

PROGRAM OF PROTECTION FOR CHILDREN AND OTHER VULNERABLE PERSONS

Conception Abbey
February 28, 2017
2nd Edition



CONCEPTION
Living the Benedictine Tradition



April 22, 2020

Dear friends of Conception Abbey,

As Christians living under the monastic Rule of Saint Benedict, the monks of Conception Abbey strongly condemn any abuse of persons — children, young persons, or adults — no matter where it occurs. Every person deserves to be treated with respect and dignity, and Conception Abbey is committed to protecting every person served by the works and ministries of the Abbey.

In common with other institutions of Consecrated Life, the monks of Conception Abbey are committed to providing a safe and protective environment for children, young people and adults. We always strive to ensure such an environment. We share the anguish and sadness expressed by many over instances of sexual abuse of minors perpetrated by diocesan priests, religious priests, and religious brothers and sisters. We know that those who have experienced the betrayal of sexual abuse have been deeply wounded, and the scars may last forever. We know that many in the Church who have looked to clergy and religious as servant leaders of the gospel have also experienced a great sense of loss and betrayal. Trust and confidence can be restored only over time, and with deliberate attention on the part of all to healing the pain while assuring a safe and healthy environment for those who work, serve, minister and worship in the Church.

All members of the monastic community of Conception Abbey, as well as all employees, volunteers and seminarians, are required to adhere to the Abbey's Program of Protection for Children and Other Vulnerable Persons. This Program is in force throughout Conception Abbey and is published here for the information of our friends and other interested persons. Conception Abbey is committed to maintaining accreditation with Praesidium, a national leader in abuse risk management. Praesidium has joined with the Conference of Major Superiors of Men in the United States to create standards for screening, education, response and supervision within religious communities of men. After an audit of our Program of Protection and a thorough site visit, Praesidium has given Conception Abbey's program full accreditation through August of 2024.

The Program of Protection for Children and Other Vulnerable Persons is intended to help ensure a safe environment for children, adolescents and adults at Conception Abbey. Utilizing proper screening of candidates, ongoing education of all current members, timely and pastoral response to any and all allegations, and proper supervision of all members, our Program of Protection fosters Catholic moral values and attitudes among monks, employees, volunteers and seminarians.

If you are aware of present or past instances of abuse, we encourage you to report what you know to Br. Jacob Kubajak, O.S.B., our Program of Protection Coordinator at (660) 944-2988 or via email at officeofprotection@conception.edu. We promise that we will respond quickly and appropriately.

We are grateful for your friendship and prayerful support. May God's grace guide us all and bring healing to those who have suffered the wounds of sexual, emotional or physical abuse.

Sincerely in Christ,

Abbot Benedict

Right Rev. Benedict T. Neenan, O.S.B.
Abbot-Chancellor

I. Introduction

The United States Conference of Catholic Bishops recognized past failures on the part of Church leadership to ensure a safe environment in which children, young people and adults were protected from abuse by clergy and other Church personnel. By adopting the *Charter for the Protection of Children and Young People*, the bishops pledged themselves to a program of protection in the future. The Preamble of the *Charter* reads: “We re-affirm our deep commitment to creating a safe environment within the Church for children and youth.”

The monks of Conception Abbey make the same solemn promise. We strongly condemn any abuse of children, young people, and adults no matter where it occurs. Abuse is particularly heinous when the perpetrator is a member of the clergy or other Church personnel. Conception Abbey is committed to protect children, young people and adults in all the works and ministries undertaken in the name of Conception Abbey.

All members of the monastic community of Conception Abbey and all employees, volunteers and seminarians must adhere to the *Program of Protection for Children and Other Vulnerable Persons (2nd Edition)* as described in this document. When official duties are carried out in another facility or under another institution’s direction and supervision, all members are also subject to that facility’s or institution’s policies and procedures.

The *Program of Protection for Children and Other Vulnerable Persons (2nd Edition)* is intended to help ensure a safe environment for children, young people and adults at Conception Abbey and to foster Catholic moral values and attitudes among Abbey personnel and seminarians. All monks, employees, volunteers and seminarians are expected to understand the goals and requirements of this Program and to implement them completely in the performance of their duties. The conduct of monks, employees, volunteers and seminarians in both public and private can inspire and motivate people or scandalize and weaken their faith. All whose vocation and work is centered at Conception Abbey must be aware of this responsibility.

The policies established in this *Program of Protection for Children and Other Vulnerable Persons (2nd Edition)* supersede any other policies of Conception Abbey on this subject but are not intended to supersede canon or civil law.

The Program of Protection for Children and Other Vulnerable Persons (2nd Edition) was reviewed by the Abbot’s Council on February 28, 2017. *The Program* was approved by Abbot Benedict Neenan, OSB on February 28, 2017, and its policies and procedures are now in force at Conception Abbey.

The Abbot of Conception Abbey retains the right at all times to address matters pertaining to the policies established here on a case-by-case basis in order to respond to specific situations and issues which may arise, with due respect for canon and civil law and the goals of this *Program of Protection for Children and Other Vulnerable Persons (2nd Edition)*.

II. Definitions

Abuse of children, young people, and adults includes: sexual abuse (inappropriate sexual contact of any kind); physical abuse (any non-accidental physical injury); neglect (failure to provide needed food, clothing, shelter, medical care, or supervision); emotional abuse (inflicting anguish, pain, or distress through verbal or nonverbal acts).

Monks of Conception Abbey are professed Benedictines of Conception Abbey or novices, postulants or aspirants for Conception Abbey. **Employees** are salaried and hourly employees of Conception Abbey; this policy covers employee behavior during the performance of work in any apostolate or department of Conception Abbey. **Volunteers** are those who assist in the works of Conception Abbey without remuneration; this policy covers behavior in a voluntary position in any apostolate or department of Conception Abbey. In this policy, the term “Abbey personnel” includes monks, employees, and volunteers of Conception Abbey.

Seminarians are those enrolled in the formation program of Conception Seminary College; this policy covers behavior during the academic year and while ministering to minors and other vulnerable persons as part of the formation program of Conception Seminary College.

Children are unmarried persons under the age of 18, considered **minors** in the State of Missouri. Some adults are considered **uniquely vulnerable** to abuse because of age, physical/mental disabilities, or being unable to protect him/herself, and are covered under this program. Other adults who take part in religious, education and pastoral care settings at Conception Abbey with Abbey personnel or seminarians may also be vulnerable because of their personal situation or life experience.

Throughout this document, **Abbot** refers to the Abbot of Conception Abbey. All references assume that in the absence of the Abbot, the Prior of Conception Abbey has the necessary authority.

A **pastoral relationship** is a relationship between a monk of Conception Abbey and any person to whom a monk provides pastoral care, including counseling, spiritual direction or guidance, and/or when the monk has heard a confession or received confidential or privileged information. Pastoral relationships may also be established by some employees or volunteers of Conception Abbey in their roles of service. Pastoral relationships and behavior are treated in a special section of this policy.

Monks always represent Conception Abbey, even outside of pastoral relationships. However for monks who have **familial and social relationships** with other persons, some of the behaviors listed in III. C. 3. c. (p. 7) of this policy may be acceptable. Care should still be taken to be with minors (children of relatives, friends, and acquaintances) only in public settings and in the presence of other people (adults).

III. Code of Ethical Standards

A. GENERAL PRINCIPLES

1. *Leadership and integrity.* Abbey personnel who are in positions of authority recognize that the authority of leadership comes from God as a gift for the good of the Church and should be carried out with integrity and good stewardship. Monks, employees, volunteers and seminarians are expected to be persons of honest and high moral standards. They should endeavor to lead by example. They are expected to conduct themselves in a responsible and conscientious manner, free from any deception or action that would be deemed improper. Leadership should be exercised through Gospel values of justice, mercy and compassion. The Benedictine values of community, mutual support, and care for all persons should be demonstrated by leaders at Conception Abbey.
2. *Respect for others.* Monks, employees, volunteers and seminarians respect the dignity, rights and worth of every person they encounter. They strive to be sensitive to cultural differences among people. All should be aware that issues of age, gender, race, religious, physical and mental disabilities, and language all affect how the Good News is received and interpreted.
3. *Commitment to the Church.* Abbey personnel and seminarians embrace the teachings of Jesus and work to promote the Gospel. The Scriptures and the Tradition of the Roman Catholic Church guide all who share leadership when decisions must be made that directly affect those who are served, as well as Gospel and Benedictine values.
4. *Personal well-being.* Monks, employees, volunteers and seminarians are responsible for attending to their own physical, mental, intellectual, emotional and spiritual health. They should nurture their strengths and attend to their shortcomings. They should be supportive of one another in maintaining a sense of well-being, and alert to any impediments to well-being and seek appropriate assistance.

B. GUIDELINES FOR WORKING WITH CHILDREN AND OTHERS

Providing pastoral care to children, young people and adults is a critical work of the Church and her ministers. In providing this ministry, important considerations need to be taken into account. When working with children and other vulnerable persons, it is particularly important to recognize the imbalance of power and authority possessed by an adult, clerical or lay person, in the situation. In light of the requirement for ethical exercise of authority and the particular vulnerability of children and other vulnerable persons, all monks, employees, volunteers and seminarians at Conception Abbey must observe the following guidelines when dealing with others:

1. Respect and care are always to be shown to others, especially children and other vulnerable persons. Monks, employees, volunteers and seminarians must always use prudence marked by personal and professional integrity to ensure the safety of children and other vulnerable persons, avoiding all inappropriate behavior or even the appearance of impropriety.

2. When providing one-on-one pastoral care to a child or other vulnerable person, meetings should take place in open and accessible locations. Meetings must be arranged at times and in places that assure accountability: open spaces, rooms with glass panes in doors, areas where other adults are present, and normally with the knowledge of parents or guardians.
3. Retreats, days of recollection, and other gatherings of children sponsored by Conception Abbey must include the participation of parents or designated guardians. An appropriate ratio of parents or guardians to minors must be maintained throughout the event, though the ratio may vary according to the age of the children and the type of event. Children under the age of 10 should be supervised by a higher ratio of 1 adult to 5 children; children over 10 will normally require a lower ratio of 1 adult to 10 minors. Good judgment must be used in every case. Under no circumstances may only one adult supervise such a gathering or event.
4. When it is necessary to communicate with minors by email or other social channels, such communication should be limited, appropriate and open to public scrutiny if necessary. Normally, such communication should be restricted to one's own family and to official business, such as abbey and seminary vocation work, seminary admissions, and official pastoral ministry assignments. The cultivation of personal and confidential relationships between adults and minors via social communication channels is never appropriate. Online chat room conversations between adults and minors are never appropriate.

C. EXAMPLES OF BEHAVIORS

Abuse and neglect of minors, young people and adults is contrary to the teachings of the Roman Catholic Church. Monks, employees, volunteers, and seminarians have a serious responsibility to avoid behaviors which abuse or neglect any one encountered in ministry or work for Conception Abbey. The following are examples of prohibited behaviors. Special attention is given to off-site activities and acceptable and unacceptable physical contact.

1. Prohibited behaviors

- a. Using, possessing, or being under the influence of illegal drugs while in the presence of minors.
- b. Using, possessing, or being under the influence of alcohol while in the presence of minors.
- c. Providing or allowing minors to use illegal drugs or alcohol.
- d. Swearing in the presence of minors.
- e. Speaking to minors in a way that is or could be construed by any observer as harsh, threatening, intimidating, shaming, derogatory, demeaning, or humiliating.
- f. Discussing sexual activities with minors unless it is a specific job requirement and the monk, employee, volunteer or seminarian is trained to discuss these matters.

- g. Engaging in any sexually oriented conversation with minors unless the conversations are part of a legitimate lesson and discussion for teenagers regarding human sexuality issues. On such occasions, the lessons will convey to young people the Church's teachings on such topics. If the young people have further questions not answered or addressed by their teachers, they should be referred to their parents or guardians for clarification or counseling.
- h. Being nude in the presence of minors.
- i. Possessing sexually oriented or morally inappropriate printed materials (magazines, cards, videos, films, clothing, etc.) around minors.
- j. Sleeping in the same beds, sleeping bags or small tents with minors.
- k. Engaging in sexual contact with minors. For the purposes of this policy, sexual contact is defined as vaginal intercourse, anal intercourse, oral intercourse, or the touching of an erogenous zone of another (including but not limited to the thighs, genitals, buttocks, pubic region or chest) for the purpose of sexually arousing or gratifying another person.
- l. Creating, possessing or distributing child pornography.

2. Off-site events

- a. Monks, employees, volunteers and seminarians are prohibited from transporting minors without written permission of their parent or guardian, except in case of an emergency.
- b. Monks, employees, volunteers and seminarians are prohibited from unnecessary and/or inappropriate physical contact with minors while in vehicles.
- c. Minors should be transported directly to their destination. No unplanned stops should be made.
- d. Monks of Conception Abbey are prohibited from having minors stay at their residence. Requests for exceptions should be submitted to the Abbot of Conception Abbey in writing two weeks prior to the visit.
- e. Changing and showering facilities or arrangements for monks, employees, volunteers and seminarians must be separate from facilities or arrangements for minors.

3. Physical contact

- a. Monks, employees, volunteers and seminarians are prohibited from using physical discipline in any way for behavior management of minors. No form of physical discipline is acceptable. This prohibition includes spanking, slapping, pinching, hitting, or any other physical force as retaliation or correction for inappropriate behaviors of minors.
- b. Appropriate affection between those covered by this policy and minors constitutes a positive part of Church life and ministry. The following forms of affection are regarded as appropriate examples for those engaged in ministry roles with minors:
 - Hugs.
 - Pats on the shoulder or back.
 - Hand-shakes.

- “High-fives” and hand slapping.
 - Verbal praise.
 - Touching hands, faces, shoulders and arms of minors.
 - Arms around shoulders.
 - Holding hands while walking with small children.
 - Sitting down beside small children.
 - Kneeling or bending down for hugs with small children.
 - Holding hands during prayer.
 - Pats on the head when culturally appropriate. (In some Asian communities, this gesture should be avoided.)
- c. Some forms of physical affection have been used by adults to initiate inappropriate contact with minors. In order to maintain the safest possible environment for minors, the following are examples of affection that should not be used by those engaged in ministry roles with minors:
- Inappropriate or lengthy embraces.
 - Kissing on the mouth.
 - Holding minors over four years old on the lap.
 - Touching buttocks, chests or genital areas.
 - Showing affection in isolated areas such as bedrooms, closets, staff-only areas, or other private rooms.
 - Being in bed with a minor.
 - Touching the knees or legs of minors.
 - Wrestling with minors.
 - Tickling minors.
 - Giving piggyback rides.
 - Any type of massage given by the minor to an adult.
 - Any type of massage given by an adult to the minor.
 - Any form of unwanted affection.
 - Compliments that relate to physique or body development.

D. TRAINING FOR ABBEY PERSONNEL AND SEMINARIANS

Monks, employees, volunteers and seminarians shall read this *Program of Protection for Children and Other Vulnerable Persons (2nd Edition)* and agree in writing to comply with it. Monks, employees, volunteers and seminarians who work with minors must participate in training organized by the Office of Protection that addresses protection of minors.

E. SUPERVISION OF PROGRAMS

Programs for minors and young people in which monks, employees, volunteers or seminarians are involved, must be supervised by at least two adults. The Abbot of Conception Abbey and the Abbot’s Council shall be aware of all programs for minors and young people which are sponsored by Conception Abbey. A list of these programs will be maintained in the Abbot’s office and include purpose, activities, sponsors or Coordinators of the programs, meeting times and locations. The Abbot shall examine these programs and determine whether there is adequate supervision.

IV. Reporting abuse of children and other vulnerable persons

The following section describes the policies and procedures of Conception Abbey concerning abuse of children and other vulnerable persons. It is based on Catholic teaching and canon law in addition to principles of civil and criminal law. This section is not intended to create or confer any additional civil or legal rights.

A. GENERAL PRINCIPLES

1. Abuse of any person is contrary to the Gospel and to all which the Catholic Church believes and professes about the dignity of all human persons. It is the policy of Conception Abbey that abuse of any kind is never to be tolerated.
2. Conception Abbey fully subscribes to the *Charter and Norms for the Protection of Children and Young People* drafted by the American bishops in June 2002 and reviewed and revised in 2005 and 2011.
3. Conception Abbey recognizes that no policy in itself prevents abuse of children and other vulnerable persons. Strict adherence to this policy and vigilance throughout the Conception community will help assure that no one is victimized.
4. This policy reflects Conception Abbey's wholehearted commitment to promote and protect the dignity of each person, and to clearly demonstrate that Conception Abbey takes seriously the responsibility to provide a safe environment for all.

B. PROTECTION FOR CHILDREN AND OTHER VULNERABLE PERSONS

1. Conception Abbey renews its commitment to provide a safe environment for children and other vulnerable persons. The Abbey is also committed to assisting monks, employees, volunteers and seminarians in recognizing, reporting, and attending to the needs of the abused. All Abbey personnel and seminarians shall maintain the integrity of the ministerial relationship at all times. Abusive conduct of any kind, including sexual conduct, between one who is performing duties on behalf of Conception Abbey and a child or other vulnerable person is not only criminal but is a violation of the Commandments and Catholic moral teaching.
2. Persons with reasonable cause to suspect abuse of a child or other vulnerable person by anyone acting on behalf of Conception Abbey – whether monk, employee, volunteer or seminarian – are required to report directly to civil authorities and to the Coordinator of the Office of Protection (see section VI.)
3. The response of Conception Abbey in cases of abuse by any Abbey personnel or seminarians will address the pastoral needs of the victim, the well-being of the community, and the assessment and treatment of the offender. Care is to be taken that all involved are treated in a manner consistent with the Gospel values of compassion, understanding and justice,

as well as those standards that are normative in the wider professional community.

C. REPORTING ABUSE

The term “abuse” may refer to the physical abuse, neglect, sexual abuse or exploitation, mental injury, or threat of harm to a minor, young person, or vulnerable adult. Such abuse is a violation of Missouri law. Some persons are mandatory reporters under Missouri law and must report suspected abuse to civil authorities.

1. *Mandatory reporting by Abbey personnel and seminarians.* Clergy, school employees at all levels of education, and other mandatory reporters are required by law to report or cause to be reported suspected abuse to the Missouri Division of Social Services or to a law enforcement agency. (See Appendix E for telephone numbers for reporting.) Conception Abbey expects all mandatory reporters to fulfill this legal obligation and then to report the matter to the Coordinator of the Office of Protection.
2. *Voluntary reporters.* Conception Abbey requires personnel and seminarians who are not mandatory reporters under Missouri law to voluntarily report suspected abuse of minors, young persons, or vulnerable adults when they have reasonable grounds to do so. Such reports should be made to the Missouri Division of Social Services or to a law enforcement agency and then to the Coordinator of the Office of Protection. (See Appendix E for telephone numbers.)
3. *Questions on reporting abuse.* If Abbey personnel and seminarians have questions about reporting, they should call the Missouri Division of Social Services hotline with their questions. (See Appendix E for telephone number.) The Coordinator of the Office of Protection can also be of assistance.
4. *The seal of confession.* A priest is absolutely prohibited from revealing, in words or in any manner for any reason, information acquired from a sacramental confession. The sacramental seal of confession is inviolable. This confidentiality is recognized under Missouri law.
5. *Reporting present abuse.* Anyone who has reasonable cause to believe that abuse involving Abbey personnel or seminarians is putting people at risk, should report the suspected abuse directly to law enforcement.
6. *Reporting past abuse.* Conception Abbey seeks to promote healing and reconciliation for those who have suffered abuse as minors, young persons, or vulnerable adults by Abbey personnel. Complainants are encouraged to contact the Coordinator of the Office of Protection at (660) 944-2988 or by emailing officeofprotection@conception.edu. Conception Abbey will provide pastoral and other assistance on a case-by-case basis.

D. CONCEPTION ABBEY’S RESPONSE TO ABUSE

A sacred relationship exists between the Catholic Church and all persons, whether they are children or adults. Abuse of any kind is a matter of gravest concern. Knowledge of such abuse calls for a timely response so that the safety of the victim and the community is assured and healing can begin.

1. The Coordinator of the Office of Protection will respond promptly to persons who contact Conception Abbey concerning abuse. The Coordinator will receive the information and will inform the Abbot or, in the case of a seminarian, the Abbot and the President-Rector of Conception Seminary College. In the case of a complaint against a member of the monastic community, the complainant may request to meet with the Abbot and/or the Abbey Review Board. The complainant will be contacted by an independent trained investigator, if he or she wishes to pursue the matter. This investigator will provide a report to the Abbot, who will present it to the Abbey Review Board and seek advice about the credibility of the allegation.
2. When Conception Abbey is informed of allegations of abuse by any of its monks, employees, volunteers or seminarians, the Abbey will address the needs and rights of all involved – the person alleging abuse, the accused, Conception Abbey, Conception Seminary College, and the larger community affected. Leadership must recognize that allegations impact all those involved, especially the person alleging abuse, the accused and those persons close to them. Care must be taken by leadership that the least amount of harm be done, especially if charges are found later to be unsubstantiated.
3. When allegations of abuse of a child or other vulnerable person have been made, the Coordinator will keep in contact with the individual (or the parent or guardian of a minor) and his or her family, if appropriate. Psychological counseling, pastoral care, or the assistance of an advocate for healing may be offered in the spirit of Christian justice and charity as appropriate. When Conception Abbey pays for counseling, the Abbey authorizes the therapist. Whenever possible, the therapist will be one who specializes in the treatment of victims of abuse.
4. If it appears that the report concerns present abuse by any Abbey personnel or seminarians, the complainant will be encouraged to report the suspected abuse directly to law enforcement. In addition, if the allegation is subject to reporting under Missouri statute, the Coordinator of the Office of Protection will make a report to the appropriate social service agency. The Coordinator will inform the complainant that a report was made to civil authorities.
5. Conception Abbey will cooperate fully with civil authorities in their investigation of the charges. To ensure that there will be no interference or perceived interference in the investigation by civil authorities, no further internal investigation (see D.1. above) will take place while the civil investigation is pending, except what may be required for compliance with canon law.
6. Unless civil authorities request otherwise, the accused individual also will be informed of the allegation by the Abbot and will be given every opportunity to respond to the charges. The Abbot and monastic community will provide pastoral care to the accused during this time in accordance with the spirit of the *Rule of St. Benedict*. The Abbot may, at his discretion, place the person accused on paid or unpaid administrative leave depending on the

circumstances and details of the accusation, and will encourage an outside professional assessment of the person accused. Should the accused be a cleric, canon law will be followed (see Appendices A and B). The person will remain on administrative leave pending the outcome of the internal and/or civil investigation. In the case of a seminarian, the President-Rector of Conception Seminary College will decide the appropriate action to be taken after consultation with the seminarian's bishop and diocesan officials.

7. Within the confines of respect for the privacy and the reputations of the individuals involved, Conception Abbey will deal as openly as possible with the larger community directly affected by the alleged ministerial misconduct with minors, young persons or vulnerable adults. But care must always be taken to deal sensitively with information, since reputations are fragile and prudence and charity must be exercised for the good of all.

E. POSSIBLE OUTCOME OF REPORTING ABUSE

The following are possible outcomes of the civil and/or internal investigation and assessment process:

1. Allegation substantiated

- a. If an allegation of abuse against a member of Abbey personnel is substantiated or found credible, and the complaint is subject to reporting under Missouri law, the person accused will be subject to the sanctions of criminal and/or civil law.
- b. If a cleric is found guilty under criminal and/or civil law of abuse of a minor, young person or vulnerable adult (or when it is determined that there is a "semblance of truth"), the Abbot shall also proceed according to the norms of canon law. (See Appendices A and B)
- c. If a non-clerical member is accused of such abuse, the Abbot may seek the advice of the Abbey Review Board and would follow the appropriate canonical procedures.
- d. Monks will receive the pastoral care and protection afforded by the Benedictine tradition, which requires members of the monastic community to "support with the greatest patience one another's weaknesses of body or behavior" (*Rule of Benedict 72.5*).
- e. If an allegation of abuse against non-monastic Abbey personnel is substantiated or found credible, the individual's employment or volunteer agreement will be terminated.
- f. If an allegation of abuse against a seminarian is substantiated or found credible, the individual will be dismissed from Conception Seminary College by the President-Rector.

2. Allegation unsubstantiated

If an allegation of abuse of a minor, young person or vulnerable adult is unsubstantiated, disproved or found not credible, the Abbot, in collaboration with the Coordinator (or in the case of a seminarian, the President-Rector) will inform the parties of the outcome of the investigation. If necessary,

continued efforts will be made to maintain or restore the good name of the accused and provide for his or her well-being. If there are any future steps that can be taken to assure a return to normal relationships in the school, parish or entity involved, Conception Abbey will consider these steps.

3. Evidence inconclusive

- a. If the evidence is inconclusive as to the validity of an allegation of abuse, two factors must be considered. First, the safety and well-being of the alleged victim and the community must be carefully considered. Second, the rights of the accused must also be carefully considered.
- b. Based on the charge and the nature of the evidence, lay employees or volunteers may receive corrective action or be terminated under the personnel policies of Conception Abbey in effect at that time.
- c. If a civil or canonical investigation raises questions about continued fitness for ministry of a cleric of Conception Abbey, the matter will be referred to the Abbey Review Board for further examination and recommendation to the Abbot. The Abbot may, as a result, issue a canonical prescript to the cleric.
- d. The Coordinator (or in the case of a seminarian, the President-Rector) will also inform the parties of the outcome of the investigation and may make efforts to minimize the impact on the alleged victim and the community. In these cases, the Coordinator (or in the case of a seminarian, the President-Rector) may refer the alleged victim for follow-up pastoral care and psychological counseling, as appropriate.
- e. Every effort must be made to restore the good name of the person accused. Continued pastoral concern should be shown to the person by the entire community.

V. Abbey Review Board

A. PURPOSE

The Abbey Review Board assists the Abbot of Conception Abbey in maintaining a safe and respectful climate for all those who participate in Abbey-sponsored programs and ministries, or who visit Conception Abbey. The Board's work includes reviewing policies and programs, especially those concerning the abuse of minors, young persons and vulnerable adults. The Board advises on educational requirements, helps address complaints of abuse, and recommends ways to foster healing and reconciliation when needed. The work of the Abbey Review Board adheres to the procedures outlined in Conception Abbey's *Program of Protection for Children and Other Vulnerable Persons (2nd Edition)*.

The Abbey Review Board:

1. reviews the *Program of Protection for Children and Other Vulnerable Persons (2nd Edition)* every three years, with a focus on the effectiveness of its implementation;
2. reviews the work of the Office of Protection annually;
3. provides a safe and effective forum for hearing complaints of abuse against monks of Conception Abbey;
4. offers advice to the Abbot on all aspects of a complaint of the abuse of a minor, young person or vulnerable adult by a monk of Conception Abbey; and
5. annually reviews all Safety Plans.

B. MEMBERSHIP

Abbey Review Board members are chosen from the wider community on the basis of their professional competence and prudent judgment. They receive no compensation.

- a. The Abbey Review Board is advisory to the Abbot.
- b. Laypeople from the area (Catholic and non-Catholic) are appointed by the Abbot of Conception Abbey to serve on the Board.
- c. The five voting members are not agents or employees of Conception Abbey.
- d. Members of the Board are indemnified through Catholic Mutual of Omaha.
- e. The Coordinator of the Office of Protection serves as secretary and is a non-voting member.

C. TERM

Appointed members of the Abbey Review Board may serve for two consecutive three-year terms. Appointments are staggered in order to provide continuity.

D. MEETINGS

- a. The Board meets annually and on an ad hoc basis.
- b. The designated chair convenes and presides at all meetings.
- c. The chair, in collaboration with the Coordinator, prepares the agenda.
- d. Members are provided access to information required for the fulfillment of their responsibilities.

E. PROCEDURES

a. Policies and procedures

The chair of the Abbey Review Board annually schedules a meeting to review the work of the Office of Protection.

b. Allegations of current abuse

If the complaints are subject to reporting under Missouri law, and this has not yet been done, Conception Abbey will file a report and cooperate fully with the civil and criminal authorities in their investigation. During the time of a criminal investigation, the Abbey Review Board does not enter into the process.

c. Allegations of past abuse

- i. After a complaint of abuse has been made against any member of the monastic community (living or deceased) through the Office of Protection and the initial interview has been completed, the complainant will be contacted by an independent trained investigator if he or she wishes to pursue the matter. Pastoral care for the complainant is offered. If there is no ongoing civil litigation, the Abbot determines if the allegation constitutes a reserved *delict* “with at least a semblance of truth” (see Appendix A).
- ii. If the person making the complaint requests to speak with the Abbey Review Board, the Coordinator will ask the chair to convene the Board for this purpose. The parameters and expectations for the meeting are provided in advance to the person making the complaint in order to keep the role of the Abbey Review Board clear. An opportunity for speaking to the Board is also made available to the accused under the same conditions.
- iii. If the complainant does not wish to pursue the matter formally and speak with an independent trained investigator, no action against the monk is mandated. A file will be kept in the Office of Protection as a record of the allegation.
- iv. Once the Abbot has received the written report on the findings of the independent investigator, the Coordinator will convene the Abbey Review Board. The Board examines the report and advises the Abbot as to the proper implementation of policy and procedure, as well as a responsible course of action.
- v. The Coordinator reports to the Board developments in the case at hand and asks the chair to reconvene the Board as needed. The Abbey Review Board is careful to avoid any interference with civil legal processes.

F. CONFIDENTIALITY

All information regarding persons is confidential. Each member of the Abbey Review Board must sign a confidentiality agreement. Such information is protected to the extent provided by the priest-penitent privilege, the attorney-client privilege and other legal privileges that may exist.

VI. The Office of Protection

The Office of Protection promotes the Church's teaching regarding the dignity of all persons. It strives to protect children and other vulnerable persons from any harmful behavior on the part of Abbey personnel. The Office also provides a safe and effective avenue for individuals who wish to make a complaint of abuse of children or other vulnerable persons against personnel of Conception Abbey. The Office assists the Abbot in his efforts to welcome and respond to those who seek reconciliation and healing. The Abbot appoints the Coordinator of the Office of Protection for an indefinite term.

The Coordinator of the Office of Protection:

- A. promotes Catholic moral values regarding the dignity and protection of all persons, especially children and the vulnerable through policies, procedures and resources at Conception Abbey; develops and maintains resource materials and information of abuse as defined by the *Program of Protection for Children and Other Vulnerable Persons (2nd Edition)*; and provides materials and referral information to inquirers as requested;
- B. supervises the implementation of the *Program of Protection for Children and Other Vulnerable Persons (2nd Edition)* and collaborates with the Abbey Review Board's annual evaluation of the Program;
- C. coordinates the accreditation processes by Praesidium and the periodic updates required by "Instruments of Hope and Healing";
- D. maintains all files and information related to the Standards of Accreditation required by "Instruments of Hope and Healing";
- E. receives initial complaints against personnel of the Abbey and helps the complainant understand what possible steps may be taken; makes referrals for assistance; informs the Abbot (in case of a seminarian, the President-Rector) and ensures that abuse policy requirements are met, including reporting to legal authorities;
- F. maintains a record of inquiries, complaints and follow-up by the Office of Protection, the Abbot, President-Rector, and other appropriate personnel;
- G. is a non-voting resource person for the Abbey Review Board.

VII. The Safe Environment Program

A. PROMULGATION AND EDUCATION

Conception Abbey is committed to make every reasonable effort to communicate clearly and regularly with all monks, employees, volunteers and seminarians the goals and expectations of the *Program of Protection for Children and Other Vulnerable Persons (2nd Edition)*. Likewise, every effort is made to keep all groups and individuals served by Conception Abbey informed regarding the Program.

To these ends, the following steps are taken:

1. An orientation to the Program is given to all new Abbey personnel and seminarians at the time of hire or admission. New personnel and seminarians are required to sign a knowledge and compliance statement.
2. Presentations on the Program are made to all Abbey personnel and seminarians every three years; each monk, employee, volunteer and seminarian who attends is required to sign a knowledge and compliance statement.
3. The Program is available on the Conception Abbey website (www.conceptionabbey.org) and through the Office of Protection.
4. The Program also requires participation in the VIRTUS “Protecting God’s Children” training for adults and the online continuing formation from VIRTUS. All monks, employees, volunteers and seminarians are required to attend initial training, and those engaged in pastoral roles or with contact with minors are required to continue online education.
5. The Office of Protection disseminates information, including policies and procedures for reporting abuse by Abbey personnel throughout Conception Abbey and in parishes and chaplaincies served by the Abbey.
6. Collaboration is fostered with community groups, law enforcement agencies, and social services in the ongoing process of education and implementation of the Program.

B. COMPLIANCE

1. A cleric applying for or proposed for assignment at Conception Abbey, including candidates applying for admission to the monastic community, must complete an application process that conforms to the guidelines of the United States Conference of Catholic Bishops (see Appendix D below).
2. Testimonial letters / letters of suitability are required of all clerics who are proposed as retreat masters, visiting lecturers, symposia presenters and so forth at Conception Abbey prior to the event. Those responsible for making such arrangements are to notify the Coordinator of the Office of Protection who requests testimonial letters /letters of suitability from appropriate Church authorities. These documents are kept in the Office of Protection.
3. All new employees must complete authorization forms and undergo a criminal background check by the Abbey Business Office before being hired by Conception Abbey. Dioceses or religious communities sponsoring seminarians at Conception Seminary College must provide the seminary with criminal background checks on each seminarian, or a letter from a diocesan official

verifying that a check was performed and that no offenses were found. Volunteers are screened via the US Department of Justice National Sex Offender Search website (<https://www.nsopw.gov/en/Search>), recommended by Praesidium. Ordinarily, this screening must be completed before the beginning date of conditional employment, volunteer service or admission to the Abbey or seminary.

4. Those seeking admission to Conception Abbey as monks and those applying for employment or volunteer service must complete the following requirements:
 - a. application, including social security number and birth date
 - b. reference check
 - c. interview
 - d. criminal background check, including sex offender database w/alias
5. Seminarians applying for admission to Conception Seminary College follow the application process and procedures as outlined by the seminary. Disqualifying offenses listed below determine, in part, admission or non-admission.

C. DISQUALIFYING OFFENSES

No one will be hired as an employee, admitted as a candidate to Conception Abbey, admitted as a seminarian at Conception Seminary College, or accepted as a volunteer, if they have been convicted of a disqualifying offense, been on probation or received deferred adjudication for any disqualifying offense, or have pending criminal charges or civil allegation for any disqualifying offense, until a determination of guilt or innocence is made.

Disqualifying offenses include:

1. a felony classified as an offense against a person or family or involving an offense against a person or family. Examples: offenses against a person include, but are not limited to, murder, assault, sexual assault, child abuse, and abandoning or endangering a child. Offenses against a family include, but are not limited to, bigamy, incest, interference with child custody, enticing a child and harboring a runaway child;
2. a felony classified as an offense against public order or decency. Examples: offenses against public order or decency include, but are not limited to, prostitution, obscenity, sexual performance by a child, possession or promotion of child pornography and disorderly conduct;
3. a felony violation of any law intended to control the possession or distribution of any substance included as a controlled substance under the laws of Missouri;
4. a misdemeanor classified as sexual assault, indecency with a child, injury to a child, abandoning or endangering a child, sexual performance by a child, possession or promotion of child pornography, enticing a child, bigamy or incest;
5. an administrative determination by a local, city, county or state agency that a person has been found to have committed child abuse or neglect.

D. REVIEW

Any person who applies for employment, for entrance into the monastic community, for admission to the seminary or for service as a volunteer, and is not accepted or is terminated under these guidelines, may have the denial or determination reviewed as follows:

1. If non-acceptance is based on the criminal background check, the applicant may be given the name and address of the agency reporting his or her criminal history so that there will be an opportunity to obtain a similar report from the agency. In the event that such a report is obtained by the applicant, and it is believed that an error has been made by the reporting agency or independent agent, then, upon written request, a second criminal background check may be obtained and the application reconsidered.
2. If non-acceptance is based upon the interview process, including reference checks, there is no review beyond the applicant's request for reconsideration by those making the determination. It is for the protection of children and other vulnerable persons that the judgment of those representing the Church has the final word. In cases of doubt, favor will be given to the Church and the protection of children and other vulnerable persons.

E. CONFIDENTIALITY

As with all personnel records at Conception Abbey, information obtained through the application form, reference information, interviews, and criminal background check is confidential. Confidential materials are kept appropriately locked and access is restricted to those who need to know because of work-related responsibilities. Records are retained even after the date of termination of employment or the end of volunteer service.

VIII. Safety Plans

A. PURPOSE

Individualized Safety Plans are written for any Member about whom allegations of abuse have been made and substantiated. The Plans are intended to assist the Member in living the monastic life at the Abbey, while helping the Abbot and the community to ensure a safer environment.

B. CONTENTS OF THE SAFETY PLAN

Each written Safety Plan will include:

1. A summary of problem behaviors of the Member;
2. Location and assignment for the Member, including information about how the Member spends the majority of his time;
3. Risk-reduction strategies, including limitations placed on the Member to help him deal with problem behaviors;
4. Supervision strategies, including issues concerning personal relationships;
5. The name of the Member's immediate supervisor for the Safety Plan;
6. Specific consequences for non-compliance of the Safety Plan;
7. Dates on which the Safety Plan has been reviewed by the Abbey Review Board;
8. The signature of the Member or documentation if the Member chooses not to sign the Safety Plan;
9. The signature of the Abbot;
10. The signatures of individuals supervising the Member.

C. PROCEDURES

The Abbot would draft a proposed Safety Plan for a Member, and would consult the Member, the Abbey Review Board and those proposed as supervisors for the Member. Care should be taken that the work assignment given the Member is compatible with the behavioral challenges the Member may face, and be an assignment which is able to be supervised and evaluated. The Safety Plan should be clear and provide directions to the Member and those who supervise him. Supervisors should be individuals who are physically and emotionally capable of supervision, and are provided training in supervision. Supervisors should be given adequate background on the Member in order to provide good supervision to him. The Safety Plan should clearly state any prohibited behaviors, locations and activities, and the consequences of violating the prescriptions of the Plan.

D. ANNUAL EVALUATION

Each year, the Abbot and the Coordinator of the Office of Protection will evaluate and document compliance with each Safety Plan. Plans and compliance with Plans must also be reviewed annually by the Abbey Review Board. The Abbot and Coordinator should seek the advice and counsel of the supervisors of each Member with a Safety Plan in determining problems or issues with any Plan. Safety Plans should be reviewed immediately if any significant behavior changes are detected or if new allegations are raised. Adjustments to the Safety Plan should be immediately communicated to the Member and to his supervisors. Documentation about changes and communication must be kept.

Appendix A

Canonical procedures for clerics of Conception Abbey

A. RECEIPT OF A COMPLAINT AGAINST A CLERIC

Upon receiving an allegation of abuse against a child or a vulnerable person by a living cleric of Conception Abbey, pastoral care for the alleged victim is offered through the Office of Protection. The Abbot is informed and if the complaint is subject to reporting under Missouri law and this has not yet been done, the Abbey will file a report and cooperate fully with the civil and criminal authorities in their investigation.

B. DETERMINING CREDIBILITY

If there is no ongoing civil investigation, the Abbot determines if the allegation constitutes a reserved *delict* “with at least a semblance of truth.” To assist him in this determination, the Abbot seeks advice from an attorney, an independent trained investigator, members of the Abbey Review Board, or others. Canonical counsel is offered to the accused and Conception Abbey’s civil counsel and insurer are notified.

1. If the allegation is determined ***not to have at least the semblance of truth:***
 - a. No action against the cleric is mandated (though administrative actions may be applied depending on circumstances).
 - b. No referral to the Congregation for the Doctrine of the Faith is required.
 - c. The complainant should be informed of the outcome.
 - d. The accused cleric, if he had been made aware of the accusation, should be informed of the outcome.
 - e. Pastoral care in the spirit of the Benedictine tradition should be provided by Abbey leadership to the accused individual.

2. If the allegation is determined ***to have a semblance of truth:***

The Abbot issues a decree opening a “preliminary canonical investigation.” This canonical investigation will be done by an independent trained investigator who will produce a written report.

C. PRELIMINARY CANONICAL INVESTIGATION

An independent trained investigator is appointed to conduct the investigation and gather the facts in the case. The investigator presents a written report to the Abbot within the time limits established. The Abbot presents the findings of the investigation to the Abbey Review Board and seeks their advice. The Abbot determines the probability of whether or not a reserved *delict* has been committed as alleged and issues a decree closing the preliminary investigation. If necessary, the restrictions of canon 1722 may be applied at any point during the preliminary canonical investigation. If applied, it is done through a precept by the Abbot.

D. POSSIBLE OUTCOMES OF THE PRELIMINARY CANONICAL INVESTIGATION

1. If the allegation is found to be false, the investigation is concluded through a decree of the Abbot, the accused cleric is notified, and, where necessary, steps are taken to support the reputation of the accused.
2. If the Abbot has determined the probability of the reserved *delict*, the accused cleric is notified of the result of the investigation. The acts of the case are forwarded to the Congregation for the Doctrine of the Faith. If the alleged abuse occurred within the canonical statute of limitations or if the alleged action took place beyond the statute of limitations and the Abbot believes the case warrants it, he may request derogation from the statute of limitations. The acts include the Abbot's *votum*, as well as his suggestion for future action. A *votum* and observations of the case by the investigator are also included with the acts of the case.
3. The Abbot shall propose remedies for the damage resulting from the abuse of a child or another vulnerable person.

E. RESPONSE OF THE CONGREGATION FOR THE DOCTRINE OF THE FAITH

Upon receiving the referral from the Abbot, the Congregation for the Doctrine of the Faith will choose one of the following:

1. reserve the case to itself because of special circumstances; or
2. notify the Abbot of its decision that the Abbot should proceed with the judicial penal process; or
3. advise the Abbot that the case warrants referral to the Holy Father for a *dimissio ex officio* of the cleric concerned; or
4. authorize the Abbot to use the administrative penal extrajudicial process of canon 1720 with referral to the Congregation for the Doctrine of the Faith for dismissal by decree.

F. THE JUDICIAL TRIAL

Should the Congregation of the Doctrine of the Faith notify the Abbot to proceed with the judicial penal process, the Abbot arranges for a canonical trial through the regional tribunal established for this purpose. The Abbot then transfers the acts of the preliminary investigation to the promoter of justice. The penal procedure is conducted according to the Code of Canon Law.

1. If a permanent penalty has been applied, the Abbot can exercise his power of governance by imposing an administrative remedy "to remove the offending cleric from office, to remove or restrict his faculties, and to limit his exercise of priestly ministry."
2. The Abbot ensures that the penalized cleric who is not dismissed has those things that are necessary for his decent support. The Abbot provides for the dismissed cleric who is truly in need.

G. APPEALS AND RECOURSES

Because of the exclusive competence of the Congregation for the Doctrine of the Faith in matters of *delicta graviora*, including the abuse of a child by a cleric, all appeals and recourses must be directed to the CDF, both with regard to any preliminary decisions by the CDF, as well as decisions in the first instance by lower tribunals.

1. A judicial appeal against a first instance sentence in penal trials concerning *delicta graviora* is heard by the CDF Tribunal at second instance. The decision of the CDF Tribunal is final.
2. Hierarchical recourses against administrative acts of abbots and bishops concerning cases of those accused or found guilty of a *delicta graviora* are made to the CDF. A further recourse against the ensuing decision of the CDF is possible to the Ordinary Session of the CDF (*the Feria IV*). Recourse to the Apostolic Signatura has been excluded in these cases by a decision of the Holy Father on February 14, 2003.

H. CARE OF THE RIGHTS OF ALL PARTIES

Care will always be taken to protect the rights of all parties involved, particularly those of the person claiming to have been abused and the person against whom the charge has been made. When the accusation has proven to be unfounded, every step possible will be taken to restore the good name of the person falsely accused. Pastoral care in the spirit of the Benedictine tradition should be provided by Abbey leadership to the accused individual, who remains a member of the community unless separated canonically.

Appendix B

Allegations Against Clerics not of Conception Abbey

If an allegation of abuse of a child or a vulnerable person is made against a cleric employed but not under the canonical authority of the Abbot of Conception Abbey, the Abbot or his delegate notifies the cleric's diocesan bishop or religious ordinary. The accused cleric may be placed on administrative leave from his duties at the discretion of the Abbot. If abuse is admitted or established, the accused person shall be permanently removed from all ministries at Conception Abbey and Conception Seminary College. Civil authorities are notified if the complaint is subject to reporting under Missouri law, and if this has not been done, Conception Abbey will file a report and cooperate fully with the civil and criminal authorities in their investigation. (See Section IV, C)

Appendix C

Reporting Warning Signs of Actions that Could Lead to Child Abuse

A. The following are examples of warning signs of potential child abuse:

1. Some warning signs of preferential offenders:
 - a. Finds reasons to spend time alone with minors
 - b. Prefers time with minors to time with peers
 - c. Gives gifts to minors, especially without permission
 - d. Goes overboard with physical contact with minors
 - e. Always wants to wrestle or tickle minors
 - f. Shows favoritism toward certain minors
 - g. Treats minors like equals or adults
 - h. Keeps secrets with minors
 - i. Ignores policies about interacting with minors
 - j. Breaks the rules
 - k. Uses inappropriate language with minors
 - l. Tells “off-color” jokes to minors

2. Some warning signs of situational offenders:
 - a. Excessively uses alcohol
 - b. Uses illegal drugs
 - c. Experiences anxiety or depression
 - d. Has trouble coping with loneliness
 - e. Has trouble facing rejection or disappointment
 - f. Has trouble coping with personal loss
 - g. Feels unappreciated and unrewarded for hard work
 - h. Becomes increasingly dependent on a “convenient” relationship with a minor, such as a minor who works in the house or is already involved with the individual

B. How should monks respond to warning signs in another monk of the Abbey?

1. The concerned monk should make a verbal report to the Abbot or the Prior within 24 hours of observing the unhealthy boundaries or relationship of another monk with a minor. The name of the monk reporting will be kept confidential.
2. If a monk does not feel he can speak about a violation directly with the Abbot or Prior, he can write an anonymous note to them explaining his observations in detail.
3. The Abbot and Prior will consult with each other about the issue, and will carefully consider the severity of the boundary violation.
4. The Abbot or Prior will summarize the report in written form and investigate within 24 hours.

5. A follow-up report will be written after the investigation.
6. The Abbey will provide support and assistance to any monk of Conception Abbey who discloses to the Abbot or Prior concerns about his own attraction to minors or difficulties with boundaries with minors. Such support and assistance may include, but may not be limited to, appropriate evaluation and/or treatment.
7. In every case, Benedictine pastoral care shall be extended to every monk. The Abbot and other monks should always remember the Gospel and Benedictine values of forgiveness, mutual support and compassion in dealing with monks troubled by boundary issues.

C. How should Abbey personnel and seminarians respond to warning signs in others at Conception Abbey?

Seminary personnel and seminarians should respond to warning signs in other seminary personnel and seminarians by reporting these to the President-Rector. All other Abbey personnel and volunteers should report warning signs to the Office of Protection or to the Abbot.

Appendix D

Pastoral relationships and behavior

A. STANDARDS OF CONDUCT IN MINISTRY WITH ADULTS

A pastoral relationship is a sacred trust. Such a relationship exists between a monk of Conception Abbey and any person to whom the monk provides pastoral care, which includes counseling, spiritual direction or spiritual guidance and/or when the monk has received a confession or confidential or privileged information. A pastoral relationship may also be established by some employees or volunteers of Conception Abbey with others. The following are guidelines for maintaining integrity in any pastoral relationship with adults.

B. BOUNDARIES IN MINISTRY

1. Monks of Conception Abbey and other Abbey personnel must never engage in sexual contact with the persons with whom they have a pastoral relationship. This includes consensual contact, forced physical contact, and sexually explicit conversations not related to counseling issues.
2. In these guidelines, “sexual contact” means vaginal intercourse, anal intercourse, oral intercourse or the touching of an erogenous zone of another (including but not limited to the thighs, genitals, buttocks, pubic region or chest) for the purpose of sexually arousing or gratifying either person. “Sexual exploitation” is sexual contact between the pastoral care giver and the person who has entered into the pastoral relationship. Any sexual contact within the pastoral setting is exploitation, regardless of who initiates the sexual contact.
3. Monks of Conception Abbey or other Abbey personnel assume the full burden on setting and maintaining clear, appropriate boundaries in all pastoral relationships.
4. Physical contact in pastoral relationships should be respectful and consistent with the intent to provide a safe and comfortable environment.
5. Ministry should be conducted in appropriate settings at appropriate times and should not be held at places or times that would tend to cause confusion about the nature of the relationship for the person being counseled. Thus, pastoral ministry should not be conducted in private living quarters or bedrooms.

C. SUPERVISION

1. Monks and others at Conception Abbey who provide pastoral care to others shall be required to have ongoing professional supervision **or** to refer individuals to professional counseling after six sessions have been held.
2. Monks of Conception Abbey practicing formal spiritual direction shall submit a list of their directees to the Abbot so that he is aware of the relationship.
3. Monks of Conception Abbey in pastoral relationships are responsible for seeking the counsel and pastoral guidance of a person of spiritual wisdom should they find themselves at risk of acting on sexual or romantic attraction to a parishioner, client, student or counselee.

4. Monks of Conception Abbey who provide counseling shall maintain a log (i.e., appointment book) of the times and places of sessions with each person counseled.

D. CONFIDENTIALITY

1. Information disclosed to a monk of Conception Abbey or other Abbey personnel during the course of counseling, advising, or spiritual direction shall be held in confidence whenever possible. A breach of confidentiality occurs when a monk discloses confidential or privileged information in the absence of compelling professional reasons or as required by law. A monk should discuss the nature of confidentiality and its limitations with each person in counseling.
2. Information obtained in the course of sessions shall be confidential, except for compelling professional reasons or as required by law.
 - a. If there is clear and imminent danger to the client or to others, the monk is to disclose the information necessary to protect the parties involved and to prevent harm.
 - b. Before disclosure is made, if feasible, the monk should inform the person being counseled about the disclosure and the potential consequences.
3. The monk providing pastoral counseling services or spiritual direction should keep records of sessions.
4. With the exception of knowledge gained in the Sacrament of Penance and kept under the seal of Confession, knowledge that arises from professional contact may be used in teaching or other public presentations. But measures should be taken to absolutely safeguard both the individual's identity and the confidentiality of disclosures.
5. If a monk discovers that there is a serious threat to the welfare of a minor and that communication of confidential information to a parent or legal guardian is essential to the child's health and well-being, the pastoral counselor or spiritual director should disclose only the information necessary to protect the health and well-being of the minor.

E. CONFLICTS OF INTEREST

1. Conflicts of interest exist when a monk of Conception Abbey takes advantage of a pastoral relationship in order to further his own personal, religious, political or business interests.
2. A monk should avoid situations that might present a conflict of interest between a counselor and a person being counseled. Even the appearance of a conflict of interest can call integrity and professional conduct into question.
3. If a conflict of interest exists or arises, the monk should inform all parties. Resolution of the issues must protect the person being counseled.
4. The monk must establish clear, appropriate boundaries with anyone with whom there is a business, professional or social relationship.
5. Monks should not step beyond their competence in counseling situations and shall refer to other professionals when appropriate.

F. RESPONSIBILITIES IN MINISTRY

Monks and all who do pastoral ministry at Conception Abbey are responsible for recognizing and respecting the power of the ministerial role. They do this by being responsible for:

1. giving and accepting feedback from others;
2. developing resources to meet their own spiritual and emotional needs;
3. taking care of their own health in order to avoid the serious impairment of judgment that is associated with sleep deprivation, nutritional deficiencies, and excessive work loads;
4. not becoming intimate with those they serve in ministry – regardless of who initiates the contact;
5. not swearing or using foul language in the presence of those they serve in ministry;
6. not speaking graphically about sexual activities or allowing others to do so;
7. not showing pornographic materials to those they serve in ministry;
8. maintaining boundaries with those they serve in ministry at all times;
9. never using their role in ministry to degrade or humiliate another person;
10. communicating to a superior when they have concerns about their own or others' relationships;
11. recognizing the warning signs of boundary violations, such as wearing special clothing or doing special grooming before seeing a certain person; finding ways or reasons to be alone with a certain person; keeping aspects of your relationship with a person secret from others; giving or receiving special gifts from a certain person; neglecting to spend time with the community or peers because you want to spend more time with a certain person; excessively looking forward to seeing a certain person; fantasizing or daydreaming about a certain person.

G. REPORTING MISCONDUCT WITH ADULTS

1. Monks of Conception Abbey and all Abbey personnel are responsible for ensuring the ethics of ministry in all apostolates and pastoral care of Conception Abbey. Communication regarding misconduct in ministry or pastoral care is essential for the continuing integrity of these ministries.
2. A monk concerned about the pastoral conduct of another monk or a concern about warning signs should make a verbal report to the Abbot or the Prior within 24 hours of observing the situation or problem. The name of the monk reporting will be kept confidential. If a monk does not feel he can speak about a violation directly with the Abbot or Prior, he can write an anonymous note to them explaining his observations in detail.
3. The Abbot and Prior will consult with each other about the issue, and will carefully consider the severity of the boundary violation. They will summarize their report in written form and investigate within 24 hours. A follow-up report will be written after the investigation.
4. The Abbey will provide support and assistance to any monk of Conception Abbey who discloses to the Abbot or Prior concerns about his conduct in ministry or pastoral care. Such support and assistance may include, but may not be limited to, appropriate evaluation and/or treatment.

5. Seminary personnel and seminarians should report their concerns about misconduct in ministry or pastoral care to the President-Rector. All other Abbey personnel and volunteers should report concerns to the Office of Protection or to the Abbot.

Appendix E Resources

Further information is available by contacting the Office of Protection at Conception Abbey. Phone 1-660-944-2988 or email officeofprotection@conception.edu .

- In Missouri, issues of abuse of children and youth are investigated by the **Children’s Division of the Department of Social Services**. Information can be found at the DSS Website: www.dss.mo.gov . If you suspect abuse of a person younger than 18, you should call the **Child Abuse/Neglect Hotline – 1-800-392-3738**.
- Abuse of elderly people (over 60) or people with disabilities in Missouri is to be reported to the **Department of Health and Senior Services**. Information about the abuse of persons 60 years or older or disabled persons can be found at the agency’s Website – health.mo.gov . If you suspect such abuse, call **The Elder/Disabled Abuse Hotline – 1-800-392-0210**.
- In the **Diocese of Kansas City-Saint Joseph**, the **diocesan victim services coordinator is Kathleen Chastain**, who can be reached at **1-816-392-0011**. The diocesan **ombudsman for sexual abuse is Jenifer Valenti**, who can be reached at **1-816-812-2500**.
- *The Charter and Norms for the Protection of Children and Young People* of the United States Conference of Catholic Bishops (2011 edition) can be found at the USCCB Website -- www.usccb.org .
- An electronic version of this *Program of Protection for Children and Other Vulnerable Persons (2nd Edition)* can be found at Conception Abbey’s Website – www.conceptionabbey.org .

Telephone numbers

- Office of Protection at Conception Abbey: 1-660-944-2988
- Missouri Department of Social Services
Child Abuse and Neglect Hotline 1-800-392-3738
- Missouri Department of Health and Senior Services
Elder Abuse Hotline 1-800-392-0210
- Nodaway County Sheriff’s Department 1-660-582-7451

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