

Office of Child, Adolescent and Adult Protection (OCAAP): Preparing for an onsite Safe Environment Program (SEP) audit

Introduction

Every two years, you can expect to be visited by the Internal Auditor, Katherine Preble. She comes to review financial, personnel and SEP operations. This guide addresses the audit of SEP operations.

Audits are meant to help you make sure that you are keeping up with the Safe Environment Program. Helpful though they may be, audits are also stressful. This guide is meant to help you prepare each day so that the audit will be a review, not a scramble.

In addition, if you are prepared for Katherine's visit, you will be equally prepared for the annual SEP audit report. The annual audit report is due no later than July 31, each year.

Resources

The following documents should always be close at hand, either in print or as an electronic file.

- Code of Conduct
- Summary of the Guidelines
- Guidelines for the Prevention of and Response to Sexual Misconduct
- Personal Safety Curriculum for Children and Youth
- Compliance Plan Template (current version)
- Compliance Officer Operations Guide

The Personal Safety Curriculum offers invaluable assistance to teachers in developing lesson plans for teaching children and youth about personal safety each year. Pay particular attention to the introductory section and to the objectives for each year.

The Compliance Plan Template (in its most current version) will have much of what you need to know about the key elements of the SEP.

The Compliance Officer Operations Guide contains what you need to know about the procedures for hiring and screening new personnel.

You also should be familiar with the resources available through the Diocese of Tucson web site.

- OCAAP Resource Page (<http://www.diocesetucson.org/SEP.html>)
- Human Resources (<http://www.diocesetucson.org/humanresources.html>)
- Property and Insurance (<http://www.diocesetucson.org/property.html>)

Contact Information

Whenever you confront an urgent situation or simply have a question, you can call for help.

In case of suspected abuse: call law enforcement (911) and CPS (1-888-767-2445) or (1-888-SOS-CHILD)

For help in dealing with a report to civil authorities, concern about imprudent behaviors, or systems to prevent such problems, call Paul N. Duckro, Ph.D. (520-838-2513, office; 520-349-0615, mobile; 520-838-2533, Cathy Moore, Executive Assistant).

For questions related to criminal history checks or any aspect of personnel management, call Richard Serrano (520-838-2565).

For questions related to physical safety, insurance or any aspect of property management, call John Shaheen (520-838-2570).

For additional guidance in preparing for an on-site audit visit, call Katherine Preble (520-838-2502).

Safe Environment Program (SEP) Records

Keeping SEP records up-to-date is the easiest way to prepare every day for the onsite audit visit or the annual SEP audit report. You should have on hand, easily accessible and current the following records.

1. **Personnel Spreadsheet:** A template of the personnel spreadsheet is available from OCAAP. Among its 12 columns, the personnel spreadsheet contains the date of the most recent criminal history check, the fiscal year in which the criminal history check expires, the date of the initial SEP education and the date of the most recent SEP annual education with Attestation.
2. **Compliance Plan:** The compliance plan must have been reviewed within 13 months of the date of the audit. If the plan was not changed at the last review, a copy of the letter so stating should be kept with the plan.
3. **Files:** A file for each employee and volunteer, stored securely for confidentiality, must be maintained. The files should contain the application, documentation of the criminal history check (if applicable), documentation of any other screening procedures performed locally (for example, reference checks, fact checks or sex offender registry check), the most recent Attestation (completed at the annual SEP educational program).
4. **Supporting materials:** For the current audit year and for the last full audit year, you should have on hand the following documents.
 - a. Sign-in sheets for SEP classes presented to employees and volunteers

- b. Class lists of students with notations as to when they were given the annual education in personal safety
 - c. Refusal forms (if any) for parents who did not permit their children to receive personal safety education
 - d. Educational log of all SEP classes presented to employees, volunteers, children, youth, parents and other adults
5. Documentation of reports made (if any) to law enforcement, CPS or OCAAP regarding suspected abuse or behavior contrary to the Code or Guidelines.
6. Other documentation is helpful. For example, consider the following.
 - a. Evidence of educational efforts aimed at parents or the congregation as a whole demonstrates the commitment to the SEP and creativity in its implementation.
 - b. The use of Standing Operating Procedures (SOPs) for recurrent high risk/responsibility activities (like religious education), periodic high risk/responsibility activities (like field trips with minors) or for periodic large scale activities that involve the use of irregular volunteers (like fiestas) demonstrate careful planning and concern for the welfare of all.
 - c. Evidence that visiting clerics or lay teachers are screened through the Chancellor's Office demonstrates collaboration with the Pastoral Center to insure the safety of those served.

Annual Safe Environment Program Audit Report

Annual Audit Reports always report on the audit year just ended. Audit years always begin on July 1 of one year and end on June 30 of the next year, which is the diocesan fiscal year. The audit year is referenced on the personnel spreadsheet or annual audit forms either by both years (for example, 2008-2009) or by the ending year (for example, FY2009 or just 2009).

Annual education of employees, volunteers, children and youth for each audit year must always be completed by June 30. If an employee's or volunteer's criminal history check expires during the audit year, it must have been updated by June 30.

Complete instructions are supplied each year to help you complete the four audit report forms. Follow the instructions step-by-step, and start early enough to ask questions in a relaxed manner. Everyone at the Pastoral Center is oriented toward assisting you and answering your questions; however, if you wait until the last minute, everything becomes more difficult and uncomfortable for all involved.

Also remember: no matter how well-written the instructions might be, if you have not maintained your records, completing the annual audit reports will be painful.