups organized by churches should be encouraged to read this policy, take the child abuse training provided, and consider supervisory plans for their events, including:

- Supervision by two screened and trained individuals;
- Safety of the environment;
- Restroom procedures specific to the environment and needs of children.

Overnight Events (including lock-ins, mission trips, and camps)

The leader from any church offering frequent (2+ per year) overnight events, trips, and camps, as well as diocesan sponsored Camp Directors, should complete *all Level 2 Leader required training*.

These additional procedures must be followed for all overnight events:

- The two-adult rule should be followed; a single student should not be alone with an adult. If a situation arises where only one adult is present, a minimum of two students must also be present (known as the rule of three).
- All leaders must have previously completed the church's screening and training process.

- Overnight sleeping arrangements must be submitted in writing to and approved by the Youth Director prior to the activity.
- As long as any students are awake for a prolonged amount of time, one trip leader must be awake and monitoring students to ensure safe behavior.
- Leaders should check with parents and use good judgment regarding PG or PG-13 movies. R-rated movies require Rector and parental approval.
- Appropriately modest sleeping attire must be worn; both tops and bottoms.
- In the event of a sleepover on campus that involves both boys and girls, boys and girls must sleep in separate rooms, properly supervised by student leaders of the same biological sex.
- Leaders will monitor sleeping students by periodically conducting visual bed checks to ensure that sleeping students remain in designated sleeping places. During bed checks, leaders should never physically touch a student.
- Whenever possible, leaders will sleep in the same room, or in an adjoining room with the door between the rooms kept open.
- In the event that overnight arrangements do not include standard beds, each leader and student will use single sleeping bags or blankets. In these instances, a “one-person-to-one bag or blanket” rule will be observed.

Off-campus, non-sponsored youth activities and events

Due to the nature of contact work within youth groups, situations may arise where an L2 Leader organizes a social event off campus. These events usually are not sponsored by the church and may only be open to certain youth due to the nature of contact work. It is recommended that these events remain in compliance with the diocesan policy and with the individual church’s policy, specifically with regard to the ‘minimum of two adults’ rule. It is consistent with best practices and research, protects the church, the leader, and the children involved.

On-campus, non-sponsored activities and events

Due to the nature of the facilities and shared ministry, the situation might arise where the church facilities are used by non-sponsored groups for activities and events (such as Young Life, or the Boy Scouts, or parties, etc.). These events may choose to offer childcare on their own, utilizing the facilities available. All churches should consult their insurance policy regarding these types of activities and to be compliant with the restrictions and recommendations in that insurance policy. It is also recommended that all churches use a Facilities Agreement (see sample on diocesan website) that clearly articulates the outside organization’s responsibility and liability for their program and leaders for every instance of an outside group using the church’s facilities.

Nudity

L2 Leaders should never be nude in the presence of children in their care. In the event there is a situation that may call for or contemplate the possibility of nudity (i.e. changing clothes during a pool party, a weekend or overnight retreat, etc.), the Children’s Ministry Director or Youth Director will detail rotation procedures for showering or changing clothes in the Supervisory Plan for the scheduled event. Children should also avoid nudity and utilize rotation procedures so as to be sensitive to body image issues and same-sex attraction.

Updated January 2025

Addictive substances

While in church facilities, while traveling with or in the presence of children or their parents, during church-sponsored activities, or while working with or supervising children, L2 Leaders should not use tobacco products, possess or use any illegal or mind-altering drugs, be under the influence of alcohol, share or view pornographic material.

Minimum Standard Compliance

It is necessary that this diocesan policy is followed at minimum by each congregation. If an individual church's optional addendum to this policy includes additional, reasonable safety measures, the leaders should be held accountable to that addendum as well as this policy and any refusal to do so allows the individual church the ability to remove the leader from youth leadership with Rector's knowledge and approval. See [Appendix E](#) for the optional addendum.

SAFEGUARDING OUR PEOPLE



Reporting

REPORTING

Anyone, who knows of, or has reasonable cause to suspect, a child or vulnerable adult has been abused, abandoned, neglected, or exploited in violation of the law should immediately contact the appropriate state abuse hotline. All reports are confidential and access to these reports is limited by specific criteria described in the appropriate state's statute(s).

- [Florida reporting information](#)
- [Georgia reporting information](#)
- [Alabama reporting information](#)
- [Mississippi reporting information](#)

Following a report to local authorities, when necessary, the Diocese also provides confidential reporting mechanisms so as to document incidents and to follow protocol. Reporting is time sensitive and may not be covered by insurance if not completed within 24 hours. Report through the hotline (904-300-0512), email (safeguarding@gulfatlanticdiocese.org), or an intake form on the [website](#). All churches are provided a #ChooseTheLight poster, available in every church administration space, per diocesan policy. The poster is available for download from the GAD website, as well. A sample incident report can be found in [Appendix D](#).

Throughout any inquiry or investigation: (1) reach out to, and care for, any potential survivors (an advocate and the response team may be utilized in pastoral care); (2) alleged offenders should be treated with dignity and support; (3) maintain confidentiality utilizing maximum discretion.

The moment someone discloses abuse to someone, the primary responsibility of the listener is to enable a safe environment for the person disclosing the information. If someone begins a conversation by implying they are about to disclose, and they ask you if you can keep a secret, it is recommended that you remind them that your primary job is to keep them safe and sometimes that means getting help, for that reason you cannot promise you will keep it secret.

Whenever someone discloses abuse, the following is recommended:

The infographic is titled "Someone just disclosed sexual abuse to me. What do I do now?" and features the logo of the Gulf Atlantic Diocese of the Roman Catholic Church in Florida. It outlines three steps:

- 1 SAY**: Say, "I believe you, and it's not your fault."
 - DO ask open-ended questions that do not make assumptions.
 - DON'T express anger, disbelief, or judgment (including stating that you don't think "that person" could do such a thing).
- 2 ASK**: Ask open questions that enable the individual to tell their story without leading.
 - Ask, "What else do you want to tell me?"
 - Ask, "What happened next?"
 - DO determine what, when, where, and whom, if at all possible.
 - DON'T probe or ask for details.
- 3 REPORT**: Report immediately.
 - DO tell law enforcement and/or child protective services if survivor is a child.
 - DON'T investigate, but report to the authorities.
 - DON'T promise not to tell anyone. Thank the child for trusting you, but let them know your main job is to help keep them safe.

Note: when the disclosure is made by a child, the child is telling the truth in 90% of cases.

DECISION TREE

Minor conflict should be handled within the church. For potential issues of misconduct or abuse the following reporting procedures are recommended:



ALLEGATIONS AGAINST LAY LEADERS

If someone discloses abuse, it is not the responsibility of the recipient of that information to investigate or verify; they should report to authorities who will investigate.

In all cases, the complainant will be assured that the church is concerned and that the complaint will be investigated promptly and thoroughly. The initial, verbal response should not convey doubt (“Say, Ask, Report” on pg 30).

The clergy, or anyone who may subsequently be involved in the process, will not, at any time following the first receipt of the complaint, hear the sacramental confession of any person(s) involved. The clergy will comply with the reporting and notification requirements as contained in the diocesan, parish or other liability policies for insurance claims.

1. When the survivor is a minor/vulnerable adult:
 - A. All reports of abuse of children or vulnerable adults must be reported to state authorities immediately (see pg 30).
 - B. Because there are legal implications, the person reporting should contact the diocesan Intake Officer next who will deploy notification procedures including the Bishop, Chancellor, Chair of Standing Committee, and Director of Safeguarding.
 - C. The Rector and Senior Warden should be informed, as well. The Director of Safeguarding can assist with documentation and expansion of inquiry, if necessary.

2. When the survivor is an adult:
 - A. Allegations of adult misconduct/abuse against a **non-clergy leader** will be reported to the Rector and the Senior Warden.
 - B. The Rector and Vestry are responsible for the church’s investigative and disciplinary procedures regarding adult misconduct/abuse allegations against lay leaders. It is recommended that all aspects of any inquiry or investigation be fully documented and filed.
 - C. The Rector or Senior Warden will contact the Director of Safeguarding for transparency and accountability. The diocese is available for guidance and templates for documentation.
 - D. Allegations of adult misconduct/abuse against a **non-clergy lay leader of the Diocese or L2 Leader serving in a diocesan program** must be reported immediately to Intake Officer.

3. Suspension of employment or volunteer activities:
 - A. The alleged offender’s employment or volunteer activity may be suspended by the Bishop, the Rector of the church, or other person in charge of a church until such time as the allegations of misconduct or abuse are resolved.
 - B. This leave of absence is without prejudice (i.e. does not imply guilt or innocence of the person under investigation) and payment of benefits to the employee may continue at the discretion of the Bishop, the Rector of the parish, or other person in charge of a church.

ALLEGATIONS INVOLVING CLERGY

If someone discloses abuse, it is not the responsibility of the recipient of that information to investigate or verify; they should report to authorities who will investigate. In all cases, the complainant will be assured that the church is concerned and that the complaint will be investigated promptly and thoroughly. The initial, verbal response should not convey doubt (“Say, Ask, Report” on pg 30).

The Bishop, clergy, or anyone who may subsequently be involved in the process, will not, at any time following the first receipt of the complaint, hear the sacramental confession of any person(s) involved. The Bishop and clergy will comply with the reporting and notification requirements as contained in the diocesan, parish or other liability policies for insurance claims. Any member of the clergy who believes himself or herself to be accused of misconduct/abuse may request the Bishop to begin formal inquiry.

1. When the survivor is a minor/vulnerable adult:
 - A. All reports of abuse of children or vulnerable adults must be reported to state authorities immediately.
 - B. All clergy domiciled or licensed in the Diocese are under the authority of the Bishop. Therefore, any complaints of misconduct/abuse by any member of the clergy shall be reported in writing immediately to the Intake Officer.
 - a) The Intake Officer will assure the complainant that the diocese is concerned and that the complaint will be investigated promptly and thoroughly.
 - b) Upon receiving a complaint of misconduct/abuse against clergy, the Intake Officer will notify the Bishop, Chancellor, and the Chair of the Standing Committee.
 - c) If the complaint is against a member of the clergy, two trained members of the Safeguarding Team will inquire into the complaint and provide a written report to the Bishop, Chancellor, and Chair of the Standing Committee.
 - (1) Prior to a decision, all parties involved may be invited to provide non-adversarial responses to the inquiry report (including complainant, guardian, and/or respondent). This invitation may be declined.
 - (2) Upon completion of the inquiry, the Bishop can take whatever action he, the Chancellor, & Chair deem appropriate, including removal, mediation, and/or reconciliation, or the use of a Godly Admonition.
 - (3) If enough evidence is found that a canonical offense has been committed, a third-party investigation may be warranted.
 - (4) Canonical procedures will be employed according to the *Constitution and Canons* of the Diocese and the ACNA.
2. When the survivor is an adult:
 - A. All of section 1B in the preceding paragraph applies.
 - B. All reports of pastoral abuse (see definition) should be reported to the Intake Officer through the hotline at 904-300-0512, [online](#) (or by scanning this QR code), via [email](#), or by bringing the matter to the attention of their supervising clergy or Bishop.
3. Suspension of employment or leadership:
 - A. The alleged clergy offender’s employment or activity may be suspended by the Bishop until such time as the allegations of misconduct/abuse are resolved.



- B. This leave of absence is without prejudice (i.e. does not imply guilt or innocence of the person under investigation) and payment of benefits to the clergy may continue at the discretion of the Bishop.

ALLEGATIONS INVOLVING THE BISHOP

1. Any person believing that the Bishop has engaged in any misconduct/abuse should immediately submit an allegation in writing to the Intake Officer through the hotline at 904-300-0512, [online](#) (or by scanning this QR code), or via [email](#), who will report the allegation to the Chancellor and the Chair of the Standing Committee.
2. The Chancellor and Chair will ask the Bishop to recuse himself and appoint another bishop to oversee the inquiry process outlined in the ACNA and GAD canons.
3. The process will follow the procedures outlined for allegations against clergy, recognizing the report will be sent to the bishop with oversight of the inquiry.



CARING FOR THE COMMUNITY

Incidents of child abuse, and the secrecy that often surrounds them, can cause devastating harm to the survivors as well as to the church. Therefore, where current or past child abuse has been perpetrated by clergy, staff, or Youth Volunteers of the church, the church shall provide consultation to encourage the discussion of such incidents and to provide a means to facilitate healing within the church. [Appendix F, *Caring for the Community*](#), includes a suggested model for congregational trauma debriefing.

SAFEGUARDING OUR PEOPLE



Compliance

COMPLIANCE

The Bishop, Director of Safeguarding and the Standing Committee are responsible for the creation and promulgation of the diocesan *Safeguarding Our People* policy, in accordance with the canons of the Diocese.

The Standing Committee will annually update and revise the Policy in light of practical experiences, medical and other scholarly research, legal developments, and other relevant considerations.

The Rector has overall responsibility for the compliance and administration of this policy within the church he/she leads and for providing all reports requested by the Diocese.

The Gulf Atlantic Diocese requires that, at a minimum, each church (see definition pg 7) is expected to have in place these four procedures with regard to adults and children:

Procedure 1: Awareness
Procedure 2: Interaction

Procedure 3: Reporting
Procedure 4: Compliance

POLICY OVERSIGHT

The Diocesan Office is responsible for:

- upholding the *Constitution and Canons* of the ACNA and maintaining/upholding the *Constitution and Canons* of the Diocese;
- setting additional, clear diocesan policies and disciplines;
- following through on those policies and disciplines to provide a consistent and transparent process;
- reporting to relevant law enforcement authorities in conformity with applicable law when necessary.

Clergy are responsible for:

- knowing and abiding by the diocesan policies and disciplines;
- ensuring that timely training, and resulting written acknowledgements, occur for all parties identified within these policies that are under their supervision;
- reporting to the Intake Officer any allegation toward clergy of misconduct/abuse;
- reporting to relevant law enforcement authorities in conformity with applicable law when necessary;
- providing proof of compliance of all such policies and disciplines to the diocesan office upon request.

Rectors and Wardens are responsible for:

- maintaining record keeping of all procedures outlined in this document;
- upholding the policies set forth in this document, which represent an appropriate standard of care, by adopting them as their own;
- reconciling this policy with the conditions of your particular congregation's insurance coverage and the need for a contextualized policy; **ensuring the conditions to your insurance coverage are met;**
- reviewing your insurance policy and calling the Dir of Safeguarding if you have any questions; the Diocese assumes no responsibility for a congregation's non-compliance with its insurance carrier's policy;

- providing proof of compliance of all such policies and disciplines to the Dir of Safeguarding upon request.

Non-clergy Level 2 Leaders are responsible for:

- abiding by the diocesan policies and disciplines;
- reporting to the Rector and Senior Warden any allegation of employee/lay person misconduct or abuse (allegations of clergy are to be reported directly to the Intake Officer);
- reporting to relevant law enforcement authorities in conformity with applicable law when necessary.

In some cases, insurance companies require a timed response or the institution forfeits coverage. A congregation's adoption of written standards of conduct may also be required by insurers as a condition of coverage. Strong warranty language in some policies requires careful compliance on the part of insured entities. Failure to comply with policy standards could result in denial of insurance coverage in the event of a claim.

COMPLIANCE DOCUMENTATION

Churches are responsible for tracking the training of their own leaders. The diocesan office is responsible for tracking training of clergy, diocesan employees, and diocesan Youth Volunteers. The Diocese assumes no responsibility for a church's non-compliance with their insurance carrier's policy on acknowledgment of receipt of the church's policies and procedures or insurance carrier training requirements.

All churches will update their rosters of Level 2 Leaders in January of each year. Signed documents are due to the Director of Safeguarding by March 31st of each year.

Anyone considered a leader in the diocese or in any of the diocesan churches (including fellowships, church plants, congregations, or parishes), is expected to sign the [Individual Policy Acknowledgement](#) annually. This includes all members of the Joint Leadership, all diocesan staff and clergy, and any Youth Volunteers in diocesan programs.

Every church associated with the diocese is expected to fill out one [Certificate of Compliance and Congregational Checklist](#) per church annually.

This document is provided to the churches and congregations in the GAD as minimum expectations. If an individual church would like to use this sample policy to create their own, and/or increase expectations/guidelines, they may add their supplemental requirements by submitting the [Submission of Church Policy Addendum](#).

Revised versions of this policy will be distributed to each congregation in the fall of the calendar year with the understanding that the congregation has the rest of the calendar year to come into compliance with any changes. It will be the responsibility of the Rector of each church to ensure all vestry, employees (full or part-time), and Youth Volunteers, are made aware of the church's policies and that those who are required to complete approved training do so. The [Individual Policy Acknowledgement](#) may be used as an example of acknowledgment of receipt of individual church policies and procedures.

SAFEGUARDING OUR PEOPLE



Resources

RESOURCES

The following appendices are offered to assist churches and Level 2 Leaders in their protection of individual members of each congregation. Some forms included here are necessary for the Diocese and are marked by an asterisk; others are offered as templates for each congregation to adjust to their individual needs (recognizing the minimum standard set forth by the Diocese within this policy document); and some are simply provided as helpful resources:

Appendix A: [Certificate of Compliance and Congregational Checklist*](#)

Appendix B: [Individual Policy Acknowledgement*](#)

Appendix C: [Sample Supervisory Plans](#)

Appendix D: [Sample Incident Report](#)

Appendix E: [Submission of Church Policy Addendum](#) (if utilized)

Appendix F: [Caring for the Community](#)

Appendix G: [Youth Volunteer Handout for Training](#)

Appendix H: [Pastoral Counseling Guidelines & Waiver](#)

Appendix I: [Sample Conflict of Interest Policy & Waiver](#)

O merciful Creator, your loving hand is open wide to satisfy the needs of every living creature:

Make us always thankful for your loving providence, and give us grace to honor you with all that you have entrusted to us; that we, remembering the account we must one day give, may be faithful stewards of your good gifts; through Jesus Christ our Lord, who with you and the Holy Spirit lives and reigns, one God, for ever and ever. **Amen.**

©*Book of Common Prayer*, 2019, Prayer 22