INDEPENDENT COMPLIANCE AUDIT

ARCHDIOCESE OF SANTA FE REPORTING POLICIES AND PROCEDURES



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PURPOSE

In fulfillment of the Non-Monetary Covenants required as part of the Archdiocese of Santa Fe's ("ASF" or "Archdiocese") bankruptcy settlement, we were retained as the Child Protection Consultant to conduct a compliance audit of its child protection policies and reporting procedures.

EXECUTIVE SUMMARY

The Archdiocese maintains robust policies condemning the abuse of children and its efforts toward increased transparency are evident both on its website and in its numerous publications regarding child protection. The reporting procedures, however, are not as clear. Personnel at ASF schools expressed confusion about the investigation process once reports are made and uncertainty about the nature and timing of parental involvement. Among other things, we recommend a uniform, well-defined, and simple reporting procedure with associated training. Implementation of such a procedure may assist individuals in pursuing appropriate interventions when necessary and help ASF take immediate action to protect the children of the Archdiocese.

INTERVIEWS

To obtain information about the visibility and effectiveness of the Archdiocese's abuse reporting policies and procedures, the following interviews were conducted. The interviewees included males and females of all ages and races who each interacted with the Archdiocese in different capacities and therefore had unique perspectives on ASF's existing child protection policies and procedures. The four youths interviewed were between the ages of 18-21, and no minors were involved. To ensure that they had the ability to give candid information and opinions, all individuals were promised anonymity and are not identified by name or gender below.

I. NON-EMPLOYEES

A. Ouestions Asked

The non-employee interviewees were asked some variation of these same standard questions:

- 1. Are you aware of the Archdiocese's abuse policies and reporting procedures?
- 2. Have you ever used ASF's abuse reporting procedures?
- 3. Have you seen posters or pamphlets or other information in your parish about abuse reporting?
- 4. If you needed to report abuse by someone associated with the Archdiocese, what process would you follow?
- 5. What, if anything, would be a barrier to your reporting?
- 6. What training have you received on ASF's abuse policies or reporting procedures?
- 7. Is there any other information or any opinions you want to share?

8. Some individuals were asked about hypothetical situations and/or tasked with navigating the ASF website to quickly identify the Victim Assistance Coordinator's ("VAC") contact information.

B. Summary of Interviews

1. Archdiocese Youth

Youth #1. The youth was asked how they would report inappropriate conduct toward them by a church member. They stated that they would first inform their parents, then the police, then their church parish. They did not know of policies or procedures but recalled brief training in connection with their confirmation program. They were able to quickly locate the VAC's contact information.

Youth #2. The youth was asked how they would respond if they were receiving unwanted texts sent by a church volunteer. They said they would block the volunteer's phone number but not report the volunteer to any other individual, including their parents, the police, or the VCA, out of embarrassment. They were unaware that their church was part of a larger archdiocese and believed that any reporting information would be found on their parish's website.

Youth #3. An Archdiocese college student was asked how they would report abuse of a child in an Archdiocese elementary school. They stated that they would call the school, the police, and the VAC whom they were able to search for and quickly identify.

Youth #4. The individual stated that when they were a minor (which was recently), they volunteered as an altar server but received no training in abuse reporting or procedures in that capacity. They did, however, receive brief training during their confirmation classes. If they knew of or experienced inappropriate conduct by anyone associated with the Archdiocese, the youth stated that they would first inform their parents, then the police, then either their parish priest or the Archdiocese. They were never alone with any individual during their volunteer service and witnessed nothing inappropriate at any time. When training is conducted for minors, the interviewee said that it may be helpful to separate the genders for training sessions because of the awkwardness of the subject matter. Although they do trust the Church, they stated that anonymous reporting is probably the best option for most individuals.

2. Archdiocese Parishioners

Parishioner #1. An Archdiocese parishioner stated that when their children received the sacraments, they had a brief general video training regarding the signs of child abuse and the reporting process. They were unsure

whether any information specific to ASF was provided to parents and they have never seen information posted in their church regarding child protection efforts or reporting procedures. The individual was asked to find the name and contact information for the person at the Archdiocese handling complaints against an ASF member and was able to do so with a quick internet search.

Parishioner #2. An Archdiocese parishioner was unfamiliar with ASF's abuse reporting policies and procedures and had never seen any postings in their parish providing information about resources available to abuse victims. Citing historical issues regarding abuse in Native American boarding schools, the individual stated that it may be culturally difficult for the Native American population to be open and trusting with the Archdiocese in disclosing abuse. Given this, the interviewee stated they would probably report abuse to the police and let the authorities contact ASF directly.

3. Archdiocese volunteers

Archdiocese Volunteer #1. An Archdiocese volunteer who also works with children as part of their job, stated that they had received recent training on the ASF abuse policies and procedures. According to the volunteer, the training was too generalized and, although it provided descriptions of what may be signs of child abuse or the characteristics of a child abuser, there was no accounting for scenarios which fall outside of the classic and stereotypical situations. The volunteer made the point that a trick of an abuser is to disguise themselves so that they are not detected. Therefore, they believed that in-person training focusing on real life examples of situations involving child abuse might be more effective in catching perpetrators. The volunteer also stated that they would call the police and the Archdiocese, not the individual parish, to report abuse as they perceived that their church might protect the accused.

Archdiocese Volunteer #2. An Archdiocese volunteer stated that they had encountered a situation in which they overheard a youth discussing disturbing pictures they had received from a fellow student outside the context of ASF. The volunteer reported the matter to the youth's parents and the head of the volunteer program and was unaware about how it was handled. The volunteer had received training and was very confident that they would immediately report any abuse they saw, experienced, or learned of to the police, their parish, and the Archdiocese.

4. Parent of a child in an Archdiocese school.

A parent of a child in an ASF school stated that if they learned their child had been subjected to inappropriate conduct by a teacher, they would first contact the police and then the school. The parent said they would inform the Archdiocese at a future point but believed that the police and the school were best positioned to handle an initial complaint. Importantly, the parent had great confidence in the Archdiocese school system and believed their complaint would be handled appropriately and with transparency.

5. Former student of an Archdiocese school

A former student at an Archdiocese school did not recall any training regarding abuse or abuse reporting during their school days, nor did they have any need to report abuse. By contrast, the individual stated that they have had training in abuse prevention and reporting in connection with their children's faith formation activities. The interviewee said that if a situation arose, they would talk with the parish priest and then CYFD. The individual said they would also contact the Archdiocese to make a report and would not be worried about retaliation. The individual recommended having posters in each parish church listing resources for anonymous reporting. The individual was encouraged by the Archdiocese's efforts to address abuse, but stated there was more work to be done.

6. Non-Catholic adult

A non-Catholic adult stated that if they learned a minor was being subjected to unwelcome conduct at a church event, they would call the police but were unaware that the Archdiocese existed.

II. ARCHDIOCESE PRIEST

An Archdiocese priest stated that he regularly receives training on identifying child abuse victims and on reporting procedures. This training has been in person, and also via the Virtus platform every two or three years. The priest has never had to use the reporting procedures, but if he knew of a situation in which it was necessary, he would first immediately call the police, then the Archbishop or Vicar General, and then the VAC who he knows and is able to identify by name. The priest also stated that when he reviews job applications and an applicant discloses anything other than a routine traffic ticket, he immediately consults the VAC to determine next steps. The priest ensures that abuse reporting information is clearly displayed in his church's vestibule. The priest did not perceive any barriers to reporting and emphasized that identifying whether someone is an abuse victim and immediately reporting it, even if allegations did not seem credible on their face, is required and would be done. The priest ensures that all volunteers and employees receive training on abuse reporting policies and procedures before they began interacting with children.

III. ARCHDIOCESE SCHOOL PERSONNEL

Employees of the Archdiocese school system are in the most frequent contact with ASF children and interact with them for several hours each day at least five times per week. Input from these employees was critical in reviewing what aspects of the Archdiocese's current policies and

procedures are effective and where improvements may be made.

A. Teachers

- 1. Archdiocese Teacher #1. An Archdiocese teacher stated that they had never had to use the reporting procedures but had been trained on them every year in their capacity as both an ASF employee and volunteer. The teacher was asked how they would report an allegation of a child being touched inappropriately. They stated that they would immediately report the matter to CYFD, even if they believed the allegation was not accurate. When there was no allegation of physical contact, the teacher said that context may be important to their determination about to whom to report to the matter, but in every scenario, they would inform the school administration. The teacher knew the name of the VAC and said that her contact information was posted in the front office where it is easily accessible. The teacher did not know if the contact information was posted anywhere else in the school or the church. The teacher stated that when they were a new teacher, they were asked by their school administration to personally handle a situation with a suicidal student, and they believed they were inadequately trained to do so. The teacher stated that the ASF schools need to broaden the scope of policies and reporting procedures so as to address mental health concerns that do not directly relate to child abuse but still impact students.
- 2. **Archdiocese Teacher #2.** An ASF teacher stated that they were aware of the abuse reporting policies and procedures although they had never had to use them in the context of physical abuse of a child. Like ASF Teacher #1, however, they did encounter a situation in which a student was suicidal, and they reported the matter to the school administration and CYFD. In recent training, the teacher said that the VAC had emphasized the importance of reporting to the point of "overreporting" and that they were told to inform CYFD of an abuse allegation even if another teacher may have already reported it. In other words, school personnel are taught not to assume that CYFD is aware of a concern until the teacher personally reports it to the agency. The teacher believes that school personnel have access to past notes and training material on a Google drive where they can review it if necessary. The teacher does not perceive any barrier to reporting and would do so regardless of a fear of retaliation by their co-workers. The teacher has seen a posting of information about abuse reporting in their school but does not know if there is a similar posting in the church.

B. Archdiocese School Principals

The Archdiocese school principals were collectively interviewed on February 14, 2023. They were asked to discuss how ASF's abuse reporting policies and procedures were applied at their individual schools from hiring to termination.

After discussing a variety of different approaches and challenges at each school there was a general consensus that the lack of a uniform process made it difficult for the principals to be confident that their particular school had followed the processes correctly and to completion. Although each principal had acted in every situation with good intent and the children's best interest in mind, the ambiguity, and criminal charges (recently dropped) against three individuals who had confronted an abuse reporting situation was the source of fear about the process. Moreover, confusion about resources and available information at the applicant screening stage led to a concern that hiring decisions could be made based on incomplete data. The principals offered many potential solutions to these challenges that are discussed below.

C. Archdiocese School Employee

An employee at an Archdiocese school said that they had not encountered a situation in which they had to report abuse. However, they stated that if a child did report "severe abuse," they said they would immediately call CYFD and then discuss the matter with the principal and if necessary, the superintendent. They defined "severe abuse" as sexual contact. If the abuse was less severe, such as a child reporting that they were afraid of their parents, the employee would talk to the principal or the superintendent. They said that they did not feel any barrier to reporting abuse out of a need to protect children and would make a report even if they were personal friends with the alleged perpetrator or did not believe abuse had actually occurred. The employee said that they attended Virtus training when they first started the job two years ago and had attended an in-person training in the summer of 2022. They did not know if any information about abuse was posted anywhere in the school or in the church and had never heard of Annette Klimka or the VAC.

D. Superintendent of Archdiocese Schools

Donna Illebrund, Superintendent of the Archdiocese Schools, was interviewed on several occasions and gave a candid assessment of ASF's abuse policies and procedures. While the policies themselves are strong, like the principals, Ms. Illebrund recognized the absolute need for one uniform reporting process which would provide clarity and reassurance to the many employees within the Archdiocese school system. Ms. Illebrund was very proactive in implementing immediate improvements where possible such as creating a visible sign to be posted in employee lounges. Using the acronym SAFE, Ms. Illebrund has communicated a simple message to school personnel about the urgency of identifying potential victims and reporting concerns.

IV. VICTIM ASSISTANCE COORDINATOR

Victim Assistance Coordinator, Annette Klimka, was interviewed twice. Ms. Klimka is responsible for receiving reports of child abuse and acting on those reports, meeting with victims, and providing ASF training on policies and procedures. Like other interviewees, she stated that

most difficult parts of the reporting process are the "grey areas" and the subjectivity in determining what is a credible or non-credible allegation. For this reason, Ms. Klimka states that she trains individuals to err on the side of safety. Although it is unfortunate that children may not always receive the type of interactions they want from an adult (e.g., friendly and innocent hugs), Ms. Klimka said that she tells her trainees that even the perception of inappropriate behavior can result in problems. Thus, adults are taught never to be alone with a child and to limit contact, if any, to a "side hug."

Ms. Klimka said that she receives reports of all types from minor perceived slights that do not really fall within the scope of her duties to offenses that merit investigation and a serious response. She stated that, with the exception of complaints involving clergy which require immediate escalation to the Archbishop and/or the Vicar General, she does not typically need to consult with any other ASF employee as to her determination of what is a minor or serious allegation. Ms. Klimka usually speaks with the parties involved and, if warranted, contacts the police. Her contact information (email address and phone number) is on the abuse reporting posters, and if an individual attempts to make a report on the weekend or after hours, Ms. Klimka has added a message on her voicemail providing individuals with phone numbers to call in off-hours. Ms. Klimka is determining with the ASF IT Department whether a similar automatic out of office reply can be added to her email account that is triggered when an email is sent to her after-hours.

Ms. Klimka maintains a database of substantiated and unsubstantiated complaints against Archdiocese employees and volunteers. The only ones with access to this database are Ms. Klimka and the ASF Human Resources department. The database is discussed below.

FINDINGS AND RECOMMENDATIONS

1. An individual's perception of how the Archdiocese has addressed child abuse in the past directly correlates with their willingness to use the ASF abuse reporting procedures in the future.

Many of the individuals interviewed perceived the Archdiocese as making sincere efforts to address child abuse and said they would avail themselves of ASF's reporting procedures if necessary. For example, a parent of a child attending an Archdiocese school voiced very positive feelings and said they would not hesitate to seek help from the school and the Archdiocese. Others, however, expressed a general concern that reporting abuse to the Archdiocese would result in it being "swept under the rug." Some of the individuals interviewed said they would only report abuse to the police but not their parishes or the Archdiocese because of broken trust.

Of significance, a Native American interviewee indicated that after information about the treatment of Native children in boarding schools became public, their trust of the Church had been lost such that they would report abuse to the police, but not the Archdiocese. Although it is beyond the scope of this report to suggest how the unique sensitivities of each culture might be addressed, the Archdiocese should recognize that there may be distinctions in how victims or reporters from different backgrounds may respond to abusive situations. While an overall theme of this report suggests that a clear and uniform policy regarding the reporting and investigation process will benefit the Archdiocese, any improvements will be useful only insofar as individual Archdiocese parishioners from

different backgrounds are willing to utilize that process. For this reason, in addition to responding to all reports of abuse in a timely, thorough, and transparent manner, ASF may consider designating a liaison from the cultures most heavily represented in the Archdiocese population to partner with the VAC in responding to reports of abuse.

To recognize cultural sensitivities, the Archdiocese will include the following language in its public communications about abuse reporting:

We are sensitive to the cultural diversity present within our Archdiocese and will gladly provide a contact person representative of your cultural community when requested.

Should a reporter request that a person from his or her cultural community help facilitate reporting, the Archdiocese will locate and appoint an individual to act in this role.

The Archdiocese should also continue to post abuse reporting information in languages used by its diverse congregation. At this time, information is posted in Spanish, Vietnamese, and Navajo.

2. Consider ways to encourage reluctant youth to report abuse of self or others.

The youth programs were not a subject of this audit, but just as some adults are reluctant to use the Archdiocese's reporting mechanisms, youth may be similarly inhibited. As stated above, one of the youth interviewees said that they would not report abuse out of embarrassment or a belief that they are overreacting. It may be helpful to include in youth-specific posters a statement that reporting inappropriate behavior, no matter how small it may seem, may keep their peers safe. The U.S. government's "If You See Something, Say Something." campaign could be used as a template for such a program. https://www.dhs.gov/see-something-say-something

3. The Archdiocese webpages relevant to abuse reporting should be monitored and updated when necessary.

Most individuals turn to the internet to find abuse reporting information and resources. Maintaining an effective website is a dynamic and ongoing process and the Archdiocese is encouraged to continually monitor its internet presence to ensure that abuse reporting resources are easily accessible and understandable on its website.

The Archdiocese may wish to refer to the following resources when considering possible upgrades to its webpages on abuse training and reporting procedures:

Archdiocese of Boston Protecting Children – Word of Welcome <a href="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome?1="https://www.bostoncatholic.org/protecting-children-word-welcome."https://www.bostoncatholic.org/protecting-children-word-welcome.

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Archdiocese of Los Angeles – Protect https://lacatholics.org/protect/

Archdiocese of Phoenix – Youth Protection https://dphx.org/youth-protection/

Boy Scouts of America Youth Protection https://www.scouting.org/training/youth-protection/

4. The Archdiocese should require each parish to post a link on its website to the abuse reporting information on the ASF webpage.

The Archdiocese's website is not widely accessed and when they think of voicing concerns or obtaining information, individuals are more likely to visit their own parish's website to do so. When a sampling of individual parish websites or Facebook pages were reviewed, most did not display a link to the ASF website or otherwise inform parishioners how to make a report of abuse. Posting policies and procedures only on the ASF website is not sufficient to disseminate information. The Archdiocese should require each parish to post reporting information on its website or Facebook page and should ensure that each parish complies.

5. Posters and other public communications regarding abuse reporting should be simple, clear, and in translated into English, Spanish, Vietnamese, and Navajo.

It is our understanding that in compliance with the stipulated non-monetary covenants, a plaque containing information regarding the reporting process has been created and posted within ASF schools and in other ASF facilities. For the sake of consistency and clarity, the identical plaque should be used on the Archdiocese's website and posted in English, Spanish, Vietnamese, and Navajo.

6. Consolidate policies or if there are material differences between them, explain those differences.

In an earnest effort to address child abuse, ASF has promulgated a number of different policies and training materials all containing the same basic information. This could be confusing. ASF should explore whether it is possible to consolidate related policies and training materials into one document. Similarly, the difference between Virtus training and Circle of Grace training should be clarified. This may be accomplished with an upgrade to the ASF website.

7. There should be a clear and absolute statement to adults interacting with ASF children in any capacity, that they are prohibited from being alone with a child.

Although it may be a subject of training, we could find no clear and absolute statement that adults are prohibited from being alone with a child. To the contrary, the Archdiocese of Santa Fe Catholic Schools Policy Manual suggests that certain individuals may be alone with children. Policy No. 2360 Section "Contact by Others" states:

The Principal/Preschool Director and the student's teachers shall not allow any student to be alone on the school campus with anyone who is not a teacher, school employee, school counselor, tutor, fellow student or custodial parent or legal guardian of the student, even if that person is a doctor, nurse, psychologist or counselor, unless the student's custodial parent or legal guardian gives consent.

Although it is surely not the intent to allow teachers, school employees, school counselors, or tutors to be left alone with children, this language permits it and no other provision in the Policy Manual prohibits it. The manual should be reworded.

8. The Archdiocese may consider including information on its website about how to affirmatively combat child abuse and a statement describing the criminal consequences of victimizing children.

Child abuse reporting policies and procedures are targeted toward individuals who have already been victimized. The Archdiocese may consider providing parishioners with information about how to prevent child abuse. See the link below for examples.

https://www.childwelfare.gov/organizations/?CWIGFunctionsaction=rols:main.dspList&rolType=Custom&RS ID=75&rList=ROL

The Archdiocese may also wish to include a strong statement that explains the criminal consequences of child abuse. This information would be powerful not only to victims who may be reassured that the law and the Archdiocese will support them, but also to potential perpetrators who may be deterred by the possibility of criminal prosecution.

9. The Archdiocese should require more frequent training and provide more opportunities for in-person training.

There is a sentiment that generalized video training on child abuse seems pro forma and ineffective whereas in-person training allows for valuable discussion and, as one interviewee noted, could help attendees learn about dangerous situations that do not fall in the classic profile of abuse. In-person training would also be helpful in providing information specific to the Archdiocese.

It is highly possible that individuals with complaints would approach the church office first. The Archdiocese should ensure that employees who are in receptionist or front office roles are trained in how to process reports that come directly to them. These complaints could involve others in the parish, including a clergy member, and it may be difficult to escalate a complaint about a co-worker or a superior. Workers may be trained to listen compassionately, provide reporting procedures to the complainant, inform the reporter of the next steps the employee will take, and then escalate the complaint to the police and the VAC.

10. The VAC's email address and telephone number are provided as a means of anonymous and immediate reporting and arrangements should be made for these to be monitored after hours or on weekends.

The VAC has created an after-hours message directing abuse reporters to the CYFD hotline should issues arise out of business hours. The VAC is exploring whether a similar auto response to emails may be feasible.

11. The job application and background check process could be improved.

There are two separate Archdiocese online "uniform job applications" one of which is

specific to ASF school.

Uniform Job Application Form for the Archdiocese of Santa Fe https://files.ecatholic.com/17613/documents/2019/6/ASF%20Uniform%20Job%20Application%20RevisedFinal-1.pdf?t=1560977805000

Uniform Job Application Form for Archdiocese of Santa Fe Schools https://files.ecatholic.com/17613/documents/2019/6/Uniform%20Job%20Application%2 0Form%20Catholic%20Schools.pdf?t=1560810128000

The two applications could be consolidated so that the information relevant only to school positions is an addendum to the main application.

One of the positions at the Archdiocese schools is "health assistant." Given that the duties of individuals in such a position may necessitate physical contact with children – e.g., taking temperatures, cleaning wounds, etc. – a higher level of background scrutiny should be required for that position. ASF should work with the HR Department to determine the limits of background checks for such positions and apply the absolute limit of scrutiny legally possible.

The VAC maintains a database of abuse complaints made against volunteers and employees. Due to confidentiality reasons, only the VAC and the Human Resources department have access to the database. As part of the background check process, to the extent it is not already done, the database should be consulted by HR for every hire. If an applicant denies ever having been employed at the Archdiocese or having a serious complaint made about their behavior, but they are in the database, this would be important information to explore with them during the interview process.

In addition, ASF may consider using a third party company to house an online database of job applications. This could lead to better control and central access to all applications. Although individuals with bad intentions may still be able to create fake accounts, the ability to access information about whether an individual has applied before would be easier if it is available to everyone. The following are examples:

https://stcdio.org/human-resources/job-openings/catholic-school-job-openings/

https://catholicschoolsphx.tedk12.com/hire/index.aspx

12. The Archdiocese schools may consider using a virtual platform to involve parents when their child is in the nurse's office.

As stated above, school nurses/health assistants are in situations where their job duties may involve direct physical contact with children. In addition to exploring how the application process for this position should be subject to increased scrutiny, ASF schools may consider whether it is feasible in non-emergency situations to contact the parent of an injured or ill student to allow them to participate virtually via a platform like FaceTime when their child is in the nurse's office. Of course, the nurse/health assistant should never be alone with a child in any event.

13. The Archdiocese should create a uniform policy and related flowchart.

To alleviate school personnel's concerns about the reporting process, the ASF should create and disseminate a uniform policy and process to be included on the Catholic schools' employee portal and in each school's teacher and parent handbook. The Archdiocese should also create a flowchart to direct employees about the sequence of reporting, including when the parents are involved. The flowchart should be available to parents as well so that they understand what procedure will be followed. A concrete flowchart could address some of the subjectivity and unwanted discretion that concern teachers and principals; it may help mitigate the worry of a teacher or principal who does not want to misreport a colleague and help ease the shame/anger of an accused individual who is later appropriately exonerated.

14. The Archdiocese should implement a whistleblower policy.

All of the adult interviewees indicated they would report abuse to some authority even if they did not take the allegation to the VAC. One of the teacher interviewees stated that although they would not be deterred from making an immediate report, they would be concerned about retaliation depending on the identity of the accused. This is an understandable concern and as such, a whistleblower policy prohibiting retaliation is important. Model policies can be found at the follow links:

https://safe-environment.archspm.org/100-ministerial-standardssafe-environment/108-whistleblower-policy/

https://buffalodiocese.org/wp-content/uploads/2021/05/Whistleblower-Policy_Revised-2021.pdf

15. Other Considerations

During our interviews, the following miscellaneous issues were raised and should be reviewed and addressed by the Archdiocese.

- Should concerns about harassment or abuse between two minors be handled the same as those concerning an adult and a child?
- What process should an individual follow if the child is self-abusing?
- Should an individual be able to react to a report of abuse based on context e.g., what should be done with a clearly false report of abuse?
- What are the rights of the accused while investigation is pending or if they are exonerated?
- How should parents be notified if an allegation of abuse is brought forward at their child's school?
- What should students be told when an educator is removed from the classroom?
- What merits a 911 call to the police and when is an emergency response not necessary?

CONCLUSION

The Archdiocese is taking the compliance process seriously and all interviewees were genuinely committed to keeping ASF children safe. We hope that this audit and report will assist the Archdiocese to recognize and resolve any gaps in procedure and to continue its efforts to strictly comply with applicable laws. Thank you for providing us with the opportunity to participate in this process.