

**THE ORDER OF SAINT PAUL THE FIRST HERMIT  
SEXUAL MISCONDUCT POLICY  
Effective / Updated April, 2 2018  
Table of Contents**

1. Introduction .....	3
2. Statement of Policy	
2.1 Prohibition .....	4
2.2 Definition of Terms .....	4
2.3 Definition of Boundaries .....	5
2.4 Nature of This Policy .....	5
2.5 Distribution of Policy, Acknowledgement & Consent .....	5
2.6 Education and Training .....	6
2.7 Background Clearances and Questionnaires .....	6
3. Review Board	
3.1 Regional Review Board .....	6
4. Victim Outreach Representative	
4.1 Responsibilities of the Victim Outreach Representative .....	6
5. Pastoral Response	
5.1 Considerations .....	7
6. Patterns of Behavior with Minors	
6.1 Boundary Violations .....	8
6.2 Spotting the Warning Signs of Offenders .....	8
6.3 Electronic Communications .....	9
7. Ministry with a Minor	
7.1 Introduction .....	10
7.2 Unacceptable Behaviors that put an Adult in a High Risk Situation with a Minor .....	10
7.3 Inappropriate Displays of Affection in Ministry with a Minor .....	11
7.4 Appropriate Displays of Affection with a Minor When & Where Culturally Appropriate .....	11
7.5 Additional Guidelines for Conduct with Minors .....	12
7.6 Counseling Minors .....	12
8. Child Pornography	
8.1 Federal Law .....	12
8.2 Willful Misconduct .....	13
9. Obligation to Report	
9.1 Internal Reporting .....	13

9.2 External Reporting of Child Sexual Abuse.....	13
9.3 Seal of Confession.....	14
9.4 Investigation of Incident Reports.....	14
9.5 Responding to Incidents and Allegations of Sexual Abuse (Victim).....	15
9.6 Responding to Incidents and Allegations of Sexual Abuse (Accused).....	15
9.7 Additional Reporting Procedures for Responding to Allegations.....	16
9.8 Additional Reporting Procedure for Responding to Unacceptable Behavior .....	16
<b>10. Voluntary Disclosure .....</b>	<b>16</b>
<b>11. Policies for Those Who Have Abused A Minor</b>	
11.1 Consequences of Admitted, Credible or Substantiated Allegations Against The Order of St. Paul I Hermit .....	17
11.2 Action Where Guilt is Determined .....	17
11.3 Media Contact .....	17
<b>12. Boundary Violations and Signs of Problematic Behavior in General</b>	
12.1 Boundary Violations .....	17
12.2 Signs of Problematic Behavior .....	18
<b>13. Appendices .....</b>	<b>19</b>

## 1. INTRODUCTION

God gifted humanity with gender and sexuality. Scripture teaches that God made humans male and female and saw that this was good (Genesis 1-2). The Bible also teaches that any good gift from God can become twisted or corrupted and that such disorder causes injury, shame and humiliation (Genesis 3).

In response to God's call, The Order of St. Paul I Hermit is committed to minister to God's people and to show special tenderness and care for those who are vulnerable, including children and seniors, and those experiencing illness, loss and brokenness. The mission of The Order of St. Paul I Hermit cannot be effective unless all reasonable steps are taken to provide a safe environment for all.

It is the policy of The Order of St. Paul I Hermit to cooperate fully with all legal requirements and law enforcement agencies while, at the same time, respecting any applicable civil and ecclesiastical law as to rights and requirements of confidentiality and privacy.

The Order of St. Paul I Hermit also cooperates fully with the United States Conference of Catholic Bishops [**USCCB-Charter for the Protection of Children and Young People**] (see Appendix A).

The Order of St. Paul I Hermit is accredited by Presidium, Inc. In addition, as a member of The Conference of Major Superiors of Men (CMSM), The Order of Saint Paul I Hermit participates in the Safe Environment Program **Instruments of Hope and Healing** (see Appendix B with Appendix I, *A CMSM Pledge* and Appendix II, *The Essential Norms for Diocesan/Eparchial Policies Dealing with Allegations of Sexual Abuse of Minors by Priests or Deacons* [The United States Conference of Catholic Bishops]).

The Order of St. Paul I Hermit, located in the United States' Dioceses, utilizes the policies of the Archdiocese of Philadelphia and where applicable (see Appendixes C to I).

## 2. STATEMENT OF POLICY

### 2.1 Prohibition

Sexual misconduct is contrary to Christian principles. It contradicts the duties, engagement or employment of all:

- (a) The Pauline Fathers and Brothers
- (b) Employees
- (c) Agents
- (d) Volunteers

These individuals, as well as any minors involved in The Order of St. Paul I Hermit's activities, must not engage in sexual misconduct and must comply with the requirements that follow. The Order of St. Paul I Hermit has a "zero tolerance" policy with regard to any form of sexual abuse or misconduct.

### 2.2 Definition of Terms

- (a) **The Pauline Fathers and Brothers:** Professed, Novice or candidates.
- (b) **Employees:** those employed by The Order of St. Paul I Hermit
- (c) **Agents:** those working in an authorized ministry and/or activity of The Order of St. Paul (Spiritual Directors, Family Centered Religious Educators, Pastoral Care Givers, Polish Supplementary Schools teachers)
- (d) **Volunteers:** anyone who volunteers "services" for The Order of St. Paul I Hermit
- (e) **Minors:** anyone under the age of 18 years. Also included are adults who would be judged vulnerable because of physical or mental disabilities.
- (f) **Sexual Misconduct:** any sexual conduct which arises from the work of The Order of St. Paul I Hermit that involves a Pauline Fathers and Brothers, an Associate, an Employee, an Agent or a Volunteer and another person and that constitutes any of the following:
  - (1) unlawful activity
  - (2) sexual harassment
  - (3) activity contrary to the teachings of the Roman Catholic Church as interpreted by the Provincial
  - (4) youth peer sexual harassment by any minor while involved in a The Order of St. Paul I Hermit activity
- (g) **Sexual Abuse:** manipulation, force or trickery of a child or vulnerable adult into inappropriate touch or sexual contact.
- (h) **Sexual Exploitation:** any kind of sexual contact between a pastoral care giver and a client, regardless of whether it was initiated by the care giver or by the client.

- (i) **Sexual Harassment:** any unwelcome sexual advance, request for sexual favors, or other verbal or physical conduct of a sexual nature when: (1) submission to such conduct is made either explicitly or implicitly a condition of an individual's employment; (2) submission to or rejection of such conduct is used as the basis for employment decisions affecting the individual; or (3) such conduct has the purpose or effect of unreasonably interfering with an individual's work performance or creating an intimidating or offensive work environment.
- (j) **Youth Peer Sexual Harassment:** any unwelcome sexual advance, request for sexual favors or other verbal or physical conduct of a sexual nature between minors which has the purpose or effect of intimidating, embarrassing or humiliating the other person.
- (k) **Sexual Contact:** vaginal, anal or oral intercourse or the touching of an erogenous zone of another (including but not limited to thighs, genitals, buttocks, pubic region or chest) for the purpose of sexually arousing or gratifying either person.

### 2.3 Definition of Boundaries

- (a) **Boundaries:** "Something that indicates or fixes a limit or extent" (Webster). Boundaries define limits and mark off dividing lines. With regard to this document, the purpose of a boundary is to provide protection and safety.
- (b) **Physical Boundaries:** Each person's physical boundaries are different, influenced by cultural norms. Physical boundaries include the space a person needs to feel comfortable.
- (c) **Emotional Boundaries:** Emotional boundaries are a complex constellation of many factors, including one's identity, history, behavior, likes and dislikes.

### 2.4 Nature of This Policy

The guidelines contained in these pages are intended to address interactions on The Order of St. Paul I Hermit premises and in programs authorized by, sponsored by or related to The Order of St. Paul I Hermit. They are not designed or intended to address interactions within families.

### 2.5 Distribution of Policy, Acknowledgement and Consent

The Provincial or his designee shall distribute this policy to all present and future Pauline Fathers and Brothers, Employees, Agents, and Volunteers and shall acquire from each individual *in writing* an acknowledgement that he/she has received and reviewed the policy and agrees to comply with it (see Appendix J).

## **2.6 Education and Training**

- (a) All Pauline Fathers and Brothers, Employees, Agents and Volunteers must attend the designated Safe Environment Program.
- (b) Participation in three hours of safe environment training is required every three years for Pauline Fathers and Brothers, due to Diocesan Policy where Pauline Fathers and Brothers serve.
- (c) Participation in one hour of safe environment training is required every three years for Employees, Agents and Volunteers.
- (d) A record of participation in training is kept on file in the Provincial's Office confirming that Pauline Fathers and Brothers, Employees, Agents and Volunteers have completed the required training.

## **2.7 Background Clearances And Questionnaires**

- (a) Purpose: To identify behavior that is not consistent with The Order of Saint Paul I Hermit Sexual Misconduct Policy
- (b) Subjects and Processes
  1. Pauline Fathers and Brothers, Novices and Affiliate Candidates: Criminal Background Check and Child Abuse History Clearance.
  2. Agents and Volunteers: Criminal Background Check and Child Abuse History Clearance
  3. Employees: Criminal Background Check and Child Abuse History Clearance.

## **3. REVIEW BOARD**

### **3.1 Regional Review Board (see Appendix K)**

## **4. VICTIM OUTREACH REPRESENTATIVE**

### **4.1 Responsibilities of the Victim Outreach Representative:**

- (a) Refer to The Order of St. Paul I Hermit Sexual Misconduct Policy regarding the investigation of a facially credible allegation of sexual misconduct
- (b) Receive allegations
- (c) Respond pastorally
- (d) Offer to meet in person
- (e) Invite the victim to bring a support person
- (f) Meet in an open place
- (g) Understand the nature of abuse, the factors that influence the effects of abuse, the types of offenders
- (h) Seek to understand the disposition, wants and needs of the victim
- (i) Realize that victims heal in stages and not all at once

- (j) Help to promote psychological, emotional and spiritual healing
- (k) Maintain boundaries
- (l) Realize the charged nature of church related issues and emotional reactions
- (m) Avoid becoming a “punching bag”
- (n) Realize that complete satisfaction is rare
- (o) Do what he/she says he/she is going to do
- (p) Know his/her limitations and use professional support
- (q) Ask questions rather than make assumptions
- (r) Do not call alleged perpetrator “Father”
- (s) Thank the person for telling the story
- (t) Communicate with other organizations, as appropriate
- (u) When a minor is reporting, a parent is to be present and professional assistance is to be provided as needed
- (v) Work with the Provincial and/or his representative to ensure that The Order of Saint Paul I Hermit complies with all legal obligations relating to the reporting of allegations of abuse to law enforcement

## **5. PASTORAL RESPONSE**

### **5.1 Considerations**

- (a) It is typically better to use a different person for pastoral response than the person used for investigations.
- (b) It is important to take time to put oneself in the place of the individual and try to understand how he or she has felt and continues to feel.
- (c) It is essential to spend time listening to a survivor’s story of abuse.
- (d) It is important to realize that these situations are complicated, painful and not likely to be resolved quickly. Responding to the needs of survivors of sexual abuse is often a long term process.
- (e) Survivors of sexual abuse are often suspicious and untrusting.
- (f) Many survivors of sexual abuse show a range of strong emotions over a period of time.
- (g) Most survivors want validation that the incidents occurred.
- (h) It is not uncommon for survivors to want support but yet not always accept it.
- (i) It is not productive or helpful, in a pastoral response, to defend, justify, excuse or argue.
- (j) Patience and compassion are essential to the healing process.

## 6. PATTERNS OF BEHAVIOR WITH MINORS

### 6.1 Boundary Violations

(a) **Physical Boundary Violations**—touching in ways most adults would not touch a minor. Some examples are:

- (1) Roughhousing or wrestling
- (2) Tickling
- (3) Touching or hugging inappropriately
- (4) Putting legs around a minor
- (5) Holding or hugging when a minor resists
- (6) Encouraging minors to jump on an adult

(b) **Emotional Boundary Violations**—treating the relationship with a minor as if it were a romantic or an intimate adult relationship. Some examples are:

- (1) Spending too much time with a minor
- (2) Telephoning, texting and/or e-mailing too much
- (3) Getting involved in too many of the minor's activities
- (4) Acting in a possessive manner

(c) **Behavioral Boundary Violations**—involving a minor in activities that his or her parents would not allow the minor to do. Some examples are:

- (1) Allowing a minor to do things against the wishes of parents
- (2) Allowing a minor to look at pornography
- (3) Supplying alcohol, tobacco or controlled substances to a minor
- (4) Asking a minor to keep secrets from his or her parents
- (5) Ridiculing the beliefs of a minor's parents

### 6.2 Spotting the Warning Signs of Offenders

(a) **Warning Signs that Point to Preferential Offenders:**

- (1) Spending more time with minors than with peers
- (2) Giving gifts to minors, especially without permission
- (3) Showing favoritism to particular minors
- (4) Treating minors like equals or adults
- (5) Keeping secrets with minors
- (6) Ignoring policies about interacting with minors
- (7) Telling "off-color" jokes to minors

(b) **Warning Signs that Can Set the Stage for Situational Offenders:**

- (1) Excessive use of alcohol
- (2) Use of drugs
- (3) Anxiety or depression
- (4) Loneliness
- (5) Rejection or disappointment
- (6) Personal loss
- (7) Dependence on a relationship with a minor
- (8) Feeling unappreciated or not rewarded for hard work

### **6.3 Electronic Communications**

(a) Members should not communicate with minors (other than relatives) using electronic media except as a part of their professional/ministerial responsibilities. This includes email, instant messaging, texting, or social networking sites. If a minor contacts the Member, a polite response is permitted, but future communications should be avoided.

(b) During any usage of social media or other electronic communications with minors, Members are not to:

- Make comments that are, or could be construed by any observer to be, harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating.
- Engage in sexually oriented conversations or discussions about sexual activities unless these are part of a pastoral situation.
- Post sexually oriented or morally inappropriate pictures, photos, or comments.
- Engage in one-on-one video chatting or have one-on-one interaction in a chatroom.
- All communication between Members and minors must be transparent.

## **7. MINISTRY WITH A MINOR**

### **7.1 Introduction**

- (a) The Order of St. Paul I Hermit leadership must be aware of and authorize all programs for minors. A list of these programs shall be maintained and include the activities, purpose, coordinators of the programs, meeting times and locations.
- (b) Adequate adult supervision is essential for all programs for minors.
- (c) Programs for minors must be supervised by at least two adults.

### **7.2 Unacceptable Behaviors that Put an Adult in a High Risk Situation with a Minor:**

- (a) Being alone with a minor (“two deep” rule), except in counseling situations (see 7.6) and the Sacrament of Reconciliation
- (b) Being in isolated areas such as bedrooms, closets, restricted areas or private rooms
- (c) Sharing overnight accommodations where there is no other adult present
- (d) Sharing changing, bathing, and showering facilities/arrangements with one or more minors
- (e) Wearing provocative or revealing attire
- (f) Being nude in front of a minor
- (g) Staring while a minor is dressing
- (h) Commenting on a minor’s body
- (i) Taking pictures of a minor while showering or dressing
- (j) Showing favoritism
- (k) Giving money or gifts to a minor without parental permission/knowledge
- (l) Receiving money or gifts from a minor without parental permission/knowledge
- (m) Giving special or secret gifts
- (n) Speaking to a minor in a way that is or could be construed by any observer as harsh, threatening, intimidating, shaming, derogatory, demeaning or humiliating
- (o) Swearing in the presence of a minor
- (p) Keeping “secrets” about a relationship with a minor
- (q) Showing affection when no one else is around
- (r) Failing to adhere to uniform or accepted standards of showing affection
- (s) Serving alcohol at adult gatherings in the presence of one or more minors, unless a parent is present
- (t) Allowing a minor to visit inappropriate internet sites
- (u) Transporting a minor or minors without parental permission

- (v) Using, possessing, or being under the influence of alcohol or any illegal drugs while in the presence of and/or supervising a minor
- (w) Engaging in inappropriate physical contact
- (x) Discussing sexual activities with minors unless it is a specific job requirement and one is trained to discuss these matters
- (y) Giving sexually oriented or morally inappropriate printed materials (magazines, cards, videos, films, clothing, etc.) to a minor
- (z) Using physical discipline in any way: spanking, slapping, pinching, hitting, etc

### **7.3 Inappropriate Displays of Affection in Ministry with a Minor:**

- (a) Full frontal hugs or “bear hugs”
- (b) Inappropriate or lengthy embraces
- (c) Touching buttocks, chests, knees, legs, thighs or genitals
- (d) Placing hands in the pockets of a minor
- (e) Laying down, cuddling or sleeping beside a minor
- (f) Giving piggyback rides
- (g) Massaging
- (h) Patting a minor on the thigh, knee or leg
- (i) Tickling or wrestling
- (j) Touching or hugging from behind
- (k) Engaging in games involving inappropriate touching
- (l) Kissing on the mouth
- (m) Making compliments that relate to physique or body development
- (n) All forms of unwanted affection

“A Member of the Institute who observes or is told of warning signs, boundary violations or inappropriate behavior on the part of another member of the Province is encouraged to discuss his concerns with the Member. At the same time, the concerned Member should inquire with Provincial whether he is aware of the particular inappropriate behavior.

If, at any time he is confronted, the Member is unresponsive, unreasonably defensive or otherwise refuses to cease the behavior, the concerned Member must inform Provincial immediately. If the Member initially ceases the problem behaviors but they are observed again, it is essential for the concerned Member to inform Provincial so that steps may be taken to interrupt the inappropriate behavior.”

### **7.4 Appropriate Displays of Affection with a Minor When and Where Culturally Acceptable:**

- (a) Side to shoulder or shoulder to shoulder hugs; arms around shoulders
- (b) Pats on the head, shoulder or back
- (c) Handshakes, “high-fives” and hand slapping
- (d) Verbal praise
- (e) Touching hands, face, shoulders and arms

- (f) Holding hands during prayer or when a minor is upset
- (g) Sitting beside small children
- (h) Kneeling or bending down for hugs with a small child
- (i) Holding or picking up children 3 years old or younger

## **7.5 Additional Guidelines for Conduct with Minors**

- (a) Parent(s) or legal guardian(s) must always be explicitly informed of a child's location and the purpose of an interaction with an adult.
- (b) Minors are allowed in public areas; minors are not to be invited or allowed (without their parents) in private areas.
- (c) Vacation, "free" or leisure time is not to be spent alone with minors.
- (d) An adult is always to be responsible for the supervision of a minor on the premises; the minor is never to be left alone.
- (e) All discipline problems are to be handled in coordination with the parent(s) or legal guardian(s) of the child.
- (f) Any activities asked of a minor must conform to applicable labor laws.
- (g) Minors are required to have working papers as a condition of employment, and should not be paid "off the clock."

## **7.6 Counseling Minors**

- (a) The counseling of minors must always take place in public/professional areas and never in private living areas or other non-public areas.
- (b) The door to the counseling room is to have a window or the door is to be left open.
- (c) Another adult is to be in close proximity.
- (d) Unless the subject matter precludes it, the minor's parent(s) or legal guardian(s) is to be present or aware of the session.
- (e) If counseling entails more than two sessions, an evaluation of the matter is to be made with the child's parent(s) or guardian(s).
- (f) Counseling sessions are to take place during regular "business" hours when other personnel are working and/or present in the public/professional areas of the building.

# **8. CHILD PORNOGRAPHY**

## **8.1 Federal Law**

Intentionally viewing child pornography over the internet is a criminal act.

- (a) Intentional viewing is the "deliberate, purposeful, voluntary viewing of material depicting a child under 18 years of age engaging in a prohibited sexual act or in the simulation of such act."
- (b) "*Accidental or inadvertent viewing of such material*" is not a violation of the statute.

## 8.2 Willful Misconduct

Intentionally viewing child pornography over the internet, whether or not in the work environment, is not only criminal but will be deemed willful misconduct for which termination of employment is warranted.

## 9. OBLIGATION TO REPORT

### 9.1 Internal Reporting

Pauline Fathers and Brothers, Employees, Agents, and Volunteers who know or reasonably suspect an incident of sexual misconduct, and any such individual who believes that he or she is a victim of sexual harassment, shall immediately report this to the Provincial. In any circumstance in which the Provincial is the alleged perpetrator or the Provincial is unavailable, a report shall be made to the Provincial Vicar.

### 9.2 External Reporting of Child Sexual Abuse

- (a) State law where Pauline Fathers and Brothers serve identifies certain individuals, including teachers, mental health professionals, medical providers, clergy and others as “mandatory reporters” of child abuse. Mandatory reporters who have “reasonable cause to suspect” that a child is the victim of child abuse must comply with the State law where Pauline Fathers and Brothers serve by making a prompt report. The law does not define “reasonable cause to suspect,” but The Order of St. Paul I Hermit strongly urges that a prompt report be made if there is any good-faith reason to suspect that child abuse has occurred. Any questions regarding the obligation to report or the manner of reporting should be discussed with the Provincial and/or The Order of St. Paul I Hermit’s legal counsel. The report is to be made to **CHILDLINE** --(800) 932-0313-- within forty-eight hours after the mandatory reporter suspects or learns of the child abuse. The Pennsylvania Department of Public Welfare, which runs CHILDLINE, may also require the reporter to file a written report (Form CY-47), which is available on the Department’s website. The form also is available in the Provincial’s office. (see Appendix L)
- (b) Whether or not there is a statutory duty to report, the Provincial or his designee shall report every known or suspected incident of sexual abuse of a child to the appropriate law enforcement agency. However, where the victim is an adult by the time the report of child sexual abuse is made, the Provincial or his designee need not notify the appropriate law enforcement agency if the adult victim requests that a report not be made and that request is confirmed in writing. In that event, the Provincial or his designee shall encourage the adult victim to permit a

report to law enforcement, and make clear to the adult victim The Order of St. Paul I Hermit's strong preference in favor of reporting. (see Appendix M)

- (c) If the victim is a minor at the time of the report, the appropriate law enforcement agency shall be notified regardless of any request by the victim or the victim's family that such a report not be made. All such reports shall be both verbal and written. The Order of St. Paul I Hermit shall maintain copies of written reports for fifty years.

### **9.3 Seal of Confession**

The Seal of Confession supersedes the requirement for internal and external reporting. The Seal is never to be violated.

### **9.4 Investigation of Incident Reports**

Whenever a facially credible allegation of sexual misconduct is received, the individual receiving the report shall immediately consult with The Order of St. Paul I Hermit's legal counsel. An investigation team shall be formed whose members will generally include at least one outside professional. They will have concern for the alleged victim, his/her family, the person reporting, the alleged offender and other affected individuals.

- (a) Upon receipt of a facially credible allegation that the alleged offender may represent a risk to the alleged victim or others, the Provincial or his designee will promptly place the individual on administrative leave, with or without pay, pending the outcome of the investigation. Administrative leave is not punishment and should not be construed as implying guilt of the person placed on leave.
- (b) The Provincial or his designee and the investigator shall take steps to preserve the confidentiality of documents created by the investigation team.
- (c) Records will be stored in a locked cabinet in a secure environment with access available only to the Provincial and Provincial Vicar. Records are made available on a need-to-know basis and a written record is kept of all those who have had access to the file or any part of it.
- (d) When an accusation is made of sexual misconduct, the investigator should promptly contact the alleged victim to schedule an interview. The investigator should interview others, including the alleged offender to determine the facts.
- (e) When a credible allegation of sexual misconduct is received, the Provincial will designate a person to serve as a liaison and assistance coordinator for the alleged victim. He will also ensure that someone else provides personal and emotional support for the alleged offender.

- (f) Any investigation conducted or discipline imposed shall be in accordance with Canon Law.

### **9.5 Responding to Incidents and Allegations of Sexual Abuse (Victim)**

- (a) The Provincial or his designee will coordinate pastoral assistance to the alleged victim.
- (b) The Provincial or his designee will gather sufficient information to complete a preliminary report. The information is to include the following:
  - (1) Name of the alleged victim
  - (2) Age
  - (3) Address and phone number
  - (4) Name of the alleged perpetrator
  - (5) Dates of alleged abuse
  - (6) Nature, type and location of alleged abuse
  - (7) Any additional relevant details
- (c) The Provincial or his designee will offer to meet in person with the alleged victim if he/she so desires, always maintaining a compassionate and pastoral manner regardless of the demeanor of the alleged victim.
- (d) The Provincial or his designee will attempt to assist with the needs of individuals who have experienced abuse, along with their families.

### **9.6 Responding to Incidents and Allegations of Sexual Abuse (Accused)**

- (a) The Provincial will notify the accused of the allegation and its details. He will ensure that the accused receives the assistance needed while the allegation is being investigated. This may take the form of assigning a support person for the accused.
- (b) The Provincial will inform the accused of the right to seek canonical and civil counsel, and he will assist in engaging such counsel.
- (c) During the investigation, the accused will be placed on administrative leave from any responsibilities and duties; if the accused is a Pauline Father or Brother, he will be temporarily removed from ministry.
- (d) The Provincial will consult with the Review Board during the process of the investigation.
- (e) The Provincial will maintain contact with the accused throughout the process of investigation.
- (f) The Provincial will present the results of the completed investigation to the accused for a response.
- (g) If the allegation is found to be unsubstantiated, the Provincial will reinstate the accused and will work towards the restoration of his name and reputation, as well as provide reasonable support during this time.

## **9.7 Additional Reporting Procedures for Responding to Allegations of Abuse**

- (a)** In addition to reporting to the civil authorities, reports of suspected or known abuse of a minor perpetrated by Pauline Fathers or Brothers, Employee, Agent or Volunteer are to be made known directly to the Provincial. Reports of suspected or known abuse may also be made to any member of the Review Board and/or the Provincial Vicar.
- (b)** An anonymous letter of concern may be sent to any of the above. Anonymous concerns will be investigated to the extent that is feasible, based on known information.
- (c)** Allegations of sexual abuse will be reported to civil authorities regardless of whether the accused is living or dead.
- (d)** Allegations of sexual abuse will be reported to civil authorities regardless of whether the alleged victim's identity is known.
- (e)** The Order of St. Paul I Hermit will cooperate fully with investigations by civil authorities.
- (f)** Files of allegations will be created at the time the allegation is received.
- (g)** When the case is established Bishop will be notified.

## **9.8 Reporting Procedures for Responding to Unacceptable Behavior**

- (a)** There is a responsibility not only to report any case of abuse but also to report any incident of unacceptable behavior.
- (b)** If any Pauline Father or Brother, Employee, Agent or Volunteer detects another Pauline Father or Brother, Employee, Agent or Volunteer engage in unacceptable behavior, this is to be reported to the Provincial or Provincial Vicar. The Provincial or Provincial Vicar will consult with legal counsel or the Review Board as appropriate.

## **10. VOLUNTARY DISCLOSURE**

- (a)** Should a Pauline Father or Brother voluntarily disclose to the Provincial an inappropriate attraction to minors, the Provincial is to provide assistance including evaluation and treatment.
- (b)** Should a Pauline Father or Brother voluntarily disclose to another Pauline Father or Brother an inappropriate attraction to minors, the Pauline Father or Brother receiving the information is to report this disclosure to the Provincial who is to provide assistance, including evaluation and treatment.

## **11. FOR PAULINE FATHERS & BROTHERS WHO HAVE ABUSED A MINOR**

### **11.1 Consequences of Admitted, Credible or Substantiated Allegations**

- (a) In cases where an allegation of sexual abuse of a minor is admitted, substantiated, or deemed credible, the Pauline Father or Brother cannot return to public ministry.
- (b) There may be restrictions on community life and/or on personal activities.
- (c) Psychological and medical assessment and intervention may be required.
- (d) Diocesan officials are to be advised of the nature of the allegation and the consequences for the accused.
- (e) The Provincial will inform the Father General of the nature of the allegation and the consequences for the accused.
- (f) The Provincial will communicate with the person who made the complaint and to any other parties as necessary and appropriate.
- (g) The Pauline Father or Brother retains a right of appeal.
- (h) If at any time during the course of implementing these procedures, civil or criminal proceedings are initiated against the accused, these procedures may be suspended or altered according to the judgment of the Provincial. These procedures can be resumed after the completion of the civil or criminal proceedings.

### **11.2 Action Where Sexual Misconduct is Determined**

Any Pauline Father and Brother, Employee, Agent or Volunteer who admits to, does not contest, or is found guilty of sexual misconduct shall be immediately disciplined or terminated from employment or any position of responsibility within The Order of St. Paul I Hermit.

### **11.3 Media Contact**

Any media contact regarding an incident of sexual abuse and/or sexual misconduct must be directed to the Provincial or his designee.

## **12. BOUNDARY VIOLATIONS AND SIGNS OF PROBLEMATIC BEHAVIOR IN GENERAL**

### **12.1 Boundary Violations**

- (a) Stepping inside a person's "comfort zone," no matter one's intention, is "crossing the line" and thus a physical boundary violation.
- (b) Making comments or remarks about anything that has to do with "who a person is" can be an emotional boundary violation. Intentions do not matter; what matters is the effect the words have on the person.

- (c) Comments and remarks starting with “You” are potentially trespassing on someone’s emotional boundaries. Even compliments can offend, e.g. one can say to a co-worker, “You should wear your hair that way more often; it really becomes you.” This can be perceived as invasive, overly personal and even a reduction of personhood to body parts.
- (d) Defining people, telling them what they should do or not do, and bringing attention to obvious facts about their person, are all potential boundary violations.
- (e) Factors that increase vulnerability for a sexual boundary violation:
  - (1) Private office
  - (2) Close relationship
  - (3) Intimate access
  - (4) Stimulating conversation
  - (5) Viewing another as a sex object
  - (6) Eagerness to please
  - (7) Illusion of one’s invulnerability
  - (8) Desire to avoid criticism
  - (9) Poor training in counseling methods
  - (10) Poor understanding of the nature of professional boundaries
  - (11) Lack of opportunity for consultation with knowledgeable peers regarding ethical and moral dilemmas
  - (12) Lack of education in human sexuality and interpersonal communications
  - (13) Stress because of emotional, spiritual and physical demands

## **12.2 Signs of Problematic Behavior**

- (a) Telling all
- (b) Talking at an intimate level at the first meeting
- (c) Infatuation
- (d) Preoccupation with a person
- (e) Acting on sexual impulse
- (f) Going against personal values or rights, to please others
- (g) Not noticing when someone else displays inappropriate boundaries
- (h) Accepting unwanted favors
- (i) Touching a person without asking