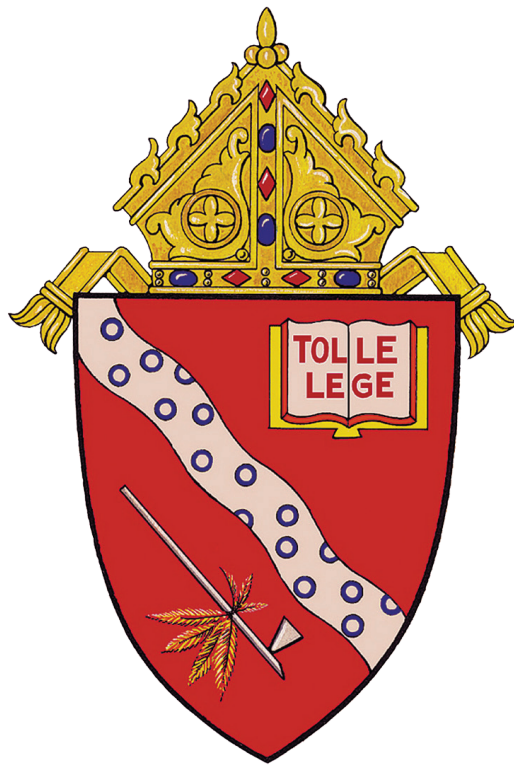
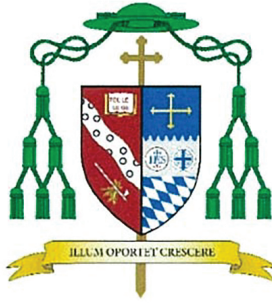


# **Policy for the Protection of Children and Youth Diocese of Kalamazoo**

*Office for the Protection of Children and Youth*



DIOCESE OF KALAMAZOO



Prot. N. 060925

## DECREE OF PROMULGATION

### PARTICULAR LAW

AS CONTAINED IN THE REVISED “POLICY FOR THE PROTECTION OF CHILDREN AND YOUTH”

WHEREAS children and youth are a treasure of incalculable worth, who hold within themselves the bright promise of the future;

Whereas the Lord entrusts these children and youth firstly to their parents, but also to the Church and to society as a whole for their wholesome upbringing, nurturing, and development;

Whereas the protection of children and youth is a sacred trust given to us all by God, and is of utmost importance to clergy, religious, and laity of the Diocese of Kalamazoo;

Whereas policy for the protection of children and youth, as well as vulnerable adults, must be regularly revised in light of the changing nature of our society, the application of new laws, and developments in technology;

THEREFORE, in accord with the norm of canon 7 of the *Code of Canon Law* and by virtue of this Decree, I hereby promulgate the entirety of the June 2025 revised **Policy for the Protection of Children and Youth** as particular law for the Diocese of Kalamazoo. All parishes, agencies, primary and secondary schools, and other Catholic entities or groups in the Diocese are hereby obliged to observe and follow this policy in its totality. All previous editions of the aforementioned policy are hereby abrogated.

FURTHERMORE, this revised **Policy for the Protection of Children and Youth** is to be read and understood in conjunction with the 1983 *Code of Canon Law* of the Universal Church and with the updated *Essential Norms for Diocesan/Eparchial Policies Dealing with Allegations of Sexual Abuse of Minors by Priests and Deacons* already established in 2006 as particular law for the United States of America.

FURTHERMORE, I hereby encourage voluntary implementation of the June 2025 revised Policy for the Protection of Children and Youth as soon as possible and declare that it will enter into force and be mandatory on January 1, 2026, all things to the contrary notwithstanding.

Given at the Chancery  
of the Diocese of Kalamazoo  
on this 9th day of June, 2025

+ Edward M. Lohse

The Most Reverend Edward M. Lohse, JCD  
Bishop of Kalamazoo

The Very Reverend Fabio Garzon, STL  
Vicar General

# Policy for the Protection of Children and Youth

## Table of Contents

<b>I. DEFINITIONS</b>	<b>Pages 4-5</b>	<b>V. Reporting Child Abuse</b>	<b>Pages 15-16</b>
<b>II. PREVENTION OF CHILD ABUSE</b>	<b>Pages 5-9</b>	A. Persons Who Must Report Abuse	
A. Screening of Personnel		B. Other Persons Who Can Report Abuse	
1. Clergy Personnel		C. Incidents to be Reported	
2. Non-School Personnel		<b>VI. Procedure for Reporting Abuse</b>	<b>Pages 16-17</b>
3. School and School-related Personnel		A. Required by Law	
B. Supervisory Procedures and Responsibilities		B. Additional Requirement for School Employees	
C. Additional Clearance Information		<b>VII. Allegations and Response Procedures</b>	<b>Pages 17-18</b>
D. Training of Personnel, Children, and Parents		A. Investigation	
1. All Personnel		B. Cooperation	
2. Children/Youth		C. Care of Victims	
3. Parents		D. Penalties	
<b>III. WORKING WITH CHILDREN/YOUTH</b>	<b>Pages 9-13</b>	E. Maintaining Records	
A. Classroom Management		<b>VIII. Confidentiality</b>	<b>Page 19</b>
1. Religious Education Classrooms		<b>IX. Pastoral Care</b>	<b>Page 19</b>
2. Catholic School Classrooms		<b>X. Conclusion</b>	<b>Page 19</b>
B. Norms for Special Activities or Events		<b>Appendix</b>	<b>Page 20</b>
1. Non-School Adult-to-Child Ratios		Adult Code of Conduct and Statement of Intent for Compliance	
a. Preschool through Grade 8		Code of Conduct and Statement of Intent for Compliance for Ages 13 through 17	
b. High School			
2. School Adult-to-Child Ratios			
3. Small Group/Youth Group Meetings/Gatherings in Private Residences			
4. Chaperones			
5. Overnight Trips			
6. Driving			
C. Childcare During Mass or Other Events			
1. Operations			
2. Parental Responsibilities			
D. Communication with Minors			
E. General Information			
<b>IV. Counseling and Spiritual Direction of Children/Youth</b>	<b>Page 14</b>		



Originally published May 28, 2003  
Revised September 2012  
New edition June 2025

# I. DEFINITIONS

(These are the governing definitions for these policies and are listed in alphabetical order.)

**ADULT** is any person eighteen years of age or older and also not a current student of any secondary school.

**CHILD or MINOR** is defined as (1) a person under the age of 18, or (2) any current student of any secondary school.

**CHILD ABUSE** as defined by Michigan law means “harm or threatened harm to a child’s health or welfare that occurs through nonaccidental physical or mental injury, sexual abuse, sexual exploitation, or maltreatment, by a parent, a legal guardian or any other person responsible for the child’s health or welfare, a teacher, a teacher’s aide, a member of the clergy, or an individual 18 years of age or older who is involved with a youth program.”

**CHILD PORNOGRAPHY** is a form of child sexual exploitation. Federal law defines child pornography as any visual depiction of sexually explicit conduct involving a minor (persons less than 18 years old). Images of child pornography are also referred to as child sexual abuse images.

**CHILD PROTECTIVE SERVICES** is the Michigan agency that receives reports of suspected child abuse. Call 1-855-444-3911 24 hours a day to report. A report may also be made over the internet at <https://www.michigan.gov/mdhhs/adult-child-serv/abuse-neglect/childrens/mandated-reporters/online-reporting/creating-complaint>.

***IF A CHILD IS IN IMMEDIATE DANGER, CALL 911!***

**CLEAR AND CONVINCING** is the standard that means the evidence indicates that “the thing to be proved is highly probable or reasonably certain.”<sup>1</sup> Clear and convincing evidence “produces in the mind of the trier of fact a firm belief or conviction as to the truth of the allegations sought to be established, evidence so clear, direct and weighty and convincing as to enable the factfinder to come to a clear conviction, without hesitancy, of the truth of the precise facts in issue.”<sup>2</sup>

**DIRECT CONTACT** is defined as the care, supervision, guidance, or control of children or routine interaction with children.

**IMMEDIATE VICINITY** is defined as an area in which an individual is physically present with a child and can see, hear, direct, and assess the activities.

## **PERSONNEL**

- **EMPLOYEES:** All clergy and lay individuals serving the Diocese, its parishes, schools, or related agencies and institutions who are paid on a full-time, part-time, or stipend basis.
- **VOLUNTEERS:** Adults who perform a service without compensation for the Diocese or its parishes, schools, or related agencies and institutions, who have direct volunteer contact with children more than three times per year.
- **INDEPENDENT CONTRACTOR/CONTRACTED EMPLOYEE:** An individual who has direct contact with children and who is employed or offered employment by:
  - an independent contractor or subcontractor
  - a subcontractor of an independent contractor
  - an individual independent contractor.

---

<sup>1</sup> BLACK’S LAW DICTIONARY (10th ed. 2014).

<sup>2</sup> In re Martin, 450 Mich. 204, 227; 538 N.W.2d 399, 410 (1995) (cleaned up).

**PORNOGRAPHY** is any material that depicts sexual acts or nudity for the purpose of sexual arousal. Pornography can take many forms, including photographs, videos, written material, audio recordings, animation, and artificial intelligence (AI).

**RELATED AGENCIES AND INSTITUTIONS** are non-parish, non-school entities that exercise a Catholic apostolate within the Diocese of Kalamazoo with at least some measure of independent control.

**ROUTINE INTERACTION** is regular and repeated contact with children that is integral to a person's employment or volunteer responsibilities.

**SEXUAL ABUSE** is the use, persuasion, or coercion of a child to engage in or assist another individual to engage in sexually explicit conduct, which includes — but is not limited to — the following:

- looking at the sexual or other intimate parts of a child or another individual for the purpose of arousing or gratifying sexual desire in any individual.
- participating in sexually explicit conversation either in person, by telephone, by computer, or by a computer-aided device for the purpose of sexual stimulation or gratification of any individual.
- actual or simulated sexual activity for the purpose of producing a visual depiction in any form, including photographing, videotaping, computer depicting, or filming.
- producing, acquiring, possessing, or distributing pornographic images of minors, whether real or digitally created (e.g., using AI), for the purpose of sexual gratification by any means or using any technology.
- any form of sexual contact or sexual penetration as defined by Michigan statutes.

**SUBSTANTIATED CASE OF CHILD ABUSE** is a case where allegations of child abuse are substantiated by any of the following:

- The perpetrator admits a behavior that is defined as child abuse.
- A judicial finding exists confirming that child abuse occurred (e.g. criminal conviction, guilty plea, etc.).
- The perpetrator is listed in the Michigan Department of Health and Human Services Central Registry.
- The Diocese determines through an investigation that the clear and convincing standard of child abuse exists.

**VULNERABLE ADULT** is defined as an adult who is physically or cognitively impaired in such a way as to be unable to protect him/herself and is to be afforded all of the same protections provided for a child or minor, unless otherwise specifically indicated.

## II. PREVENTION OF CHILD ABUSE

### A. SCREENING OF PERSONNEL

The following applies to all clergy, employees, and all volunteers whose duties include direct contact with minors. *These requirements also apply to any individual age 13-17 who has direct contact with minors as defined by these policies.*



## 1. CLERGY PERSONNEL

**All priests (including retired), deacons (including retired), seminary students, and diaconate candidates ministering or intending to minister in the Diocese of Kalamazoo in a stable manner are required to have the following:**

- A signed *Adult Code of Conduct and Statement of Intent for Compliance* (see Appendix A) indicating the person has received, read, and agrees to conform to the diocesan *Policy for the Protection of Children and Youth*
- Initial and periodic renewals of both state and national background checks
- Completion of the diocesan-promulgated abuse prevention training, remaining current with ongoing education
- Clearance from the Office for the Protection of Children and Youth

These clergy, seminarians, or diaconate candidates not in compliance with the above will not be permitted to minister in any capacity.

## 2. NON-SCHOOL PERSONNEL

**Employees must have the following *before being hired and working in any capacity*:**

- a signed *Adult Code of Conduct and Statement of Intent for Compliance* indicating the person has received, read, and agrees to conform to the diocesan *Policy for the Protection of Children and Youth*
- initial and periodic renewals of both state and national background checks
- completion of diocesan-promulgated abuse prevention training, remaining current with ongoing education
- clearance from the Office for the Protection of Children and Youth.

**Independent Contractor/Contracted Employees (*including but not limited to the following contracted services: Transportation, Cafeteria Services, Maintenance Services, Janitorial Services, Security Guard*) must provide to the parish, agency, or institution with which they have a contract the following current documentation for each contracted employee:**

- Michigan Criminal History Record
- Federal Criminal History Record
- Michigan Central Registry (Clearance Requests available at: <https://www.michigan.gov/mdhhs/adult-child-serv/abuse-neglect/accordion/forms/central-registry-clearance-requests>)

Providers of contracted services who will not have direct contact with children as defined in these policies are not required to furnish clearances.

If an employer has reasonable cause to believe that a current employee has been arrested for or convicted of one of the disqualifying offenses listed in MCL 380, but the employee has not disclosed that information, the employer may – at the employer’s expense – require the employee to obtain and present updated versions of all required background-check clearances as a condition of continued employment.

**Volunteers with children and/or vulnerable adults *before volunteering in any capacity must have the following*:**

- A signed *Adult Code of Conduct and Statement of Intent for Compliance* indicating the person has received, read, and agrees to conform to the *Policy for the Protection of Children and Youth*
- Initial and periodic renewals of both state and national background checks
- Completion of diocesan abuse prevention training, remaining current with ongoing education
- Clearance from the Office for the Protection of Children and Youth

### 3. SCHOOL AND SCHOOL-RELATED PERSONNEL

**School Employees: *before being hired and working in any capacity must have the following:***

- a signed *Adult Code of Conduct and Statement of Intent for Compliance* (see Article X) indicating the person has received, read, and agrees to conform to the diocesan *Policy for the Protection of Children and Youth*
- federal fingerprint background check in compliance with state law
- completion of diocesan abuse prevention training, remaining current with ongoing education
- clearance from the Office for the Protection of Children and Youth.

**Coaches (including assistants) of any Catholic-entity-sponsored team or event (paid or volunteer): *before being hired or working in any capacity, must have the following:***

- a signed *Adult Code of Conduct and Statement of Intent for Compliance* indicating the person has received, read, and agrees to conform to the diocesan *Policy for the Protection of Children and Youth*
- federal fingerprint background check in compliance with state law
- completion of diocesan abuse prevention training, remaining current with ongoing education
- clearance from the Office for the Protection of Children and Youth

**Independent Contractor/Contracted Employees (*including but not limited to the following contracted services: Transportation, Cafeteria Services, Maintenance Services, Janitorial Services, Security Guard*) working in schools must have the following:**

Providers of contracted services that will not have direct contact with children as defined in these policies are not required to furnish clearances.

As a condition of their contract, contractors must provide to the school the following current documentation for each contracted employee:

Michigan Criminal History Record

- Federal Criminal History Record
- Michigan Central Registry (Clearance Requests available at: <https://www.michigan.gov/mdhhs/adult-child-serv/abuse-neglect/accordion/forms/central-registry-clearance-requests>)

#### **Additional Requirements for all School and School-related personnel**

If an employee/contracted employee is or was arrested for or convicted of any of the offenses listed in MCL 380.1535a as requiring or allowing for the suspension of a teaching certificate, that employee/contracted employee is obligated to disclose that arrest or conviction in writing to her or his employer within 72 hours of the change of status.

If an employer has reasonable cause to believe that a current employee has been arrested for or convicted of one of the disqualifying offenses, but the employee has not disclosed that information, the employer may – at the employer’s expense – require the employee to obtain and present updated versions of all required background-check clearances as a condition of continued employment.

**Volunteers with children and/or vulnerable adults *before volunteering in any capacity, must have the following:***

- A signed *Adult Code of Conduct and Statement of Intent for Compliance* indicating the person has received, read, and agrees to conform to the diocesan *Policy for the Protection of Children and Youth*
- Initial and periodic renewals of both state and national background checks
- Completion of diocesan abuse prevention training, including remaining current with ongoing education
- Clearance from the Office for the Protection of Children and Youth

## B. SUPERVISORY PROCEDURES AND RESPONSIBILITIES

Supervising personnel should use appropriate judgment in the selection of volunteers who work with children, and their motivation to work in a certain program or ministry should be carefully considered.

If a supervisor has local community knowledge from reputable sources (including historical and current media) of a person's prior misconduct (e.g., admitted abuse that could not be prosecuted because of the passage of time), they may reject the volunteer's service even if all clearances are obtained.

**For all employment and volunteer positions which require clearances, before an applicant is hired/accepted,** the hiring or volunteer-placement supervisor shall obtain a clearance for the applicant (for child protection purposes) from the Office for the Protection of Children and Youth. An applicant may begin employment or assume the volunteer role only after the Office for the Protection of Children and Youth grants the clearance.

**FOR CLERGY:** The Diocese retains and secures all background check records.

**FOR PARISHES (AND PARISH ENTITIES):** The Pastor or parochial administrator, assisted by the local coordinator, is responsible for ensuring the retention and security of all background check records.

**FOR SCHOOL EMPLOYEES:** All background check records for school employees are maintained by each individual school location in compliance with state law.

**FOR ALL OTHERS:** The leader of any other agency or institution within the Diocese of Kalamazoo is responsible for ensuring the security of all background check records relevant to that agency or institution.

**FOR OTHER GROUPS USING FACILITIES:** Must have an approved diocesan use agreement.

## C. ADDITIONAL CLEARANCE INFORMATION

Child abuse clearance information is confidential and may not be released or otherwise disclosed to other individuals without approval from a diocesan lawyer.

It is prohibited to hire a person or place a volunteer in a position working with children who:

- is a perpetrator of (a) a Substantiated Case of Child Abuse who:
  - is on Michigan's Central Registry
  - who has been convicted of an offense listed under MCL 380.1535a or
  - one substantially similar in another jurisdiction, domestic or foreign.
- has committed a felony offense, other than one of the offenses covered by (1), if less than ten years has passed since the end of the sentence for the offense.
- has committed an offense graded as a misdemeanor, other than one of the offenses enumerated in (1), if less than five years has passed since the end of the sentence for the offense.
- has committed an offense under MCL 267.625 (relating to driving under the influence of alcohol or controlled substance) and less than three years has passed since the end of the sentence.
- has been convicted of violating MCL 267.625 (relating to driving under the influence of alcohol or controlled substance) on more than one occasion.

\*NOTE: The Bishop or his delegate can dispense from individual requirements of these policies on case by case basis.

One may appeal a decision through the Office for the Protection of Children and Youth.



## **D. TRAINING OF PERSONNEL, CHILDREN AND PARENTS**

### **1. ALL PERSONNEL**

All employees, volunteers, clergy, deacons, and seminarians are required to complete the online diocesan in-service program *Protecting God's Children*. This in-service shall be completed every five years. Additionally, all of the above groups shall complete an annual continuing education online module.

A certificate of completion for the diocesan in-service program will be maintained by the appropriate supervising personnel in a secure, locked file in the parish, school, agency, or institution.

### **2. CHILDREN/YOUTH**

Training programs for children will be conducted annually and include age-appropriate materials pertaining to personal safety, healthy relationships, a safe environment in both the physical and online world, and the prevention of child abuse.

Training programs must be completed using the diocesan-promulgated curriculum.

Documentation that training programs have been completed will be maintained by the appropriate supervising personnel in a secure file in the parish, school, agency, or institution. *These records must be kept in accordance with the diocesan data retention policy.*

### **3. PARENTS**

Parishes and schools will make available to parents and guardians the information regarding child abuse and safe environments provided by the Office for the Protection of Children and Youth. Verification of this will be recorded on the parish/school annual compliance audit.

Documentation that information was provided will be maintained by the appropriate supervising personnel in a secure file in the parish, school, agency, or institution. *These records must be kept in accordance with the diocesan data retention policy.*

## **III. WORKING WITH CHILDREN/YOUTH**

Consent must be obtained from the parent or guardian for children to participate in any extracurricular activities sponsored by the diocese, parish, school, agency, or institution. Such permission must include instructions for emergency care.

At least two adults (a husband and wife cannot be the only two adults) must be present for any extra-curricular activity or program sponsored by the diocese, parish, school, agency, or institution. These adults must have all required documentation on file before the event. If both male and female students are present, it is preferred to have both male and female volunteers/chaperones. This requirement applies to both on-site and off-site events. The correct ratio for the nature of the event must be used. Any exceptions must be cleared through the Office for the Protection of Children and Youth.

## A. CLASSROOM MANAGEMENT

### 1. RELIGIOUS EDUCATION CLASSROOMS

There is to be at least one church personnel per 15 minors in a classroom setting. The preference is either two catechists, or a catechist and an aide in each classroom. It is recommended that there is at least one church personnel available in the hallways to assist with any issues that may arise.

In cases where fewer than three students are present in a classroom, that class should be joined with another class.

At the end of a class, church personnel are to release the minors only to parents, legal guardians, or those designated in writing by the parents or legal guardians. Children may be dismissed early if a request is made in writing or in person by the child's parent/guardian. The request must state the reason, date, and time involved, and written requests will be kept on file. This includes releasing the child to obtain assignments or for disciplinary reasons.

Any parent who wishes to visit a religious education class is welcome to do so. In this event, if they are not pre-approved by the parish safe environment coordinator, they may only attend if there are at least two already approved VIRTUS-trained and background-checked adults in the classroom. Additionally, they may not interact with the children but may sit in the back of the class and observe. If they wish to observe more than once, they must obtain approval through the parish safe environment coordinator and obtain all necessary clearances.

### 2. CATHOLIC SCHOOL CLASSROOMS

Catholic schools are to follow all policies, regulations, and best practices for classroom management as established in the *Catholic Schools Diocese of Kalamazoo Policy Manual*.

## B. NORMS FOR SPECIAL ACTIVITIES OR EVENTS

### 1. NON-SCHOOL ADULT-TO-CHILD RATIOS

#### a. Preschool through Grade 8 (or equivalent age group)

For on-site activities or events, there must be at least two approved adults for the first eight minors, and one additional adult for every eight additional minors.

For off-site activities or events, there must be at least two approved adults for the first six minors, and one additional adult for every six additional minors.

#### b. High School (or equivalent age group)

For on-site activities or events, there must be at least two approved adults for the first ten minors, and one additional adult for every ten additional minors.

For off-site activities or events, there must be at least two approved adults for the first eight minors, and one additional adult for every eight minors.

NOTE: The two approved adults can not be a husband and wife. If a husband and wife are chaperones, there must be an additional adult.

## **2. SCHOOL ADULT-TO-CHILD RATIOS**

Catholic schools are to follow all policies, regulations, and best practices for special activities and events as established in Catholic Schools Diocese of Kalamazoo Policy Manual.

## **3. SMALL GROUP/YOUTH GROUP MEETINGS/GATHERINGS IN PRIVATE RESIDENCES**

Youth group programs are a ministry of the parish(es) and should be anchored in the parish(es). Preference should be given to ecclesial settings over private residences. Though meetings at private residences are discouraged, they are permitted up to three times per year. Preference must be given to holding the meetings in a participant's home over the adult small group leader's home. Permission slips/waivers must be signed by a parent or guardian for each youth participant. The dates and times of any meetings off the church property must be included with the permission slip.

When using a private residence, a reasonable application of these policies should occur. When youth gatherings are held in private homes, the adult screening and training standards will apply to all adults present at the home. Individuals who are in the host home but who are not connected to the small group should confine themselves to another area in the home to ensure that the group members have the necessary privacy. This is necessary to allow them to share freely within the confines of the youth group. Youth group leaders should be the first to arrive and no minors should enter the residence until two youth group leaders are present.

Homeowners should be made aware that they are taking on substantial liability and that it is their own. Michigan Catholic Conference (MCC) recommends that homeowners who host activities at their homes should have at least \$1,000,000 of liability insurance.

Persons providing shared rides must follow the diocesan driving guideline (page 12).

Any off-parish-grounds meetings outside the local area or requiring overnight travel will require a separate permission slip/waiver and must follow diocesan guidelines as noted above.

### **Required Forms**

- Child Protection Required Clearances and Forms for Non-School Regular Volunteers
- Permission slip for Youth Group Meetings

## **4. CHAPERONES**

For overnight or offsite events, chaperones must be at least 21 years of age.

For onsite special activities or events, chaperones 18-20 years of age are permitted so long as they are at least five years older than the youth participants.

During the time adults are responsible for the chaperoning of children during day activities or overnight trips, they are never permitted to provide for minors — or use themselves — illegal drugs, cannabis, alcohol, tobacco, vaping materials or media in any form that is unsuitable for children (e.g., pornography).

A “buddy system” of a child with another child on trips is recommended as a good safety strategy. This in no way removes the requirement for adult supervision.

## 5. OVERNIGHT TRIPS

There must be at least two adults (a husband and wife cannot be the only two adults) accompanying children on any overnight trips. These adults must be cleared, trained, and have all required documentation on file before the trip. The appropriate ratio of adults to minors must be present. If both male and female children are present, male and female adult supervision is required.

Care needs to be taken to provide a safe environment for sleeping, showering, bathing, dressing, and all other aspects of being away for a period of time. Adults must always respect the privacy of children. Adults must likewise maintain standards of personal privacy when using the restroom, showering, dressing, and otherwise engaging in typically private daily activities while traveling. An adult should never enter a restroom or sleeping area without at least one other adult except for in cases of emergency. If an emergency situation occurs, the leader in charge of the group should be notified immediately.

While staying in a hotel-style room or camping, it is never appropriate and therefore prohibited for an adult — other than a parent or legal guardian — to share a room with a child.

While staying in a large recreation-style room (e.g., gymnasium or classroom), care must be taken to separate adults to one side and minors to the other.

If children visiting from out of town (such as youth choirs and sports teams) need to be housed in private homes, all adult residents of the home, along with all adults who will stay there, must obtain the clearances required of volunteers before the children are housed.

## 6. DRIVING

Persons transporting minors to or from events must be known to the leaders of the event. The driver must:

- be at least 21 years old;
- be in compliance with all adult volunteer requirements
- complete the diocesan Volunteer Driving Information Sheet, documenting:
  - no record of convictions for the past five years for DUI;
  - not driving with a suspended or revoked license, or reckless endangerment;
  - proof of minimum \$500,000 of insurance;
  - valid state driver's license qualified for the vehicle being operated.

When transporting minors, all vehicles must travel together. All vehicles must leave and arrive at the designated locations at the same time and must follow the same route, including stopping at pre-arranged stops. If only one vehicle is needed to transport minors, two adults must be present in said vehicle. The only exception is the case in which an adult is transporting only his or her own children.

Drivers should be made aware that they are taking on substantial liability and that it is their own.

## C. CHILDCARE DURING MASS OR OTHER EVENTS

Childcare programs can be a helpful resource to families with young children and must be preapproved by the Pastor. All pertinent information and policies must be clearly communicated to parents/guardians. **The parish or school reserves the right to close or limit the number of children admitted if adequate staff/volunteers are not available. All childcare personnel are required to follow all diocesan child protection policies.**

**Parents must always remain on the same property as the childcare program and must be reachable at all times.**

## 1. OPERATIONS

- a. Parishes should have set operating hours and require parents/guardians to pick up their child within the designated pickup period following the conclusion of the Mass or activity (e.g., within ten minutes of the conclusion).
- b. Parents/guardians are required to complete a childcare registration form on an annual basis.
- c. Parishes reserve the right to set minimum and/or maximum age requirements.
- d. Parishes will create a communication plan for how to communicate with parents in the event of a necessary bathroom visit, emergency, etc.
- e. Parishes should create a set of rules that dictates the health requirements of those attending the childcare program.
- f. Childcare personnel may not administer medication.
- g. Minors are permitted to be childcare providers **only if they are assisting adults** and have been given proper training and signed the Code of Conduct and Statement of Intent for Compliance for Ages 13 Through 17. Minors who are assisting with childcare are not to be counted as adults for maintaining the proper adult-to-child ratio.

## 2. PARENTAL RESPONSIBILITIES

- a. Parents/guardians must respond in a timely manner if childcare personnel requires them to return to their child.
- b. It is preferred that parents/guardians assist their child with diapering, changing, or bathroom assistance. If a parent/guardian is not available or in case of emergency, two adults may assist the child.
- c. Other than to assist with needed bathroom visits or to administer medications, parents are not permitted to stay with their child in the childcare program.

## D. COMMUNICATION WITH MINORS

Adults are not to intentionally engage in one-on-one communications with minors via telephone, text, email, social media, or any other electronic communication. Any communications with minors must include at least one other approved adult. This also pertains to any in-person meetings as well.

Adults are not permitted to follow on social media any minors involved in youth programming.

## E. GENERAL INFORMATION

Adults are never to give gifts to individual children without the prior knowledge and consent of the child's parents as gift-giving can be interpreted as a form of grooming.

Adults must always maintain a professional attitude when dealing with minors, avoiding unhealthy emotional attachment and being aware of an attraction minors have toward adults in positions of authority and trust. If a personal or physical attraction begins, the minor child should be referred to working with other church personnel. If there is a need to speak to a minor in private, another adult should be notified and it should be done in a place where the adult and minor are visible at all times.



## IV. COUNSELING AND SPIRITUAL DIRECTION OF CHILDREN/YOUTH

Counselors who are licensed professionals and spiritual directors and hold recognized credentials bear full responsibility for establishing and maintaining clear and appropriate boundaries in accord with their professional standards.

Others providing counseling or spiritual direction and meeting alone with children must use the following precautions:

- The door to the meeting room must be left open or allow for visibility from the outside (e.g., window).
- Barring emergencies, another adult must be informed of the meeting and be nearby.
- Barring emergencies, meetings must occur during standard business, worship, or school hours.

Counseling and spiritual direction should be done in an appropriate setting and at an appropriate time, following precautions listed in the statement above without exception.

Private living quarters are never a suitable place for counseling or spiritual direction.

If the extent of a minor's need for counseling exceeds a church personnel's competency, they are to refer the minor child to a qualified adult or licensed professional.

Unless subject matter precludes their presence or knowledge, parents or guardians should always be made aware of the counseling sessions.

Church personnel must discuss the nature of confidentiality and its limitations with each person being counseled. Information that is disclosed during counseling or advising is to be kept confidential, except for compelling professional reasons or as required by law.

While counseling a minor child, if church personnel discover that there is a serious threat to the welfare of the minor, and that communication of confidential information to a parent/legal guardian or other authority is essential to the minor child's health and well-being, the church personnel must disclose the information necessary to protect the health and well-being of the minor child.

The relationship between an adult and a minor child must always remain professional during the counseling session. Pastoral counselors should try to recognize any personal/physical attraction to-or-from a minor. In such a situation, the minor should be immediately referred to another qualified adult or licensed professional.

If counseling is expected to extend beyond two sessions, evaluation of the situation should be made with parents or guardians, an advisor, or licensed professional. Careful and appropriate boundaries concerning physical contact with a minor must be observed at all times.

If celebrating Sacrament of Reconciliation, it should be administered in the proper location or, if that is not available, in a discreet location following all proper guidelines.

The Seal of Confession is inviolable.

## V. REPORTING CHILD ABUSE

### A. PERSONS WHO MUST REPORT ABUSE

Under state law, certain individuals such as doctors, nurses, teachers, law enforcement officers, clergy members, and others who are likely to come into contact with children in the course of their work or professional practice are mandated to report suspected child abuse including child sexual abuse. This means that some volunteers who perform services for a parish/school may also be considered mandated reporters under certain circumstances. Legal immunity is granted to any individual who, in good faith, makes a report of suspected child abuse, even if he/she was not under a legal obligation to do so.

The privilege governing communications between a professional person and his/her patient/client typically does not require confidentiality in situations involving child abuse and does not constitute a legitimate reason for failure to report, particularly where future harm may be prevented. Nonetheless, clergy are not permitted by Church law to report information received privately during sacramental confession. In addition, according to Michigan state law:

Any legally recognized privileged communication except that between attorney and client or that made to a member of the clergy in his or her professional character in a confession or similarly confidential communication is abrogated and shall not constitute grounds for excusing a report otherwise required to be made or for excluding evidence in a civil child protective proceeding resulting from a report made pursuant to this act. MCL 722.631

### B. OTHER PERSONS WHO CAN REPORT ABUSE

Any person may make a report of child abuse. The report is made when abuse is actually disclosed by the child or when a person has reasonable cause to suspect that a child is being or was abused. Reasonable suspicion — not proof — is the standard. Even an erroneous report — made in good faith — is permissible and legally protected from repercussions.

### C. INCIDENTS TO BE REPORTED

Child abuse disclosed directly to a mandated reporter must be reported to the proper authorities. In addition, any reasonable suspicion of child abuse by a mandated reporter must also be reported. In other words, a child need not personally report the abuse to the mandated reporter to trigger the mandate to report. *The reporter merely needs a reasonable cause to suspect that the child may be a victim of child abuse.* It is the policy of the Diocese of Kalamazoo that even an employee or volunteer who suspects child abuse, but who is not a mandated reporter, **is to report the abuse to the Michigan Department of Health and Human Services Centralized Intake (if the suspected victim is still a minor)** or to secular law enforcement (for adults previously abused as children). By diocesan policy, this duty to report applies whether or not a mandatory-reporting obligation is required by law. The mandate to report applies to all child abuse, not just abuse that has been perpetrated by Church personnel. Possible abusers could include, for example, parents, relatives, older siblings, neighbors, youth group or sports leaders, family friends, and other children. [See VI A.] When an incident of abuse occurred in the past and the victim is an adult when the information is received, the reporting procedures of these policies still apply (see VI, Procedure for Reporting Abuse).

As a matter of diocesan policy, any doubt concerning the application or interpretation of these provisions should be resolved in favor of reporting and securing the safety of the child as far as possible. The secular authorities will determine the particulars and take appropriate action. Any suspicious or inappropriate behavior involving children even if it does not give rise to a reasonable suspicion of child abuse, including any violation of the “Guidelines for Working with Children and Youth” or the “Code of Conduct,” should be reported directly to the employee’s or volunteer’s supervisor, who must then immediately notify the Office for the Protection of Children and Youth of the complaint and all known details. If the complaint involves the supervisor, the employee or volunteer must personally notify the Office for the Protection of Children and Youth.

## VI. PROCEDURE FOR REPORTING ABUSE

### A. Required by Law

**IN EVERY INSTANCE,  
IN THE EVENT OF LIKELY IMMINENT DANGER TO THE CHILD,  
LOCAL POLICE (911) SHOULD BE CONTACTED IMMEDIATELY.**

A mandated reporter is legally required to make a direct immediate report of the suspected abuse to the Centralized Intake of Michigan Department of Health and Human Services. The toll-free number is 855-444-3911 and the website is [https://newmibridges.michigan.gov/s/isd-partnershiplanding?language=en\\_US](https://newmibridges.michigan.gov/s/isd-partnershiplanding?language=en_US).

Within 72 hours of making an **oral** report by telephone, the reporting person shall file a **written** report (DHS-3200, [http://www.michigan.gov/mdhhs/-/media/Project/Websites/mdhhs/Doing-Business-with-MDHHS/Child-Welfare/DHS3200\\_report.dot?rev=dfa38db3ae4541808bdfd0d20519125a&hash=8878E9D8349571435816C13595752F530](http://www.michigan.gov/mdhhs/-/media/Project/Websites/mdhhs/Doing-Business-with-MDHHS/Child-Welfare/DHS3200_report.dot?rev=dfa38db3ae4541808bdfd0d20519125a&hash=8878E9D8349571435816C13595752F530)). If the immediate report has been made using the online reporting system, no additional written report is required. The mandated reporter is also to notify the person in charge (Principal/Administrator for a school, Pastor for a parish, Agency Director for an agency), who must thereafter assume the responsibility to assure the cooperation of the institution in any resulting investigation. The person in charge will immediately notify the Office for the Protection of Children and Youth and follow up with a written report to that same office within 24 hours of having received the allegation.



***A mandated reporter shall not conduct an investigation on his or her own. As appropriate, the Diocese will follow its internal investigation protocols and coordinate with law enforcement. The Diocese will only commence its investigation after receiving clearance from law enforcement authorities.***

## B. ADDITIONAL REQUIREMENT FOR SCHOOL EMPLOYEES

If the suspected perpetrator of abuse is a fellow employee in a Catholic school, follow the diocesan reporting procedures, and also:

Immediately and directly notify:

1. Law enforcement officials
2. Principal/Administrator (if the alleged perpetrator is the Principal/Administrator, notify the Superintendent instead).

Be sure to give as much of the following information as possible to the persons or agencies listed above:

- the name, age, address, and school of the student.
- the name and address of the student's parents or guardian.
- the name and address of the school administrator.
- the name, work, and home address of the perpetrator.
- the nature of the alleged offense.
- any specific comments or observations that are directly related to the alleged incident and the individuals involved.

The Principal/Administrator will immediately notify the Superintendent of Schools as well as the Pastor. The Superintendent will confirm that all necessary parties have been notified.

## VII. ALLEGATIONS AND RESPONSE PROCEDURES

Upon learning of an allegation of child abuse, and verifying that all required reporting has been fulfilled, the Office for the Protection of Children and Youth shall undertake the following:

### A. INVESTIGATION

Any investigative or other action on the part of the Diocese will be undertaken only after consultation with and in collaboration with law enforcement.

During the course of the investigation of alleged abuse, the alleged perpetrator who is an employee will be placed on paid leave of absence until the investigation is concluded unless law enforcement or diocesan counsel instruct otherwise in writing.

UPON RECEIPT OF AN ALLEGATION: The Office for the Protection of Children and Youth (or the diocesan bishop in the case of a cleric) shall 1) inform the alleged perpetrator of the allegation, 2) inform the alleged perpetrator that he or she is placed on immediate leave, and 3) instruct the alleged perpetrator to refrain from any retaliation, contact, or communication involving the alleged victim, victim's family members, or witnesses. Additionally, the alleged perpetrator must be instructed that 4) by virtue of these policies, full cooperation with all investigations is a condition of continued employment, and 5) all reasonable steps must be taken to preserve any evidence, including electronically stored information, pending the conclusion of the investigation.

If the alleged perpetrator is a priest or deacon, after having conferred with legal authorities and in cooperation with them, the diocesan bishop will conduct the canonical investigation and any follow-up procedures as defined in the USCCB *Essential Norms for Diocesan/Eparchial Policies Dealing with Allegations of Sexual Abuse of Minors by Priests or Deacons*.

## **B. COOPERATION**

The Diocese, its Office for the Protection of Children and Youth Protection, its schools, agencies, parishes, and all employees and volunteers will cooperate fully in any investigation into child abuse by secular or diocesan authorities. The commitment to cooperate fully in child abuse investigations is a condition of employment or volunteering within the Diocese in any of its schools, parishes, agencies, institutions, programs, or services. Cooperation includes making oneself available for interviews, answering all questions truthfully and completely, and providing any requested documents, files, or electronically stored information, in whatever format and stored in whatever fashion.

## **C. CARE OF VICTIMS**

In instances of allegations of child sexual abuse, the Bishop or his delegate will refer the alleged victim to the Victim Assistance Coordinator, who will coordinate whatever range of care is necessary, including medical care, counseling, spiritual assistance, and other social service assistance.

If an alleged victim of child sexual abuse is in need of physical medical care or counseling due to the abuse that the child has suffered, the Diocese will pay the costs of that care and counseling within reason.

If a civil settlement agreement is reached with the victim, such agreement shall not contain a confidentiality provision except for grave and substantial reasons brought forward by the victim/survivor and noted in the text of the agreement.

## **D. PENALTIES**

If a single allegation is confirmed as a Substantiated Case of Child Abuse, the offending employee or volunteer will be immediately dismissed from his/her position and permanently prohibited from working or volunteering with children anywhere in the Diocese of Kalamazoo.

## **E. MAINTAINING RECORDS**

The Office for the Protection of Children and Youth maintains a public website (<https://diokzoo.org/list>) that lists the names of individuals disqualified in the judgement of the Diocese from working or volunteering with children in the Diocese, its parishes, schools, related agencies, institutions, or any entity funded by the Diocese of Kalamazoo.

Such disqualification arises from actions which could include the following:

- continued violations of a child protection policy after warnings
- failing as a mandated reporter to report allegations of abuse of minors
- failing to act to prevent abuse that they knew was happening
- furnishing pornography to minors
- the possession/use of child pornography
- physical abuse of minors
- direct sexual abuse or sexual assault of minors.



The Office for the Protection of Children and Youth shall maintain a centralized depository of name-based indexed reports of suspected child abuse, violations of the *Policy for the Protection of Children and Youth*, and other inappropriate behavior. The records shall be kept by the Office of Child and Youth Protection in digitized files to ensure ease of access and transfer.

The Office for the Protection of Children and Youth shall maintain a record of new reports and complaints of suspected child abuse, inappropriate behavior relating to a child, and violations of the *Policy for the Protection of Children and Youth*. The Office for the Protection of Children and Youth will update each record with information from follow-up investigations and any dispositions of a case.

## VIII. CONFIDENTIALITY

Any communication regarding a child abuse case must be limited to the proper reporting authorities (legal, educational, parental) unless good cause exists for the Bishop to make an allegation public (e.g., seeking public help to identify unknown perpetrators, victims, or witnesses) or until such time as a clear determination of the allegation's veracity has been made.

## IX. PASTORAL CARE

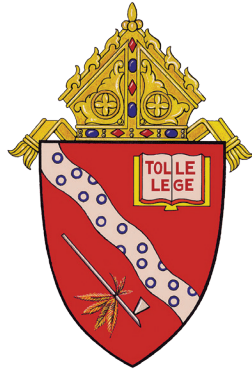
The Diocese of Kalamazoo takes seriously its responsibility for pastoral care for the victim, the accused, and the parish/diocesan community. The professional Victim Assistance Coordinator is available to victims and their families to provide immediate assistance and to coordinate whatever range of pastoral care is deemed necessary. The name and contact information of the current Victim Assistance Coordinator can be found at [diokzoo.org/protect](http://diokzoo.org/protect).

## X. CONCLUSION

The purpose of these policies is to ensure, as far as possible, a safe environment for all children who are served by the Diocese of Kalamazoo itself, or by any Catholic school, parish, or related agency within the diocese. By articulating a code of behavior through training and education; guidelines for prevention; recognition of child abuse; and a clear procedural response, the Diocese of Kalamazoo promotes that safe environment.



**[diokzoo.org/protect](http://diokzoo.org/protect)**  
**for more information, resources and forms**



# APPENDIX

# ADULT CODE OF CONDUCT AND STATEMENT OF INTENT FOR COMPLIANCE

(PLEASE NOTE: To be completed and signed by employees and regular volunteers AFTER this manual is read.)

I have read and understand the Diocese of Kalamazoo *Policy for the Protection of Children and Youth*. I understand that to share in the ministry of Christ is a great privilege as well as a great responsibility. I will comply fully with all the requirements specified in these policies, including the procurement of background checks and completion of the diocesan training session, *Protecting God's Children*, and any additional ongoing education required. I will not allow anyone to complete compliance requirements on my behalf.

I also understand that if I do not complete the requirements of these policies, I will be prohibited from working with children until the requirements are complete.

I testify that I have never been convicted of child abuse or a crime involving actual or attempted sexual molestation. No formal or informal unresolved charge, claim, or complaint has ever been made against me that would call into question the advisability of entrusting me with the supervision, guidance, and care of children.

I understand that the Church is committed to protecting the children who are entrusted to its care and to ensuring that people offering services are in proper relationships with the children receiving services.

In Ephesians 4:1-3 we are implored to live in a manner worthy of the call we have received from Christ. As a member of Church personnel, I pledge:

- To represent the Church in a faithful, authentic, and loving way, supporting the teachings of the Catholic Church;
- To exhibit the highest Catholic ethical standards and personal integrity in both my work and personal lives;
- To conduct myself in a professional manner in both Church and work environments, avoiding any flagrant or public misconduct;
- To hold myself and others accountable to appropriate conduct and standards;
- To foster the dignity of each person and be committed to the best interests of others;
- To respect the integrity of all individuals and protect the confidentiality of all information of which I have access to;
- Never to take advantage of any relationship with a child for my own benefit;
- Never to physically, sexually, or emotionally abuse or exploit any person; and
- Never to neglect a child in my care.

---

**SIGNATURE**

---

**PRINTED NAME**

---

**DATE**

# CODE OF CONDUCT AND STATEMENT OF INTENT FOR COMPLIANCE FOR AGES 13 THROUGH 17

(PLEASE NOTE: To be completed and signed by employees and regular volunteers AFTER *Policy for the Protection of Children and Youth* is read.)

To ensure the safety of children and youth in the Diocese of Kalamazoo, youth ages 13-17, who work or volunteer with children/youth in co-curricular school programs or parish ministries must receive training on the *Policy for the Protection of Children and Youth* from the designated supervising adult before beginning their ministry. The youth worker/volunteer and their parent/guardian must sign this form to verify they understand their obligations.

I have agreed to work or volunteer with fellow youth or younger children. I promise to set a good example of our Catholic faith and treat others with human dignity. I understand that if I break the rules of this Code of Conduct, I may be removed from my work or volunteer assignment and that my parent/guardian will also be notified, as appropriate. If I am dismissed while on a trip, I will be sent home at the expense of my parent/guardian.

## **As a youth worker/volunteer, I will:**

- behave according to the teachings of the Catholic Church;
- treat everyone with whom I interact with respect, patience, integrity, courtesy, and dignity;
- make sure that children or youth in my care are safe;
- report to the adult in charge if I see, hear, or suspect anything that makes me uncomfortable or that makes me think that another person is in danger or has been harmed;
- inform the adult in charge if I sense that a child/youth is developing inappropriate feelings or behavior toward me;
- dress and speak appropriately;
- carefully consider my leadership role before participating in private visits, parties, or other activities with the children/youth I am working with and discuss any questions or concerns with the adult in charge (pre-existing relationships with families or peers in the program or ministry should be shared with the adult in charge);
- consider my role as a leader before giving any gifts to children/youth in my program or ministry and discuss with the adult in charge the appropriateness of any gifts I may wish to give.

## **As a youth worker/volunteer, I will not:**

- do anything I know to be illegal or immoral;
- smoke, vape, or use tobacco, marijuana, or other related products;
- possess, consume, or distribute alcohol or illegal drugs;
- verbally threaten, bully, tease, or physically abuse anyone;
- use profanity;
- use physical discipline or discipline that frightens or humiliates a child/youth;
- touch a child/youth in an inappropriate manner;
- sexually harass; request sexual favors from; or make sexually explicit statements to anyone; or
- become inappropriately friendly with the children/youth I am working with through social media or other forms of communication.

I have read and understand the Diocese of Kalamazoo *Policy for the Protection of Children and Youth*.

I have read and understand the above guidelines and agree to support my child in following them. I agree that I am ultimately responsible for my child's behavior, and agree to accept the consequences, which may include my child's dismissal from the program or ministry, if my child does not follow the guidelines.

---

**SIGNATURE FOR MINOR**

---

**PRINTED NAME MINOR**

---

**DATE**

---

**SIGNATURE PARENT/GUARDIAN**

---

**PRINTED NAME PARENT/GUARDIAN**

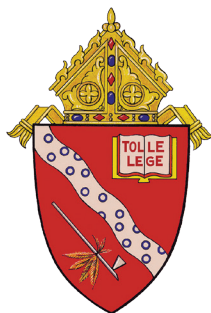
---

**DATE**

## NOTES

[illegible]





DIOCESE OF KALAMAZOO

© 2025