WORKING WITH MINORS AND VULNERABLE ADULTS

BOUNDARIES & STANDARDS

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Introduction

The Roman Catholic Diocese of Calgary has developed this document as part of the Safe Environment program to guide our clergy and religious, staff and volunteers in their interactions with minors and vulnerable adults. The safety, rights and well-being of minors and vulnerable adults we serve are at the core of our daily programs. We nurture supportive relationships with minors and vulnerable adults while balancing and encouraging appropriate boundaries.

We are committed to ensuring all vulnerable persons (minors and adults) are protected and safe. Setting standards that must be adhered to is an important part of creating safe environments for these individuals. The safety, rights and well-being of participants in our programs is a priority in our daily operations.

The intent of this document is to provide guidance in developing healthy relationships with minors and vulnerable adults involved in church ministry, events and activities delivered in our parishes and throughout the Diocese and to model appropriate boundaries when interacting with these individuals. In most cases, the information provided can be adapted to working with minors and/or vulnerable adults.

No policy manual can anticipate every circumstance or every question about policy or standards. Questions regarding the information provided in this document can be raised with your immediate Supervisor or the Diocese Human Resources Office. The Diocese, at its own discretion may determine, alter or modify standards, policies, procedures, or other statements made in this manual and will assess reported incidents based on their own merit.

It is the responsibility of all individual's working within the Diocese to familiarize themselves with this document and how it applies to their role. A signed acknowledgement form must be returned as part of an information package provided to all individuals assigned to roles that work directly with minors and vulnerable adults. The acknowledgement form signifies that the document has been reviewed and that the individual will comply with the standards as outlined in it.

This document has been adapted from the *Canadian Centre for Minors Protection's Code of Conduct* as well as other organizations that provide ministry and services to vulnerable persons (minors and vulnerable adults) with their permission. It also aligns with the recommendations made in *Lesson Five: The Need for Better Safeguarding Practices and Training* (page 34) of the Canadian Conference of Catholic Bishops (CCCB) publication on *Protecting Minors from Sexual Abuse (2018).*

Definitions

Boundary – physical and emotional space created between you and others that show what is okay and what is not
Minor – an individual under the age of 18
Diocesan representative – refers to clergy, religious, staff or volunteer
Youth – individual between the ages of 15 and 18
Vulnerable Adult – those who are not able to defend themselves, protect themselves, or get help for themselves when injured or emotionally abused. A person may be vulnerable because of a physical condition or illness, such as weakness in an older adult or physical disability, or a mental or emotional condition.

Treating Vulnerable Persons with Dignity and Maintaining Boundaries

Clergy and religious, staff and volunteers are expected to:

- Treat all minors and vulnerable adults with respect and dignity
- Establish, respect, and maintain appropriate boundaries with minors, vulnerable adults and families involved in activities and programs delivered by the parish/diocese

It is important to monitor your own actions and behaviour towards vulnerable persons and pay close attention to those of your peers to ensure that both are appropriate and respectful and will be perceived as such by others. It is the responsibility of the member of clergy and religious, staff or volunteer to set appropriate boundaries with minors and vulnerable adults and, each will be held accountable for those boundaries.

All of your interactions and activities with minors and vulnerable adults:

- Should be known to, and approved by, your direct supervisor, and the parent or guardian of a minors or adult with disability
- Must be tied to your regular duties, and
- Designed to with the minors and/or vulnerable adults needs in mind

Always consider the vulnerable persons reaction to any activities, conversations, behaviour or other interactions. If at any time you are in doubt as to the appropriateness of your own behaviour or the behaviour of others, you should discuss it with your direct supervisor.

Establishing Appropriate Boundaries

It is not only the responsibility of the clergy and religious, staff member or volunteer to set appropriate boundaries but to also stay within the standards of conduct and guidelines for appropriate and inappropriate behaviour as provided below. Boundaries protect you and those you interact with so that no actions or behaviours on your part can be misconstrued or perceived by others as something more than what is intended.

There is a power imbalance working with minors, due to the age gap between the minor and the adult or young adult engaging with them. This type of power imbalance makes it awkward if not difficult for the minor to recognize or defend themselves against the adult. They may be unaware of the need for boundaries and may at times even demonstrate behaviours towards us or make requests of us that could constitute boundary violations. It is our responsibility, as the adult, to set appropriate boundaries with minors and to maintain those boundaries.

Similarly, a power imbalance occurs between a vulnerable adult and an adult engaging with them when the vulnerable adult does not have the functional, physical or mental capacity to protect him or herself against harm or exploitation.

Questions to Consider when Assessing Appropriate Boundaries

In some cases, boundary issues may pose dilemmas for individuals when they are interacting with a vulnerable person and there may be no clear or obvious answer. In determining how to proceed, the following questions may be helpful to ask yourself:

- Is this in the vulnerable person's best interest?
- Whose needs are being met by my actions?
- Will this have a negative impact on the service I am delivering?
- Should I consult with a colleague or my supervisor?
- How would the vulnerable person's family view this?
- How would I feel telling a colleague about this?
- Am I treating the minor or vulnerable adult differently than others for their benefit or mine? (i.e. spending a disproportionate amount of time with one individual).
- Would my action make me uncomfortable if I were in the vulnerable person's place?
- How would others judge my behaviour?
- Would I feel comfortable if another staff member or volunteer were to do the same thing to my own children or to a minors or vulnerable adult in my family?

General Standards of Behaviour

Individuals should ensure that their interactions with minors and vulnerable adults remain professional and occur within the scope of the program or service. Examples of establishing professional boundaries include:

- Establishing relationships with vulnerable persons that are friendly but not overly friendly. They are not our friends. We must keep in mind that friends are those people whom we consider as equals and who share common goals, desires and interests. We must create and maintain a professional "distance" with minors and vulnerable adults. Vulnerable persons should not be added, or 'friended', on your personal social media sites.
- Telling parents/guardians how you plan to communicate with their minors or vulnerable adult.
- Communicating to the entire group rather than an individual.
- Ensuring that one-on-one interactions with minors and vulnerable adults are known about, supported by and preferably visible to others, to protect the dignity of the individual and to prevent the appearance of misconduct.
- Not organizing or attending unsanctioned social events or meetings with a vulnerable person unless it is sanctioned by the Diocese. Socializing in this manner undermines the professional relationship and invites the appearance of misconduct. Chance meetings in public places and invitations by families to social events are unavoidable, and good judgment should be exercised in such situations: be friendly, courteous, and always mindful of one's professional authority and responsibility.
- Keeping your personal life separate from your professional life by not telling minors or vulnerable adults too much about your private life or discussing your problems with them.
- Telling yourself that you will not hold yourself responsible for every aspect of others' lives, including the minors or vulnerable adults you are responsible for. That way you won't be too hard on yourself when a vulnerable person suffers something out of your control.
- Asking minors and vulnerable adults to refer to you as Mr., Mrs., Ms., etc. rather than by your first name.

Clergy, religious, staff and volunteers of the Diocese **must not:**

- Engage in any sort of physical contact with a vulnerable person that may make them or a reasonable observer feel uncomfortable, or that may be seen by a reasonable observer to be violating reasonable boundaries.
- Engage in any communication with a minors or vulnerable adult within or outside of duties, that may make the vulnerable person uncomfortable or that may be seen by a reasonable observer to be violating reasonable boundaries.
- Engage in any behaviour that goes against (or appears to go against) the Diocese's mandate, policies, or Code of Conduct, regardless of whether or not they are serving the Diocese at that moment.

- Conduct their own investigation into allegations or suspicions of potentially illegal or inappropriate behaviour – it is the member of clergy and religious, staff or volunteer's duty to report the matter to their direct supervisor or the Diocesan Human Resources Office, Minors Welfare or law enforcement, depending on the situation, not to investigate.

What is Considered Appropriate Behaviour?

The following list of behaviours is generally encouraged. However, even appropriate touch can become inappropriate when lingering or excessive, done in the giver's best interests rather the receiver's, or when the intention is to give preferential treatment to one individual over others.

1. Ensuring that language is appropriate and not offensive or discriminatory.
2. Text or email communication with a minors or vulnerable adult specific to the program they participate in (i.e. change in hours or venue) with their parent or guardian copied on the communication.
3. If a vulnerable person specifically asks for or needs some private time with you, ensure another adult (staff or volunteer) knows where you and the individual are. Preferably, remain in the same room as others but remove yourselves to a corner of the room where you can talk quietly or to a room where there is visibility by others (i.e. glass wall, open door).
4. Kneeling/bending down for loose hugs with younger children (i.e. pre-school). Minors should never be pressed front-to-front against an adult or older minors in a hug.
5. Side hugs for youth.
6. High-fives and pats on the shoulder or upper back.
7. Holding hands while walking with small children.
8. Shaking hands as a greeting, high-five or fist bumps.
9. Show affection equally in open places where others can see.
10. Place your arm around the individual's shoulder and give a gentle hug or squeeze from the side.
11. Placing a young child (under the age of 5) on your knees and not in your lap when holding them; maintain 6" distance from your mid-section.
12. Ask permission to touch before doing so – "Would you like a hug?", "May I touch your shoulder?", "You look like you need a hug. Is it okay if I give you one?"
13. Fixing hair – okay if doing so around others but not okay if selected special attention or prolonged time with any one person (i.e. put clip back in, put hair in ponytail or braid to remove from face).
14. Never force a vulnerable person to accept an unwanted hug or touch. In all things, respect the integrity of the minors or vulnerable adult and allow them to move away from your well-intentioned affection if they wish. Remember that not all individuals like to be touched.

What Constitutes Inappropriate Behaviour?

Inappropriate behaviour will not be tolerated, especially as it relates to the well-being of the minors or vulnerable adults involved in activities or programs delivered by the Diocese. The following behaviours could result in corrective action up to and including termination from your position whether a paid or unpaid diocesan representative.

Inappropriate behaviour includes but is not limited to:

- Communicating with a vulnerable person or his/her family outside of the context of duties for the Diocese, regardless of who initiated the exchange. For example:
    - Personal phone calls not tied to duties with the vulnerable person
    - Electronic communications (email, text message, online chats, social networking including "friending", etc.) not tied to duties with the vulnerable person
    - Personal letters not tied to duties
    - Excessive communications (online or offline)
    - Storing of contact information for a minors/vulnerable adult on your personal phone
- Spending unauthorized time with a minors or vulnerable adult outside of designated duties with the Diocese.
- Singling out a minor, certain minors or vulnerable adult and providing special privileges and attention. For example:
    - Paying a lot of attention to a specific individual
    - Giving or sending personalized gifts
    - Allowing privileges that are excessive, unwarranted or inappropriate
- Using a personal cell phone, camera or video to take pictures of a minor or vulnerable adult or allowing any other person to do so, as well as uploading or copying any pictures you may have taken of a vulnerable person to the internet or any personal storage device. Pictures taken as part of your job duties are acceptable, however the pictures are to remain with the Diocese and not be used by you in a personal capacity. In the case of minors and adults with disabilities, parental or guardian written consent must always be given prior to taking the picture.
- Telling sexual jokes to a vulnerable person or making comments to a vulnerable person that are or is in any way suggestive, explicit or personal.
- Showing a vulnerable person material that is sexual in nature, including signs, cartoons, graphic novels, calendars, literature, photographs, screen savers, or displaying such material where a minors may view it, or making such material available to a vulnerable person.
- Acting in a way that can be perceived as threatening, intimidating or intrusive.
- Making fun of a vulnerable person.
- Providing your personal contact details (mobile number, address) to a vulnerable person.
- Making sarcastic, insensitive, derogatory or sexually suggestive comments or gestures to or in front of minors or vulnerable adults.
- Patronize or treating minors and young people as if they are silly – may include patting.

- Making inappropriate promises to minors and young people, particularly in relation to confidentiality.
- Personal contact – tickling, wrestling, piggyback rides, massage of any type, swinging minors by ankles or wrists.
- Lengthy embraces.
- Having 'secrets' between yourself and the minors or vulnerable adult. Secrecy is defined as a condition designed to conceal or hide a specific activity usually for an illicit or unauthorized purpose and often is motivated by the fear of being discovered.

Whether or not a particular behaviour or action constitutes inappropriate behaviour will be a matter determined by the Diocese having regard to all of the circumstances, including past behaviour, and allegations or suspicions related to such behaviour.

Prohibited Behaviours

The following list of prohibited behaviours, when substantiated and the diocesan representative knew or should have known the rule, represents gross misconduct. Incidents will result in immediate suspension of duties depending on the situation and need for investigation. The following list should not be considered exhaustive as each incident involving a vulnerable person will be considered separate from all other incidents. Sexual relations or sexual intercourse with a minors or vulnerable adult.

- Any form of sexual touching of a minor or vulnerable adult.
- Any sexual contact including behavior or remarks of a sexual nature, regardless of the age of the minors or any apparent consent by the minors or vulnerable adult.
- Sexual harassment or discrimination against a minors or vulnerable adult.
- Attempt to establish a sexual relationship with a minors or vulnerable adult, such as sending intimate letters, emails or Internet messages, making telephone calls of a personal nature; socializing or dating.
- Physical abuse, punishment, discipline (i.e. using physical force, hitting or striking the individual; restraining the individual in an inappropriate manner such as tying their hands, taping or covering mouths).
- Bigotry (e.g. making derogatory comments towards the vulnerable person or their family)
- Bullying, taunting or other form of intimidation (i.e. using physical force).
- Telling or asking a vulnerable person to not tell an adult or parent/guardian of words or actions of a diocesan representative.
- Failure to fully cooperate with an investigation by the Diocese of Calgary, law enforcement agency or other authorized outside agency.
- Sexual exploitation of a vulnerable person (e.g. sharing or taking nude pictures).
- Accessing, displaying or possessing pornography on diocesan property or equipment.
- Using, selling or providing alcohol, marijuana or illegal drugs to minors or vulnerable adults.

- Selling or providing over-the-counter drugs to minors or vulnerable adults, except by documented parental authorization.

Reporting Requirements

All clergy and religious, staff and volunteers must report suspected sexual abuse involving a minors or vulnerable adult, and inappropriate behaviours or incidents that may be considered boundary violations that they become aware of, whether the behaviour or incidents were personally witnessed or not.

Where to report:

1. All allegations or suspicions of **sexual abuse** that a member of the clergy and religious, staff member or volunteer witnesses first-hand, must be promptly reported to police (in the case of a minors or vulnerable adult) and/or minors welfare. If the abuser is a member of the clergy and religious, staff or volunteer, the incident must also be reported to the Diocesan Sexual Abuse Committee as required in the *Code of Pastoral Conduct* and under the *Human Resources Sexual Misconduct Policy (#810-036).*

2. To ensure the protection of all minors and vulnerable adults in our care, all allegations or suspicions of **potentially illegal behaviour** must also be promptly reported to police and/or minors welfare as noted above. Police and/or minors welfare will make the determination as to whether the allegation or suspicion requires further investigation. As above, if the abuser is a member of the clergy and religious, staff or volunteer, the incident must also be reported to the Diocesan Sexual Abuse Committee.

3. All allegations or suspicions of **inappropriate behaviour/boundary violations** (see above examples), must reported to a direct supervisor or the Diocesan Human Resources Office. The person who you disclose the information to will take the necessary actions to investigate and to respond appropriately.

4. Discussing the incident, allegation or suspicion with individuals other than local enforcement authorities (police or minors welfare) in the case of sexual abuse of a vulnerable person, your direct supervisor, the Human Resources Office or Diocese representative on the Sexual Abuse Committee is strictly prohibited. This is required in order to ensure the integrity of any investigations that may occur as a result of your reporting. Those in authority will contact any and all individuals they deem necessary to gather information they require regarding the situation.

Keep in mind that you may learn of potentially illegal or inappropriate behaviour from the minors or vulnerable adult or some other third party, or you may witness it first-hand. Examples of the type of behaviour you may learn of or witness and that you must report as set above include:

- Potential illegal behaviour by a member of clergy or religious, staff member or volunteer of the Diocese
- Potential illegal behaviour by a third party, who is not clergy or religious, employee or volunteer of the Diocese

If you are not sure whether the issue you have witnessed or heard about involves potential illegal behaviour or inappropriate behaviour, discuss the issue with your direct supervisor, Parish Pastor or Diocesan Human Resources Office who will support you through the process. You have an independent duty to report all suspicions of potentially illegal behaviour directly to police and/or minors welfare.

Contact Information for Reporting

Diocese Sexual Abuse Committee:
- Father Tim Boyle (timothy.boyle@calgarydiocese.ca)

Diocese Human Resources:
- Human.resources@calgarydiocese.ca

Follow-up on Reporting

When an allegation or suspicion of potentially illegal behaviour (i.e. sexual abuse) is reported, police and/or a minors welfare agency will be notified directly by the Diocesan Sexual Abuse Committee representative. The Diocese representative will follow-up as appropriate and in accordance with the Sexual Abuse Committees procedures.

When an allegation or suspicion of inappropriate behaviour/boundary violations is made, the Diocese Human Resources Office and/or other designate appointed by the Bishop will follow-up on the matter to gather information about the incident and determine what, if any formal or other disciplinary action is required.

Disciplinary action that may be warranted includes:

- Verbal warning
- Written warning
- Suspension from duties
- Termination of assignment (staff or volunteer)

AGREEMENT TO THE WORKING WITH MINORS AND VULNERABLE ADULTS-BOUNDARIES & STANDARDS Document

I confirm that I have read and agree to comply with the Boundaries and Standards identified as appropriate and/or inappropriate in the *Working with Minors and Vulnerable Adults* document for the Roman Catholic Diocese of Calgary.

_____ _____

Staff/Volunteer Signature Date

_____

Print Name (Staff/Volunteer)