



**Policies for the Prevention  
of  
Sexual Harassment and Sexual Exploitation**

Approved 11/2/2018

## **General Definitions**

### **1. Church**

The Diocese of Central New York and all congregations within the Diocese of Central New York

### **2. Church Personnel**

For purposes of this Policy, the term "Church Personnel" shall mean:

- a. All clergy whether stipendiary, non-stipendiary, or otherwise who are engaged in ministry or service to the Church;
- b. All paid personnel whether employed in areas of ministry or other kinds of services by the diocese, its congregations, schools or other agencies. For example, sextons are Church Personnel;
- c. All interns, persons in the ordination process, or persons serving in field education assignments.

### **3. Supervisors and Decision-Makers**

For purposes of this Policy, the term "supervisors and decision-makers" shall mean:

- a. All persons who have the express authority to hire, select, supervise, discipline, promote, demote, terminate, set compensation or other terms and conditions of employment;
- b. All persons who have the express authority to recruit, duly appoint, select, license, discipline, supervise, terminate, or set terms and conditions of volunteer service;
- c. All members of decision-making bodies who have the authority to approve the creation of ministries, programs, Church activities, or personnel policies;
- d. Standing Committees, Diocesan Councils/Executive Boards, Vestries, and Bishop's Committees and the like.

### **4. Persons Who Have Pastoral Relationships**

For purposes of this policy, the following Church Personnel are included in the definition of Persons Who Have Pastoral Relationships:

- a. All clergy whether stipendiary, non-stipendiary, or otherwise.
- b. All persons who have Pastoral Relationships.

- c. The following ministers licensed under Canon III.4: Pastoral Leaders, Worship Leaders, Preachers, Eucharistic Visitors, and Catechists.

### **Responsibility for Clergy or Lay and Administration**

**Rector, Priest in Charge, or Vestry of Congregations or any other person serving in these or equivalent roles in Diocesan institutions are directly responsible to the bishop for the implementation and administration of the policies and procedures outlines in *Safeguarding God's People: Preventing Sexual Harassment and Sexual Exploitation of Church Workers*.**

The implementation and administration of these policies and procedures may be delegated to other staff members or volunteers, but the ultimate responsibility may not be delegated. Supervision of these administrative processes by the Rector, Priest in Charge, or Vestry, etc. is required to assure appropriate compliance and confidentiality.

Anyone who administers *Safeguarding God's People* must have received the full *Safeguarding God's People (Prevention of Harassment AND Prevention of Exploitation)* training and have the results of a completed background check in their personnel file.

Questions regarding this policy should be directed to the Bishop's Office at 315/474-6596 or [office@cnyepiscopal.org](mailto:office@cnyepiscopal.org).

# Sexual Harassment Policy

The Episcopal Diocese of Central New York (the “Church”) prohibits sexual harassment of Church Personnel by anyone (including supervisors or decision-makers, co-workers, consultants, vendors and other non-employees). All sexual harassment in the Diocese, including its constituent parishes, is prohibited. The behavior of individuals engaging in such conduct, or supervisors or decision-makers who knowingly allow such behavior to continue, will not be tolerated.

## **A. Prohibited Behavior**

As noted above, the Church prohibits all forms of sexual harassment in the Church. Specific definitions and examples of sexual harassment are set forth below.

### **1. Sexual Harassment**

Sexual harassment is prohibited by this Policy. Sexual harassment includes unwelcome sexual advances and requests for sexual favors. Other unwelcome conduct which may constitute sexual harassment includes, but is not limited to, the following:

#### **Verbal:**

- Repeated sexual innuendos, sexual epithets, derogatory slurs, off-color jokes (for example, jokes that include sexual language, innuendo, references, scenarios, etc.);
- propositions, threats, or suggestive or insulting sounds (for example, comments about body, sexuality, etc., including insults and innuendo) even if the comment is about someone else;
- inappropriate e-communication (for example, e-mail that includes sexual jokes or other references of a sexual nature about any person, gossip or speculation about a person’s sexuality, sexual practices, sexual health, pregnancy, virility, etc.). This includes e-communication that was sent accidentally, for example by hitting the “forward” button instead of “reply,” or forgetting that a particular individual or worker is on one of your group lists.

#### **Visual/Non-Verbal:**

- Derogatory posters, cartoons or drawings (for example, cartoons and calendars that include nudity, sex acts, provocative poses, innuendo, sexual language, etc.);
- suggestive objects or pictures (for example, photographs that include nudity, sex acts, provocative poses; wallpaper, Screensavers, or other electronic displays of a sexual nature);
- Graphic commentaries; leering; or obscene gestures (for example, vulgar gestures, gestures simulating sexual acts, “shooting the finger,” kissing the air toward someone or licking the lips in a sexually suggestive or provocative manner).

**Physical:**

Unwanted physical contacts (including touching, interference with an individual's normal work movement, unwelcome displays of romantic or sexual affection, aggressive physical contact or assault); and

**Other:**

Making or threatening reprisals to an individual who opposes, objects to or complains about sexual harassment; possession of inappropriate material of a sexual nature in the Church or its display, duplication, or transmission.

**Such verbal and physical conduct may constitute harassment when:**

1. Submission to such conduct is made either explicitly or implicitly a term or condition of an individual's employment or other Church work;
2. Submission to or rejection of such conduct by an individual is used as a basis for employment or other Church work decisions affecting such individual;
3. Such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile or offensive working environment.

**2. Retaliation**

The Church will not take any action in retaliation against any Church Personnel who, in good faith and with a genuine belief that he/she has been sexually harassed, brings or voices a complaint pursuant to this Policy or otherwise opposes sexual harassment. In addition, the Church will not tolerate any retaliatory acts by other individuals.

Retaliation is a serious violation of Church policy and applicable law. If you believe you have been subjected to retaliation in violation of this Policy, you should report your complaint immediately in the manner specified in Section B below. Individuals will be subject to discipline, up to and including termination if they are found to have retaliated against an individual because such individual (1) in good faith and with a genuine belief that he/she has been subjected to sexual harassment, made an honest complaint about such conduct, (2) participated honestly and in good faith in any investigation into a sexual harassment complaint, and/or (3) in good faith opposed acts of sexual harassment.

**B. Procedure for Reporting Suspected Sexual Harassment and/or Retaliation**

If you believe that the actions or words of a supervisor/manager, co-worker, customer, vendor, volunteer, or other individual in the Church constitutes illegal or prohibited sexual harassment, you have a responsibility to promptly report that behavior to the Church's management. Prompt reporting enables the Church to

stop the sexual harassment, before it becomes severe or pervasive.

If you believe you have been the victim of any form of sexual harassment or retaliation by a member of the clergy, please contact an Intake Officer. Contact information is available at: [cnyepiscopal.org/#intake](http://cnyepiscopal.org/#intake).

If you believe you have been the victim of any form of sexual harassment or retaliation, you must promptly give notice of your complaint to one or more of the following:

- Your supervisor;
- anyone in your supervisory chain;
- the rector or clergy person in charge of the congregation;
- a warden of the congregation;
- the Canon to the Ordinary. Contact information is available at: [cnyepiscopal.org/diocesan-staff](http://cnyepiscopal.org/diocesan-staff).

An individual may, but is not required, to speak to the person whose conduct is objectionable in an effort to resolve the situation. However, no one is ever required to complain to the person who is accused of the offensive conduct, and should only approach the person engaging in the unwelcome conduct if he or she is comfortable doing so. No one is required to complain to his or her supervisor or within her or his chain of command and may utilize the other reporting options.

You may formally or informally complain to any of the above personnel via any of the following:

1. Telephone call
2. Letter (note that to initiate formal disciplinary proceedings pursuant to the Canons of The Episcopal Church, a charge must be submitted in writing and must be notarized. *Canons of the General Convention, Canon IV.3.2; IV.15.*)
3. E-mail
4. In-person meeting
5. Filing a “Notice of Concern” (see appendix A) and/or

All supervisors and decision-makers are required to report all formal and informal complaints, as well as any suspected or known policy violations, immediately to the rector or clergy person in charge of the congregation (unless that person is the subject of the complaint *and* the Canon to the Ordinary. Contact information for the Canon to the Ordinary is available at [cnyepiscopal.org/diocesan-staff](http://cnyepiscopal.org/diocesan-staff)).

All supervisors and decision-makers are expected to act promptly and appropriately to prevent sexual harassment in the Church, and retaliation against those who make a good faith complaint of sexual harassment, or those who

participate honestly and in good faith in either an investigation of a complaint or oppose illegal or prohibited sexual harassment in the Church.

All complaints of sexual harassment will be reviewed and investigated promptly and impartially by the Church's management and/or its designee. Complaints may be made orally or in writing. Once Church management receives notice of any complaint of sexual harassment it will swiftly determine whether or not a fact-finding investigation is necessary. If it is determined that a fact-finding investigation is necessary, it will be launched promptly. If necessary, intermediate measures may be taken before completing the investigation to ensure that further sexual harassment does not occur.

The Church will protect the confidentiality of the allegations to the extent possible; however, no individual can be promised or guaranteed strict or absolute confidentiality. For example, information may have to be disclosed to those officials and/or Church Personnel with a need to know in order to carry out the purpose and intent of this Policy.

Corrective or disciplinary action will be taken against any Church Personnel found to have engaged in sexual harassment. Such action may include counseling and/or appropriate disciplinary measures, up to and including termination. If a complaint is made against a clergy person, it will be handled pursuant to the Disciplinary Canons of the *Canons of the General Convention*.

As the complaining party, you will be given notice, in a timely fashion, of the outcome of the investigation of any formal or informal complaint.

## **C. Education and Training Requirements**

### **1. Church Personnel**

Church Personnel are required to take training on sexual harassment and the organization's sexual harassment policy. Church Personnel are required to keep their training up to date (see appendix B). New Church Personnel must, if practicable, be trained before they start work in their Church position. If that is not practicable, the Policy must be reviewed and discussed with them before they start work and the training must be completed within six (6) months of starting.

### **2. Supervisors and Decision-Makers**

Supervisors and decision-makers must complete training on sexual harassment, including preventing and responding to sexual harassment, within six (6) months of the effective date of this Policy, or of becoming a supervisor or decision-maker.

**D. Effective Date of this Policy and Date for Implementation of Training Requirements**

This policy will become effective immediately upon approval by the Diocesan Board. Training required by this policy must be obtained within three months after the first training session offered in the Diocese.



## Policy for the Prevention of Sexual Exploitation

The Episcopal Diocese of Central New York does not tolerate sexual exploitation in any form. Sexual exploitation is the development or attempted development of a sexual relationship between a person in any ministerial position, lay or ordained, and an individual with whom he or she has a Pastoral Relationship.

### **A Pastoral Relationship is a relationship:**

1. Between any clergy person and any person:
  - a. who attends a congregation or other ministry setting in which the clergy person serves; or
  - b. who seeks ministry from the clergy person; or
  
2. Between any clergy person or any duly-appointed lay person, whether employee or volunteer, who is authorized to provide and does provide:
  - a. counseling;
  - b. pastoral care;
  - c. spiritual direction or spiritual guidance;
  - d. ministration of any Sacrament (other than the distribution of the Bread and Wine by a lay person at a public service of Holy Communion);
  - e. life/leadership/peer coaching;
  - f. hearing a person's confession, in the course of the duly-authorized ministry and those they serve in the course of their ministries;
  - g. ministry leaders (for example: altar guild director, acolyte coordinator; or choir director).
  
3. The following ministers licensed under Canon III.4:
  - a. Pastoral Leaders,
  - b. Worship Leaders,
  - c. Preachers,
  - d. Eucharistic Visitors
  - e. Catechists, and
  - f. Lay Preachersand those they serve in the course of these ministries.

Examples of relationships that do not constitute a Pastoral Relationship include:

1. Group facilitators in which the party's primary purpose is to facilitate group process, are not in a Pastoral Relationship with one another or the group they facilitate.
  
2. Vestry members are not in a Pastoral Relationship with one another by virtue of their membership on the vestry.

Sexual exploitation includes but is not limited to the following actions:

1. Verbal: such as sexual innuendo, indecent proposals, sharing sexual stories, jokes or fantasies, or making inappropriate comments about someone's appearance.
2. Behaviors: such as inappropriate touching, sending or posting communications with sexual content (correspondence, electronic communications, images, attachments, phone conversations, voice mail, etc.)
3. Sexualizing a Pastoral Relationship (e.g., requesting dates, giving unwanted attention, etc.).

### **Reporting Suspected Sexual Exploitation**

If you believe that the actions or words of a supervisor/manager, co-worker, customer, vendor, volunteer, or other individual in the Church constitutes illegal or prohibited sexual exploitation, you have a responsibility to promptly report that behavior to the Church's management. Prompt reporting enables the Church to stop the sexual harassment, before it becomes severe or pervasive.

If you believe you have been the victim of any form of sexual exploitation by a member of the clergy, please contact an Intake Officer of the Diocese. Contact information is available at: [cnyepiscopal.org/safechurch#intake](http://cnyepiscopal.org/safechurch#intake).

You may also call the Bishop's Office to speak with the Canon to the Ordinary, contact information available at [cnyepiscopal.org/diocesan-staff](http://cnyepiscopal.org/diocesan-staff).

If you believe you have been the victim of any form of sexual harassment or retaliation, you must promptly give notice of your complaint to one or more of the following:

- Your supervisor;
- Anyone in your supervisory chain;
- The rector or clergy person in charge of the congregation;
- A warden of the congregation;
- The Canon to the Ordinary. Contact information available at [cnyepiscopal.org/diocesan-staff](http://cnyepiscopal.org/diocesan-staff).

An individual may, but is not required, to speak to the person whose conduct is objectionable in an effort to resolve the situation. However, no one is ever required to complain to the person who is accused of the offensive conduct, and should only approach the person engaging in the unwelcome conduct if he or she is comfortable doing so. No one is required to complain to his or her supervisor or within her or his chain of command and may utilize the other reporting options.

You may formally or informally complain to any of the above personnel via any of the following:

1. Telephone call
2. Letter (note that to initiate formal disciplinary proceedings pursuant to the Canons of The Episcopal Church, a charge must be submitted in writing and must be notarized. *Canons of the General Convention, Canon IV.3.2; IV.15.*)
3. E-mail
4. In-person meeting
5. Filing a “Notice of Concern” (see appendix A)

All supervisors and decision-makers are required to report all formal and informal complaints, as well as any suspected or known policy violations, immediately to the rector or clergy person in charge of the congregation (unless that person is the subject of the complaint), or contact an Intake Officer of the Diocese, phone and email information is available at: [cnyepiscopal.org/#intake](http://cnyepiscopal.org/#intake).

All supervisors and decision-makers are expected to act promptly and appropriately to prevent sexual harassment in the Church, and retaliation against those who make a good faith complaint of sexual exploitation, or those who participate honestly and in good faith in either an investigation of a complaint or oppose illegal or prohibited sexual exploitation in the Church.

## **Safeguards for Preventing Sexual Exploitation of Adults**

### **A. Screening and Selection**

Any and all Persons Who Have Pastoral Relationships shall be screened and selected using the following tools and procedures:

Persons Who Have Pastoral Relationships shall be screened before engaging in Pastoral Relationships.

1. Applicants shall be known to the leadership of the congregation for at least six (6) months to a year.
2. Background Screening
  - a. An Application form completed by the applicant that includes an authorization for the release of information to conduct background screening and reference checks and that also includes the Code of Conduct.
  - b. Criminal Records Check for people who will be working with vulnerable adults in the home of the vulnerable adult in any state where the applicant has resided during the past seven (7) years, and other states, if

- any, as determined by the congregation or diocese.
- c. Sexual Offender Registry Check in any state where the applicant has resided during the past seven (7) years.
  - d. Individual Interview with the applicant.
  - e. Reference Checks of applicants should include at least one relative outside the congregation and at least one other person outside the congregation.
3. All information gathered about an applicant will be carefully reviewed and evaluated to make a determination, in consultation with others as necessary, of whether or not the person is appropriate to engage in Pastoral Relationships.
  4. Persons Who Have Pastoral Relationships must have a personnel file that is kept where other church records are kept.
  5. Criminal records checks and sexual offender registry checks will be conducted every five (5) years on Persons Who Have Pastoral Relationships.
  6. Persons Who Have Pastoral Relationships who transfer within the Diocese of Central New York and apply for or are asked to or who do undertake a position in which they have Pastoral Relationships are required to undergo the same screening and selection process specified above. This requirement may be met through a transfer of a copy of their personnel file to the new congregation, school, agency, or program together with completion of a new application, individual interview and reference checks with the congregations, schools, agencies or other programs for which the applicant has had Pastoral Relationships since the screening was last done as shown in the applicant's personnel file.

## **B. Education and Training Requirements**

### **Persons Who Have Pastoral Relationships**

Before any person engages in Pastoral Relationships s/he is required to complete training on the prevention of sexual exploitation of adults. If that is not possible, this policy must be reviewed and discussed with her/him before s/he has Pastoral Relationships. The rest of the education and training must be completed within three months of beginning to have Pastoral Relationships.

### **Supervisors and Decision-Makers of Persons Who Have Pastoral Relationships**

Within three months of becoming a Supervisor or Decision-Maker, individuals must complete training on the prevention of sexual exploitation of adults.

## **C. Activities for Monitoring and Supervising Pastoral Relationships**

The monitoring and supervision of programs and activities involving Pastoral Relationships is important for safeguarding adults from sexual exploitation. Monitoring

and supervision should include, but are not limited to:

1. Maintaining an up to date list of approved Persons Who Have Pastoral Relationships in the church office or other place where church records are kept.
2. Requiring that all new activities that include Pastoral Relationships have the approval of the rector or canonical equivalent before they start. Requests to develop new activities should be submitted in writing to the rector. The rector will consider whether the plan for a new activity includes adequate monitoring and supervision.
3. Requiring that all Persons Who Have Pastoral Relationships be approved to do so by the rector or canonical equivalent in accordance with the Screening and Selection process above.
4. Settings where Pastoral Relationships take place:
  - a. should, whenever possible, be places where casual monitoring by others is convenient (for example along well-traveled hallways or in areas where other Church Personnel work nearby)
  - b. in open, visible spaces or in closed spaces that have windows that remain unobstructed by closed blinds, furniture, plants, or other adornments (i.e. classroom, nursery, office, meeting space.)
  - c. should convey safety and comfort without the use of couches, loveseats, beds, futons or other furniture that would encourage close seating between the persons in the Pastoral Relationship.

#### **D. Behavioral Guidelines for the Prevention of Sexual Exploitation of Adults**

When creating safe boundaries for Persons Who Have Pastoral Relationships, it is important to establish what types of interactions are appropriate and inappropriate. Stating which behaviors are appropriate and inappropriate allows Church Personnel to comfortably show positive affection in ministry, and yet identify individuals who are not maintaining safe boundaries with other adults.

These Guidelines are:

- based, in large part, on avoiding behaviors known to be used by those who have engaged in sexual exploitation of adults
- intended to assist Church Personnel and Congregants in monitoring and supervising behaviors and interactions of Persons Who Have Pastoral Relationships to help maintain appropriate boundaries at all times
- intended to be used to make decisions about interactions of Persons Who Have Pastoral Relationships with those with whom they have a Pastoral Relationship
- to be carefully followed by all who are involved in Pastoral Relationships

Some appropriate interactions, as long as they are welcomed by the recipient, are listed below:

- brief hugs
- pats on the shoulder or back
- kisses on the cheek
- handshakes
- holding hands during prayer

Some inappropriate interactions in Pastoral Relationships and other ministries with adults include:

- inappropriate or lengthy embraces
- kisses on the mouth
- touching sexual areas of the body
- showing affection while in isolated areas such as bedrooms, closets, staff-only areas or other private rooms
- any form of unwanted affection
- comments or compliments (spoken, written, or electronic) that relate to a person's body or appearance that are at all suggestive. Examples would be, "You should wear that outfit more often," or "You look really hot in those jeans."
- giving gifts or money to favored individuals
- repeated and/or private meetings with individual adults, especially meetings that occur away from church property and during non-business hours
- repeated electronic communications, such as email or texts, especially those that contain personal disclosures or solicitations of an intimate relationship
- seeking excessive private time with a specific adult
- changing one's manner of dress when in the company of a specific adult
- providing a specific adult with personal access such as one's personal email address or cell phone number if that is not the norm
- revealing intimate information about one's life with the intent to sexualize the pastoral relationship
- discussing one's marriage or other significant relationship with the intent to sexualize or otherwise exploit the pastoral relationship (i.e., "My spouse does not understand me the way you do." "I am so unhappy in my marriage.")

**E. Effective Date of this Policy and Date for Implementation of Training Requirements**

This policy will become effective immediately upon approval by the Executive Council. Training required by this policy must be obtained within three months after the first training session offered in the Diocese.

**APPENDIX A - Confidential Notice of Concern**

Who is the complaint about? \_\_\_\_\_

Their position: \_\_\_\_\_

Date incident occurred: \_\_\_\_\_

Church/school/institution \_\_\_\_\_

City where church/school/institution is located \_\_\_\_\_

Nature of concern: \_\_\_\_\_

\_\_\_\_\_

**Describe the situation: (i.e. - what happened?)**

\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_  
\_\_\_\_\_

**Where did it happen?**

\_\_\_\_\_  
\_\_\_\_\_

**Who else was present?** \_\_\_\_\_

\_\_\_\_\_

**Has it ever happened before?** \_\_\_\_\_

\_\_\_\_\_

**Was it reported?** \_\_\_\_ Yes \_\_\_\_ no \_\_\_\_ don't know

**If reported, to whom:**

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**What action was taken:**

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**Follow-up:** Does anyone else need to be notified?

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Would you like someone to call to discuss the situation? \_\_\_\_\_ Yes \_\_\_\_\_ no

Name \_\_\_\_\_

Phone: \_\_\_\_\_ Email: \_\_\_\_\_

Mailing Address \_\_\_\_\_

Signature \_\_\_\_\_

Date \_\_\_\_\_

Once completed, mail or email to the Canon to the Ordinary or the Bishop's Executive Assistant in the Diocese of Central New York. Current contact information available at [cnyepiscopal.org](http://cnyepiscopal.org).



## APPENDIX B—SCREENING AND TRAINING PROTOCOLS

### Training Requirements for Safeguarding God's Family

If you serve in one or more of the following paid or volunteer positions, you must take the approved In-Person Safe Church Training. Thereafter, every 5 years you must renew training by taking the In-Person or Safeguarding Online training.

- Clergy (Canonical and Licensed-to-Officiate)
- Administrative Assistant/Secretary
- Administrator
- Volunteer on a regular basis
- Christian Education Director or Coordinator
- Acolyte Leader
- Confirmation Sponsor
- Cursillo and Vocare Team Members
- Diocesan Committees and Commissions
- Diocesan Staff
- Youth Program Leaders
- Licensed Minister (Eucharistic Minister, Eucharistic Visitor, Lay Preacher, Lay Worship Leader)
- Organist
- Choir Director
- Persons in the Ordination Process
- Sexton
- Church School Teacher
- Vacation Bible School: Director, Teacher, Helper
- Vestry Members
- Youth Leader in Diocesan Youth Programs
- EfM Mentors
- Spiritual Directors

**Diocese of Central New York  
Screening Requirements for Safeguarding God’s Family**

Who	Screening Standard	Credit Report	DMV
1. Canonical Clergy and Clergy Licensed to Officiate	Oxford Background	Included in Oxford	Included in Oxford
Who	Screening Standard	Credit Report	DMV
3.a. All <u>paid</u> church personnel (full and part-time). This includes:  Parish Administrators; Youth Ministers; Organists; Sextons; Directors of Christian Formation; Music Directors; Childcare workers	i. Standard Application; ii. Interview; iii. Reference Checks;  <i>Secure Search Faith</i> Basic Background Check (Multi-State Criminal records check; National Sex Offender Registry; SSN Validation)	Yes for personnel managing church finances	Yes for personnel regularly transporting children, youth or adults
3.b. Any paid personnel living on church grounds			

4.a. All <u>non-paid</u> persons who regularly <u>supervise</u> or <u>assist</u> <u>with supervising</u> children or youth ministries, more than 4 times a year (someone with a title);	i. Standard Application; ii. Interview; iii. Reference Checks; iv. <i>Secure Search Faith</i> Basic Background Check (Multi-State Criminal records check; National Sex Offender Registry; SSN validation)	No	No (unless providing transportation – see below)
4.b. full-time or part-time volunteers serving in staff positions;			
4.c. all volunteers who assist with children or youth ministries more than 4 times			

a year, including overnight activities;			
5. All volunteers who provide transportation to children, youth or other church related activities including Lay Eucharistic Visitors	Interview	No	Yes
6. Adults who volunteer less than 4 times a year.	Interview	No	No
7. Adults at overnight activities less than 3 times a year	Interview	No	Yes - if driving
8. All staff (paid personnel and volunteer) at diocesan or church camps	<ul style="list-style-type: none"> <li>i. Standard Application;</li> <li>ii. Interview;</li> <li>iii. Reference Checks;</li> <li>iv. Basic Background Check (Multi-State Criminal records check; National Sex Offender Registry; SSN validation)</li> </ul>	No	Yes - if driving