

DIOCESE OF MANCHESTER
ACTION PLAN IV

February 6, 2009

Objective: To continue to develop and implement sustainable policies and procedures for the Diocese of Manchester in accordance with Church and state law in order to advance the protection of children and young people.

This Action Plan ("Action Plan IV") addresses certain recommendations contained in the KPMG report dated December 11, 2008. The headings of each section reference the headings contained in KPMG's December 11, 2008, report. In developing the Action Plan and its timeline, consideration was given to ongoing scheduling between the Compliance Officer and Director of Safe Environment Programs (formerly the "Compliance Coordinator") and the pastors, principals, directors, and safe environment coordinators.

Organizational Structure and Oversight

1. The Office for Ministerial Conduct reviews its Screening and Training Protocol annually. During the next annual review of the Protocol, the fact that overnight chaperones must complete all requirements prior to working with minors will be listed in the "Special Considerations" section of the Protocol so as to draw special attention to this requirement. **To be completed on or before July 1, 2009.**
2. The Compliance Officer will continue to highlight best practices in the safe environment reports, diocesan electronic newsletter, and the diocesan website and will continue to communicate these best practices on the diocesan website. On at least a bi-monthly basis, the Compliance Officer will continue to review and update the best practices section of the website. **Ongoing.**
3. The Office for Ministerial Conduct will review the Safe Environment Disciplinary Procedures and develop enhancements to the procedures, as appropriate. The recommended enhancements will be reviewed with the Diocesan Review Board (DRB) and the Safe Environment Council (SEC) before being finalized. **To be completed on or before September 30, 2009.**
4. The Office for Ministerial Conduct will ensure that any forms that are developed for future use are assigned unique names, in order to ensure that there is no confusion over their intended use. **Ongoing.**
5. After consultation with the Diocesan Review Board, the Office for Ministerial Conduct will develop a policy that provides for an annual evaluation of its Program and the subsequent development of action plans. **To be completed on or before April 1, 2009.**

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6. The Compliance Officer will review the various risk assessments documents, including the risk matrix, and will give consideration to the recommendations for improvement that are noted in the KPMG assessment report. **To be completed on or before July 1, 2009.**
7. The Office for Ministerial Conduct will consult with the Safe Environment Council regarding ways to potentially enhance Safe Environment Coordinator accountability. **To be completed on or before February 28, 2009.**

Mandatory Reporting and Response

8. The Office for Ministerial Conduct will consult with the Safe Environment Council to discuss additional ways to raise awareness of the mandatory reporting requirements. **To be completed on or before February 28, 2009.**
9. The Office for Ministerial Conduct will consult with its investigators and with the Diocesan Review Board regarding investigative protocols and any recommended updates to the protocols, including whether investigations should assess whether any other individuals had knowledge of, or should have been aware of, alleged abuse or a policy violation and failed to report it. The Office for Ministerial Conduct will take into consideration the recommendations of its investigators and of the Diocesan Review Board when updating the investigative protocols. **To be completed on or September 30, 2009.**
10. The Delegates for Ministerial Conduct will direct the diocesan Database Manager to work with the database developers in order to create safeguards that will prevent multiple entries for a single individual in the Database. **To be completed on or before September 30, 2009.**
11. The Office for Ministerial Conduct will develop a written procedure for the appropriate and systematic application of the restriction note. The recommended procedures will be reviewed with the Diocesan Review Board and the Safe Environment Council before being finalized. **To be completed on or before September 30, 2009.**

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Programs to Prevent the Sexual Abuse of Minors

12. The Delegates for Ministerial Conduct will direct the Database Manager to work with the database developer to develop database safeguards that will prohibit the entry of duplicate names unless approved by an authorized Database Administrator. **To be completed on or before September 30, 2009.**
13. The Office for Ministerial Conduct will consult with the Safe Environment Council regarding the following issues raised in the KPMG assessment report:
 - a) Whether only Office for Ministerial Conduct personnel should be authorized to change a person's Database status to pending or active.
 - b) The addition of a start date for each individual in the Safe Environment Database.
 - c) The inclusion of multiple dates of compliance in the Safe Environment Database.
 - d) Camp review procedures for special needs week and camp personnel screening timelines.
 - e) The development of protocols for handling Safe Environment Coordinator turnover and absence.
 - f) Improvements to out-of-state criminal check procedures.
 - g) The development of a protocol for appropriate follow-up procedures when those performing NSOPR checks identify an issue requiring additional due diligence.
 - h) The communications protocols and areas for improvement.

To be completed on or before February 28, 2009. The Office for Ministerial will take into consideration the recommendations of the Safe Environment Council as well as the recommendations made by KPMG when planning Database enhancements, revisions to site review procedures, and revisions to other protocols and procedures as described above. **Ongoing.**

14. The Compliance Officer will continue to work with leaders of the scouting organizations and the CYO office and catechetical leaders to solicit their cooperation in the safe environment protocols. In addition, the Compliance Officer will continue to work with the Delegate to establish policies to ensure that ministry heads regularly communicate with the Safe Environment Coordinator regarding volunteers and employees. **Ongoing.**
15. See item 13 (a) above. Moreover, the Compliance Officer will direct the Safe Environment Coordinators to review the file of each returning person before an individual's status is returned to "active." **To be completed on or before February 28, 2009.**
16. As part of the annual review of site review procedures, the Compliance Officer will consider all suggestions made by KPMG regarding site review testing procedures and will incorporate

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the enhancements, as deemed appropriate, into the site review protocol. **To be completed on or before July 1, 2009.**

17. The Office for Ministerial Conduct will review the current administrative protocol for accountability of pastors, school principals, and diocesan institutional leaders regarding compliance with diocesan policy and will develop a plan to ensure that all Safe Environment Coordinators have reviewed the Screening and Training Protocol and the Code and Policy in a timely manner. The revised protocol will be reviewed with the Diocesan Review Board. **To be completed on or before June 30, 2009.**
18. The automated notifications that are sent to parishes and schools each month will be updated to include that individuals who are overdue in meeting the requirements "should immediately be removed from their positions working with minors." **To be completed on or before April 1, 2009.**
19. The Office for Ministerial Conduct will revise its employment applications to include a question requiring applicants to list all states of residence during the 5 years preceding the person's application for employment. **To be completed on or before July 1, 2009.**
20. The Compliance Officer will update the site review protocol to include a step whereby employment applications will be checked to determine if 3 references are listed and if reference checks were completed and documented. **To be completed on or before July 1, 2009.**
21. The Compliance Officer will update the site review protocol to include the inquiry of parish personnel to determine if there are any independent contractors at the parish who regularly work with minors. **To be completed on or before July 1, 2009.**
22. The Compliance Officer will develop a protocol for periodically requesting documentation from independent contractors so as to demonstrate their compliance with the screening and training requirements. **To be completed on or before July 1, 2009.**

Training Personnel, Communications, and Acknowledgements

23. The Office for Ministerial Conduct will review its recordkeeping systems and present proposed changes to the Safe Environment Council and Diocesan Review Board for their review and input. **To be completed on or before September 30, 2009.**

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Auditing/Testing of the Program

24. The Office for Ministerial Conduct will work with the Diocesan Review Board to develop a plan for ongoing oversight and audit of the safe environment program. The plan will be presented to Bishop McCormack for his review and approval. **To be completed on or before June 30, 2009.**