

SVDP - Cincinnati – Memorandum on Safeguarding in Vincentian and Council Life

(Abridged for Vincentians)

Purpose

Safeguarding is the act of protecting people who are vulnerable from harm. It involves reducing and preventing risks of harm and working to ensure the safety and empowerment of vulnerable individuals and communities. Safeguarding involves recognizing the human rights of all persons and working to prevent and address violations of those rights.

In the context of the Society of St. Vincent de Paul, safeguarding involves working to ensure that in seeking to assist people in need, we are committed to do no harm to their health and wellbeing or put them at risk of abuse or neglect.

St. Vincent de Paul - Cincinnati seeks to address safeguarding as it applies to children and young people. It also applies to other vulnerable people, acknowledging that people could be vulnerable to abuse or neglect by reason of their age, physical or mental disability, or poverty and reliance on support services.

As Vincentians, the nature of our work means that there is often a power imbalance when we encounter a person in need; a person's circumstances, whereby they are seeking help, and our position as a provider of financial, material, or personal support, creates a risk and renders vulnerable the person seeking help. In committing to safeguarding, we are not just seeking to ensure the prevention, reporting, and appropriate response to abuse; we are also seeking to create safe and respectful environments.

Scope

Our safeguarding policies applies to all representatives of St. Vincent de Paul – Cincinnati including its Conferences and their members, staff, and volunteers. Our policies also apply to anyone who acts as a representative or serves within a program of or on property owned or managed by St. Vincent de Paul - Cincinnati, no matter the length of time.

Safeguarding is the responsibility of every representative of St. Vincent de Paul – Cincinnati. The Chief Executive Officer is responsible for all safeguarding matters including but not limited to supporting safeguarding measures, supporting the reporting process for any safeguarding violations, and ensuring needed resources for effective safeguarding.

Why is St. Vincent de Paul - Cincinnati committed to safeguarding?

St. Vincent de Paul – Cincinnati commits to the effective implementation of safeguarding policies and procedures as a responsibility to uphold the dignity of our neighbors, whether they are seeking assistance, an employee, a Vincentian, or a volunteer.

We recognize the corresponding responsibility of protecting these rights in our actions, language, and observations. Especially when a neighbor welcomes us into their home, we have a unique responsibility and privilege to promote their efforts to create a safe environment for themselves and their family. We are committed to initial and ongoing safeguarding training, especially for Vincentians who are directly serving neighbors.

The examples of St. Vincent de Paul, St. Louise de Marillac, Bl. Frederic Ozanam, and Bl. Rosalie Rendu inspired the charity as lived by the Society's Vincentians, volunteers, and staff. The Society's members live the Gospel message by serving Christ in the poor. In that work, we seek to embody these values:

- **Empathy:** to listen to and to understand those we assist and to work together as members to support those in need.
- **Simplicity and Humility:** to treat each other and those we assist as equals in a fraternal relationship.
- **Justice:** to respect people's convictions and beliefs and to help them to regain and retain their autonomy and human dignity.

Safeguarding understanding and application

St. Vincent de Paul - Cincinnati commits to offer training events and continuing education for Vincentians, staff, and volunteers that detail what safeguarding is, why safeguarding is important, why the Society is making safeguarding a priority, and what can be done to ensure safeguarding policy and application.

The National Council now requires all member Councils to comply with their diocese's safeguarding policy. St. Vincent de Paul – Cincinnati finds guidance in the following documents:

- Archdiocese of Cincinnati. (2018). Decree on Child Protection.
- National Council of the United States Society of St. Vincent de Paul, Inc. (2019). National Safeguarding Policy for all Member Councils.

Policy for all representatives of St. Vincent de Paul

Regardless of training requirements, all Vincentians, staff, volunteers, and other representatives must follow the following guidelines. All volunteers must sign the "Safeguarding Code of Conduct" (Form SG.4) before they volunteer with St. Vincent de Paul – Cincinnati.

- **No adult should ever be alone with one or more youth.** At least two adults must accompany groups of one to 10 youth; larger groups must maintain a 2:10 ratio of adults to youth. Use a team approach to manage youth activities. Avoid elevators and other isolated or enclosed spaces when you are the only adult present.
- Any individual volunteer under age 18 must volunteer with a parent/guardian or a safeguarding trained adult.
- Any physical contact with children and youth should be carefully thought out and never done outside a public setting. Physical contact with youth can be misconstrued and should occur (a) only when completely nonsexual and otherwise appropriate and (b) never in private.
- No adult should exchange phone numbers, personal email addresses, or social media with youth. This
 could include Facebook, Instagram, Snapchat, texting, etc.
- No adult should use or have drugs or alcohol when working with youth and children. Staff and volunteers should refrain from (a) the illegal possession and/or illegal use of drugs and/or alcohol at all times and (b) the use of alcohol when working with youth.
- No minor should sleep overnight in a situation in which there are less than two safeguarding trained adults present. Staff and volunteers should not provide shared, private, overnight accommodation for individual young people including, but not limited to, accommodations in any SVDP-owned facility, any private residence, hotel room, or any other place where there is no other adult supervision. In rare, emergency situations, when accommodation is necessary for the health and well-being of the youth, the staff or volunteer should take extraordinary care to protect all parties from the appearance of impropriety and from all risk of harm. Use a team approach to managing emergency situations.
- Anyone who suspects abuse must report it. This includes physical, sexual, emotional, or mental abuse. Please contact the Chief Services and Strategy Officer at slain@svdpcincinnati.org or 513.345.4966 if you are made aware of previous violations of abuse or if you suspect current violations.
- At least two safeguarding trained adults must be in any vehicle transporting minors when volunteering or working for SVDP.

Policies in place for specific roles

St. Vincent de Paul – Cincinnati has committed to a culture of safeguarding. With the guidance of the Archdiocesan and National Council documents, we understand that training requirements and required behaviors may differ slightly based on role within the Society and its associated duties and responsibilities as well as working locations and supervision.

Policy for Vincentians

St. Vincent de Paul – Cincinnati requires all Vincentians who participate in direct service at least six times per year to complete safeguarding training. All current Vincentians must meet this requirement by October 1, 2023. New members

(those who join after October 1, 2023) will receive the safeguarding resolution upon joining and must complete this within six months of their joining.

St. Vincent de Paul - Cincinnati offers three options for Vincentians to meet this requirement:

- A. Vincentians may complete the SafeParish training through their parish or with another Archdiocesan organization. Vincentians can share their completion with St. Vincent de Paul through completing Form SG.1: Section A, along with the signature of the Safe Environment Coordinator of their parish or Archdiocesan organization. Vincentians should return the completed form to SVDP's Safeguarding Coordinator.
- B. Vincentians may choose to complete safeguarding training through St. Vincent de Paul Cincinnati. This training and its continuing education are unique to St. Vincent de Paul Cincinnati and discuss real experiences Vincentians encounter in their mission to bring Christ's love to all around them. Vincentians should complete their section of Form SG.1: Section B, return it to the Safeguarding Coordinator, and sign up for an upcoming safeguarding training. After completion of training and background check, the Safeguarding Coordinator will sign the second part of the form.
 - a. All Vincentians who opt for option B must complete a background check through our approved vendor. The Safeguarding Coordinator will send instructions after the Vincentian registers for safeguarding training.
 - b. The results of all background checks will be reviewed by St. Vincent de Paul Cincinnati. Based on these results, members may be disallowed from providing services at the discretion of the Senior Director of Services.
- C. Vincentians who do not serve children or vulnerable adults face-to-face more than six times per year may sign Form SG.1: Section C and return the completed form to the Safeguarding Coordinator. If the Vincentian begins to serve children or vulnerable adults face-to-face more than six times per year, the Vincentian should contact the Safeguarding Coordinator to update their form and to choose between option A or B.

Topics and measures covered in the safeguarding training

Safeguarding training will include an initial course offered by St. Vincent de Paul – Cincinnati which covers the following topics:

- Reception of the Decree, National Council Resolution, and St. Vincent de Paul Cincinnati Resolution.
- Discussion of what safeguarding is and why it is important to the Vincentian vocation.
- Instruction and awareness of different forms of abuse and its victims.
- Instruction on how to report abuse, both to SVDP Cincinnati and the proper civil authorities.
- Reflection on whether we consider ourselves "mandated reporters."
- Awareness of boundary behaviors.
- Activities that help decide appropriate actions related to Bystander Intervention and Vincentian scenarios.

St. Vincent de Paul will also offer regular, ongoing training through bulletins, reflections, and other materials to all Conferences and individuals who have completed the initial safeguarding training. These ongoing training materials will expand on the topics listed above and address related topics and concerns, especially those that weigh directly on Vincentian spirituality and service models.

Reporting process for St. Vincent de Paul - Cincinnati

Any staff member, Vincentian, volunteer, or representative who witnesses a safeguarding violation (especially acts of abuse) perpetrated by another staff member, Vincentian, or volunteer, or who suspects such an act has occurred, must immediately report the incident to the Senior Director of Services. St. Vincent de Paul – Cincinnati encourages any neighbor who experiences or witness a safeguarding violation (especially acts of abuse) perpetrated by a staff member, Vincentian, or volunteer to report the incident to the Senior Director of Services.

If the suspected abuse occurs on property owned by the Archdiocese or during an event closely related to the parish or Archdiocese, report the incident to the Archdiocese as well.

If someone is in immediate danger, any representative of the Society should contact 911 for assistance. In the event that the Ohio Revised Code mandates the reporting of said incident to an appropriate agency, the representative should report the incident to the appropriate agency. Any representative may request assistance with how to report from the Senior Director of Services or the Safeguarding Coordinator.

Other Council measures to promote effective safeguarding

- **Two adult rule:** This statute serves to keep vulnerable persons safe and to protect against false/malicious allegations against Vincentians and others providing services. Whenever possible no fewer than two Vincentians should be present during any meeting with those we serve, and a Vincentian should not interact with a vulnerable person in the course of the Vincentian work without another adult being present.
- Media, audio, and visual recordings: If any audio/visual recordings include interviewing a neighbor, always ensure that the neighbor is at no risk of endangerment or adverse effects. This includes ensuring their privacy and not disclosing identifying information about a child or a vulnerable person (i.e., their full names, addresses, or identifying their homes, host community, or general location) and being vigilant of street signs, license plates, advertising boards, or any other background information that might indicate where the person may live. All media must never be demeaning or disrespectful of the dignity of persons and must always avoid the gratuitous portrayal of extreme suffering.

- Communicating the safeguarding message:

- St. Vincent de Paul Cincinnati will give a hard copy of this document to all Vincentians through Conference Presidents. Conference Presidents are responsible for requesting more documents if needed.
- Any person may request electronic and/or hardcopies through the Senior Director of Services or the Safeguarding Coordinator.
- St. Vincent de Paul will distribute display materials that include information about whom a vulnerable person or witness should report to, or seek advice from, regarding violations of safeguarding.
 - The following locations must display this material in a place where any visitor may see it: the Neyer Outreach Center, the Ozanam Center, the Clothing and Home Resource Center, Thrift Stores, and any physical location operated by a Conference that offers direct service to neighbors (including Food Pantries or office spaces).
 - If a Conference's location is on property owned by the Archdiocese of Cincinnati, the Conference must ask the pastor and the parish's Safe Environment Coordinator if they prefer that the Archdiocesan reporting information is visible instead.

- Monitoring Compliance:

- All current members must complete Form SG.1 by October 1, 2023. New members (those who join after October 1, 2023) will receive the safeguarding resolution upon joining and must complete this within six months of their joining.
 - Members who have not completed safeguarding training may be disallowed from providing services at the discretion of the Senior Director of Services.
- St. Vincent de Paul Cincinnati will record attendance at all safeguarding trainings. The Safeguarding Coordinator will sign all forms after their completion.
- Spiritual advisors will receive a quarterly formation packet. Conference Presidents should present the bulletin during a conference meeting within that quarter. The Secretary, or another member, must record the completion of the bulletin in the meeting minutes.
- St. Vincent de Paul Cincinnati will complete a safeguarding audit at the end of each fiscal year.
 - The conference will receive the current safeguarding status of all members.
 - The Conference should confirm the status of all members.
 - New members and members who have not completed Form SG.1. must do so at this time.
 - Members who signed Section A of the form must ensure they are maintaining compliance with SafeParish requirements in the Archdiocese of Cincinnati.
 - *In the case that the Archdiocese changes training vendors, St. Vincent de Paul
 - Cincinnati will send instructions regarding maintaining compliance.
 - Members who signed Section B of the form do not need to do any additional work at this time.

 Members who signed Section C of the form must ensure they are not serving neighbors face-to-face more than six times per year. If they wish to serve neighbors face-to-face more frequently, members can choose to update their Form SG.1 at any time.

Policy review

St. Vincent de Paul – Cincinnati will review the safeguarding policy whenever a new Archdiocesan Decree or National Resolution is promulgated to ensure our compliance. A formal review will occur every three years, regardless of interim reviews. St. Vincent de Paul – Cincinnati will review changes in legislation, the National Council's Resolutions, and the Archdiocese of Cincinnati's decree (and other appropriate Church documents). They will update processes, guidelines, and practices to fit the needs of the Council, the persons with whom we interact, and the reviewed changes in legislation or advisory thought.

Important Contacts

Safeguarding Coordinator msheehan@SVDPcincinnati.org 513-345-4985

Senior Director of Services slain@SVDPcincinnati.org 513-345-4982

Reporting Abuse

If someone is in immediate danger, please call 911.

Hamilton County Child Protective Services 513-242-5437

Hamilton County Adult Protective Services (Elder Abuse) 513-421-5433

Hamilton County MUI Reporting Line (Developmental Disability Abuse) 513-559-6629 https://ocf.prodapps.dodd.ohio.gov/

Appendix A: Policy Against Workplace Harassment

The Society of St. Vincent de Paul has a strict policy against all types of workplace harassment, including sexual harassment and other forms of workplace harassment based upon an individual's age (40 and older), race, color, national origin, ancestry, religion, sex, sexual orientation (including transgender status, gender identity or expression), pregnancy (including childbirth, lactation, and related medical conditions), physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status, or any other status protected by federal, state, or local laws. All forms of harassment of, or by, employees, vendors, visitors, customers, and clients are strictly prohibited and will not be tolerated.

Sexual Harassment

Sexual harassment is defined as unwelcome sexual advances, requests for sexual favors, and other verbal or physical conduct of a sexual nature when (1) submission to such conduct is made either explicitly or implicitly as a term or condition of an individual's employment; (2) submission to, or rejection of such conduct by an individual is used as the basis for employment decisions affecting such individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating, hostile, or offensive work environment.

While it is not possible to identify every act that constitutes or may constitute sexual harassment, the following are some examples of sexual harassment:

- Unwelcome requests for sexual favors;
- Lewd or derogatory comments or jokes;
- Comments regarding sexual behavior or the body of another;
- Sexual innuendo and other vocal activity such as catcalls or whistles;
- Obscene letters, notes, emails, invitations, photographs, cartoons, articles, or other written or pictorial materials of a sexual nature;
- Repeated requests for dates after being informed that interest is unwelcome;
- Retaliating against another for refusing a sexual advance or reporting an incident of possible sexual harassment to the Organization or any government agency;
- Offering or providing favors or employment benefits such as promotions, favorable evaluations, favorable assigned duties or shifts, etc., in exchange for sexual favors; and,
- Any unwanted physical touching or assaults or blocking or impeding movements.

Other Harassment

Other workplace harassment is verbal or physical conduct that insults or shows hostility or aversion toward an individual because of the individual's age (40 and older), race, color, national origin, ancestry, religion, sex, sexual orientation (including transgender status, gender identity or expression), pregnancy (including childbirth, lactation, and related medical conditions), physical or mental disability, genetic information (including testing and characteristics), veteran status, uniformed servicemember status, or any other status protected by federal, state, or local laws.

Again, while it is not possible to list all the circumstances that may constitute other forms of workplace harassment, the following are some examples of conduct that may constitute workplace harassment:

- The use of disparaging or abusive words or phrases, slurs, negative stereotyping, or threatening, intimidating, or hostile acts that relate to the above protected categories;
- Written or graphic material that insults, stereotypes, or shows aversion or hostility toward an individual or group because of one of the above protected categories and that is placed on walls, bulletin boards, email, voicemail, or elsewhere on our premises, or circulated in the workplace; and,
- A display of symbols, slogans, or items that are associated with hate or intolerance toward any select group.

Reporting Discrimination and Harassment

If you feel that you have witnessed or have been subjected to any form of discrimination or harassment, immediately notify any member of management.

The Organization prohibits retaliation against employees who, based on a reasonable belief, provide information about, complain, or assist in the investigation of any complaint of harassment or discrimination.

We will promptly and thoroughly investigate any claim and take appropriate action where we find a claim has merit. To the extent possible, we will retain the confidentiality of those who report suspected or alleged violations of the harassment policy.

Discipline for violation of this policy may include, but is not limited to, reprimand, suspension, demotion, transfer, and discharge. If the Organization determines that harassment or discrimination occurred, corrective action will be taken to effectively end the harassment. As necessary, the Organization may monitor any incident of harassment or discrimination to assure the inappropriate behavior has stopped. In all cases, the Organization will follow up as necessary to ensure that no individual is retaliated against for making a complaint or cooperating with an investigation.

Reporting Discrimination and Harassment - Vincentian and Volunteers

Any Vincentian or volunteer who observes incidents of sexual or other kinds of harassment or a hostile work/service environment must report those incidents as soon as possible. A report may be made to that Vincentian's Conference President. However, if the Vincentian wishes to maintain substantial confidentiality of the report, or if the Vincentian believes that their Conference President may be involved in the harassment or hostile work/service environment or believes that a fellow Vincentian might retaliate against them for making such a report, the reporting supervisor is encouraged to make a confidential report to the Senior Director of Services. Any concerns related to harassment and/or discrimination experienced by volunteers should also be directed to the Senior Director of Services.

The reporting Vincentian/volunteer will be requested to make a confidential written statement of the nature of the conduct underlying his or her claim. The statement will initiate an investigation directed by the Council President or designee. Throughout the course of the investigation and thereafter, the complaining Vincentian/volunteer will be protected from any form of retaliation by the person accused of the act of harassment or hostile work/service environment or by any other representative of the Society of St. Vincent de Paul.

Vincentians and volunteers should recognize that this complaint procedure is not to be used maliciously or frivolously, but that it is designed to fairly and completely investigate good faith claims of harassment or hostile work/service environment. This does not mean that a claim which results in a finding of no harassment or hostile work/service environment. This does not mean that a claim as either malicious or frivolous, but it does mean that if a claim is found to be groundless – that is, untruthful, malicious, frivolous, and/or without any foundation – the complaining or reporting person may be subject to disciplinary action.

The primary steps in the investigation process are as follows:

- 1. The President or designee will meet with the complaining or reporting Vincentian/volunteer, provide assurances that the investigation will remain confidential so far as possible, and require that the reporting Vincentian/volunteer make a written statement of the facts.
- The reporting Vincentian/volunteer will be encouraged to reveal the names of any other Vincentians/volunteers
 who may be witnesses to the harassing conduct or hostile work/service environment, and any witnesses named
 or otherwise revealed during the investigation will be questioned on a confidential basis.
- 3. The person(s) accused of the harassment will be confidentiality questioned and will be asked to make a written statement of his or her position regarding the specifics of the charge of harassment or hostile work/service environment. The accused persons will be warned that any attempts at retaliation in any form against the complaining/reporting Vincentian/volunteer or other witnesses will result in immediate suspension of any persons involved in the attempt to retaliate.
- 4. The reporting or complaining Vincentian/volunteer may be interviewed one or more additional times so that he or she has a full opportunity to comment on facts and circumstances found during the interviews of the accused and any material witnesses.
- 5. The President or designee will make a confidential determination of the facts relative to whether or not harassment has occurred or a hostile work/service environment exists and what, if any, corrective action including disciplinary measures should be taken.
- 6. The reporting person and the victim of the harassment or hostile work/service environment, if other than the reporting person, as well as the accused, will be informed of the corrective action to be taken and any disciplinary measures which result.
- 7. All witnesses interviewed during the investigation will be informed about the need to maintain absolute confidentiality surrounding all facets of the investigation and their knowledge of the facts or results. Any disclosure of the incident may result in disciplinary action.

In summary, it is anticipated that some complaint of harassment or hostile work/service environment will result in clear findings of harassment or hostile work/service environment and appropriate corrective action will be taken. It is further recognized, however, that in some cases it will not be possible to determine whether or not harassment or a hostile work/service environment has actually occurred. In these cases, it is not the intent of the Society of St. Vincent de Paul to form any conclusions about the truthfulness of the reporting Vincentian/volunteer, the victim, the accused, or any of the witnesses. In all cases, it is the intent of the Society of St. Vincent de Paul to be reasonably responsive to any Vincentian/volunteer who has an honest perception that he or she or any other Vincentian has been the victim of unlawful or otherwise inappropriate harassment or hostile work/service environment which interferes with a good working/service environment.

Form SG.1: St. Vincent de Paul – Cincinnati safeguarding statement for Vincentians

Safeguarding is the act of protecting people who are vulnerable from harm. It involves reducing and preventing risks of harm and working to ensure the safety and empowerment of vulnerable individuals and communities. Safeguarding involves recognizing the human rights of all persons and working to prevent and address violations of those rights. In the context of the Society of St. Vincent de Paul, safeguarding involves working to ensure that in seeking to assist people in need, we are committed to do no harm to their health and wellbeing or put them at risk of abuse or neglect. This policy seeks to address safeguarding as it applies to children and young people. It also applies to other vulnerable people, acknowledging that people could be vulnerable to abuse or neglect by reason of their age, physical or mental disability, or poverty and reliance on support services.

In an effort to ensure the safety and care of children and vulnerable adults, beginning on October 1, 2022, all St. Vincent de Paul Councils in the United States where required to create and follow Safeguarding Policies.

Vincentians in the Cincinnati District Council have three options to meet this requirement by October 1, 2023:

- A. You may complete SafeParish training through your parish or another Archdiocesan organization. Complete **Section A** of the form, including the signature of your parish's Safe Environment Coordinator.
- B. You may complete safeguarding training through SVDP-Cincinnati. To get started, complete **Section B** of the form; SVDP's Safeguarding Coordinator will sign the form once you complete the background check and training.
- C. If you are a Vincentian who does not serve children or vulnerable adults face-to-face more than six times each year, you are exempt from this requirement. Please sign **Section C** of this form stating you are not required to meet this requirement and that you will not serve children or vulnerable adults more than six times per year.

Section A: Completion through the Archdiocese

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I,		, confirm that:		
2)	of the Archdiocese has processe I am currently SafeParish trained I am currently in good standing w Cincinnati and in St. Vincent de F	through the Archdiocese of Cincinnati. with the Safe Environment requirements for volunte	eering in the Archdiocese of	
To be	completed by the Safe Environmen	nt Coordinator of the above signed's parish or orga	anization:	
As the Safe Environment Coordinator of the abovesigned:			, I confirm that	
1) 2) 3) 4)	Has completed initial SafeParish	eck for the Archdiocese of Cincinnati; training through the Archdiocese of Cincinnati; tins and other continued training; and, vironment requirements.		
By sigr	ning below, I affirm that to the best	of my knowledge, the truth of the above statemen	nts.	
(Print N	Name – S.E. Coordinator)	(Signature – S.E. Coordinator)	(Date)	
	ning below, I affirm that the above of St. Vincent de Paul – Cincinna	statements are true and agree to notify the Safeguti if I fail to maintain compliance.	uarding Coordinator of the	
(Print Name – Vincentian)		(Signature – Vincentian)	(Date)	

(continued on reverse)

Section B: Completion through St. Vincent de Paul - Cincinnati

l,	, confirm that:				
 Safeguarding Coordinator. I will attend a safeguarding t I am currently in good standing Cincinnati. I fully intend to maintain safe to me and by their due date. 	training through St. Vincent de Paul – Cincinnati, which had training through St. Vincent de Paul – Cincinnati. ing with the safeguarding requirements for volunteering with the safeguarding training by completing all bulletins and other training through St. Vincent de Paul – Cincinnati, which had	ith St. Vincent de Paul –			
by signing below, rammi, to the bes					
(Print Name - Vincentian)	(Signature - Vincentian)	(Date)			
To be completed by the Safeguarding Coordinator of St. Vincent de Paul – Cincinnati:					
3) Is up-to-date on safeguardin4) Is in good standing with safe	larding training through St. Vincent de Paul – Cincinnati; and bulletins and other continued training; and,				
(Signature – Safeguarding Coordina	tor) (Date)				
Section C: Vince	ntians who do not regularly serve children or vulneral	ble adults			
I am not safeguarding trained; I agre while I am volunteering at St. Vincen	ee that I will not interact with youth or vulnerable adults mont de Paul – Cincinnati.	re than six times per year			
(Print Name – Vincentian)	 (Signature – Vincentian)	(Date)			