



Diocese of Helena Quick Guide: Safe Environment Policy and Procedures

This document is intended to serve as a quick reference guide for Pastors, Parish Administrators, School Principals, Local Administrators, Facilitators, and others who coordinate a diocesan-affiliated program. It covers the following topics:

- Safe Environment Requirements
- Group Youth Activity Requirements
- VIRTUS Training & Registration
- Facilitators and Local Administrators
- Annual Attestation of Policy Implementation

Protecting our most sacred responsibilities—the children, youth, and vulnerable adults who have been entrusted to our care—takes a collaborative and coordinate effort. Thank you for your participation in the prevention, detection, and early intervention efforts that are such an important part of this process.

Questions about the Safe Environment/Sexual Conduct Policy can be directed to one of the following Safe Environment contacts at the Diocese of Helena offices:

- Cassie Hall, Human Resources and Safe Environment Director (chall@dohmt.org)
- Mathias Gisondi Cormack, VIRTUS Coordinator (cfcldadmin@dohmt.org)
- Kevin Molm, Youth and Young Adult Ministry Manager (kmolm@dohmt.org)

SAFE ENVIRONMENT REQUIREMENTS

Policy Highlights

Effective December 1, 2024, the most recent reissuance of the diocesan safe environment policy was amended. In summary, the policy amendment does the following:

- Requires all active clergy, candidates for ordination, religious, educators, employees, and volunteers to **renew their safe environment training every five years.**
- Requires all parishes, schools, ministries, and diocesan entities to participate in the Diocese of Helena **safe environment compliance review (audit) program.**
- Clarifies that the *Code of Pastoral Conduct* specifically prohibits the acquisition, possession, and distribution of child pornography and child sex abuse materials.

In 2022, the full *Policy Regarding Abuse of Minors and Vulnerable Adults, Sexual Misconduct, and Sexual Harassment, and Code of Pastoral Conduct* was revised and approved by Bishop Vetter. The reissued policy became effective on July 1, 2022.

Minimum Requirements for Employees

ALL employees, including part-time employees or those paid on a stipend basis by the Parish, School, and/or Diocesan entity:

- MUST have a **clear background check** prior to the employment start date
- MUST review and accept **Safe Environment Policy** prior to employment start date
- MUST be **VIRTUS trained** within 30 days of employment start date

Background checks and VIRTUS training must be renewed every five years.

Once VIRTUS trained, all employees must also **stay current with their monthly VIRTUS bulletins** (falling behind no more than six updates), with some limited exceptions:

- Liturgical, ministry-only positions (e.g. cantors, musicians, technology assistants for Mass) may work with their employer to request an exemption from monthly bulletins.
- Maintenance, grounds, janitorial/cleaning positions *only in locations that do not include access to children or vulnerable adults* may work with their employer to request an exemption from monthly bulletins (i.e. school janitors or any maintenance workers with building access DO need to keep up).
- Remote-only employees may work with their employer to request an exemption from monthly bulletins.

The only employees who may be exempt from the minimum requirements listed above must fall within one of the following categories:

- Youth employee under 18 years of age (or 18+ but still enrolled in high school)—exempt from both background check and VIRTUS training
- Employee 18+ but who is a vulnerable adult (e.g. developmental disability) and/or who has experienced sexual misconduct—background check required, but exempt from VIRTUS training
- Seasonal cemetery worker only—background check required, but exempt from VIRTUS training

Minimum Requirements for Volunteers

All volunteers (with the exception of some liturgical ministers—see note below) who work in any capacity involving young people under the age of 18 or vulnerable adults and/or who are regularly utilized in any position in a Parish, School, or Diocesan entity which would otherwise be filled by an employee:

- MUST have a **clear background check** prior to the start of volunteering
- MUST review and accept the **Safe Environment Policy** prior to the start of volunteering
- MUST be **VIRTUS trained** prior to the start of volunteering

Background checks and VIRTUS training must be renewed every five years.

Once VIRTUS trained, all regularly utilized volunteers must also **stay current with their monthly VIRTUS bulletins** (falling behind no more than six updates), with some limited exceptions:

- Maintenance, grounds, janitorial/cleaning positions in locations without children or vulnerable adults

Liturgical Ministry Volunteers: *Volunteers who serve only in liturgical ministries (e.g. usher, lector, cantor, Eucharistic minister at Mass only—not homebound) and who will not have regular contact with young people or vulnerable adults outside of liturgy are not required to complete the items above.*

Safe Environment Compliance Reviews

To assess compliance with safe environment requirements and help foster communication about best practices, the Diocese of Helena safe environment office will conduct periodic compliance reviews (audits) at parishes, schools, and ministries. All locations are required to supply the information and documentation requested by diocesan staff, as well as to participate in site visits (in person and/or virtual) cooperatively and with a spirit of shared responsibility. Parish compliance reviews will be completed alongside the parish financial audit process; school and ministry reviews will be conducted on a separate schedule.

GROUP YOUTH ACTIVITY REQUIREMENTS

Parental Permission

- The **written consent of a parent or guardian** is required for any minor to participate in an organized program sponsored by a Parish, School, or any other Diocesan entity.
- Parental permission is also required for any overnight stay, transportation arrangement, and/or taking or sharing photographs.

The Office of Youth and Young Adult Ministry can assist with providing example forms.

Transportation & Overnights

- Only adults may transport youth as part of organized youth activities; youth may not drive themselves or other youth.
- No minor may travel along with a cleric, church worker, or volunteer for an extended distance without parental permission (exceptions for close relatives, or in extenuating circumstances). At least two adults should be present in the vehicle; whenever possible, one of the adults should be a parent of the participant.
- Adults may not sleep in the same room as non-related minors.

Adult Chaperones

- With the exceptions of the Sacrament of Penance or as a teacher/instructor in a classroom at a school/religion class where other adults are in the facility, at least two adults must be present for any activity sponsored by a Parish, School, or entity of the Diocese; whenever possible, one of the adults should be a parent of the participant.
- A person who is at least 21 years old and is able and willing to assume responsibility can fulfill the role of adult chaperone.
- Young adults who are 18-20 years old AND are not in high school are welcome to ASSIST with chaperoning responsibilities; however, they may not count towards a group's Youth-to-Chaperone ratio, nor may they drive/transport youth.
- Any person who is 18 years old AND has graduated high school is considered an Adult and must meet all respective Diocese of Helena requirements for Safe Environment. (A person who is 18-20 years old and is still enrolled in high school is to be considered a youth participant.)
- These guidelines must be strictly followed when any overnight activity is involved.

Ratios

- A reasonable number of adults to provide a safe environment must be present at any activity sponsored by a Parish, School, or entity of the Diocese. Event facilitators must also consider and ensure the

presence of adults of the same sex as youth—if you have youth participants of both sexes, you should also have adults of both sexes present. Overnight events should have a maximum of 6:1 ratio (youth-to-adult); all other events should have a maximum ratio of 10:1.

Social Media

Communication with youth via social media requires caution and sound judgment; Appendix VII Social Media/Electronic Communication (p. 58 of Policy) should be consulted. The fast-changing nature of social media means that we expect responsible adults to make reasonable adaptations to ensure the safety of young people as technology changes. Two of our primary operating principles for all electronic communication between minors and adults are: (1) Parental oversight; and (2) Transparency.

- All electronic communications between minors and unrelated adults must be done with the pre-approval of parents (e.g. a written media release form) and continued oversight of the parents (e.g. including parents in messages). All social media posts/groups must be public, and unrelated adults must never take or share pictures or videos of minors without approval, knowledge, and oversight of their parent(s).
- Supervisors of adult employees and volunteers must be included or have the ability to monitor all electronic communications between the adult(s) and minor(s). For example, private direct messages between an adult and a minor(s) are not allowed, while group messages with minors that also include parents, supervisors, or other responsible adult chaperones are permitted.

Youth Education/Training Lessons

Schools, religious education programs, and other youth programs should include in their health and sexuality curricula an appropriate discussion of abuse of minors. VIRTUS provides a menu of lessons for each age group (grades Pre-K, K-2, 3-5, 6-8, and grades 9-12). Annually, each School and Parish is responsible for:

- Informing parents of the lesson plan and the ability to opt out
- Facilitating an age-appropriate lesson from the VIRTUS Teaching Safety—Empowering God’s Children program to each youth at their location, *and taking attendance*
- Submitting a report in VIRTUS for each age group, indicating the lesson taught, number of children trained, number of opt-outs, and number of absent

More detailed information about youth training lessons and reporting is prepared and distributed annually by the Office of Youth and Young Adult Ministry (see Additional Resources).

VIRTUS TRAINING & REGISTRATION

VIRTUS 4.0 Training Options

The online module of the VIRTUS 4.0 training is available to all new users to select when they register; in addition to including the videos that live session trainees watch, the online training module requires the participant to answer questions and review other pertinent information. It takes roughly two hours to complete.

It is still possible for locations to request an in-person training led by a facilitator, especially if they have a specific group that would benefit from in-person content and discussion. Please be in touch with the diocesan safe environment office to schedule this option.

VIRTUS 4.0 Registration Process

To register for VIRTUS training as a Diocese of Helena employee or volunteer, go to www.virtus.org and complete the following steps:

- Click on the **First Time Registrant** button

FIRST-TIME REGISTRANT

- If you already have a VIRTUS account but are **having trouble logging in**, please choose the “I Need Login Help” button

I NEED LOGIN HELP

- If you had a VIRTUS account in the past but is **inactive due to an interruption in your service and/or being out of compliance with your monthly bulletins**, please contact the VIRTUS Coordinator for the Diocese of Helena at (406) 442-5820

- Choose the **Begin the registration process** option



Begin the registration process.

- Select **Helena, MT (Diocese)** from the drop-down list

Please select your Archdiocese/Diocese/Religious Organization from the list below:

- Select your organization ----->	Select
Hartford, CT (Archdiocese)	
Helena, MT (Diocese)	
Holy Family School in Lacey, Washington	
Holy Names Academy in Seattle	

- Follow the prompts to complete the following steps:
 - Create your VIRTUS account
 - Read the introductory letter from Bishop Vetter
 - Acknowledge receipt of the Diocese of Helena Sexual Conduct Policy 2022 (*Policy Regarding Abuse of Minors and Vulnerable Adults, Sexual Misconduct and Sexual Harassment and Code of Pastoral Conduct*)
 - Select your preferred Protecting God’s Children® Training Session
 - Online or In-Person trainings options are available, so please check with your Parish or School about local requirements
 - Enter your background check information
- Complete your VIRTUS training session, either Online or In Person

Once you have completed your initial training and your background check has also been completed, your VIRTUS account will be activated. You will then be responsible for keeping up with ongoing monthly training bulletins; a reminder email with link to the training will be emailed to you from VIRTUS at the beginning of each month. **If you fall behind by 6 bulletins or more, your account will be subject to deactivation and you will have to complete another full training to become active again.**

FACILITATORS & LOCAL ADMINISTRATORS

VIRTUS Facilitators

Facilitators of in-person trainings will be responsible for:

- Completing the VIRTUS 4.0 facilitator training
- Staying up-to-date on the Safe Environment policies and procedures of the Diocese
- Ensuring that all live training session attendees sign in
- Ensuring that all attendees have registered ahead of time in VIRTUS;
 - If not, the attendee must create their VIRTUS account before joining in the live training (www.VIRTUS.org can be accessed from a mobile device!)
 - As part of this process, the attendee must review and accept the Sexual Misconduct Policy electronically and submit his or her background check information
- Facilitating the live training and accompanying information and discussion
- Sending completed sign-in sheets and any paperwork collected to the Diocese in a timely manner

Facilitators should bring the following items to each training:

- DVDs or USB drive with videos
- Participant booklets
- Sign-in sheet

VIRTUS Local Administrators

Each Parish or School needs to identify a local administrator who is responsible for:

- Tracking employee and volunteer compliance with all VIRTUS and safe environment requirements in their location(s)
- Ensuring that youth training are conducted annually and that reports are submitted into VIRTUS by their location(s) each year prior to the spring deadline of May 31 each year
- Serving as a point of contact for the Safe Environment/VIRTUS staff at the Diocesan level and assisting with policy implementation and communication at the local level

On the Annual Attestation Form, each Pastor/Parish Administrator/Principal/Program Coordinator will be asked to confirm the name and email address of their designated Local Administrator. Changes that happen mid-year should be communicated in a timely manner to the VIRTUS Coordinator for the Diocese.

Local Administrators are given access to several reports and features in the VIRTUS system that will assist them with helping their location or entity maintain compliance. If you need assistance with running these reports, please refer to the separate **VIRTUS Local Administrators Guide** and/or contact the Diocese of Helena office at (406) 442-5820 and we will be happy to help you!

ANNUAL ATTESTATION OF POLICY IMPLEMENTATION

Before June 30 of each year, Pastors, Parish Administrators, School Principals, and those who coordinate a diocesan-affiliated program will attest to the Human Resources Director that all aspects of the Safe Environment / Sexual Conduct Policy have been implemented. A form with checklist has been developed by the Diocese and will be distributed to all locations annually.

ADDITIONAL RESOURCES

- Diocese of Helena, Safe Environment Webpage: <https://diocesehelena.org/home-2/offices-and-ministries/safe-environment/>
- Youth Lessons and Training Reports: <https://diocesehelena.org/home-2/offices-and-ministries/safe-environment/protecting-gods-children-resources/>
- Safe Environment Forms and Resources: <https://diocesehelena.org/home-2/offices-and-ministries/safe-environment/policy-resources/>
- VIRTUS Online: www.virtus.org
- VIRTUS Resources: https://www.virtusonline.org/virtus/virtus_resources.cfm

Steps from *VIRTUS' A Plan to Protect God's Children*

Step 1—Warning signs of adults:

- Discourages others from participating/monitoring
- Attempts to be alone with, or isolates, children
- Seems more excited to be with children than adults
- Gives gifts, without permission
- Goes overboard touching, wrestling, tickling...
- Uses bad language, or tells inappropriate or sexual jokes to children
- Behaves or speaks as if the rules do not apply to them (ignores policy, bends rules)
- Allows young people to engage in activities parents would not allow
- Tells children to keep secrets from others
- Takes, posts or shares photos without the parent's or the organization's approval
- Shows young people sexual content or pornography (*which is also abuse*)

Step 2—Screening measures:

- Create procedures to determine who has access to children
- Regularly review and distribute guidelines and policies for adults working with minors
- Use standard employment/volunteer applications
- Identify any history or known conduct that could create future harm
- Obtain previous experience with youth-serving organizations
- Complete face-to-face interviews
- Require criminal background checks (initial and refresher)
- Check personal and employment references
- Attend safe environment training
- Ensure compliance with the rules and policies
- Communicate the organization's commitment to keeping children safe
- Apply all of these measures consistently

Step 3—Monitoring environments:

Employees & volunteers can monitor in-person environments:

- Maintain a healthy caution about any environment in which children are entrusted
- Identify secluded areas, lock empty rooms
- Develop and follow policies regarding the use of any area (open, secluded, off-site, etc.)
- Don't permit children to enter staff-only areas
- Only meet with children where other adults have open access
- Perform consistent and random status checks
- Ensure enough adults are involved in programs
- Don't start new programs without approval

- Encourage parental involvement to evaluate safety, giving parents proper program access

Employees & volunteers can monitor technology, too:

- Always use sanctioned devices/accounts to communicate with youth
- Never “friend,” “follow,” or communicate with youth using personal accounts
- Always communicate with youth during appropriate timeframes
- Never take or post photos of youth without the proper approvals
- Install and use appropriate blocking/filtering software

Step 4—Being attentive to youth includes:

Recognizing the concerning behavioral cues children and youth may exhibit when experiencing abuse, such as:

- Sudden behavioral change(s) (likes/dislikes, health, eating habits)
- Appearing increasingly moody or aggressive, withdrawn or depressed
- Losing interest in school, or having a sudden shift in grades/school activities
- Becoming secretive or defensive (including with technology or online activities)
- Becoming fearful, anxious, or uncomfortable around certain people
- Bathing excessively or discontinuing personal hygiene
- Showing regressive behavior, such as bed-wetting, thumb-sucking, etc.

And, we can teach children and youth the following when advocating for their safety and boundaries:

- The *Personal Boundary Safety Rules*: Say “no,” try to get away, and tell a safe adult right away
- What to do when they feel uncomfortable, violated, unsafe, or if someone tries to force them, or their friends, to see, touch, or show their private parts
- Youth have a right to be safe; it’s OK to speak up
- Being abused/victimized is never the youth’s fault
- Youth always have safe adults who will advocate for their safety and protection
- When it comes to their safety, we will believe them and work to protect them

Step 5—Ways to communicate concerns:

- If you see or hear of a potential warning sign of inappropriate behavior, do not hesitate—speak to a supervisor right away
- If you continue to see inappropriate behavior, communicate again, or go to another supervisor
- If abuse has been disclosed to you, or you suspect that a child is being, or has been, abused, contact the child protection agency in your state
- If the suspected abuse involves a church volunteer, employee or member of the clergy, first contact civil authorities, and then also notify a church official
- If you are aware a child is in danger of imminent abuse, call emergency services right away (dial 911 immediately)
- When youth are being sexually exploited online, make a report to www.CyberTipline.org, or you can also contact law enforcement

TO REPORT ABUSE IN MONTANA:

If you suspect a child is in imminent danger from abuse, please call 911 immediately.

To report *known* or *suspected* child abuse, contact:

Child and Family Services
(866) 820-5437
dphhs.mt.gov/cfsd/

Diocese of Helena Safe Environment Office: (406) 389-7070

Diocese of Helena Victims Advocate: (406) 459-0513