



Safeguarding Policy and Procedures

Indianapolis Archdiocesan
Council of the Society of St.
Vincent de Paul

Effective February 1, 2023



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SVdP Indianapolis Safeguarding Policy

The Society of St. Vincent de Paul Indianapolis Council of the (hereafter, SVdP, the Society, Vincentians, or “we”) has authored and approved this Safeguarding Policy, to be effective immediately at all SVdP facilities in the Council region and for all employees, volunteers, contractors and visitors engaging with SVdP.

I. Introduction

a. Definitions

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

Child Abuse: Any form of intentional or malicious infliction of injury that damages a child’s physical, moral, or mental well-being. Child abuse includes sexual abuse of, or sexual misconduct with, a child or other individual who is legally incompetent. Indiana Code 31-34-1

Endangered Adult: “An individual who is at least eighteen (18) years of age and is incapable by reason of mental illness, mental retardation, dementia, or other physical or mental incapacity of managing or directing the management of the individual’s property or providing or directing the provision of self-care.” Indiana Code 12-10-3

Fiduciary Relationship: A relationship in which one person is placed in a position of trust relative to another party and is, therefore, legally or morally obligated to place that other party's interests first above their own.

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

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

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

Sexual Abuse: Sexual abuse refers to any type of illegal or coerced sexual conduct against another individual. A variety of different offenses fall into this category, which is not limited to physical contact alone. Instead, sexual abuse includes acts of sexual harassment, rape, indecent exposure, forcing another individual to view or participate in pornography, and contributing in any way to the commercial sexual exploitation of children. Sexual conduct is criminal if it is not consented to, either because the perpetrator uses force or because the survivor is not capable of providing consent. In Indiana minors under 16 years of age are deemed to be incapable of consenting to sexual conduct regardless of their level of maturity.

Sexual Exploitation: The development of—or the attempt to develop—a sexual relationship between a cleric, religious, employee, coach, volunteer, or youth and any person with whom he or

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she has a pastoral, counseling, mentoring, or other peer or fiduciary relationship. Sexual exploitation exists whether or not an individual consents to the relationship. Sexual exploitation includes, but is not limited to, activities such as intercourse; kissing; touching the breasts, genitals, or buttocks; dating during the course of a professional relationship; verbal suggestions of sexual involvement; or sexually demeaning comments.

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

Sexual/Boundary Violations: Any behavior that can reasonably be considered a violation of the Code of Conduct (see Attachment A or << link >>) including but not limited to unauthorized communications with children, endangered adults or vulnerable adults through social media.

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

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

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

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

- c. **Why is SVdP Committed to Safeguarding?** “The protection of minors and vulnerable persons is an integral part of the Gospel message that the Church and all its members are called to proclaim throughout the world. Christ himself, in fact, has entrusted us with the care and protection of the weakest and defenseless: ‘whoever receives one child such as this in my name receives me’ (Mt 18:5). Therefore, we all have the duty to welcome openheartedly minors and vulnerable persons and to create a safe environment for them, with their interests as a priority.-This requires a continuous and profound conversion, in which personal holiness and moral commitment come together to promote the credibility of the Gospel proclamation and to renew the educational mission of the Church.”

Pope Francis

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

The National Council and its members also look to the nation's Bishops for leadership guidance in the area of Safeguarding to create a safe environment for all, which can be found here:

<https://www.usccb.org/topics/catholic-safeguards>.

- d. **The Rule, Our Mission, and Our Value** Charity as lived by the Society's over 800,000 volunteers throughout the world is inspired by the example of St. Vincent de Paul, a great apostle of charity in his day and the Society's patron saint. SVdP members live the Gospel message by serving Christ in the poor. Inspired by the spirituality of St. Vincent de Paul, members strive to deepen their faith by meeting real needs, undertaking concrete action in neighborhoods, villages, and communities. In that work, we are called to embody these values:
- Empathy — to listen to and understand those we assist and to work together as members to support those in need.
 - Simplicity and Humility — treating each other, and those we assist, as equals in a fraternal relationship.
 - Justice — respecting people's convictions and beliefs and helping them to regain and retain their autonomy and human dignity
- e. **Safeguarding Understanding and Application** There needs to be an understanding in all SVdP Councils and Conferences of:
- What safeguarding is
 - Why it is important
 - Why the Society is making this a priority
 - What can be done to ensure application of this safeguarding policy.
- f. **A National Commitment to Minimum Standards** This policy recommends minimum guidelines and standards for the safeguarding of children and vulnerable people served by SVdP entities or personnel. SVdP entities or personnel include employees, contractors, volunteers and visitors. In cases where SVdP works through partners and vendors, our partners and vendors also have a responsibility to meet these minimum standards for those served in their programs.
- The International and National Society are committed to protecting the rights of all people, and to ensuring that vulnerable persons of all ages are protected from physical and mental violence, injury, abuse, and exploitation, including sexual abuse.
- The Society acknowledges that different jurisdictions set different definitions or age limits for children in their local legislation, e.g., laws dealing with the legal age of majority, age of sexual consent, voting age, etc. These differences do not alter the inherent vulnerability of children or other persons with whom the Society works and relates.

II. A Safeguarding Policy for the Indianapolis Council

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- a. **What the SVdP Indianapolis Archdiocesan Council Will Do** We seek to safeguard those we serve and our fellow volunteers by requiring that our employees, contractors, and volunteers adhere to SVdP values of empathy, humility and justice as set forth in a Code of Conduct. Also, as required by state law, everyone must agree to report any suspected abuse to county or state authorities. The SVdP Indianapolis Archdiocesan Council will require certain individuals to:
- Sign our Code of Conduct
 - Receive training on a Safeguarding Policy
 - Undergo a background check
 - Obtain SVdP photo ID

In addition, the SVdP Indianapolis Archdiocesan Council is instituting the office of Compliance Coordinator and an Investigative Review Team to assist any person who contacts us reporting suspected abuse.

- b. **Who Does This Policy Apply to?** This policy applies to all employees, contractors, volunteers and visitors at all SVdP facilities in the Indianapolis Council. It also applies to Home Visitors working in the community representing SVdP as well as those who pickup goods from homes or from blue bins.

III. General Requirements for Employees, Contractors, Volunteers and Visitors.

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

- a. **Additional Policies for Employees** All advertisements and job posting for employees must include a required commitment to this Safeguarding Policy. Solicitations for volunteers should also include a reference to this policy.
- **Pre-employment Interviews** During pre-employment interviews the existence of this policy should be included for information purposes; all employees will be required to commit to this Safeguarding Policy. Offers of employment must always come before background screening. Acceptable background screens are a condition of all employment offers.
- b. **Code of Conduct** SVdP Indianapolis has developed a Code of Conduct to be signed by all employees, contractors and certain public-facing volunteers (including Home Visitors). This Code is included in Attachment A.

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Table I. Roles, Awareness, Agreement, Training, Background Checks and Photo IDs

Role	Safeguarding Policy Awareness	Code of Conduct Signature	Training	Background Check	Photo ID
Employee	Required	Required	Required	Required	Required
Contractor	Required	Required	Required	(from Contractor)	(from Contractor)
Key Volunteer ¹	Required	Required	Required	Required	Required
CLF Facilitator	Required	Required	Required	Required	Required
Mentor	Required	Required	Required	Required	Required
Home Visitor	Required	Required	Required	Required	Required
Lead Volunteer ²	Required	Required	Required	Not Required	Required
Public-Facing Volunteer ³	Required	Required	Required	Required	Required
Frequent Volunteer ⁴	Required	Required	Optional	Not Required	Not Required
Occasional Volunteer	Required	Optional	Optional	Not Required	Not Required
Conference Member ⁵	Required	Required	Optional	Not Required	Not Required
Vendor	Required	Not Required	Not Required	(from vendor)	Not Required
Visitor	Required	Not Required	Not Required	Not Required	Not Required

¹ Volunteers with organizational responsibility including Presidents and Treasurers

² Volunteer leading a team of other volunteers

³ Volunteers in a role that faces those we serve on a regular basis, including stores, pantry intake and home delivery, who have access to personal identifying information on those we serve, including access to databases including Serveware, Salesforce and eTapestry

⁴ Volunteer participating at least monthly

⁵ Includes both active and associate members

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- c. **Background Checks** All employees and certain volunteers in positions of responsibility or high risk environments will be required to have background checks. The breadth and depth of these checks will depend on the role the employee or volunteer performs for SVdP and their history of employment and residences.
- **What Is A Background Check in Indiana?** A background check or background investigation is the process of researching and compiling past information on an individual in Indiana. This information is usually gleaned from public records held by government organizations and departments. They include arrest records (warrants, felony, and misdemeanor charges, incarcerations, sex offenses), vital records (marriage and divorce records, birth and death certificates, civil court hearings), property records (owned property, estimated values, purchased goods used as collateral), bankruptcy records, and employment history.
- d. **FCRA Compliance in Indiana Background Checks** In Indiana, a certified background check must follow the Fair Credit Reporting Act (FCRA). The FCRA act was passed in 1970 and is a collection of regulations meant to safeguard consumer information privacy, especially regarding information obtained through background checks. This regulation limits the information that Consumer Reporting Agencies (CRAs) can collect and use when making decisions about an individual. FCRA requirements prohibit CRAs from disclosing information on arrests that occurred more than seven years ago but did not result in convictions. CRAs must also withhold information concerning judgment liens, bankruptcies, civil litigation, and debt collection if the incident is seven years or older. Criminal conviction records can be gathered and published regardless of the age of the incident. Unless the report is being utilized for insurance purposes, they cannot disclose any medical information. When CRAs perform background checks, they must obtain the birth date, social security number, and consent of the subject. Individuals who are subjects of FCRA-compliant background checks are also allowed to verify the accuracy of information gathered and make corrections where necessary.

The required disclosure under the Fair Credit Reporting Act (FCRA) is in Attachment B.

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

Volunteers in a position of responsibility (such as President, Treasurer, etc.) will also have background checks consistent with employment and residence history. Additionally, volunteers who act as mentors for Changing Lives Forever and Getting Ahead programs will have a background check. Home Visitors who work in pairs **will** be required to have background checks (see Specific Policies for Home Visitors below). Additionally, volunteers who have access to personal information such as databases, including databases for Serveware, Salesforce or eTapestry, will be required to have background checks.

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

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

IV. Photo Identification

All employees, certain designated volunteers, and Home Visitors should have a photo ID that includes at least a first name, the Council name and the SVdP logo. These IDs will be issued free of charge to those who need one.

V. Training

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

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

VI. Monitoring Compliance and Record Keeping

The Compliance Coordinator, in conjunction with Human Resources function, is responsible for monitoring compliance within SVdP. Ongoing monitoring and evaluation will indicate the extent to which safeguarding is being effectively implemented and any need in training for employees, contractors, members and volunteers. The Council office will keep records to track the process of:

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

All records pertaining to reports, training and monitoring will be kept at least as long as legally required, up to the limit of storage technologies.

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VII. Two Adult Rule

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

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

- a. **High Risk Environments** A high risk environment is one where a vulnerable adult or child would be alone with an employee or volunteer. One example would be a Home Visitor making a visit alone to a home, something that should never happen. Another might be a volunteer working alone with a vulnerable adult or child out of sight from other workers in a facility. More examples are included in the Code of Conduct in Attachment A. Care must always be taken to recognize high risk environments and avoid them if possible.
- b. **Specific Policies for Home Visitors** Home visitors must always visit in pairs (see Two Adult Rule above). Each Home Visitor should have a background check completed. Each home visitor must wear an SVdP photo ID. The two home visitors should remain together during the entire visit. Observations should be shared after the visit.

Should one or both home visitors observe an abusive situation in the home, Indiana requires them to report this to appropriate state or local authorities. A report should also be made to the SVdP Compliance Coordinator: Crystal Wiley, phone: 317-771-0837; email: cwiley@svdpindy.org.

VIII. Disclaimer of Liability with Partner or Vendor Organizations

SVdP assumes no liability for partner and vendor organizations or their employers or contractors. SVdP expects partners/vendors to inform them of any safeguarding incidents relevant to SVdP. If SVdP receives a safeguarding concern about a partner or vendor organization, SVdP will report it as required to legal authorities. SVdP will inform the partner/vendor and expect them to respond quickly and appropriately. The partner/vendor will be responsible to ascertain its obligations under local law to refer the matter to the police or other legal authorities for criminal investigation. The partner/vendor will be responsible to address the issue through an appropriate independent investigation which should not interfere with any criminal investigation being conducted by legal authorities. If the outcome is that

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abuse or exploitation has occurred, ongoing work with the partner/vendor will be suspended until the partner/vendor is in compliance. If there is reason to believe that an allegation of abuse has been dealt with inappropriately by a partner/vendor, then the partner/vendor organization risks withdrawal of funding and/or ending the working relationship.

IX. Disclaimer of Liability for Visitors to SVdP Facilities

Visitors to SVdP are included in the Safeguarding Policy and should be made aware of the Policy. Apart from complying with the Indiana mandatory abuse reporting requirement, SVdP assumes no liability for visitors to SVdP facilities.

X. Awareness: Communicating the Safeguarding Message

SVdP ensures that a hard and/or electronic copy of the safeguarding policy is provided or made available in each office or headquarters within their jurisdiction and available to and acknowledged by employees, contractors, volunteers, and visitors. Copies will be provided to the general public in hard copy or through email upon request. The policy will be translated into necessary local languages. Safeguarding will be maintained for employees, members, and volunteers by including short sessions on the policy or related safeguarding matters during meetings, other trainings and via regular communications. All material will include clear information about whom a vulnerable adult or child or witness should report to, or seek advice from, if they feel they or another person has been violated or offended in any way.

- **Signage** All SVdP facilities in the Council region will have signage in an obvious location stating that this Safeguarding Policy exists and all employees, contractors, volunteers and visitors to the site agree to comply with the policy. Visual posters, including language and imagery appropriate for children and other vulnerable persons, will be displayed about the existence of this policy in appropriate locations throughout SVdP facilities as best as possible.

XI. Whistleblower Protection

SVdP will not, in relation to the reporting of any incident under this Policy, permit any form of retaliation or reprisal (including discharge, demotion, transfer, suspension, threat, intimidation, harassment or any other form of discrimination) by any person or group, directly or indirectly, against any reporter, witness or interviewee who, truthfully and in good faith:

- a. reports an Incident in accordance with this Policy;
- b. lawfully provides information or assistance in an investigation regarding any conduct which the reporter reasonably believes constitutes a violation of applicable laws, the Code of Conduct or any other SVdP policies;
- c. files, causes to be filed, testifies, participates in or otherwise assists in a proceeding related to a violation of applicable laws, the Code of Conduct or any other SVdP policies;

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- d. provides a law enforcement officer with information regarding the commission or possible commission of an offense, unless the individual reporting is one of the violators;
- e. or assists the Compliance Coordinator, the Investigative Review Team, the Council Board, management or any other person or group (including any governmental or regulatory authority) in the investigation of an Incident.

Any director, employee, contractor or volunteer who retaliates against a reporter, witness or interviewee in violation of Section XI could face disciplinary action, up to and including termination of the person's employment or position with SVdP.

If any person believes that retaliation or reprisal has occurred, that person may submit a complaint pursuant to this Policy after the person knew or ought to have known that the retaliation or reprisal occurred.

XII. Media, Audio, & Visual Recordings

If any audio or visual recordings involve interviewing a neighbor in need, always ensure that the neighbor is at no risk of being endangered, or adversely affected. This includes ensuring their privacy and not disclosing identifying information about a vulnerable adult or child, i.e., their full names, addresses or identifying their home, host community, or general location and being vigilant of street signs, advertising boards or any other background information that will indicate to a viewer where the person may live. Do not publish any story or image that might put a vulnerable person or their family at risk. This is the case even when identities are changed, obscured, or not used. Use only a neighbor in need's first name and provide a general location such as a city or county to avoid their being identified. Still photographs and videos must never be demeaning, or disrespectful of the dignity of the persons portrayed. The rights, safety, and wellbeing of the persons being portrayed are always to be protected. The gratuitous portrayal of extreme suffering is always to be avoided. Editing should maintain the integrity of the photographic and video images' content and context. No changes should be made that distort the context of the image, or that make a situation look worse than it actually is. People should always be adequately clothed. They should never be portrayed in poses that could be regarded as sexually suggestive, erotic, or obscene. As appropriate a consent form should be completed and signed (see Attachment C).

XIII. Reporting Requirements

Under Indiana law (Indiana Code 31-33-5), it is a criminal act to knowingly fail to report abuse or neglect. This law applies to all adults without exception. Indiana's reporting statutes generally require anyone who has reason to believe that a child is a survivor of abuse, neglect or endangerment must report immediately to:

- The local Child Protective Services agency (Hotline: 800-800-5556), or
- A local law enforcement agency.

A copy of Indiana State Form 114 Preliminary Report of Alleged Child Abuse or Neglect is included as Attachment D.

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Indiana law (Indiana Code 12-10-3-9) also requires that any individual who has reason to believe that an endangered adult is the survivor of battery, neglect, or exploitation must report immediately to:

- The local Adult Protective Services agency (Hotline: 800-992-6978), or
- A local law enforcement agency.

A report also must be made to the Council Compliance Coordinator. In the case of doubt as to whom to notify, call the SVdP Compliance Coordinator: Crystal Wiley, phone: 317-771-0837; email: cwiley@svdpindy.org. Confidential reports to SVdP can also be made online at <<link>>. You do not have to give your name.

XIV. Investigation Procedures

Upon receipt of a report of an incident involving sexual misconduct, abuse, neglect or exploitation, the Compliance Coordinator will immediately take the following steps:

- Gather appropriate information.
 - Determine if further investigation is warranted and initiate a preliminary investigation if necessary.
 - Make the required report to Child Protective Services or Adult Protective Services and/or the appropriate law enforcement agencies in accordance with Indiana law.
 - Take appropriate action (as outlined below).
- a. In order to manage the flow of information, gain access to potential sources of information, and analyze and document information concerning an allegation of sexual misconduct, an investigation will be conducted by the Investigative Review Team. This group serves as staff to the SVdP Council Board and conducts the investigation to assist the board in making its recommendations to the Board. The Compliance Coordinator convenes this group, which may consist of the Executive Director; outside legal counsel; volunteer director; managing director; and other professionals as needed.

The work of the Investigative Review Team is confidential.

- b. Here are the general courses of action that may be taken by the Investigative Review Team after careful review on reported incidents of sexual misconduct, abuse, neglect or exploitation. (It should be noted that reports of alleged sexual misconduct by their very nature must be treated as separate and unique incidents. This requires some variation in the course of action taken.)
- i. When the preliminary investigation of a complaint against an employee, contractor, volunteer, or visitor so indicates, the person will promptly be suspended of their duties and barred from SVdP facilities during the preliminary course of the investigation. Employees will be suspended with pay.
 - ii. If the Team determines that the reported conduct does not fall within the definitions of sexual misconduct but does potentially represent unprofessional or inappropriate conduct or conduct leading to an impression of impropriety, then the Compliance Coordinator will ensure that

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there is a follow-up discussion with the accused individual. Follow-up action may involve a written warning or loss of employment or volunteer service if there were violations of the Code of Conduct listed in the Appendix. The Compliance Coordinator will also provide support and information to the alleged survivor and their parents or guardians.

- If the Investigative Resource Team determines that the reported conduct does, in fact, fall within the definitions of sexual misconduct, the Compliance Coordinator will provide support and information to the survivor and their family regarding SVdP procedures pertaining to reports of misconduct and offer appropriate assistance in the case of child abuse or endangered adult abuse, will report the allegation to the appropriate Child Protective Services agency, Adult Protective Services agency, or law enforcement agency in accordance with civil law.

Again, if there is reason to believe that the sexual misconduct incident is a case of child abuse, a report to the Compliance Coordinator does not relieve an individual of the obligation of reporting the incident to Child Protective Services (800-800-5556), Adult Protective Services (800-992-6978) or local law enforcement agency as required by Indiana law.

If an accusation has proved to be unfounded, every step possible will be taken to restore the good name of the person wrongly accused.

XV. Communications policy

The communications policy of the SVdP will reflect a commitment to transparency and openness with regard to sexual misconduct, abuse, neglect or exploitation by SVdP employees, contractors, volunteers, or visitors working on behalf of the Society.

However, this commitment will be carried out with due regard to the respect owed to the privacy and reputations of all persons involved—accused, alleged survivors, and others—and with respect to civil law.

News media inquiries regarding allegations of sexual misconduct by SVdP personnel should be directed to the Council Executive Director.

XVI. Policy Review

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

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Attachment A. Code of Conduct

Society of St. Vincent de Paul, Indianapolis Archdiocese Council Code of Conduct (Revised August 2022)

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

I will:

- Safeguard children, endangered adults, and vulnerable adults* entrusted to my care at all times.
- Treat everyone with respect, patience, integrity, courtesy, dignity, and consideration.
- Complete Safeguarding training if required and read bulletins.
- Avoid situations where I am alone with a child, endangered adult, or vulnerable adult when engaged in SVdP activities and meet with them in areas that are visible and accessible to other adults.
- Refrain from giving inappropriate, personal gifts to children, endangered adults, and vulnerable adults.
- Avoid all unnecessary physical contact, especially when alone with a child, endangered adult, or vulnerable adult.
- Always maintain a professional attitude when dealing with children, endangered adults, and vulnerable adults avoiding emotional attachment and maintaining professional boundaries.
- Report suspected abuse to civil authorities (Indiana Child Protective Services hotline: 800-800-5556 or Indiana Adult Protective Services hotline: 800-992-6978) or to a local law enforcement agency and to the Council Compliance Coordinator: Crystal Wiley, phone: 317-771-0837; email: cwiley@svdpindy.org. Report any violations of this code of conduct to the Compliance Coordinator. Confidential reports to SVdP can also be made online at <<link>>. You do not have to give your name.
- Cooperate fully in any investigation of abuse of children, endangered adults, or vulnerable adults.

I will not:

- Use, possess, or be under the influence of alcohol when engaged in SVdP service work.
- Be alone with minors in a residence, sleeping facility, locker room, rest room, dressing facility, other closed room, or isolated area that is inappropriate to a ministry relationship.
- Use, possess, or be under the influence of illegal drugs.
- Allow children to have and/or use alcohol or illegal drugs.
- Use profanity or engage in behavior that is harassing or degrading to others.

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- Acquire, use, possess, or assist others, including children, to gain access or distribute any material that is pornographic in nature including child pornography. This includes, but is not limited to: pictures, videos, movies, social media, websites, magazines, or written material.
- Contact a child via social media or post pictures, video, or other information that may identify them.

Signature: _____ Date: _____

Printed Name: _____

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

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

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

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Attachment B.

Para información en español, visite www.consumerfinance.gov/learnmore o escriba a la Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.

A Summary of Your Rights Under the Fair Credit Reporting Act

The federal Fair Credit Reporting Act (FCRA) promotes the accuracy, fairness, and privacy of information in the files of consumer reporting agencies. There are many types of consumer reporting agencies, including credit bureaus and specialty agencies (such as agencies that sell information about check writing histories, medical records, and rental history records). Here is a summary of your major rights under FCRA. **For more information, including information about additional rights, go to www.consumerfinance.gov/learnmore or write to: Consumer Financial Protection Bureau, 1700 G Street N.W., Washington, DC 20552.**

- **You must be told if information in your file has been used against you.** Anyone who uses a credit report or another type of consumer report to deny your application for credit, insurance, or employment – or to take another adverse action against you – must tell you, and must give you the name, address, and phone number of the agency that provided the information.
- **You have the right to know what is in your file.** You may request and obtain all the information about you in the files of a consumer reporting agency (your “file disclosure”). You will be required to provide proper identification, which may include your Social Security number. In many cases, the disclosure will be free. You are entitled to a free file disclosure if:
 - a person has taken adverse action against you because of information in your credit report;
 - you are the victim of identity theft and place a fraud alert in your file;
 - your file contains inaccurate information as a result of fraud;
 - you are on public assistance;
 - you are unemployed but expect to apply for employment within 60 days.
- In addition, all consumers are entitled to one free disclosure every 12 months upon request from each nationwide credit bureau and from nationwide specialty consumer reporting agencies. See www.consumerfinance.gov/learnmore for additional information.
- **You have the right to ask for a credit score.** Credit scores are numerical summaries of your credit-worthiness based on information from credit bureaus. You may request a credit score from consumer reporting agencies that create scores or distribute scores used in residential real property loans, but you will have to pay for it. In some mortgage transactions, you will receive credit score information for free from the mortgage lender.

SVdP Indianapolis Safeguarding Policy

- **You have the right to dispute incomplete or inaccurate information.** If you identify information in your file that is incomplete or inaccurate, and report it to the consumer www.consumerfinance.gov/learnmore for an explanation of dispute procedures.
- **Consumer reporting agencies must correct or delete inaccurate, incomplete, or unverifiable information.** Inaccurate, incomplete, or unverifiable information must be removed or corrected, usually within 30 days. However, a consumer reporting agency may continue to report information it has verified as accurate.
- **Consumer reporting agencies may not report outdated negative information.** In most cases, a consumer reporting agency may not report negative information that is more than seven years old, or bankruptcies that are more than 10 years old.
- **Access to your file is limited.** A consumer reporting agency may provide information about you only to people with a valid need – usually to consider an application with a creditor, insurer, employer, landlord, or other business. The FCRA specifies those with a valid need for access.
- **You must give your consent for reports to be provided to employers.** A consumer reporting agency may not give out information about you to your employer, or a potential employer, without your written consent given to the employer. Written consent generally is not required in the trucking industry. For more information, go to www.consumerfinance.gov/learnmore.
- **You may limit “prescreened” offers of credit and insurance you get based on information in your credit report.** Unsolicited “prescreened” offers for credit and insurance must include a toll-free phone number you can call if you choose to remove your name and address from the lists these offers are based on. You may opt out with the nationwide credit bureaus at 1-888-5-OPTOUT (1-888-567-8688).
- The following FCRA right applies with respect to nationwide consumer reporting agencies:

CONSUMERS HAVE THE RIGHT TO OBTAIN A SECURITY FREEZE

You have a right to place a “security freeze” on your credit report, which will prohibit a consumer reporting agency from releasing information in your credit report without your express authorization. The security freeze is designed to prevent credit, loans, and services from being approved in your name without your consent. However, you should be aware that using a security freeze to take control over who gets access to the personal and financial information in your credit report may delay, interfere with, or prohibit the timely approval of any subsequent request or application you make regarding a new loan, credit, mortgage, or any other account involving the extension of credit.

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As an alternative to a security freeze, you have the right to place an initial or extended fraud alert on your credit file at no cost. An initial fraud alert is a 1-year alert that is placed on a consumer's credit file. Upon seeing a fraud alert display on a consumer's credit file, a business is required to take steps to verify the consumer's identity before extending new credit. If you are a victim of identity theft, you are entitled to an extended fraud alert, which is a fraud alert lasting 7 years.

A security freeze does not apply to a person or entity, or its affiliates, or collection agencies acting on behalf of the person or entity, with which you have an existing account that requests information in your credit report for the purposes of reviewing or collecting the account. Reviewing the account includes activities related to account maintenance, monitoring, credit line increases, and account upgrades and enhancements.

- **You may seek damages from violators.** If a consumer reporting agency, or, in some cases, a user of consumer reports or a furnisher of information to a consumer reporting agency violates the FCRA, you may be able to sue in state or federal court.
- **Identity theft victims and active duty military personnel have additional rights.** For more information, visit www.consumerfinance.gov/learnmore.

States may enforce the FCRA, and many states have their own consumer reporting laws. In some cases, you may have more rights under state law. For more information, contact your state or local consumer protection agency or your state Attorney General. For information about your federal rights, contact:

TYPE OF BUSINESS:	CONTACT:
<p>I.a. Banks, savings associations, and credit unions with total assets of over \$10 billion and their affiliates</p> <p>b. Such affiliates that are not banks, savings associations, or credit unions also should list, in addition to the CFPB:</p>	<p>a. Consumer Financial Protection Bureau</p> <p>1700 G Street, N.W.</p> <p>Washington, DC 20552</p> <p>b. Federal Trade Commission</p> <p>Consumer Response Center</p> <p>600 Pennsylvania Avenue, N.W.</p> <p>Washington, DC 20580</p> <p>(877) 382-4357</p>

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<p>2. To the extent not included in item 1 above:</p> <p>a. National banks, federal savings associations, and federal branches and federal agencies of foreign banks</p> <p>b. State member banks, branches and agencies of foreign banks (other than federal branches, federal agencies, and Insured State Branches of Foreign Banks), commercial lending companies owned or controlled by foreign banks, and organizations operating under section 25 or 25A of the Federal Reserve Act.</p> <p>c. Nonmember Insured Banks, Insured State Branches of Foreign Banks, and insured state savings associations</p> <p>d. Federal Credit Unions</p>	<p>a. Office of the Comptroller of the Currency Customer Assistance Group 1301 McKinney Street, Suite 3450 Houston, TX 77010-9050</p> <p>b. Federal Reserve Consumer Help Center P.O. Box 1200 Minneapolis, MN 55480</p> <p>c. FDIC Consumer Response Center 1100 Walnut Street, Box #11 Kansas City, MO 64106</p> <p>d. National Credit Union Administration Office of Consumer Financial Protection (OCFP) Division of Consumer Compliance Policy and Outreach 1775 Duke Street Alexandria, VA 22314</p>
<p>3. Air carriers</p>	<p>Asst. General Counsel for Aviation Enforcement & Proceedings Aviation Consumer Protection Division Department of Transportation 1200 New Jersey Avenue, S.E. Washington, DC 20590</p>
<p>4. Creditors Subject to the Surface Transportation Board</p>	<p>Office of Proceedings, Surface Transportation Board Department of Transportation 395 E Street, S.W. Washington, DC 20423</p>
<p>5. Creditors Subject to the Packers and Stockyards Act, 1921</p>	<p>Nearest Packers and Stockyards Administration area supervisor</p>

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6. Small Business Investment Companies	Associate Deputy Administrator for Capital Access United States Small Business Administration 409 Third Street, S.W., Suite 8200 Washington, DC 20416
7. Brokers and Dealers	Securities and Exchange Commission 100 F Street, N.E. Washington, DC 20549
8. Federal Land Banks, Federal Land Bank Associations, Federal Intermediate Credit Banks, and Production Credit Associations	Farm Credit Administration 1501 Farm Credit Drive McLean, VA 22102-5090
9. Retailers, Finance Companies, and All Other Creditors Not Listed Above	Federal Trade Commission Consumer Response Center 600 Pennsylvania Avenue, N.W. Washington, DC 20580 (877) 382-4357

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Attachment C. Media Waiver Release Form (Revised August 2022)

SOCIETY OF ST. VINCENT DE PAUL

PHOTO/VIDEO/WRITTEN WORKS RELEASE

I permanently grant to the Society of St. Vincent de Paul Indianapolis the right to use my appearance, voice, or statements in photographs, sound recording, video/film recordings, or writing for any purpose it deems proper in any manner and media. I understand that these photographs and recordings may be used for a variety of purposes, including, but not limited to, publicizing the Society of St. Vincent de Paul Indianapolis through publications, newsletters, news releases, and other printed materials; television/radio ads; and the internet. In addition, the Society of St. Vincent de Paul Indianapolis may use my appearance or statements for a variety of purposes, including, but not limited to, publicizing the Society of St. Vincent de Paul Indianapolis through publications, newsletters, and press releases.

I understand that the images and recordings of me may be edited by the Society of St. Vincent de Paul Indianapolis' sole discretion at any time, and that I hereby waive the right to inspect or approve any photographs, recordings, statements, or derivative versions prior to use by the Society of St. Vincent de Paul Indianapolis. I understand that I may or may not be given credit for my appearance in photographs or recordings.

I expressly release the Society of St. Vincent de Paul Indianapolis, its agents, Directors, officers, employees, licensees, and assigns from and against any and all claims which I have or may have for invasion of privacy, false light, libel, defamation, or any other cause of action arising out of or relating to my appearance in the photographs, audio or visual recordings, or written materials created by the Society of St. Vincent de Paul Indianapolis.

I hereby agree that I will make no monetary or other claim against the Society of St. Vincent de Paul Indianapolis related to the Society of St. Vincent de Paul Indianapolis' use of my appearance, voice, or statements as described herein.

Volunteer Initial: _____ **Date:** _____

SOCIETY OF ST. VINCENT DE PAUL

VOLUNTEER AGREEMENT, LIABILITY WAIVER, CONFIDENTIALITY

My signature on this agreement indicates that I understand and agree to the following conditions:

All statements I have made on this application are true and complete to the best of my knowledge and I have withheld no information, which would unfavorably affect my volunteer services.

- I hereby release SVdP, for whom I will be performing volunteer/community service work, and all persons and entities involved in planning, organizing and supervising service activities, from any and all liability for any and all loss or injury, personal or otherwise, that I may sustain as a result of my participation in volunteer – community service.
- Furthermore, I understand that any client or sensitive (outside the public domain) agency information which is disclosed to me in any manner while I am serving at SVdP, is confidential and must be treated as such.
- I understand that disclosure of confidential client or agency information cannot be given without the informed, written consent of the client or the Executive Director (in the case of the agency).
- If I will be driving my own vehicle in the conduct of my volunteer service work, I hereby state that my vehicle is covered by insurance as required by state law and that I have a valid Driver’s License.
- If I will be driving a SVdP vehicle in the conduct of my volunteer service work, I agree to submit a copy of my valid Driver’s License and BMV Driving Record.

Print Name:

Date

Signature:

Attachment D. Indiana State Form 114 Preliminary Report of Alleged Child Abuse or Neglect



PRELIMINARY REPORT OF ALLEGED CHILD ABUSE OR NEGLECT

State Form 114 (R13 / 6-19) / CW 0310
DEPARTMENT OF CHILD SERVICES

Preliminary Report of Alleged Child Abuse or Neglect: In compliance with Indiana Public Law 276, Acts of 1979, IC 31-33-18, the information provided upon completion of this form will be treated as a **CONFIDENTIAL RECORD**.

Family surname	County	Date of report (month, day, year)	Time of report <input type="checkbox"/> AM <input type="checkbox"/> PM
Name of complainant (and Title / Agency, if applicable)		Telephone number ()	E-mail address
Address (number and street, city, state, and ZIP code)			Forty-five (45) day report required? <input type="checkbox"/> Yes <input type="checkbox"/> No

PARENT / GUARDIAN INFORMATION

Person ID	Name	Role <input type="checkbox"/> Alleged Perpetrator <input type="checkbox"/> Uninvolved	Date of Birth (month, day, year)	Age	Sex	Race*	Hispanic or Latino Origin? <input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined	Address (number and street, city, state, and ZIP code)	Telephone Number
		<input type="checkbox"/> Alleged Perpetrator <input type="checkbox"/> Uninvolved					<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		
		<input type="checkbox"/> Alleged Perpetrator <input type="checkbox"/> Uninvolved					<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		
		<input type="checkbox"/> Alleged Perpetrator <input type="checkbox"/> Uninvolved					<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		
		<input type="checkbox"/> Alleged Perpetrator <input type="checkbox"/> Uninvolved					<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		
		<input type="checkbox"/> Alleged Perpetrator <input type="checkbox"/> Uninvolved					<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		

CHILD(REN) INFORMATION

Person ID	Name of Child	Role <input type="checkbox"/> Victim <input type="checkbox"/> Not Involved <input type="checkbox"/> Perpetrator <input type="checkbox"/> Victim / Perpetrator	Date of Birth (month, day, year)	Age	Sex	Race*	Hispanic or Latino Origin? <input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined	Current Location (if other than home)	Report Source Relationship
		<input type="checkbox"/> Victim <input type="checkbox"/> Not Involved <input type="checkbox"/> Perpetrator <input type="checkbox"/> Victim / Perpetrator					<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		
		<input type="checkbox"/> Victim <input type="checkbox"/> Not Involved <input type="checkbox"/> Perpetrator <input type="checkbox"/> Victim / Perpetrator					<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		
		<input type="checkbox"/> Victim <input type="checkbox"/> Not Involved <input type="checkbox"/> Perpetrator <input type="checkbox"/> Victim / Perpetrator					<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		
		<input type="checkbox"/> Victim <input type="checkbox"/> Not Involved <input type="checkbox"/> Perpetrator <input type="checkbox"/> Victim / Perpetrator					<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		
		<input type="checkbox"/> Victim <input type="checkbox"/> Not Involved <input type="checkbox"/> Perpetrator <input type="checkbox"/> Victim / Perpetrator					<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		
		<input type="checkbox"/> Victim <input type="checkbox"/> Not Involved <input type="checkbox"/> Perpetrator <input type="checkbox"/> Victim / Perpetrator					<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		
		<input type="checkbox"/> Victim <input type="checkbox"/> Not Involved <input type="checkbox"/> Perpetrator <input type="checkbox"/> Victim / Perpetrator					<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		

Attachment D. Indiana State Form 114 Preliminary Report of Alleged Child Abuse or Neglect

ALLEGED PERPETRATOR INFORMATION (If other than parent / guardian)									
Person ID	Name	Relationship to Child	Date of Birth (month, day, year)	Age	Sex	Race*	Hispanic or Latino Origin?	Address (number and street, city, state, and ZIP code)	Telephone Number
							<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		
							<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		

OTHER PERSON RESPONSIBLE FOR CHILD(REN)									
Person ID	Name	Relationship to Child	Date of Birth (month, day, year)	Age	Sex	Race*	Hispanic or Latino Origin?	Address (number and street, city, state, and ZIP code)	Telephone Number
							<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		
							<input type="checkbox"/> Yes <input type="checkbox"/> Unknown <input type="checkbox"/> No <input type="checkbox"/> Declined		

* RACE CODES
(AI) American Indian or Alaskan Native – Having origins in any of the original peoples of North, Central or South America (A) Asian – Having origins in any of the original peoples of the Far East, Southeast Asia, or Indian Subcontinent (B) Black or African American – Having origins in any of the black racial groups of Africa (NH) Native Hawaiian or Other Pacific Islander – Having origins in any of the original peoples of Hawaii, Guam, Samoa or the Pacific Islands (W) White – Having origins in any of the original peoples of Europe, the Middle East, North Africa (U) Unable to Determine – Choose only when client refuses or is unable to identify race(s).

NATURE OF COMPLAINT	
Is the child in imminent danger of serious bodily harm? <input type="checkbox"/> Yes <input type="checkbox"/> No	
If yes, state why. Request the nature and extent of injury or neglect; if abuse, request where and when the abuse occurred and what part of the body was injured.	
Address directions	
Worker safety factors	
Report completed by (typed or printed name):	Title
Signature	Agency or local DCS office
Date (month, day, year)	
Report assigned to:	
Date (month, day, year)	