

POLICY
FOR THE PROTECTION OF MINORS

Communion and Liberation in the United States
and
The Human Adventure Corporation

(As amended effective December 20, 2023)

TABLE OF CONTENTS

ARTICLE I.	INTRODUCTION.....	1
ARTICLE II.	COMMUNION AND LIBERATION’S EDUCATIONAL PATH DIRECTED TOWARD MINORS	3
ARTICLE III.	SOURCE MATERIAL FOR THIS POLICY	4
ARTICLE IV.	DEFINITIONS	5
ARTICLE V.	POLICY IMPLEMENTATION AND DISTRIBUTION	9
ARTICLE VI.	EDUCATION AND TRAINING.....	10
ARTICLE VII.	SCREENING AND BACKGROUND CHECKS	11
ARTICLE VIII.	THE COMMITTEE FOR THE PROTECTION OF MINORS; THE POLICY COORDINATOR.....	12
ARTICLE IX.	ALLEGATIONS OF CONDUCT IN VIOLATION OF THIS POLICY	14
ARTICLE X.	THIS POLICY SUPPLEMENTS BUT DOES NOT REPLACE EXISTING CIVIL MANDATORY REPORTING OBLIGATIONS AS TO CHILD ABUSE.....	16
ARTICLE XI.	ALLEGATIONS OF CHILD SEXUAL ABUSE	17
ARTICLE XII.	INITIAL EVALUATION BY THE COMMITTEE OF ALLEGATIONS/REPORTS OF CHILD SEXUAL ABUSE OR OTHER MISCONDUCT IN VIOLATION OF THIS POLICY	19
ARTICLE XIII.	INTERNAL INVESTIGATION OF ALLEGATIONS FOUND TO BE SUPPORTED BY REASONABLE CAUSE AFTER INITIAL EVALUATION.....	20
ARTICLE XIV.	FALSE OR NOT SUBSTANTIATED ALLEGATIONS AFTER INTERNAL INVESTIGATION	24
ARTICLE XV.	SUBSTANTIATED ALLEGATIONS OF CHILD SEXUAL ABUSE.....	24
ARTICLE XVI.	SUBSTANTIATED ALLEGATIONS OF OTHER MISCONDUCT IN VIOLATION OF THIS POLICY	25
ARTICLE XVII.	CONFLICTS OF INTEREST	25

- APPENDIX A: CODE OF CONDUCT
- APPENDIX B: ACKNOWLEDGMENT OF RECEIPT OF THE POLICY FOR THE PROTECTION OF MINORS
- APPENDIX C: CONTACT INFORMATION
- APPENDIX D: PARENT/GUARDIAN CONSENT FOR ELECTRONIC COMMUNICATION & USE OF PHOTOS, VIDEOS
- APPENDIX E: PROMULGATION AND REVISION HISTORY

Article I. INTRODUCTION

Section 1.01 Communion and Liberation (CL) is a lay Catholic movement, recognized by the Vatican as an international association of the faithful. Its story started in 1954, when Fr. Luigi Giussani, a priest from the Diocese of Milan, began teaching religion in a public high school, committing himself to faith education of young people (“Communion and Liberation” or “the Movement”). As a great friendship within the Church, Communion and Liberation aims to reciprocally educate members as to the elementary aspects of the Catholic faith and to discover its relevance for the deepest needs of human nature. Today, the members of Communion and Liberation are spread over more than eighty countries in all continents.

Section 1.02 In any given country, Communion and Liberation is led by a National Responsible who is an individual designated by the center of the Movement to lead the pastoral and educational activities of Communion and Liberation in that specific country. Accordingly, within the United States, CL is led by a National Responsible, who leads the educational activities of Communion and Liberation in the United States – referred to herein as “CL US” or “Communion and Liberation in the United States”.

Section 1.03 The Human Adventure Corporation (“HAC”) is a US not-for-profit corporation which, since its inception in 1989, performs certain administrative functions on behalf of CL US, including providing assistance in the administration of this Policy. HAC is governed by a Board of Directors (“the HAC Board”) and is currently headquartered in New York, New York.

Section 1.04 This Policy, including the Code of Conduct, is binding upon, and intended to govern all Adults working directly with Minors who are engaged in the educational activities of CL US directed toward Minors. (*See* Section 4.01, below, for the full definition of “Adults” or “Adult,” as used in this Policy).

Section 1.05 The protection of Minors is a constituent part of the educational and formative proposal of Communion and Liberation. Adults must maintain personal relationships with Minors that are beyond reproach and must actively commit to preventing abuse and spreading a culture characterized by respect and care for everyone.

Section 1.06 Those Adults working directly with Minors in CL US activities

directed toward Minors must, in addition to expressing a sincere educational passion evidenced at the professional and vocational level, also embody a sincere dedication in following the path of Communion and Liberation.

Section 1.07 The assessment of the suitability of Adults working directly with Minors in CL US educational activities is the responsibility of the National Responsible and those persons(s) appointed by him.

Section 1.08 This Policy and the accompanying Code of Conduct, annexed as Appendix “A,” describe the proper relationship between an Adult and a Minor in all educational activities of CL US directed toward Minors. (As used herein, the phrase “educational activities of CL US directed toward Minors” shall mean all such CL US or HAC activities directed toward Minors that are organized, originate, or conducted anywhere within the United States or its territories, including but not limited to those described in Articles II and III below.) The Policy also provides specific procedures designed to address reported or perceived violations of that Code of Conduct.

Section 1.09 In the most general terms, the Policy requires that:

- (a) Adults must at all times maintain appropriate boundaries with Minors participating in CL US activities;
- (b) Minors participating in CL US activities must be made aware of these boundaries;
- (c) Any Minor who breaches these boundaries must be counseled by the Adult who witnesses it, as to proper behavior, with such counseling to occur in the presence of another responsible Adult;
- (d) Any breach of boundaries – by either an Adult or a Minor – must be promptly reported and addressed, consistent with the terms and procedures of this Policy; and
- (e) Child Sexual Abuse is a crime and allegations of this nature must be immediately reported to civil and ecclesial authorities; in addition, all Adults must adhere to the reporting requirements within CL US and HAC, as set forth in this Policy.

Article II. COMMUNION AND LIBERATION’S EDUCATIONAL PATH DIRECTED TOWARD MINORS

Section 2.01 Middle School Age Minors in CL US: CL US and HAC provide a variety of educational and recreational activities directed toward middle-school-aged Minors, referred to sometimes herein as “Knights,” but conducted under various names and in various locations, including without limitation:

- (a) A beginning day and concluding day for each year that are aligned with the beginning and end of the school year, which may involve day trips and age-appropriate activities of Christian friendship such as outdoor games, visits to significant sites, and the celebration of Mass;
- (b) Regular meetings of varying frequency, guided by Adults;
- (c) “Promise”: an annual two-day trip during which students promise or renew their promise to be faithful to their friendship with Jesus;
- (d) Summer vacations: a short period of vacation which allows Minors to share free time together with games, singing, hikes, witnesses of Christian life, and common prayer;
- (e) Other educational or recreational activities under the responsible guidance of Adults.

Section 2.02 High School Age Minors in CL US: CL US and HAC also provide a variety of educational activities directed toward high-school-aged Minors, who are offered the possibility of participating in the educational path of *Gioventù Studentesca* (“GS”). Examples of the educational activities offered to high-school-aged Minors include, without limitation:

- (a) A beginning day and concluding day for each year that are aligned with the beginning and end of the school year, which may include shared time for recreation and conversations in assemblies, and concludes with the celebration of Mass;
- (b) Regular meetings of varying frequency, guided by Adults;
- (c) Easter Triduum: a retreat taking place on the days representing the culmination of the liturgical year, from Holy Thursday to Holy Saturday, in which Minor participants in GS, accompanied by Adults, participate in a meditation on the Lord’s Passion, death, and resurrection;
- (d) Summer vacations: a short period of vacation that allows Minors to share free time together, with games, singing, hikes, significant witnesses to

- Christian life, and common prayer;
- (e) Charitable work: a regular gesture to educate about the importance of charity;
 - (f) Other educational or recreational activities under the responsible guidance of Adults.

Section 2.03 From time-to-time Minors, accompanied by their parents or guardians, attend certain CL US educational and/or recreational activities and events intended for adults. Parents and guardians remain primarily responsible for the physical safety and moral integrity of the Minors they involve in such activities. However, the provisions of this Policy shall govern to the extent, if any, the planned activities are expected to be directed toward Minors.

Article III. SOURCE MATERIAL FOR THIS POLICY

Section 3.01 Source Material: In the drafting and implementation of this Policy, CL US and HAC are guided by the moral teachings and doctrines of the Catholic Church, and in large part have relied upon the policies promulgated by the Archdiocese of New York and other Catholic Dioceses around the country, as well as commonly recognized professional standards and common sense, to serve as a model and guide for this Policy.

This Policy is also modeled after the *Policy on the Protection of Minors and Vulnerable Persons*, issued in Milan, Italy, by the *Fraternità di Comunione e Liberazione*, effective January 1, 2020 (“the Global CL Policy”). To the extent, if any, that there are inconsistencies between this Policy and the Global CL Policy, the terms of this Policy shall govern as to all educational activities of CL US directed toward Minors within the United States.

In adopting this Policy, CL US and HAC also intend to rely upon and comply with the following materials and directives: *Vox Estis Lux Mundi*, Apostolic Letter, issued *Motu proprio* by Pope Francis, May 7, 2019; *the Code of Canon Law, the Bishops' Charter for the Protection of Children and Young People* (as revised June 2018); *the Essential Norms for Diocesan/Eparchial Policies Dealing with Allegations of Sexual Abuse of Minors by Priests or Deacons* (a/k/a “the Dallas Charter,” as revised June 2018); and any directives and decrees from the competent authorities of the Holy See (collectively, herein, “Existing Canon Law”).

Section 3.02 Local Civil Law: Finally, in implementing this Policy, CL US and

HAC also intend to rely on and comply with all relevant provisions of local civil and criminal laws within the United States (“Local Civil Law”). To the extent, if any, that there are inconsistencies between this Policy and Local Civil Law, the terms of Local Civil Law shall govern as to CL US and HAC.

Section 3.03 Local Diocesan/Eparchy Guidelines: Adults must be mindful of their obligations under this Policy, as well as under any applicable safe environment policy or analogous policy for the protection of minors which may be in place in the local diocese/eparchy where the particular activities are to occur. This Policy does not replace or supersede any such local diocesan/eparchial policy. Where allegations of conduct in violation of this Policy are reported, to the extent, if any, that there are material inconsistencies between this Policy and the Safe Environment Policy or analogous policy for the protection of minors in the local diocese/eparchy, the National Responsible and the HAC Board shall determine which of the conflicting policy provisions shall govern in each instance, after consultation with the Committee for the Protection of Minors and Young Adults and the bishop/ordinary in the local diocese/eparchy where the relevant facts and circumstances allegedly occurred.

Section 3.04 Priest-Penitent Privilege Preserved: Nothing in this Policy shall require or permit a priest to violate the priest/penitent relationship of the Sacrament of Confession (*see* Code of Canon Law, Canons 983 and 984) or any “priest/penitent” or equivalent privilege applicable under Local Civil Law.

Section 3.05 No Additional Liability Created: This Policy does not and is not intended to create or expand upon any express or implied contractual obligation, nor any direct or vicarious liability under the law, on the part of the HAC or CL US or any of their directors, responsables, volunteers, employees, or other representatives, including the Policy Coordinator or the members of the Committee for the Protection of Minors and Young Adults.

Article IV. DEFINITIONS

The following definitions are provided for the purposes of this Policy only:

Section 4.01 “Adults” means all persons who are not Minors, as defined below, and who work directly with Minors engaged in the educational activities of CL US directed toward Minors, as described in Article II, including but not limited to

persons who are employed by or are under personal contract with HAC and whose duties include working with Minors, and/or persons who lead, assist, or otherwise volunteer in any capacity working with Minors in such CL US educational activities. (For the sake of clarity, it should be noted that this definition is not intended to include persons who are merely occasional guests or spectators at CL US events directed toward Minors, unless they are expected to work directly with Minors, other than their own children, at such events.)

Section 4.02 “Canon Law” shall mean the Code of Canon Law and complementary norms issued by the Holy See and/or approved by the United States Conference of Catholic Bishops.

Section 4.03 “Child Pornography” shall include any image of sexually explicit conduct in any medium, including images that are simulated, computer-generated, altered, or animated, that depict or purports to depict a Minor, such as images of actual or simulated sexual acts in which a Minor is a participant; or exhibition of the genitals or pubic area of a Minor.

Section 4.04 “Child Sexual Abuse” shall include, but not be limited to:

- (a) Any Sexual Act between an Adult and a Minor;
- (b) Soliciting Sexual Acts from a Minor;
- (c) Possession of Child Pornography;
- (d) Providing or soliciting Sexual Materials to or from a Minor;
- (e) Performing a Sexual Act or the indecent exposure of the private or intimate parts of the body under circumstances where it is reasonably likely that the act may be witnessed by a Minor; or
- (f) Any other offense involving sexual conduct committed against a Minor that is prohibited by Civil or Canon Law.

Section 4.05 “Civil Law” and **“Local Civil Law”** shall mean the laws, statutes, and regulations of the civil authorities of the United States, New York State and/or any other State or political jurisdiction within the United States, in which HAC and/or CL US are engaged in educational or pastoral activities directed toward Minors. To the extent that allegations of conduct in violation of this Policy are made, then the term “Civil Law” shall refer to and include the federal and applicable state and local law governing in the place where such conduct is alleged to have occurred.

Section 4.06 “Clergy” shall mean any ordained persons, including bishops, priests, and deacons.

Section 4.07 “Code of Conduct” means the rules of behavior and guidelines for maintaining proper boundaries for Adults working with Minors as articulated in the context of this Policy and set forth specifically at Appendix “A” hereto.

Section 4.08 “Committee for the Protection of Minors” or “Committee,” as used herein, shall mean a Committee comprised of individuals who assist the National Responsible and the HAC Board in evaluating and responding to allegations of misconduct as outlined in this Policy and in the separate “Code of Conduct” . The composition and responsibilities of the Committee are further outlined in Article VIII below.

Section 4.09 “Leadership Position,” as used herein, shall mean a volunteer or employment position in CL US or HAC, leading activities of CL US for Adults or Minors, where such position is filled by appointment, designation, or contract by or on behalf of the National Responsible or the HAC Board.

Section 4.10 “Majority Vote,” in the context of this Policy, means a simple majority vote of each of the members of the HAC Board or the Committee, as the case may be. In the event of a “tie” vote, the President of the HAC Board or the Chairman of the Committee shall cast two votes. To the extent, if any, that a member of the Board or the Committee casts a dissenting vote as to any decision required or contemplated by this Policy, such dissenting vote shall be duly recorded, along with any supporting information as may be provided by the person casting such vote, and such record shall be kept and maintained by the Secretary of the Board or the Policy Coordinator, as the case may be.

Section 4.11 “Minor” as used herein means a person who has not yet attained 18 years of age (except in those jurisdictions where the age of majority is different under Local Civil Law); as well as any person who is a high school student and who participates in the CL US educational activities described in Article II, whether or not they have attained the age of majority in the relevant jurisdiction. The definition of Minor also includes persons who are attending college or university but have not yet attained the age of majority under Local Civil Law.

Section 4.12 “Misconduct” means a violation of one or more provisions of the

Policy or Code of Conduct that does not rise to the level of Child Sexual Abuse as defined herein.

Section 4.13 “Policy Coordinator” means an individual appointed by the HAC Board to assist the National Responsible, the HAC Board, and the Committee with the administrative, organizational, and record-keeping requirements of this Policy.

Section 4.14 “Policy for the Protection of Minors” or “Policy,” as used herein, means this Policy, including the Code of Conduct annexed as Appendix A, and any related procedures established in connection with this Policy.

Section 4.15 “Reasonable Cause” as used herein means that a reasonable person, considering the available information, would conclude that there is a sufficient semblance of truth, such that an allegation may be credible and is not manifestly false or frivolous.

Section 4.16 “Sexual Act” shall include, but not be limited to, the touching or attempted touching of the sexual, private, or intimate parts of a person’s body in a manner that a reasonable person would consider to be for the purpose of gratifying sexual desire or for the purpose of degrading or abusing a person.

Section 4.17 “Sexual Materials” shall include, but not be limited to any image, text, writing, or audio in any medium, including images that are simulated, computer-generated, altered, or animated that:

- (a) Depicts nudity, actual or simulated sexual acts, or an explicit description of sexual subjects; and
- (b) When considered as a whole by a reasonable person, is for the purpose of sexual gratification and lacks any legitimate literary, artistic, political, educational, or scientific value.

Section 4.18 “Substantiated,” as used herein, means that, in the totality of the circumstances, there is enough reliable evidence for a reasonable person to conclude that it is more likely than not that the alleged offense occurred.

Article V. POLICY IMPLEMENTATION AND DISTRIBUTION

Section 5.01 Binding Effect: This Policy and its Code of Conduct shall be binding upon all Adults in CL US activities directed to Minors, as described in Article II, and all HAC officers, agents, or employees involved in working directly with Minors in such CL US activities. This Policy shall also be binding upon all Adults in CL US activities directed toward college or university students, to the extent (if any) that the students are Minors, as defined herein.

Section 5.02 Effective Date: This Policy, and any subsequent amendment(s), shall be in effect (a) for HAC as of the date it was first adopted (or subsequently amended) by vote of the HAC Board of Directors, and (b) for CL US as of the date it was first approved (or subsequently approved as amended) by the National Responsible of CL US, on behalf of CL US.

Section 5.03 Distribution: Within thirty (30) days of the Effective Date, or any amendments thereto, a copy of this Policy shall be published and/or distributed in a form and manner reasonably calculated to alert all Adults of its existence and terms. In addition, the Policy, and any subsequent amendments thereto, shall be published and maintained online through a link on the website of HAC and/or CL US, so as to be readily available for public viewing and distribution at all times.

Section 5.04 Record of Distribution: Under the supervision of the Policy Coordinator, HAC shall keep and maintain, in either hard copy or electronic form, a written record of the dates and manner of the publication and/or distribution of this Policy and any subsequent amendments thereto.

Section 5.05 Acknowledgement of Receipt: A signed acknowledgment of receipt and understanding of this Policy shall be required of all Adults. The required acknowledgment form is attached to this Policy as Appendix “B.” Acknowledgment of receipt and understanding of this Policy shall be included in any written contracts of employment with HAC or CL US. Acknowledgements can be in electronic or handwritten form.

Section 5.06 Record of Acknowledgement: The signed acknowledgments of receipt and understanding of this Policy shall be forwarded to the Policy Coordinator, and such acknowledgements shall be kept and maintained by the Policy Coordinator, in either hard copy or electronic form, for no less than the duration of the Adult’s service for HAC or CL US (either employment or

volunteer), plus six (6) years.

Section 5.07 Failure to Acknowledge: Notwithstanding the foregoing, any failure to execute the acknowledgement specified above (or to maintain a copy of such acknowledgement) shall not affect the obligation of every Adult to comply with this Policy.

Article VI. EDUCATION AND TRAINING

Section 6.01 Training Requirement: In addition to receiving a copy of this Policy and Code of Conduct, all Adults must also receive training regarding the prevention of Child Sexual Abuse including identifying and responding to potential incidents, allegations, or reports of Child Sexual Abuse.

Section 6.02 Form of Training: Such training may be offered online or in person. Instructions for accessing, completing, and certifying completion of such training shall be maintained by the Policy Coordinator and published within ten (10) days after the Effective Date, and from time to time thereafter as needed.

Section 6.03 Time of Training: All Adults must complete the training *before* they commence working with Minors in CL US educational activities directed toward Minors.

Section 6.04 Training Materials Must Conform to Catholic Teaching: All training and educational materials to be provided pursuant to this Policy shall be approved by the National Responsible to ensure that they conform to the moral teachings of the Catholic Church.

Section 6.05 Ensuring Compliance: The Policy Coordinator will coordinate with the National Responsible and the HAC Board to ensure that all Adults have timely completed such training, certified such completion, and provided proof of such compliance to the Policy Coordinator, as required by this Policy.

Section 6.06 Persons Already Certified: Adults who have completed their safe environment certification and background check through their diocese (or equivalent jurisdiction), and who maintain up-to-date certification and demonstrate the same to the Policy Coordinator may be admitted to working with Minors.

Section 6.07 Record-Keeping: Records regarding training, including certification of completion of training, shall be kept and maintained by the Policy Coordinator at HAC's office, in hard copy or electronic form, for no less than the duration of the volunteer service/employment, plus six (6) years.

Article VII. SCREENING AND BACKGROUND CHECKS

Section 7.01 Screening of Adults: All Adults shall be screened and approved for suitability by the National Responsible or person(s) appointed by him, before working directly with Minors in educational activities directed toward Minors.

Section 7.02 Background Check: This screening will include a background check (including checks of criminal history and sex offender registry status), which may be conducted at the time of application for service and/or during the course of service, according to procedures established by the Policy Coordinator and/or the Committee from time to time.

Section 7.03 Personnel Must Submit to Background Check: All Adults must submit to a background check before working directly with Minors in educational activities directed toward Minors. Failure to submit full and complete information required for a background check, or any materially false statement made during the screening process, shall result in termination of employment and/or termination of volunteer service in CL US educational activities directed toward Minors.

Section 7.04 Results of Background Check: Results of background checks will be provided to the Policy Coordinator, who will initially review them. If the background check suggests that there may be a risk to Minors, the results shall be referred by the Policy Coordinator to the Committee, which shall then make a recommendation to the National Responsible and the HAC Board. Taking into account the Committee's recommendation and their own reasonable assessment of the potential risks to Minors, if any, the National Responsible and the HAC Board shall then determine whether, and to what extent, the background check disqualifies the subject Adult from participating in CL US activities directed toward Minors. If they determine that the Adult is disqualified from such participation, the subject Adult shall be so notified in writing by the Policy Coordinator. The Policy Coordinator shall keep a written record of any such referral and resulting determination, including any notice, along with a copy of the background check and any related information upon which the determination was made, for a period of at least six (6) years.

Section 7.05 Confidentiality: The information provided and the results of all background checks will be handled and maintained in a confidential manner to protect, to the extent reasonably practical, the privacy of all applicants and to ensure, to the extent reasonably practical, that negative or personal information is not improperly revealed. The results of background checks shall be handled in conformity with all applicable provisions of state and federal law.

Section 7.06 Periodic Updates of Background Check: The Policy Coordinator may periodically request a new background check after the passage of six (6) years since the person's last check, or at any time if new information about the Adult is received regarding a potential incident in violation of the Code of Conduct or of any alleged criminal conduct. Failure to submit full and complete information required for a background check, or any materially false statement made during the screening process, shall result in termination of employment and/or termination of volunteer service in CL US educational activities directed toward Minors.

Section 7.07 Persons Already Certified: Adults who have completed their safe environment certification and background check through their diocese (or equivalent jurisdiction), and who maintain up-to-date certification and demonstrate the same to the Policy Coordinator may be admitted to working with Minors.

Article VIII. THE COMMITTEE FOR THE PROTECTION OF MINORS AND YOUNG ADULTS; THE POLICY COORDINATOR

Section 8.01 Composition of Committee: The Committee shall be comprised of at least three (3) and no more than five (5) adults, each of whom shall be a person of outstanding integrity and good judgment in full communion with the Catholic Church.

Section 8.02 Contact Information: Contact information for the Committee is set forth in Appendix "C" hereto.

Section 8.03 Appointment to Committee: The members of the Committee shall be appointed and serve in accordance with the following:

- (a) The National Responsible shall select one member of the clergy to serve on the Committee at all times ("the Clergy Committee Member");
- (b) The remaining members of the Committee shall be appointed by Majority Vote of the HAC Board. At least two members of the Committee should be

lay persons;

- (c) Each member of the Committee should have professional or personal experience in some field relevant to the protection of Minors, including education, mental health, law, law enforcement, medicine, social work, etc. To the extent, if any, that the Committee wishes to seek input from outside parties with special expertise or unique experience in order to review and address a particular allegation before the Committee, the Committee may seek approval and funding from the HAC Board to retain and consult with such appropriate outside experts. The Committee may also seek the approval and funding of the HAC Board to retain and consult with outside counsel, as needed.

Section 8.04 Vacancies: Any vacancies on the Committee other than the Clergy Committee Member (who shall be designated as described above) shall be filled by majority vote of the HAC Board. Suggestions for suitable members of the Committee can, at any time, be forwarded to any sitting member of the Committee, the HAC Board, or the National Responsible, for future consideration.

Section 8.05 Duties of Committee: The principal duties of the Committee are set forth in this Policy, and shall include but not be limited to:

- (a) receiving, initially evaluating, and as appropriate arranging for internal investigation of allegations of conduct in violation of this Policy;
- (b) referring any alleged victims of sexual abuse and/or their family members to law enforcement and any available victims' support services;
- (c) reporting its conclusions and recommendations to the National Responsible and the HAC Board at the close of any such initial evaluation and/or internal investigation;
- (d) providing counsel to the National Responsible and the HAC Board regarding this Policy and any recommendations for amendments hereto;
- (e) advising the National Responsible and the HAC Board with regard to any other matters relating to this Policy from time to time, when the particular expertise of Committee members would be valuable.

Section 8.06 Policy Coordinator: The Committee shall be assisted in the performance of its duties by the Policy Coordinator, who shall be appointed by the National Responsible and the HAC Board. The principal duties of the Policy

Coordinator shall include but not be limited to: assisting the National Responsible, the HAC Board, and the Committee, as needed, in the performance of their duties

and obligations under this Policy; facilitating and ensuring compliance with procedures for training, screening, and background checks of Adults, as set forth in this Policy; disseminating notices and maintaining records as set forth in this Policy; and performing other similar tasks and duties as necessary to effectively administer this Policy.

Article IX. ALLEGATIONS OF CONDUCT IN VIOLATION OF THIS POLICY

Section 9.01 Obligation to Report Allegations of Child Sexual Abuse or Other Misconduct in Violation of this Policy: Any Adult who suspects, witnesses, is informed of or otherwise learns of an allegation or complaint of alleged Child Sexual Abuse, Misconduct, or other violations of any other provisions of this Policy, shall immediately report it to any of the following people: The Policy Coordinator, a member of the Committee, a member of the HAC Board, or the National Responsible. (*See also* Article X, below, regarding the additional civil reporting obligations of Mandated Reporters, under state or local law, where allegations of Child Sexual Abuse or other Child Abuse are implicated.)

Upon receipt, all such allegations shall be immediately referred to the Policy Coordinator, who shall forward them to the Committee. Contact information for the above-mentioned people is provided in Appendix “C” of this Policy. Allegations of conduct in violation of this Policy should be reported to the Policy Coordinator and the Committee promptly and without regard to the perceived credibility (or lack of credibility) of the allegations, as any evaluation of credibility is to be made by the Committee, consistent with the terms of this Policy.

Section 9.02 Form of Report: Allegations of conduct in violation of this Policy should be made in a written report, or, if made orally, should be promptly written down by the person taking the complaint and, if possible, signed by the person making the complaint (the “complainant”).

Section 9.03 Oral or Unsigned Written Report: If the complainant fails or refuses to sign the written report for whatever reason, the person taking the report should sign and date the report and indicate the complainant’s name (if known), the date, and the circumstances under which the report was received.

Section 9.04 Contents of Report: The report should contain as much of the following information as possible:

- (a) The name, contact information and signature of the complainant and the victim, if not the same person;
- (b) The name of the person accused or sufficient information that the accused can be identified with accuracy;
- (c) A detailed description of the facts and circumstances of the incidents alleged, including, if possible, dates, locations, and description of incidents;
- (d) The names and contact information of other persons who may have relevant information regarding the incident; and
- (e) Where the report alleges Child Sexual Abuse or other criminal conduct subject to mandatory reporting under Local Civil Law, and the complainant or the person receiving the complaint is a mandatory reporter, then the report shall also provide a Case Number and/or similar details including the date, time, and manner that the allegations were in fact reported to the appropriate civil authorities.

Section 9.05 Anonymous Allegations or Reports: All reasonable efforts shall be made to encourage a complainant or witness who wants to remain anonymous to identify himself/herself, to provide a written report, and to cooperate with the evaluation and/or internal investigation of the report thereafter. Anonymous allegations or reports will be referred to the Committee and given due consideration, and such allegations will be promptly evaluated by the Committee, where sufficient information is provided to allow such evaluation. In the event, however, that an anonymous allegation fails to provide adequate information to allow for initial evaluation by the Committee – i.e., information sufficient to identify an alleged act, a perpetrator, and a victim – the Committee may elect to suspend its review and evaluation until and unless additional details are provided.

Section 9.06 Gathering and Preserving Relevant Documents: Upon receipt of a report of an alleged violation of this Policy, the Policy Coordinator shall take steps to gather together all potentially relevant documents and shall work (with counsel or directly) to ensure the preservation and non-destruction of potentially relevant documents or other information within the possession, custody, or control of HAC, CL US, and/or their agents or assigns.

Section 9.07 Confidentiality: All reports will be handled with a high level of concern and confidentiality for the alleged victim, the family of the alleged victim, the person reporting the incident, and the accused.

Section 9.08 Record-keeping by Policy Coordinator: The Policy Coordinator shall keep a written record of the date, nature, and substance of any report made pursuant to this Policy, the action taken, including the results of all initial

evaluations and internal investigations, referrals or reports made, and any other relevant information about how the report was handled and resolved.

Section 9.09 Committee Access to Relevant Files: Upon request, the Committee shall be given full and sufficient access to copies of the entire file gathered by the Policy Coordinator, with respect to any alleged conduct in violation of this Policy, as well as to any other non-privileged documents in the files of HAC, CL US, or their agents and assigns, arising from or related to any such alleged violation.

Section 9.10 Whistleblower Protection: Persons who report alleged violations or other concerns pursuant to this Policy, and those who cooperate with investigations of such reports by offering evidence or other testimony or by identifying potential victims or witnesses, shall be treated with respect and discretion and shall not be subject to any form of retaliation, including harassment, threats, coercion, intimidation, or adverse employment actions.

Section 9.11 Media or Third-Party Inquiries: Any media contact or third-party inquiries regarding a report of conduct in violation of this Policy must be directed to the HAC Board and/or its counsel. No other Personnel, employees, officers, or other agents or representatives of HAC or CL US, including the members of the Committee, shall be authorized to speak for or on behalf of HAC or CL US regarding any subject covered by this Policy.

Article X. THIS POLICY SUPPLEMENTS BUT DOES NOT REPLACE EXISTING CIVIL MANDATORY REPORTING OBLIGATIONS AS TO CHILD ABUSE

Section 10.01 Policy Supplements Civil Law: Nothing herein is intended to, nor shall it, supersede, limit, or abridge in any way any existing Local Civil Law, including statutory or other civil legal obligations or professional mandates governing mandatory reporters – *i.e.*, persons who, by virtue of their profession or special training, are bound by federal, state or local law or professional rules of conduct to report cases of known or suspected child abuse, child sexual abuse, or other such misconduct involving children. The reporting obligations created by this Policy are intended to supplement those existing obligations – and not in any sense to replace them.

Section 10.02 Mandated Reporters: New York State law requires that specified persons and institutions (“Mandated Reporters”) are required to report certain

incidents to civil authorities where there is reasonable cause to suspect child abuse or maltreatment. Specifics of this law can be found in New York State Social Service Law, including section 413 of that Law. Similar laws exist in jurisdictions outside of the State of New York, in other States and civil jurisdictions within the United States – referred to herein collectively as “Mandatory Reporter Laws”.

Section 10.03 Mandated Reporters Must Comply with Civil Law: Certain Adults working with Minors in the educational activities of CL US may be Mandatory Reporters under New York’s Social Service Law (or the analogous civil law of another jurisdiction). Mandatory Reporters must fully comply with the requirements of the civil law, including prompt reporting to civil authorities of suspected child abuse or maltreatment. Such obligations to report under the Social Services Law or other civil laws are and shall continue to be distinct from, and in addition to, the reporting obligations created by this Policy.

Section 10.04 Policy Does Not Replace Mandatory Reporter Laws: Mandated Reporters DO NOT satisfy their obligation under New York Social Services Law (or analogous mandatory reporting civil laws in other jurisdictions) by reporting incidents to the Policy Coordinator, the Committee, the National Responsible or the HAC Board.

Article XI. ALLEGATIONS OF CHILD SEXUAL ABUSE

Section 11.01 Child Sexual Abuse is a crime. Whenever an allegation or report is received regarding alleged Child Sexual Abuse or other criminal conduct, the complainant (and/or their parent or guardian, if the complainant is a Minor) must be strongly urged to report the complaint immediately and directly to the civil authorities. **This recommendation that the complainant (or his/her parent or guardian) report the complaint or allegation to the civil authorities should be made immediately and without regard to the commencement or results of the initial evaluation of credibility by the Committee.**

Section 11.02 Imminent Threat of Harm: If the suspected or reported Child Sexual Abuse or other abuse is believed to present an ongoing or imminent threat to a Minor(s), an immediate report should also be made directly to the New York State Child Abuse Hotline or, if the alleged conduct is outside of the State of New York, to a similar Child Abuse hotline in the involved jurisdiction.

Section 11.03 Immediate Report of Alleged Child Sexual Abuse: Immediately after witnessing or receiving an allegation or report of Child Sexual Abuse, the person(s) witnessing the conduct or receiving the allegation or report shall provide notice of same, and a copy of any written report, to one of the following: the Policy Coordinator, the Committee, the HAC Board, and/or the National Responsible; provided, however, that if the accused is one of the aforementioned individuals, then the notice shall not be directed to him/her. All such allegations or reports shall then be referred to the Policy Coordinator and the Committee, which shall evaluate and process them in the manner set forth in this Policy. Whosoever of those mentioned in this section who receives an allegation or report will immediately communicate that in writing to the Policy Coordinator and the Committee, without regard to the perceived merits of the allegation or report.

Section 11.04 Committee's Immediate Response to Allegations: Upon receiving a report providing Reasonable Cause regarding allegations of Child Sexual Abuse, the Committee (upon notice to the HAC Board and National Responsible) shall immediately take the following additional steps, either directly or through counsel, *before* and *without regard to* the commencement or results of the Committee's initial evaluation:

- (a) initiate contact with the alleged victim and, if appropriate, the victim's parent or guardian (unless reporting to the parent/guardian is deemed unsafe for the Minor under the circumstances), to acknowledge receipt of the report and to urge them to contact the local civil authorities directly;
- (b) report the allegation to the appropriate civil authorities within the jurisdiction where the abuse is alleged to have occurred – with such report to be made as quickly as possible, but in no event more than two (2) days after receiving the report;
- (c) report the allegation to the appropriate ecclesial authorities whose interests or jurisdiction are implicated by the report as quickly as possible, but in no event more than seven (7) days after receiving the report;
- (d) recommend that the National Responsible and/or the HAC Board: (i) notify the accused Adult in writing that an allegation of Child Sexual Abuse has been made against him/her; and (ii) suspend the accused Adult from employment and/or volunteer service immediately and until such time as the allegations are resolved;
- (e) refer the alleged victim (or, if the victim is a Minor, their parent or guardian) to any available victims' assistance services offered by local civil or ecclesial authorities; and

- (f) undertake an initial evaluation of the allegations, as outlined in Article XIII below.

Section 11.05 Cooperation and Duty Not to Interfere: The Policy Coordinator, the Committee, the HAC Board, the National Responsible, and all Adults shall cooperate with any lawful investigation conducted by civil or ecclesial authorities of allegations of Child Sexual Abuse or any other potentially criminal behavior. HAC and CL US will not interfere in any way with any investigation being conducted by civil or ecclesial authorities.

Section 11.06 Option to Suspend Evaluation in Certain Circumstances: In the event such an investigation by civil or ecclesial authorities is instigated, the Committee may elect to suspend the initial evaluation of an allegation of Child Sexual Abuse or other Misconduct until such civil or ecclesial authorities conclude their investigation, as long as the accused Adult is, and remains for the duration, suspended from working with Minors while such investigations are underway.

Section 11.07 Independent Duty to Evaluate and/or Investigate: Regardless of whether allegations of conduct in violation of this Policy are formally investigated, adjudicated or otherwise acted upon by civil or ecclesial authorities, the Committee shall make its own report and recommendations based upon the results of its own initial evaluation and/or internal investigation, conducted pursuant to this Policy. The HAC Board and National Responsible shall likewise act, in accordance with the procedures detailed herein, after considering the Committee's report and recommendation, as to each and every allegation of conduct in violation of this Policy that is brought to their attention.

Article XII. INITIAL EVALUATION BY THE COMMITTEE OF ALLEGATIONS/REPORTS OF CHILD SEXUAL ABUSE OR OTHER MISCONDUCT IN VIOLATION OF THIS POLICY

Section 12.01 Purpose of Initial Evaluation: Reports of conduct in violation of this Policy will be initially referred to and evaluated by the Committee which shall promptly consider the nature, substance, and details of the report to determine whether there is Reasonable Cause. This process is referred to herein as the "initial evaluation."

Section 12.02 Notice to Complainant: The complainant shall be notified by the Committee that his/her report or allegation has been received and will be processed consistent with the terms and procedures set forth in this Policy.

Section 12.03 Finding of Reasonable Cause After Initial Evaluation: If, upon such initial evaluation, a majority of the Committee Members determines that there is Reasonable Cause, the Committee shall: (1) provide a summary of its initial evaluation in writing to the HAC Board and the National Responsible; (2) promptly initiate an internal investigation to assess whether the allegations are Substantiated; and (3) request the Board of the HAC and/or the National Responsible to implement whatever interim suspension or other measures may be appropriate while an internal investigation is underway.

Section 12.04 Finding of No Reasonable Cause After Initial Evaluation: In the event a majority of the Members of the Committee finds that there is no Reasonable Cause, the Committee shall so advise the HAC Board and the National Responsible, who shall then decide whether (a) to accept the Committee's finding and mark the matter as closed, with a finding of no Reasonable Cause; or (b) to find Reasonable Cause and direct the Committee to commission an internal investigation in connection with the report or allegation.

Article XIII. INTERNAL INVESTIGATION OF ALLEGATIONS FOUND TO BE SUPPORTED BY REASONABLE CAUSE AFTER INITIAL EVALUATION

Section 13.01 Commissioning of Internal Investigation: In the event that, upon initial evaluation pursuant to Article XII, there is a finding of Reasonable Cause, then the Committee shall promptly commission an internal investigation.

Section 13.02 Scope, Duration and Nature of Investigation: The scope, duration, and nature of the internal investigation may vary and will depend upon such factors as the nature and seriousness of the alleged conduct, the complexity of the allegations, the number of alleged victims or witnesses, and the number of violations/incidents reported. It shall be within the discretion of the Committee to define the scope, duration, and nature of the internal investigation in any given case.

Section 13.03 Dispensing with Investigation in Certain Cases: In the

following circumstances, the Committee may dispense with or suspend the internal investigation and present its findings and recommendations directly to the HAC Board and the National Responsible: (a) where the conduct alleged is acknowledged or admitted by the accused person; (b) where the conduct alleged is sufficiently established by unrefuted documentary or other uncontroverted evidence obtained by the Committee during its initial evaluation, such that no further investigation is necessary or warranted; or (c) where the conduct alleged is determined to have occurred, either in a civil court of law or in formal ecclesial proceedings conducted pursuant to Canon Law.

Section 13.04 Notice to Complainant: The complainant shall be notified by the Committee that an internal investigation consistent with the terms and procedures set forth in this Policy has been initiated.

Section 13.05 Manner of Conducting the Internal Investigation: The internal investigation shall be conducted as expeditiously as is reasonable under the circumstances, with due diligence to ensure that all relevant information is obtained and considered. The internal investigation shall be conducted under the supervision of the Committee by competent, objective persons selected by the Committee (*i.e.*, outside counsel with experience investigating such matters, and/or private investigator with a background in law enforcement).

Section 13.06 Expenses: Costs of the investigation will be paid by HAC; the HAC Board shall approve the preliminary budget for a proposed internal investigation, as well as any changes or updates to the budget as the investigation proceeds.

Section 13.07 Independent Conclusions: In overseeing the internal investigation and formulating a report and recommendation, the Committee may also consider any findings, actions, and/or recommendations of civil or ecclesial authorities, related to the allegations and the accused. However, any such findings or recommendations shall not be binding upon the Committee (unless binding pursuant to Local Civil Law or Canon Law). The Committee shall in any event make its own report and recommendations to the National Responsible and the HAC Board, based upon the results of its own evaluation, internal investigation, and/or all other relevant circumstances.

Section 13.08 Confidentiality: In connection with an internal investigation, the complainant, witnesses, and the accused person shall have the right to have

their good name and privacy protected to the extent reasonably possible, consistent with the goals and requirements of this Policy and civil law, although confidentiality cannot be totally ensured. Extra precautions shall be taken to protect the identity of any complainant/victim who is or was a Minor at the time of the alleged misconduct and, except where disclosure is required by law, the decision whether to identify a Minor victim/complainant to the accused person shall be left to the Minor victim/complainant (or, where appropriate, their parents or counsel).

Section 13.09 Witness and Complainant Rights and Duties: Witnesses and complainants shall have the following rights and duties in connection with an internal investigation:

- (a) The right to offer information relevant to the allegations, along with the duty to ensure that any such information be true and accurate, to the best of their knowledge, information, or belief;
- (b) The right to have assistance of counsel, both civil and canonical, if they so choose (which counsel shall be retained at their own expense); and
- (c) The right to know the general result of the investigation upon its conclusion (*i.e.*, whether the allegations have been Substantiated or not).

Section 13.10 Accused's Rights and Duties: Accused persons have the following rights and duties in connection with an internal investigation:

- (a) The right to be informed that an internal investigation is underway and to know the general nature and scope of the allegations, unless the Committee determines that such disclosure could reasonably be expected to (i) interfere with, compromise the integrity of, or otherwise obstruct any investigation being conducted by the Committee or by civil or ecclesial authorities; (ii) expose the complainant, victims, or witnesses to danger, retaliation, harassment, or intimidation; or (iii) expose the identity of a complainant or witness who has offered information with a request to maintain anonymity;
- (b) The right to offer information and testimony relevant to the allegations where the Committee deems such information and testimony to be necessary or helpful to ensure the integrity and fairness of the investigation;
- (c) The right to have assistance of counsel, both civil and canonical, if they so choose (which counsel shall be retained at their own expense);
- (d) The duty not to interfere with the investigation, including but not limited to by contacting witnesses or potential witnesses during the pendency of the

- investigation to discuss or inquire about the allegations, the investigation, or anything related thereto;
- (e) The duty not to contact the complainant or alleged victim while the investigation is pending;
 - (f) The duty not to encourage, request, aid, or approve of any other person contacting the complainant, alleged victim, or any other person who is providing information to the investigation, with the intent to influence their cooperation; and
 - (g) The duty not to engage in, encourage, request, aid, or approve any action that is intended to have a detrimental effect on the reputation of the complainant, alleged victim, or of any other person who is providing information or cooperating with the investigation.

Section 13.11 Committee’s Report and Recommendation: At the conclusion of the internal investigation, the Committee shall formulate a report and recommendation to the HAC Board and the National Responsible to either: (a) sustain the allegations as Substantiated and impose appropriate responsive measures, or (b) dismiss the allegation as not Substantiated and, if appropriate, restore the accused to full service and/or employment.

Section 13.12 Determination by the HAC Board, in Consultation with the National Responsible: Upon receipt and review of the Committee’s Report and Recommendation and any underlying investigative reports or materials, the HAC Board shall decide, by Majority Vote, after consultation with the National Responsible, whether to accept the Committee’s conclusions and recommendations, specifically as to (a) whether the allegations are Substantiated or Not Substantiated; and (b) if they are Substantiated, what remedial measures shall be implemented in response thereto. In reaching a decision, unanimity among the members of the HAC Board, and as between the HAC Board and the National Responsible, is preferred, but not required. Dissenting positions, if any, shall be recorded if requested.

Article XIV. FALSE OR NOT SUBSTANTIATED ALLEGATIONS AFTER INTERNAL INVESTIGATION

Section 14.01 Closing File: In the event that an allegation is determined to be false or Not Substantiated, the conclusion shall be noted in the file and the matter shall be marked as closed.

Section 14.02 Corrective Action: If an allegation has become a matter of public knowledge and has caused damage to the accused's reputation, but is determined to have been false or Not Substantiated, the HAC Board may take such appropriate corrective action to mitigate any damage to the accused person's reputation as it deems appropriate to the circumstances.

Section 14.03 Knowingly False Allegations: A person who knowingly and maliciously makes a false allegation of Child Sexual Abuse or other violations of this Policy may be subject to appropriate disciplinary action and may be referred to appropriate ecclesial or civil authorities.

Article XV. SUBSTANTIATED ALLEGATIONS OF CHILD SEXUAL ABUSE

Section 15.01 Measures to be Imposed: If an allegation of Child Sexual Abuse is found to be Substantiated, the accused person shall be barred from exercising any employment in HAC, participating in any CL US educational activity involving Minors, or otherwise holding a Leadership Position in any CL US ministry, program, or activity.

Section 15.02 Notice to Civil and Ecclesial Authorities: In addition, consistent with the provisions of this Policy, written notice of such Substantiated allegations of Child Sexual Abuse or other criminal conduct shall be provided to the appropriate civil and ecclesial authorities. The form and content of any such notice shall be approved, in each instance, by the HAC Board and the National Responsible.

Section 15.03 Notice to Others: The Policy Coordinator shall also take steps to ensure that, where allegations of Child Sexual Abuse are Substantiated, an appropriate notice of the conclusion and the measures to be implemented, is provided to the victim(s), the accused, and to any others within or without CL US

who the National Responsible and the HAC Board determine should receive notice(s) to enforce any measures, to avert and avoid future misconduct, and/or to provide closure on the subject. The form and content of any such notice shall be approved, in each instance, by the HAC Board and the National Responsible.

Article XVI. SUBSTANTIATED ALLEGATIONS OF OTHER MISCONDUCT IN VIOLATION OF THIS POLICY

Section 16.01 Measures to be Imposed: If an allegation of conduct in violation of this Policy (other than Child Sexual Abuse) is found to be Substantiated, the National Responsible and the HAC Board shall determine what measures shall be implemented in response to such Substantiated allegation – including whether, and to what extent, he/she may be deemed unsuitable to participate in CL US activities with Minors, continued employment at HAC, or to serve in a Leadership Position in any CL US ministry, program or activity. The accused person shall be given clear notice and direction regarding the scope and duration of these measures. The form and content of any such notice shall be approved, in each instance, by the HAC Board the National Responsible.

Section 16.02 Notice: The Policy Coordinator shall also take steps to ensure that, where allegations are Substantiated, an appropriate notice of the conclusion and the measures to be implemented in relation to the accused, is provided to the victim(s), the accused, and to any others within or without CL US who the National Responsible and the HAC Board determine should receive notice(s) to enforce any measures, to avert and avoid future misconduct, and/or to provide closure on the subject. The form and content of any such notice shall be approved, in each instance, by the HAC Board and the National Responsible.

Article XVII. CONFLICTS OF INTEREST

Section 17.01 Automatic Recusal for Direct Conflicts: In the event that, in the course of addressing an allegation or report of conduct in violation of this Policy, it is established that a key witness, the victim, or the accused is directly related by blood or marriage to the Policy Coordinator, any member of the Committee, a member of the HAC Board, and/or the National Responsible, then the person so related to the key witness, victim, or accused shall promptly recuse

himself or herself from further involvement in the evaluation, investigation, and/or disposition of such allegation or report.

In the event that an allegation or report of conduct in violation of this Policy is made against the Policy Coordinator, any member of the Committee, or a member of the HAC Board, then the accused person shall promptly recuse himself or herself from further involvement in the evaluation, investigation, and/or disposition of such allegation or report.

In the event that the National Responsible is the accused, he shall promptly recuse himself and the HAC Board can consult with the Center of the CL Movement in Italy as to whether an alternate, disinterested person should participate in the evaluation, investigation, and/or disposition of the allegations, in the place and stead of the National Responsible.

Any such recusal and the reasons for the recusal shall be noted in the file relative to the allegation or report, by the Policy Coordinator or the Committee.

Section 17.02 Discretionary Recusal In Other Circumstances: In the event that, in the course of addressing an allegation or report of conduct in violation of this Policy, it is established that a key witness, the victim, or the accused has a close personal or professional relationship with the Policy Coordinator, any member of the Committee, a member of the HAC Board, and/or the National Responsible, the person with the personal or professional relationship to the key witness, victim, or accused shall recuse himself or herself from further involvement in the evaluation, investigation, and/or disposition of such allegation or report if he or she, in the exercise of good faith judgment and discretion, concludes that the relationship would create a conflict of interest that would make it impossible to be impartial and objective in the matter. Such recusal is not mandated (except as noted in Section 17.01 above). The decision to recuse or not to recuse shall be left to the conscience of the individual involved.

Any such recusal and the reasons for the recusal shall be noted in the file relative to the allegation or report, by the Policy Coordinator or the Committee.

APPENDIX A

CODE OF CONDUCT

Article I. GUIDELINES FOR HEALTHY RELATIONSHIPS

Healthy Christian relationships between Minors and Adults are a constituent part of the communication of the Christian experience. Therefore, all Adults are called to both maintain a lifestyle and personal relationships that embody Christian virtue and to actively commit to preventing abusive relationships, as well as to cultivate a culture characterized by awareness of the truth of every human person as created in the image and likeness of God and therefore worthy of infinite dignity and respect. In relationships with Minors, the responsibility to establish and maintain proper boundaries rests at all times with the Adults in such relationships.

Section 1.01 Adults must take special care and vigilance to cultivate healthy relationships when they are dealing with all Minors, but especially those who may be particularly vulnerable (*e.g.*, children who have experienced abuse or who are isolated by distance or circumstances from family).

Section 1.02 Whereas the content of this Appendix describes potential risks of inappropriate behavior, it is not intended to be an exhaustive list of such risks, but it seeks to foster a safe and healthy educational experience.

Section 1.03 Adults involved in activities directed towards Minors must avoid showing undue interest or sharing excessive information or details in areas such as romantic relationships, dating, and sexual activity.

Section 1.04 Adults involved in activities directed toward Minors must avoid creating exclusive bonds with a Minor or encouraging self-referential attitudes, such that one or both parties begin to feel possessive of the other's affection.

Section 1.05 One on one conversations are a vital element of the educational relationship between an Adult and a Minor. At the same time, they can easily give the appearance of impropriety. For this reason,

- (a) Adults who wish to speak one on one with a Minor should always do so in a visible, open location. If an Adult meets with a Minor in an office or classroom, there must be windows, both parties should be visible from outside the room, and there must be at least one other Adult in the near proximity (within sight on the same floor, same hallway, or same general area).
- (b) Two Adults should be present in each vehicle where Minors are present. If that is not possible, the minimum required is one Adult and two or more Minors; if, in cases of absolute necessity, an Adult must transport a single Minor, the Adult must obtain specific advanced permission from parents or guardians by phone, and the Minor must sit in the back seat of the car.

Section 1.06 Adults should never exceed the limits of a cordial friendship in their physical gestures with Minors and should use great caution to ensure that any kind of physical contact with a Minor is not perceived or misconstrued as inappropriate or sexual by the Minor involved or any third-party observer. Physical contact between an Adult and an unrelated Minor is acceptable only if all the following conditions are met:

- (a) It is limited and fully appropriate to the situation;
- (b) It occurs openly, in the view and presence of other Adults, and is age appropriate;
- (c) It is entirely and unambiguously nonsexual and nonromantic;
- (d) The Minor consents to the contact and is fully comfortable with it;
- (e) It cannot be misconstrued by the Minor or by others; and
- (f) It does not constitute an abuse of the Adult's authority.

Section 1.07 In order to avoid a situation where relationships between an Adult and a Minor can be misinterpreted or misconstrued, the following general guidelines for physical contact should be followed:

- (a) Physical contact with Minors may never take place in a one-on-one setting;
- (b) Physical contact such as prolonged hugging, or placing and leaving one's arm around a minor's shoulder, back or waist should be avoided;
- (c) Occasional hugging in the context of greeting or saying goodbye can be appropriate behavior for an Adult. Side-hugs are preferred as they are a more clearly appropriate form of physical contact in this setting.
- (d) Repeatedly touching the arm, back, legs or any other part of the body of an

unrelated Minor should be avoided;

- (e) Otherwise unacceptable behavior does not become acceptable if it is initiated by a Minor. For example, cultural customs, or the ordinary behavior of Minors towards their peers, do not justify otherwise inappropriate physical contact or behavior with an unrelated Adult;
- (f) If a Minor initiates any physical contact with an unrelated Adult that the Adult deems inappropriate or likely to be misconstrued, the Adult must counsel the Minor as to proper behavior. The Adult should also report the incident to their immediate responsible within CL US.

Section 1.08 The following behaviors between an Adult and a Minor are highly inappropriate and merit immediate reporting:

- (a) Touching the areas of the body that are ordinarily covered by a bathing suit;
- (b) Sitting with legs or arms intertwined, or sitting on the lap or shoulders;
- (c) Kissing or nuzzling;
- (d) Dating, romantic, or physical relationships between an Adult with a Minor.

Article II. COMMUNICATION BETWEEN ADULTS AND UNRELATED MINORS

Section 2.01 This article applies to Adult communication with unrelated Minors. Adults should use language that is respectful and that emphasizes all that is beautiful, noble, and pure, no matter the means of communication chosen. For this reason, Adults should:

- (a) abstain from any profane or sexual language, banter, or off-color jokes in the presence of or in communications with Minors;
- (b) not offer excessive or unduly personal compliments, remarks or gestures that focus on the Minor's physical appearance, body, or clothing.

Section 2.02 Electronic communication (emails, text messages, instant messaging, teleconferencing, and videoconferencing, etc.) presents a series of challenges in the relationship between Adults and Minors. By design, electronic communication gives a false sense of intimacy and fosters a lack of awareness and a lessening of inhibitions. Electronic communication is ripe for misinterpretation and misuse. To avoid this pitfall, electronic communication between an Adult and a Minor should be limited, if it occurs at all. The following general guidelines should be followed:

- (a) One on one electronic communication between Minors and Adults must always be brief (including phone calls, email, and texts), infrequent, and messages should be kept short and to the point.
- (b) Adults must set appropriate boundaries around the times and circumstances when one on one communication with Minors takes place. Specifically, they should communicate clear guidelines as to when phone calls will be made/received and when electronic communications will be sent/received.

Section 2.03 Electronic communication between an Adult and a Minor should not be considered private and confidential. Therefore:

- (a) Apps that allow for group messaging and announcements are preferred.
- (b) Use of social media and other applications to communicate with Minors is strongly discouraged unless the messages, posts, or images, are permanently recorded and accessible thereafter (*i.e.*, such messages, posts, or images are not automatically deleted by the social media website, application, or user).
- (c) Online gaming is a recreational activity used by Minors to play games and socialize. Adults are not the Minors' peers and, therefore Adults should not be engaged in online gaming or in-game communications with Minors.
- (d) An Adult should never instruct Minors not to share their communications with their parents, guardians, or other Adults.

Section 2.04 Electronic communications (including phone, text messaging, e-mail, teleconferencing, videoconferencing, or other electronic means) between an Adult and a Minor require the prior written permission of the Minor's parent or guardian. Therefore, prior to initiating any such communications, the Adult should obtain the parent or guardian's written consent, as provided for in Appendix D, "Parent/Guardian Consent Form for Electronic Communications with Minors and For Use of Photographs, Videos."

- (a) A copy of such written consent shall be kept on file and shall remain in effect until such time as it is modified or revoked by the parent or guardian, or until such time as the Minor reaches the age of majority;
- (b) In the event that an individual Minor initiates electronic communication with an Adult without prior written permission being granted by the Minor's parents or guardian, the Adult should notify the Minor's parents or guardian and copy them on any response to the Minor, unless the Adult reasonably believes that doing so would put the Minor at risk of harm.

Section 2.05 If a Minor sends an Adult an inappropriate message or content of a sexual nature, the Adult should not respond to it, forward it, or delete it. The Adult should immediately notify one of the following: the Policy Coordinator, the Committee, a member of the HAC Board, or the National Responsible and await instructions as to what to do with the message – including, if necessary, printing it and/or providing it to the civil authorities.

Section 2.06 If a Minor sends an Adult a message that causes the Adult to have concerns for the Minor’s health and safety, the Adult should promptly notify parents, civil authorities (as appropriate), and one of the following: the Policy Coordinator, the Committee, a member of the HAC Board, or the National Responsible. If the message causes the Adult to believe the Minor is threatened with immediate harm (or is threatening to harm him/herself or others), the Adult should first contact the Police, Child Abuse Hotline, and/or other emergency services to assist the endangered Minor, and then notify any of the above-mentioned individuals within CL US or the HAC.

Section 2.07 The transmission or creation of illegal or immoral materials to, with, or involving Minors (such as pornographic, sexist, harassing, or discriminatory materials) is unacceptable. Such activities must be immediately reported to one of the following: the Policy Coordinator, the Committee, a member of the HAC Board, or the National Responsible.

Section 2.08 The protection of the privacy of Minors (including photos, name, address, e-mail, phone number, etc.) requires that written permission from the parent or guardian be obtained:

- (a) before an Adult shares or posts pictures or videos of Minors; and
- (b) before an Adult shares a Minor’s email, telephone number, or other contact information with other Minors or Adults (for example, if a group of Minors need to be in contact with each other via phone or email, permission must be obtained from the parent or guardian before sharing a Minor’s phone number or email address with other members of the group).

A copy of such written consent shall be kept on file and shall remain in effect until such time as it is modified or revoked by the parent or guardian, or until such time as the Minor reaches the age of 18 (or other in those jurisdictions where the age of majority is different). *See Appendix D, Parent/Guardian Consent Form for*

Electronic Communications with Minors and For Use of Photographs, Videos.

Furthermore,

- (a) Adults should always use the blind carbon copy (BCC) feature when sending an email to more than one Minor, so as to avoid sharing the Minor's email address with others, unless written permission has been received from parents or guardians of all Minors involved.
- (b) Videos and photographs which are posted by electronic means with the permission of the parent or guardian should not give identifying information about the Minor depicted (*i.e.*, full name, addresses, birth date, location, etc.).

Article III. OVERNIGHT EVENTS AND DAY TRIPS

Section 3.01 Overnight events and day trips present unique challenges. This Article, which must be read in conjunction with the entire Policy, provides additional rules for any overnight events or day trips (e.g., CL US vacations, cultural outings, retreats, etc.) involving Minors.

Section 3.02 No overnight CL US educational activities directed to Minors should take place without the express written approval of the National Responsible of CL US and those person(s) appointed by him.

Section 3.03 All Minors on overnight events or day trips must present a signed permission slip from a parent or guardian. Copies of such permission slips must be maintained for a period of no less than six years.

Section 3.04 Parents or guardians of Minor participants must be permitted to contact their children at any time during an overnight event, and to withdraw their children from the event at any time and for any reason. Parents of Minor participants are also entitled to be fully informed of all planned activities that will take place during the overnight event or day trip.

Section 3.05 Adults organizing, supervising, and/or participating in overnight events or day trips involving Minors must be extra vigilant to cultivate and protect healthy relationships between all persons involved in such events or trips. In particular:

- (a) a sole Adult may never enter a locker room, dressing room, bedroom, shower, or bathroom being used by a Minor, except in the case of an emergency to ensure safety or health or to preserve order;
- (b) two or more Adults should conduct routine room checks;
- (c) Minors are not permitted to leave the location where the overnight event is taking place, except as part of a group that is under the direct supervision of two or more Adults.

Section 3.06 A minimum of two Adults are required as chaperones on all overnight events or day trips with Minors. The minimum ratio for Adults to Minors on an overnight event or day trip is:

- (i) *Knights: – 1 Adult per 6 Minors (but not less than 2 Adults);*
- (ii) *GS – 1 Adult per 10 Minors (but not less than 2 Adults);*
- (iii) *Provided, however, that in dioceses that allow or require different Adult to Minor ratios, the local diocesan guidelines will be followed, but in no case should less than two Adults partake in such events.*

Section 3.07 The following guidelines must be followed with regard to sleeping accommodations:

- (a) There must be separate bedrooms/sleeping areas, bathrooms, and showers for males and females on overnight events;
- (b) In open dormitory-style facilities males and females must sleep in different areas separated by a wall or partition. Adults should sleep in separate sections from Minors, but with the ability to supervise for safety and appropriate behavior. Male and female participants may not sleep in connecting rooms;
- (c) Dormitory areas for Minors must be overseen by at least two Adults;
- (d) No Minor is permitted to sleep in a bedroom with an Adult, except in the case of a Minor sleeping in the room of their own parent or guardian.

Section 3.08 Hazing, harassment, and physical rough-housing, horseplay, or violence directed at Minors by Adults, even in the context of games and outdoor or group activities, are strictly forbidden and are considered highly inappropriate behavior that merits immediate reporting to one of the following: the Policy Coordinator, the Committee, the National Responsible or the HAC Board.

Section 3.09 Under no circumstance will Minors be physically restrained or

deprived of their ordinary senses in any way (*e.g.*, kept in darkness, provided with alcohol or drugs), be subjected to any humiliating or demeaning treatment (*e.g.*, any form of hazing or corporal punishment), or be deprived of a reasonable amount of sleep.

Section 3.10 Under no circumstance will Minors be required by an Adult or by another Minor to make a promise of secrecy about what happens at CL US events or about any aspect of CL US.

APPENDIX B

**ACKNOWLEDGMENT OF RECEIPT OF THE POLICY
FOR THE PROTECTION OF MINORS**

I have received a copy of the Policy for the Protection of Minors of CL US and the Human Adventure Corporation (“the Policy”).

By signing below, I acknowledge that I have read the Policy, including the Code of Conduct for Personnel in Contact with Minors and the reporting requirements for allegations of Child Sexual Abuse and other violations of this Policy.

I further acknowledge that I understand the content and meaning of the Policy, and I agree to conduct myself in accordance with its terms.

I acknowledge that the Policy is not intended to create or expand upon any common law or contractual obligations, express or implied, on the part of HAC, CL US, or any of their employees, agents or assigns.

Dated: _____

Signature

Printed Name

APPENDIX C

CONTACT INFORMATION

As of March 11, 2024

COMMITTEE FOR THE PROTECTION OF MINORS:

- Mrs. Therese Gower, BSN, RN
Missouri
TGower@clhac.com
(816) 868-9501
- Rev. Scott A. Hastings, MDiv, MA, JCL
Nebraska
SHastings@clhac.com
(402) 679-4977
- Ms. Holly Peterson, PhD
Ohio
HPeterson@clhac.com
(916) 505-6989
- Ms. Rachelle Ramirez, Esq.
North Carolina
RRamirez@clhac.com
(980) 285-8338
- Mr. Jose Redondo, Sr., PhD
Florida
JPrendondosr@clhac.com
(305) 903-4252

POLICY COORDINATOR:

- Mr. Marco Saccaggi
msaccaggi@humanadventurecorp.org
(937) 266-8792

THE HAC BOARD:

- Mr. Steven Brown, President
sbrown@humanadventurecorp.org
(240) 354-1843
- Dr. Renzo Canetta, MD – Financial Officer
renzo.canetta@gmail.com
(203) 710-7717
- Mr. Jonathan Fromm – Secretary
jffromm@gmail.com
(347) 886-5933
- Ms. Barbara Gagliotti
bgagliotti@clhac.com
(240) 731-4985
- Mr. Marco Saccaggi
msaccaggi@humanadventurecorp.org
(937) 266-8792

NATIONAL RESPONSIBLE OF CL US:

- Fr. Michael Carvill

mcarvill@humanadventurecorp.org

(303) 900-2652

NEW YORK STATE CHILD ABUSE HOTLINE:

- New York Statewide Central Register of Child Abuse and Maltreatment, commonly known as the Child Abuse Hotline: (800) 342-3720.

APPENDIX D

PARENT/GUARDIAN CONSENT FOR ELECTRONIC COMMUNICATION & USE OF PHOTOS, VIDEOS

In order to ensure transparency and parental involvement, and consistent with the principles set forth in the Policy for the Protection of Minors, Communion and Liberation, United States (“CL US”), and the Human Adventure Corp. (“HAC”), have created this Parent/Guardian Consent Form for Electronic Communications with Minors, requesting that Parents or Guardians select, in advance, the methods and media by which Adults working with Minors in CL US activities directed toward Minors may communicate electronically with those Minors.

Any and all digital networking and communication including but not limited to, email, texting, videoconferencing, Facebook, Twitter, other Social Networking sites, etc., from Adults to Minors in CL US activities will be ministry related and NOT personal in nature and will conform to the requirements of the Code of Conduct set forth in the Policy for the Protection of Minors.

Name of Parent/Guardian: _____

Name of Minor Child(ren): _____

Name of CL US or HAC Program: _____

Approved Parent/Guardian Communication Methods (Indicate all that apply):

Home Phone – Please provide, if applicable: _____

Parent’s Cell Phone (phone/text) – Please provide, if applicable: _____

Parent’s Email Address – Please provide, if applicable: _____

Other (please explain): _____

Please check the box reflecting your choice, on behalf of your Minor child:

_____ Adult leaders may not contact my child(ren) directly.

_____ Adult leaders may contact my child(ren) directly, pursuant to the methods authorized below:

Approved Child(ren) Communication Methods (Indicate all that apply):

Home Phone – Please provide, if applicable: _____

Minor’s Cell Phone (phone/text) – Please provide, if applicable: _____

Minor’s Email Address – Please provide, if applicable: _____

Sharing Contact Information (Please check the box(es) reflecting your choice):

_____ Adult leaders may share my child’s email address, cell phone number or other contact information approved above with other Adult leaders and Minors or young people involved in the CL US or HAC activity.

_____ Adult leaders may not share my child’s email address, cell phone number or other contact information with anyone.

Use of Minor’s Image or Likeness, in Photos or Videos (Please check the box(es) reflecting your choice):

_____ Adult leaders have permission to use my child’s likeness, including photographs or videos depicting my child, in print or electronic materials publicizing or reporting on the CL US or HAC activities.

_____ Adult leaders do not have permission to use my child’s likeness, except for specific events that I will choose from time to time – in which case I will grant permission at that time.

The consent provided herein shall remain in effect until such time as it is modified or revoked by the Parent or Guardian, or until such time as the Minor reaches the age of 18.

Dated: _____

Signature: _____

Printed name & Relationship to Minor: _____

APPENDIX E

PROMULGATION AND REVISION HISTORY¹

- Policy adopted on August 24, 2020, by Resolution of the Board of Directors of the Human Adventure Corp., and by Fr. José Medina, National Responsible of CL US.
- September 1, 2020: Revised/Updated Contact Information in Appendix C.
- September 6, 2020: Revised/Added new HAC Board Member, Ms. Barbara Gagliotti, *see* Appendix C.
- September 8, 2020: Revised/Updated Contact Information in Appendix C.
- September 14, 2020: Revised/Removed Member of the Committee, Ms. Margaret Laracy, *see* Appendix C.
- September 18, 2020: Revised/Removed HAC Board Member, Mr. Maurizio Capuzzo, *see* Appendix C.
- September 23, 2020: Revisions, amendments to Section 8.03; Footnote 3 on page 20; and Section 9.03, pursuant to Resolution of the Board of Directors, dated September 23, 2020.
- December 31, 2020: Revisions, amendments to Section 8.03 and Footnote 3 on page 20, pursuant to Resolution of the Board of Directors, dated December 23, 2020, and effective December 31, 2020.
- April 9, 2021: Revised/Added Member of the Committee, Ms. Amy Hickl, *see* Appendix C.
- April 14, 2021: Revised/Removed HAC Board Member, Mr. Joseph Wiener, *see* Appendix C. Revised/Added new HAC Board Members, Mr. Jonathan Fromm, Samuel Nelson, Marco Saccaggi, *see* Appendix C.
- June 9, 2021: Revisions, amendments to Section 8.03 and Footnote 3 on page 20, pursuant to Resolution of the Board of Directors dated June 5, 2021, and effective May 15, 2021.
- October 15, 2021: Revisions, amendments to Section 8.03 and Footnote 3 on page 20, pursuant to Resolution of the Board of Directors, dated October 14, 2021 and effective October 1, 2021.
- February 11, 2022: Revisions, amendments to Section 8.03 and Footnote 3 on page 20, pursuant to Resolution of the Board of Directors, dated Feb. 1, 2022 and effective January 31, 2022.
- June 2, 2022: Revised/Added new National Responsible of CL US, Fr. Michael Carvill, *see* Appendix C.

¹ Revisions cited here do not include de minimis changes such as contact information.

- February 20, 2023: Revised Policy Adopted by Resolution of the Board of Directors of the Human Adventure Corp. and by Fr. Michael Carvill, National Responsible of CL US. Removed Ms. Marcie Stockman as a member of the Committee. Added Mr. Steven Brown as Vice President of the HAC Board, *see* Appendix C.
- June 1, 2023: Revised/Removed HAC Board Member, Mr. Marco Aiolfi, *see* Appendix C. Revised/Added HAC Board Member, Mr. Steven Brown, *see* Appendix C. Revised/Added Member of the Committee, Ms. Therese Gower, *see* Appendix C.
- October 28, 2023: Removed Ms. Amy Hickl as a member of the Committee.
- December 20, 2023: Added Section 6.06 on page 11, pursuant to Resolution of the Board of Directors, dated Dec. 20, 2023 and effective Dec. 20, 2023. Added Section 7.07 on page 12, pursuant to Resolution of the Board of Directors, dated Dec. 20, 2023 and effective Dec. 20, 2023. Revisions, amendments to Section 8.05 on page 13, pursuant to Resolution of the Board of Directors, dated Dec. 20, 2023 and effective Dec. 20, 2023. Revised/Added Member of the Committee, Ms. Holly Peterson, *see* Appendix C. Replaced Luigi Tanzi with Marco Saccaggi as Policy Coordinator, pursuant to Resolution of the Board of Directors, dated Dec. 20, 2023 and effective Dec. 20, 2023, *see* Appendix C.
- February 5, 2025: Revised/Removed HAC Board Member, Mr. Samuel Nelson, who withdrew from the HAC Board effective March 11, 2024, *see* Appendix C.