

Diocese of Toledo
Policy on Sexual Abuse of Minors
February 13, 2004

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I. SCOPE, PURPOSE AND SUMMARY OF POLICY

A. Scope of Policy

This policy on sexual abuse of minors applies to all parishes, schools, offices, agencies, and other institutions that operate under the administrative authority of the Bishop of the Diocese of Toledo. It is not intended to substitute for civil or criminal law, but to guide and assist church personnel within the Diocese of Toledo for purposes recognized within its religious jurisdiction. The policy covers all church personnel, meaning members of the clergy, religious, seminarians, employees and volunteers throughout the Diocese.

B. Purpose of Policy

The Diocese of Toledo is deeply concerned for the spiritual and material welfare of every person in its jurisdiction, particularly children and young people. Sexual abuse of minors can and does occur, but these crimes and sins are all the more reprehensible when committed by those in positions of trust within the church. The present policy is intended to protect children and young people, to guarantee an effective response to allegations of sexual abuse of minors, to ensure the accountability of our procedures, and to promote healing and reconciliation with victims/survivors.

C. Summary of Policy

1. Procedures

This policy sets forth procedures to address seriously and effectively all allegations of sexual abuse of minors, by requiring immediate diocesan reporting and investigation of all complaints. Church personnel shall also comply with all state reporting requirements and cooperate with the authorities during any civil or criminal investigation.

2. Pastoral Response

Respecting individual rights, this policy provides for an immediate pastoral response and care of all parties involved. It emphasizes both healing of victims and their families, and reconciliation insofar as it can be accomplished.

3. Confidentiality

This policy presumes that, to the extent possible, the preliminary investigation by the diocese will remain confidential. If the preliminary investigation determines that the allegation is credible, the wishes of the victim or victim's family will be seriously considered in any public disclosure. The wishes of the formerly accused will be seriously considered if the preliminary investigation determines that the allegation is not credible.

4. Prevention and Screening

This policy requires that a system of prevention be established within the Diocese, including the screening of personnel, in order to identify those who may have the potential to sexually abuse minors.

5. Education

The objectives of this policy are to be integrated not only into the awareness and procedures of individuals at the diocesan level, but also on the parish and school level within the Diocese of Toledo. The 'Protecting Youth and Those Who Serve Them' Certification must be renewed for all diocesan, parish and school employees and volunteers every five years. Opportunities for community education should be provided as well, when possible in cooperation with local agencies.

6. Accountability

Compliance with this policy is mandatory in the Diocese of Toledo. A review of parish compliance in all matters of this policy including education and training programs is to be done annually by the Dean as part of his written report to the Diocese on the occasion of his parish visitation.

II. DEFINITION OF TERMS

Accused -- the individual who is alleged to have sexually abused a minor.

Adult -- an individual eighteen years old or older (or in civil law a physically or mentally handicapped person over the age of twenty-one).

Allegation -- a claim that may or may not be substantiated that a minor has been sexually abused.

Canon Law -- Code of Canon Law (revised 1983) i.e. the law of the Roman Catholic Church.

Church personnel -- includes all persons (clergy, religious and laity) who are serving in, employed by, are under personal contract with, or volunteer in any of the entities encompassed by the Diocese.

Civil law -- state law, e.g., the Ohio Revised Code or Ohio Administrative Code.

Clergy -- bishops, diocesan priests, deacons, and religious order priests serving in the Diocese.

Credible -- under all the circumstances known at the time of determination, a prudent person would conclude that there is a significant possibility that the incident occurred.

Diocese – encompasses the Roman Catholic Church of Toledo in accord with Canon 369 of the Code of Canon Law; all parishes and other canonical juridical persons whose competent ecclesiastical superior is the Bishop of Toledo.

Diocesan Case Manager -- the person designated by the Bishop of Toledo to oversee the intake of complaints, provide for the investigation of allegations of sexual abuse of minors, and coordinate the pastoral care of victims.

Investigatory Team – a designated group of individuals who are available to investigate allegations of sexual abuse.

Local Church Community – a parish, school or other place of church-related ministry.

Minor -- a person under the age of eighteen (or in civil law a physically or mentally handicapped person under the age of twenty-one). For allegations of acts that occurred prior to April 25, 1994 the canonical definition of a minor is an individual who has not yet turned sixteen.

Offender -- an individual who has sexually abused a minor; for the purposes of this policy, one against whom such allegations are substantiated.

Parent or guardian -- the person who possesses legal custody of a minor.

Pastoral Response Team -- a designated group of individuals who are available to respond to alleged victims of sexual abuse as minors and who are able to provide continuing pastoral care as needed.

Religious -- ordained clerics and non-ordained men and women who have taken public vows in approved institutes of consecrated life.

Review Board – a body appointed by the Bishop of Toledo to review cases involving allegations of sexual abuse of minors and make recommendations to the Bishop concerning these cases.

sexual abuse – sexual molestation of a minor or sexual exploitation of a minor and other behavior by which an adult uses a minor as an object of sexual gratification.

Substantiated – supported by the existence of probable and competent facts or circumstances sufficient to draw a reasonable conclusion.

Victim -- a person who has suffered an act of sexual abuse as a minor.

Volunteer – an individual not employed or under personal contract to the diocese who nonetheless serves in some capacity, paid or unpaid, which places them in contact with children (e.g. catechist, scout leader, coach, service coordinator).

III. REPORTING TO AUTHORITIES

A. Ohio Law Reporting Requirements

CHURCH PERSONNEL MUST RECOGNIZE THAT OHIO LAW ALREADY REQUIRES INDIVIDUALS IN AN OFFICIAL OR PROFESSIONAL CAPACITY, TO IMMEDIATELY REPORT ANY SUSPECTED OR ACTUAL ACT OF CHILD SEXUAL ABUSE TO THE COUNTY CHILDREN'S SERVICES BOARD, CHILD PROTECTIVE AGENCY OR POLICE OFFICER. Everyone must comply with this law, Sections 2151.421 of the Ohio Revised Code, included in the Appendix.

B. After complying with the Ohio Law, the Diocese requires the following:

1. Reporting Child Sexual Abuse

Any person who witnesses, suspects, or receives a report of sexual abuse of a minor must immediately report such information to the Diocesan Case Manager or to a member of the Investigatory Team.

2. Privileged Information

If privileged information is made known to a priest in the course of pastoral counseling or in the Sacrament of Reconciliation, whereby he is bound by the seal of that sacrament, the priest should urge the offender to obtain immediate medical and psychological help. The confessor should impress upon the offender the gravity of the offense and the legal and criminal consequences of the offense.

3. Diocesan Case Manager

The Diocesan Case Manager shall comply with all State Reporting Requirements. All reports of alleged sexual abuse of a minor shall be referred to the appropriate Child Protection Agency, and the minor's parents will be advised of the Diocese's compliance with reporting requirements.

The Diocesan Case manager will immediately notify the Bishop and other individuals within the local Church community who should be made aware of any allegation.

When an allegation of sexual abuse of a minor refers to actions occurring in the distant past, the Diocesan Case Manager will nonetheless respond as if there had been no delay in reporting. All cases will be handled expeditiously.

The Diocesan Case Manager has primary responsibility for the intake of complaints against diocesan personnel, which are to be immediately referred for investigation to a member of the Investigatory Team . The Diocesan Case Manager will also alert the Pastoral Response Team to the need for any pastoral care.

IV. DIOCESAN PRELIMINARY INVESTIGATORY PROCESS

When an allegation of sexual abuse involves a minor, a civil investigation takes place in which the diocese will give the civil authorities its full cooperation. A diocesan investigation will also take place and be coordinated with any investigation by civil authorities in compliance with the Ohio Revised Code, Appendix A.

When civil authorities do not investigate an allegation of past sexual abuse of a minor because the civil statute of limitations has expired, the diocese will still conduct its own investigation.

The procedures for a diocesan investigation are the following. Confidentiality during the process shall be respected, and the rights of the parties protected.

A. Investigatory Team

The Investigatory Team, appointed by the Bishop, consists of qualified volunteers who bring the necessary professional expertise and/or pastoral gifts to accomplish their task. Sufficient men and women will be appointed to allow for trained team members to be readily available.

B. Preliminary Investigation Time Line

When an allegation of past sexual abuse as a minor is made by an adult, the Diocesan Case Manager must initiate the diocesan investigation as soon as possible with the appointment of an investigator within 48 hours who is to proceed without delay.

C. Investigative Report

As a result of the investigation, the Investigative Team members will prepare a written report that contains conclusions and recommendations to be submitted to the Diocesan Case Manager, who forwards it to the Diocesan Review Board.

D. The Diocesan Review Board

The Review Board, appointed by the Bishop, shall consist of a number of qualified lay volunteers with professional expertise, as well as a canon lawyer and a priest. Upon receiving the results of the preliminary investigation from the Diocesan Case Manager, the Board, in accordance with its rules (cf. appendix H) will make a recommendation to the Bishop regarding the credibility of the accusation and further action.

E. Investigative Determinations

1. Allegations which lack credibility

If an allegation against an accused person is not credible, all parties involved will be informed of this fact. The case will be considered closed and no action is taken against the accused. Appropriate pastoral care will be offered to the formerly accused person. If new evidence at a later date warrants it, the case will be reinvestigated.

2. Credible Allegations

If an allegation is determined to be credible, all parties involved will be informed of this fact. If the accused is a lay employee, school professional or volunteer, the accused lay person will immediately be placed on paid or unpaid leave of absence pending final resolution of the matter. The accused person will be encouraged to seek his or her own lawyer and counseling, and will be directed to have no further contact with the alleged victim. The Review Board will recommend to the supervisor of the individual to either terminate the employment of a lay employee or terminate the service of a lay volunteer. The original investigative report will be retained by the diocese.

If a credible allegation is made against a member of the clergy, all parties involved will be informed of this fact. The cleric will be removed from public ministry as a precautionary measure, pending the final outcome of his case as determined by the Congregation for the Doctrine of the Faith in Rome. "When even a single act of sexual abuse by a priest or deacon is admitted or established after an appropriate process in accord with Canon Law, the offending priest or deacon will be removed permanently from ecclesiastical ministry, not excluding dismissal from the clerical state, if the case so warrants" (*Essential Norms*, no. 8)

V. PASTORAL CARE INTERVENTION

Pastoral Care of both victims and offenders is an essential component of the Church's response to the tragedy of sexual abuse. Members of the Pastoral Response Team, and as required, the Vicar for Priests, the Vicar for Deacons, or the local Dean, will be responsible for Pastoral Care interventions.

The Pastoral Response Team or the appropriate Vicar, along with the Dean, will be responsible for initial and ongoing care to those alleged or proven to be victims of sexual abuse as minors, those alleged or proven to be offenders, and parish communities or groups within parish communities which have been touched by accusations.

The Pastoral Response Team consists of volunteers appointed by the Bishop. They will have backgrounds, professional training, and/or personal gifts that will enable them to work with victims.

Pastoral Response Team members will include both a man and a woman from each deanery of the diocese. Various members of the team will be called upon as needed.

Pastoral Response Team members involved with particular cases or parishes will coordinate their services with appropriate parish or school leaders. When an allegation of abuse involves a member of the clergy, the Pastoral Response Team for that particular case should coordinate its work with the local Dean.

A. Response to the Alleged Victim

1. Initial Response

As soon as possible, but usually within 48 hours of an allegation of sexual abuse of a minor, a member of the the Pastoral Response Team will make an initial contact with the alleged victim and arrange a personal visit. Care must be taken that the Response Team member does not talk with the alleged victim before civil authorities are informed. When the allegation involves an individual who is still a minor, every effort must be made to keep the child's parents or guardians fully informed.

The time and place of the meeting and the particular individuals chosen to be present should be selected with sensitivity to the alleged victim and the specifics of the case. When the accuser is still a minor, at least one member of the Response Team should be especially conversant with the developmental and emotional needs of children.

2. Purpose of Meeting

The purpose of the initial visit is not to investigate, but to provide comfort and support. This may include: empathetically listening to the alleged victim of sexual abuse, providing information regarding help available to the individual and family (including a list of resources the Church and community has to offer), explaining the steps that are to be taken by the Investigatory Team, acting as a liaison to the Diocesan Case Manager, and assisting with any other questions and concerns.

3. Response Pending Investigation

The Pastoral Response Team will coordinate efforts to keep the alleged victim aware of the progress of the investigation. A name of one or more specific contact persons on the Response Team will be provided to the alleged victim for on-going communication and support.

4. Response After the Investigation

The Diocese will make its best efforts to provide appropriate care for all victims and their families. If an allegation is substantiated, the victim, or if the victim is a child, the victim's parents or guardians, will be informed of this fact. The consequences to the accused will also be relayed. Victims and their families will be encouraged to seek professional counseling services at diocesan expense as provided by the counseling procedures extended through the Diocesan Case Manager's office. In conjunction with counseling, spiritual or pastoral direction is encouraged as well. If an allegation is

unsubstantiated, this fact will be reported to the accuser by the Diocesan Case Manager, with continuing pastoral care.

B. Response to the Accused

1. Initial Response

When an allegation of sexual abuse of a minor involves a diocesan priest or deacon, the Vicar for Priests or the Vicar for Deacons will make an initial contact, usually within 48 hours, with the alleged offender. It may be judged helpful to include one or two other priests who have sufficient awareness and training in the area of abuse. When the accused is a religious, the superior of the religious institute or his or her specific delegate should provide the initial response as soon as possible, and should continue to inform the Diocesan Case Manager of the progress of the case. Care must be taken that the Vicar/Religious Superior does not talk with the alleged offender before civil authorities are informed.

When an allegation of abuse involves church personnel who are not clergy or religious, the Diocesan Case Manager will arrange an initial contact, usually within 48 hours, with the alleged offender, the pastor of the parish where the accused works, and at least one member of the Pastoral Response Team.

2. Purpose of Meeting

The purpose of the initial meeting is not to investigate, but to offer concern for the accused person's well-being. This may include empathetically listening to the accused, providing information regarding help available to him or her (including a list of resources the Church and community has to offer), explaining the steps that are to be taken in the Investigatory Team process, acting as a liaison to the Diocesan Case Manager, and assisting with any other questions or concerns.

3. Response Pending Investigation

The accused person may be asked to obtain appropriate medical and psychological assessment and evaluation as part of the pending investigation. The accused person will be directed to seek his own legal counsel and will immediately be directed to have no further contact with the alleged victim or victim's family. In the case of a religious, these steps will be coordinated with the Superior of the religious institute or his/her specific delegate.

4. Response After the Investigation

If after the investigation a case is found to be unsubstantiated, the formerly accused person's wishes will be considered with respect to disclosure. Continuing pastoral care will be offered to the individual.

If after the investigation a case has been substantiated, the offender will be directed to appropriate therapy or other services that are needed.

When after an investigation a case has been substantiated against a member of the clergy, pastoral care will be offered through the appropriate Vicar.

C. Confidentiality

1. Disclosure to Public

A diocesan preliminary investigation will remain confidential. However, there will be no attempts at secrecy from the public of any cases that are substantiated. Public disclosure will include acknowledgment of a substantiated case, and the steps which have been taken against the offender.

Every effort will be made to respect the confidentiality of the victim. In an unsubstantiated case, the wishes of the formerly accused will be respected regarding public disclosure.

2. Disclosure to the Church Community

The Dean or other person designated by the Bishop will coordinate disclosures which occur within the church community or parish involved. Before a case has been substantiated, care must be taken to respect the privacy rights and reputations of the parties involved. When a case has been substantiated, the church community should be given an opportunity to discuss the matter with representatives of the Diocese. The Pastoral Response Team should communicate openly, honestly, and consistently with the victim and victim's family as well as with the accused person in matters of disclosure.

In the case of a priest, special consideration must be given to the parish community, and past parishes in which the priest has served. Representatives of the Diocese must provide opportunities for parishioners to deal with the news of a substantiated case.

VI. CONTINUING PASTORAL CARE

A. Ongoing Pastoral Response to Victims

After the initial pastoral response, the diocese will continue its outreach to those who have been sexually abused by clergy or other Church personnel. Whether or not a case is pursued through the civil or criminal courts, pastoral care, including a ministry of presence and listening, will be offered to victims and their families, with the Church expressing compassion and understanding to the extent the victim permits. One who provides pastoral care shall be especially attentive to the spiritual affirmation and trust needed by victims. Special emphasis is to be placed on re-establishing trust and fostering the hope of reconciliation.

B. Pastoral Care to the Church Community

When a local church community is wounded by allegations of abuse within its membership, on-going pastoral ministry and healing should be provided to the community as a whole. The Diocesan Case Manager will appoint members of the Pastoral Response Team to provide ongoing pastoral care within the church community.

VII. EDUCATION FOR PREVENTION OF SEXUAL ABUSE OF MINORS

A. Purpose of Education

The Diocese is committed to foster the safety of the child from sexual predators. Its church personnel, perceived as special and trustworthy individuals, are to work to maintain in the church community a safe environment for all, particularly children. This means educating themselves as well as those they serve to understand the causes, the signs of, and responses to sexual abuse of minors. Education on these issues is an ongoing process that must be regularly assessed to ensure the safety of children. Policies alone cannot eliminate evils such as child sexual abuse. The Diocese stands ready to support and assist those who confront abusive tendencies in their own lives or are in need of help and healing.

B. Mandatory Education

1. Pastoral Leadership

Clergy epitomize trust and integrity to children. When it comes to understanding sexual abuse of minors, its warning signs and its destructive effects on those abused, the clergy must be leaders in promoting awareness and prevention, as well as health and healing in their church communities. All priests and pastoral leaders are to participate in mandatory education programs.

2. Deacons and Seminarians

Permanent Deacon Candidates and Seminarians, likely to be pastoral leaders in the near future, have a special obligation to address these matters as part of their personal, professional, and spiritual formation. Deacon Candidates will participate in mandatory sexual abuse awareness and prevention programs in the diocese. Seminarians of the Diocese will participate in courses and other programs that foster mature and healthy psychosexual development, as well as participating in mandatory sexual abuse awareness and prevention programs in the diocese. Each seminarian should have the opportunity to relate to a mentor priest who is equipped to take on this task.

3. Other Church Personnel

All persons employed by the Church, including volunteers who work regularly with the children, have an obligation to be informed about child sexual abuse and its effects, since in many cases they have frequent contact with children and are trusted by them. Teachers and other lay personnel in the Diocese are to avail themselves of current information and up-to-date resources in their understanding of these issues. The Diocese, through the Secretariat of Catholic Youth and School Services, will direct schools and parish youth programs to include sexual abuse awareness and prevention programs for teachers, lay personnel and volunteers.

C. Education of Community

Education and training in ways to create and maintain a safe environment for children will be provided for parents, children, and all employees and volunteers who work with youth in the diocese. Efforts should also be made to cooperate with community agencies in providing such safe environment programs for the wider community. A proactive, rather than reactive approach to such programming is encouraged to foster a safe environment for children

1. Parents

Parents have the first and most obvious responsibility for the well-being of their children. Schools and religious education programs in the Diocese will provide opportunities for parents to learn about the signs of, and appropriate responses to sexual abuse of minors, and the prevention of child sexual abuse. Discussion of such topics can be integrated into school orientation and sacramental preparation sessions for parents, and ongoing parish adult education programs. The pastor, together with the Director of Religious Education and/or the school principal shall be responsible for the inclusion of this content. The Department of Catholic Youth and School Services will assist parishes in integrating the objectives of this policy with current education programs. Enforcement and review of parent programs are the responsibility of the pastor and parish education leaders.

The Deans should do a review of parish compliance in offering programs to parents annually.

2. Children

Education of children can help prevent child sexual abuse. Consistent with House Bill 55 (Appendix B), child sexual abuse prevention sessions designed for different age levels to inform children about abuse and its risks should be part of the catholic school curriculum. Enforcement and review of inclusion of such programs in the curriculum will be carried out by the Catholic Youth and School Services (CYSS). Parental involvement is encouraged in developing these programs. The Deans should do a review of parish compliance in offering programs to children annually.

D. Screening Issues

The diocese has established screening requirements for employees and volunteers who work with youth based upon the level of involvement in youth programs (Appendix D). Those responsible for hiring employees and for recruiting volunteers who have contact with children are to follow these screening requirements. Veteran employees, including clergy and religious, and volunteers who have not been previously screened must be in compliance with the new screening policy. Permanent Deacon candidates, seminarians and those who apply for seminary studies are required to undergo background checks and are to be evaluated regarding their psychosexual development.

E. Adult Behavior With Children

Adults must be role models and use prudence in relating to children. It is not appropriate to become 'buddies' or build a social life with youth outside of a family relationship. Situations that may lend themselves to opportunities for abuse, or even to the perception of opportunity for abuse, should be avoided, such as: being alone with a child, spending a night alone with a child, driving alone with a child or accompanying a child alone to the restroom. Consuming alcohol or illegal substances and using suggestive jokes, stories or language with children is totally inappropriate adult behavior. The director of each youth program is expected to review and discuss with each staff member appropriate adult behaviors regarding working with children (Appendix D, Expectations Brochure).

VIII. POLICY PROMULGATION, IMPLEMENTATION AND ACCOUNTABILITY

A. Promulgation

This policy has the force of particular law in the Diocese of Toledo as governed by the Code of Canon Law of the Roman Catholic Church. It also reflects the provisions of the U.S. Bishops' *Charter for the Protection of Children and Young People* and the *Essential Norms for Diocesan/Eparchial Policies Dealing with Allegations of Sexual Abuse of Minors by Priests or Deacons*.

B. Publication and Dissemination

The Episcopal Vicar for Administration will see to the reproduction and distribution of this policy to Church personnel and will arrange for informational sessions to be conducted within six (6) months of its promulgation.

C. Curriculum for Prevention

The Secretariat of Catholic Youth and School Services, in collaboration with other diocesan offices and agencies, will assist schools and parishes in integrating the objectives of this policy with the training and certification of youth ministers and in educational programs for children. Issues of sexual abuse of minors will be addressed regularly in training programs that exist for church personnel, particularly those who

work regularly with children. Similar programs will be offered by the Vicar for Priests, Vicar for Deacons and Vicar for Seminarians.

D. Effective Date

The Diocesan Policy on Sexual Abuse of Minors will take effect February 13, 2004.

E. Review and Modification

The Diocesan Review Board, in consultation with Diocesan Case Manager, will review this policy and procedure every five years and make recommendations to the Bishop for formal amendment. The Bishop, who has the primary responsibility for the implementation of this Policy, may modify the policy at any time upon another person's recommendation or at his own initiative, in order to accomplish its stated purposes.

F. Accountability

The Bishop is responsible for overseeing the auditing of schools, parishes, and diocesan institutions for compliance to this policy. This auditing should be done every two years in the interest of providing a safe environment for minors.