

# POLICY FOR THE PROTECTION OF MINORS, YOUNG PEOPLE, AND VULNERABLE ADULTS

Communion and Liberation in the United States

and

The Human Adventure Corporation

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## **Article I. INTRODUCTION**

**Section 1.01** The Fraternity of CL (“the Fraternity”) is a Catholic Universal Association of the Faithful, recognized by the Pontifical Council for the Laity on February 11, 1982. It is made up of adults who freely commit themselves to following Christ and the Church through the method passed down by its founder, Fr. Luigi Giusanni. The Fraternity is headquartered in Milan, Italy. Its members are spread throughout the world.

**Section 1.02** Within the United States, the Fraternity is led by a National Responsible, who is an individual designated by the President of the Fraternity to lead the pastoral and educational activities of the Fraternity 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 not-for-profit corporation which acts as the administrator of CL US. HAC is governed by a Board of Directors and is headquartered in New York, New York.

**Section 1.04** This Policy is binding upon and intended to govern any and all Adults in the educational or pastoral activities of CL US and HAC, anywhere within the United States, particularly those who work with Minors, Young People, or Vulnerable Adults (as those terms are defined herein).

**Section 1.05** CL US and HAC firmly condemn any conduct that is not in keeping with this Policy, including the annexed Code of Conduct (“Policy”).

**Section 1.06** The protection of Minors, Young People, and other Vulnerable Persons is a constituent part of the educational and formative proposal of Communion and Liberation. It concerns not only those involved in educational and pastoral activities with Minors, Young People, and Vulnerable Adults, but all members, who are called, on the one hand, to maintain a lifestyle and personal relationships that are beyond reproach, and on the other, to actively commit to preventing abuse, raising awareness, and spreading a culture characterized by respect and care for the weakest persons. Indeed, CL US and HAC are unconditionally committed to ensuring a productive, healthy, and respectful environment in all educational and pastoral activities of Communion and

Liberation and in particular with those activities that involve Minors, Young People or Vulnerable Adults.

**Section 1.07** Those in leadership roles in activities dedicated to Minors and Young People or Vulnerable Adults must, in addition to expressing a sincere educational passion evidenced at the professional and vocational level, demonstrate emotional maturity, as well as embody a sincere dedication to and proven fidelity in following the path of Communion and Liberation.

**Section 1.08** All Adults involved in education and pastoral activities with Minors, Young People, or Vulnerable Adults must cultivate in the educational relationship a deep respect for the freedom of conscience of entrusted to their care and a highly sensitive concern for the protection of their personal privacy.

**Section 1.09** Vigilance is advised in the use of language, which ought to always be respectful, seeking for and emphasizing all that is beautiful, noble, and pure, no matter the means of communication chosen, particular as it respects social media.

**Section 1.10** The utmost discretion in physical gestures is also required. In these gestures, Adults should never exceed the limits of a cordial friendship that is always openly shared with other Adults and other Young People present.

**Section 1.11** To this end, self-referential attitudes and personalistic bonds that might generate misunderstandings and inhibit a healthy relational dynamic both at the educational level and in friendships among peers, must be avoided.

**Section 1.12** For all Adults working with Minors, Young People or Vulnerable Adults, this Policy requires training and a background check. Clerics or religious must also inform the legitimate ordinary and/or their superior of their involvement in activities of CL US involving Minors, Young People, or Vulnerable Adults.

**Section 1.13** The assessment of the suitability of those Adults involved in educational and pastoral activities with Minors, Young People, or Vulnerable Adults, commensurate with the educational commitment undertaken and considering the number of persons involved and the scale of the activities proposed, is the responsibility of the National Responsible of CL US or a person(s) appointed by him.

**Section 1.14** This Policy is intended to establish clear guidelines and a code of conduct for all Adults who work with Minors, Young People, or Vulnerable Adults in the educational or pastoral activities of CL US and to protect the human and baptismal dignity of all those who participate in these activities, in particular the youngest and weakest, through prevention and training programs related to sexual abuse, a clear reporting process for any allegations of inappropriate behavior that are brought to our attention, and proposals of accompaniment to care for anyone who may have suffered any violation in one of the educational or pastoral activities of Communion and Liberation in the United States.

**Section 1.15** The overriding goal of this Policy is to safeguard and protect the Minors, Young People, and Vulnerable Adults who participate in the educational and pastoral activities of Communion and Liberation in the United States for Minors and Young People in middle school, high school, or university, as described in Article II herein or any other ministry or program that involves Adults working with Minors, Young People, or Vulnerable Adults and is organized, hosted, or sponsored by CL US or HAC. This Policy seeks to fulfill this critical goal in four specific ways:

- (i) By thoroughly screening and supervising all Adults who work with Minors, Young People, or Vulnerable Adults as part of their employment by, volunteer work, or ministry with CL US or HAC;*
- (ii) By requiring that Adults who work with Minors, Young People, or Vulnerable Adults involved in educational and pastoral activities sponsored by Communion and Liberation are aware of and agree to be governed by this Policy and the Code of Conduct promulgated herewith;*
- (iii) By providing appropriate training in recognizing and reporting suspected child sexual abuse to Adults involved in Communion and Liberation activities with Minors, Young People, or Vulnerable Adults; and*
- (iv) By establishing clear reporting requirements and procedural steps which are to be taken once a report of suspected child sexual abuse, sexual misconduct, or other inappropriate behaviors in violation of this Policy is made to leadership within CL US or HAC.*

**Article II. STATEMENT OF COMMUNION AND LIBERATION'S EDUCATIONAL AND PASTORAL PATH**

**Section 2.01 Middle School Age Minors in CL US:** The relevant educational and pastoral activities of CL US aimed at middle-school-aged Minors, conducted under various names and in various locations, include:

- (a) A beginning day and concluding day for each year that are aligned with the beginning and end of the school year, respectively. These involve day trips organized by Adults, and are characterized by a proposal of age-appropriate Christian friendship that typically involves outdoor games, visits to sites significant for their history or beauty, and the celebration of Mass;
- (b) Regular meetings of varying frequency, guided by Adults, intended as moments of recreation dedicated to games and conversation for the purpose of cultivating familiarity with Jesus Christ;
- (c) “Promise”: an annual two-day trip, usually to a significant Christian landmark that can be easily reached by the participating groups from different locations, during which students promise or renew their promise to be faithful to their friendship with Jesus under the guidance and protection of a saint selected by each individual participant;
- (d) Summer vacations: a short period of vacation in a place, preferably in the mountains, with lodgings featuring decent rooms and facilities that provide the highest possible amount of discretion for each person’s privacy and respects the separation of genders and of different age groups. These are privileged times to share free time together with games, singing, hikes, witnesses by those who live notable examples of Christian life, and common prayer, all under the responsible guidance of Adults;
- (e) Other educational or recreational activities under the responsible guidance of Adults.

**Section 2.02 High School Age Minors and Young People in CL US:** Minors and Young People in high school are offered the possibility of participating in the educational path of Gioventù Studentesca (“GS”). The educational and pastoral activities offered by CL US through GS are marked by the following proposals:

- (a) A beginning day and concluding day for each year that are aligned with the beginning and end of the school year, respectively, and are characterized by shared time for recreation and conversations in assemblies, and concludes with the celebration of Mass;
- (b) Regular meetings of varying frequency called the “radius,” guided by Adults. These meetings are moments of assembly, which begin with communal singing and end with common prayer. They are dedicated to the verification of the relevance of the Christian encounter to the needs of daily life in the environments of school and home and with friends, the realities where the human and Christian growth of Young People is played out;
- (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 Minors and Young People, accompanied by Adults, participate in a meditation on the Lord’s Passion, death, and resurrection, led by an assigned priest, with a celebration of the Mass of the Lord’s Supper and a Way of the Cross, personal and communal time for silence, and an assembly for the purpose of sharing experiences gained from participating in the gesture;
- (d) Summer vacations: a short period of vacation in a place, preferably in the mountains, in lodgings featuring decent rooms and facilities that provide the highest possible amount of discretion for each person’s privacy, respecting the separation of genders and of different age groups. These are privileged times to share free time together, with games, singing, hikes, significant witnesses to Christian life, and common prayer, all under the responsible guidance of Adults;
- (e) Charitable work: a regular gesture to educate about the importance of charity, taking place under the responsible guidance of Adults, which requires the faithful commitment of one’s free time without compromising one’s studies or taking away from time with family, to share with those in situations of need or poverty, as they arise, in the various places where GS is present;
- (f) Other educational or recreational activities under the responsible guidance of Adults.



**Section 2.03 College/University Aged Young People in CL US:** Young People in College or University are offered the possibility of participating in the educational path of Communion and Liberation - University (“CLU”). The educational and pastoral activities offered by CL US through CLU are marked by the following proposals:

- (a) A beginning day and concluding day for each year that are aligned with the beginning and end of the school year, respectively, and are characterized by shared time for recreation and conversations in assemblies, and concludes with the celebration of Mass;
- (b) School of Community: a catechesis based on texts by Fr. Giussani, which is the Movement’s primary educational tool to develop one’s awareness and affection within the experience of having encountered the charism. It consists of a weekly/biweekly meeting freely convened by a group of people, usually set in a public place or workplace;
- (c) Spiritual Exercises: a three-day retreat dedicated to communal prayer including the Liturgy of the Hours, listening to meditations proposed by the president of the Fraternity or a priest he delegates, daily Mass, individual and communal times for silence, and a time of assembly to share questions and experiences inspired by participation in the gesture;
- (d) Summer/winter vacations: a short period of vacation in a place, preferably in the mountains, in lodgings featuring decent rooms and facilities that provide the highest possible amount of discretion for each person’s privacy, respecting the separation of genders and of different age groups. These are privileged times to share free time together, with games, singing, hikes, significant witnesses to Christian life, common prayer and daily Mass, all under the responsible guidance of Adults;
- (e) Charitable work: a regular gesture to educate about the importance of charity, taking place under the responsible guidance of Adults, which requires faithful commitment of one’s free time without compromising one’s studies or taking away from time with family, to share with those in situations of need or poverty, as they arise, in the various places where CLU is present; and

(f) Other educational or recreational activities that may arise.

**Section 2.04 Adults in CL US:** The educational path of adults in Communion and Liberation is marked by the following communal events:

- (a) **School of Community:** a catechesis based on texts by Fr. Giussani, which is the Movement's primary educational tool to develop one's awareness and affection within the experience of having encountered the charism. It consists of a weekly/biweekly meeting freely convened by a group of people, usually set in a public place or workplace;
- (b) **Beginning Day:** a gathering that includes an introductory reflection on the path to be followed during the course of the social year, concluding with a celebration of the Mass;
- (c) **Spiritual Exercises:** a three-day retreat dedicated to communal prayer including the Liturgy of the Hours, listening to meditations proposed by the president of the Fraternity or a priest he delegates, daily Mass, individual and communal times for silence, and a time of assembly to share questions and experiences inspired by participation in the gesture;
- (d) **Winter/summer vacations:** short recreational holidays as a community, preferably in the mountains, dedicated to reviewing the course of human education taking place over the year in a context of hikes, games, conversations, and witnesses in a fraternal environment, supported by the pillars of common prayer and daily Mass. The vacations are organized by the free initiative of adults involved in guiding the many different communities throughout the world and involve an equally free participation of adults interested in such a recreational experience;
- (e) **Charitable work:** a regular gesture to educate about the importance of charity, which requires the faithful commitment of one's free time without compromising the serious responsibilities of one's profession or particular state of life, to share with those in situations of need or poverty, as these situations arise, including as the result of a request or notification from ecclesiastical authorities, in the various places where Communion and Liberation is present;

(f) Other educational or recreational activities that may arise.

### **Article III. GENERAL PRINCIPLES UNDERLYING THIS POLICY**

**Section 3.01** The protection of Minors, Young People and Vulnerable Adults is a constituent part of the educational and formative proposal of Communion and Liberation. All Adults working with Minors, Young People, and Vulnerable Adults in the pastoral or educational activities of CL US must maintain a lifestyle and personal relationships that are beyond reproach, and actively commit to preventing abuse, raising awareness, and spreading a culture characterized by respect and care for the weakest persons.

**Section 3.02** Those Adults in leadership roles in CL US activities, particularly those dedicated to Minors, Young People, and Vulnerable Adults must, in addition to expressing a sincere educational passion evidenced at the professional and vocational level, demonstrate emotional maturity, as well as embody a sincere dedication to and proven fidelity in following the path of Communion and Liberation.

**Section 3.03** All Adults involved in CL US educational and pastoral activities with Minors, Young People, or Vulnerable Adults must cultivate in the educational relationship a deep respect for the freedom of conscience of the people entrusted to their care and a highly sensitive concern for the protection of their personal privacy.

**Section 3.04** All Adults involved in CL US educational and pastoral activities with Minors, Young People, or Vulnerable Adults must be vigilant in the use of language, which ought to always be respectful, seeking for and emphasizing all that is beautiful, noble, and pure, no matter the means of communication chosen, particularly as it respects social media.

**Section 3.05** All Adults involved in CL US educational and pastoral activities with Minors, Young People, or Vulnerable Adults must be mindful of proper boundaries in physical gestures towards them. In gestures and interactions with Minors, Young People, or Vulnerable Adults, Adults should never exceed the limits of a cordial friendship that is always openly shared with other adults and others present.

**Section 3.06** Adults and Minors or Young People must live and interact openly, ever-mindful of the appropriate boundaries that exist in relationships between Adults and Minors or Young People and ever-vigilant to maintain those boundaries at all times.

**Section 3.07** All Adults involved in CL US educational and pastoral activities with Minors, Young People or Vulnerable Adults must avoid self-referential attitudes and personalistic bonds that might generate misunderstandings and inhibit a healthy relational dynamic both at the educational level and in friendships among peers. A relationship is inappropriate when it is no longer that of an Adult and a Young Person, but that expected to between contemporaries or peers. The concept of “preference” in the context of CL must never be misconstrued to encourage or allow exclusive, intimate, or otherwise inappropriate relationships between Adults and Minors, Young People, or Vulnerable Adults. Indeed, special care must be given to ensure that an Adult does not foster an exclusive, affective, one-on-one relationship with an unrelated Minor, Young Person, or Vulnerable Adult.

**Section 3.08** All Adults working with Minors, Young People, or Vulnerable Adults in CL US educational or pastoral activities must undergo training and a background check. Clerics or religious must also inform the legitimate ordinary and/or their superior of their involvement in such activities.

**Section 3.09** All Adults have the responsibility to speak up and be heard if a relationship between an Adult and a Minor or Young Person conveys even the appearance of impropriety.

**Section 3.10** This Policy and the accompanying Code of Conduct, annexed as Appendix “A,” describe the proper relationship between an Adult and a Minor, Young Person, or Vulnerable Adult in all educational or pastoral activities of CL US. The Policy also provides specific procedures designed to address reported or perceived violations of that Code of Conduct. In the most general terms, the Policy requires that:

- (a) All Adults involved in CL US educational and pastoral activities must at all times maintain appropriate boundaries with the Minors, Young People, or Vulnerable Adults participating in those activities;

- (b) All Minors, Young People, or Vulnerable Adults participating in CL US and HAC activities must be made aware of these boundaries;
- (c) Any Minor, Young Person, or Vulnerable Adult 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, Young Person, or Vulnerable Adult – 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.

#### **Article IV. SOURCE MATERIAL FOR THIS POLICY**

**Section 4.01** 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.

**Section 4.02** 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 or pastoral activities of CL US and HAC involving Minors, Young People, or Vulnerable Adults within the United States.

**Section 4.03** 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 4.04** 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”).

**Section 4.05** 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. (*See also*, Article V, below.)

**Section 4.06** 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 4.07 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 its directors, responsables, volunteers, employees, or other representatives, including the Policy Coordinator or the members of the Committee for the Protection of Minors.

**Article V. THIS POLICY SUPPLEMENTS BUT DOES NOT REPLACE EXISTING CIVIL MANDATORY REPORTING OBLIGATIONS AS TO CHILD ABUSE, INCLUDING BUT NOT LIMITED TO CHILD SEXUAL ABUSE**

**Section 5.01** Nothing herein is intended to, nor shall it, supersede, limit, or abridge in any way any existing Local Civil Law, including but not limited to 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.

## **Article VI. DEFINITIONS**

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

**Section 6.01 “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. *See* Section 4.03 of this Policy.

**Section 6.02 “Child Pornography”** shall include, but not be limited to, 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 for purposes of sexual gratification, including, but not limited to:

- (a) Images of actual or simulated sexual acts in which a Minor is a participant;  
or
- (b) Lascivious exhibition of the genitals or pubic area of a Minor.

**Section 6.03 “Child Sexual Abuse”** shall include, but not be limited to:

- (a) Any Sexual Act between an Adult and a Minor;
- (b) Soliciting Sexual Acts or sexual materials from a Minor;
- (c) Possession of Child Pornography;
- (d) Providing Sexual Materials to 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 offense involving sexual conduct committed against a Minor that is prohibited by Civil or Canon Law.

**Section 6.04 “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 Personnel are engaged in educational or pastoral activities sponsored by, funded in whole or in part, or otherwise overseen or facilitated by HAC or CL US. 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 6.05 “Code of Conduct”** means the rules of behavior and guidelines for maintaining proper professional boundaries for Adults in contact with Minors and Young People, as articulated in the context of this Policy and set forth specifically at Appendix “A” hereto.

**Section 6.06 “Committee for the Protection of Minors” or “Committee,” as used herein,** shall mean a committee comprised of no less than three (3) and no more than five (5) individuals, each of whom shall be a person of outstanding integrity and good judgment in full communion with the Church.

- (a) Contact information for the Committee for the Protection of Minors is provided at Appendix “C” to this Policy;
- (b) The members of the Committee shall be appointed and serve in accordance with the following:
  - (i) *The National Responsible of CL US shall select one member of the clergy to serve on the Committee at all times (“the Clergy Committee Member”). The remaining member(s) of the Committee shall be appointed by Majority Vote of the HAC Board. At least two members of the Committee should be lay persons and, ideally, at least one of the members of the Committee should have particular education and/or specialized expertise in the treatment or investigation of sexual abuse of Minors;*
  - (ii) *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;*



(iii) *The members of the Committee shall be appointed upon adoption of this Policy to serve three, four, and five-year renewable terms;*

(c) The principal duties of the Committee for the Protection of Minors are set forth in this Policy, and shall include but not be limited to: administering this Policy with the assistance of the Policy Coordinator; receiving, initially evaluating, and as appropriate arranging for internal investigation of allegations of conduct in violation of this Policy; referring any alleged victims of sexual abuse and/or their family members to available victims' support services; reporting its conclusions and recommendations to the HAC Board and the National Responsible of CL US at the close of any such initial evaluation and/or internal investigation; and providing periodic reports to the HAC Board and the National Responsible of CL US as to the administration of this Policy and any recommendations for amendments hereto;

(d) The Committee for the Protection of Minors shall be assisted by the Policy Coordinator, whose duties are set forth below.

**Section 6.07 “Communion and Liberation in the United States” or “CL US”** as used herein shall mean the Fraternity of Communion and Liberation in the United States, which engages in the educational and pastoral activities and events for Minors, Young People, and Adults identified in Article II herein.

**Section 6.08 “HAC Board” or “Board”** in the context of this Policy shall mean the Board of Directors of the Human Adventure Corporation.

**Section 6.09 “Human Adventure Corporation” or “HAC”** shall mean the nonprofit public benefit corporation by that name, with a principal place of business at 125 Maiden Lane, New York, New York (“HAC’s National Office”).

**Section 6.10 “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 for the Protection of Minors, 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 6.11 “Minor”** in the context of this Policy means a person who has not yet attained 18 years of age (except in those jurisdictions where the age of majority is 19 years of age under Local Civil Law – in which case the definition of Minor in this Policy shall refer to a person who has not yet attained 19 years of age).

**Section 6.12 “Misconduct”** means a violation of one or more provisions of the Code of Conduct that does not rise to the level of Child Sexual Abuse, Sexual Misconduct, or Sexual Harassment, as those terms are defined herein.

**Section 6.13 “National Responsible of CL US” or “National Responsible”** shall mean the officially designated and appointed National Responsible of CL in the USA appointed by the president of the Fraternità di Comunione e Liberazione.

**Section 6.14 “Personnel” or “Adult,”** as used in this Policy, includes all persons at least 18 years of age<sup>1</sup> (including clergy, religious, and laity) who: (a) are employed by or are under personal contract with CL US or the HAC; (b) have been designated as a National, Regional, or Local Responsible of CL US; or (c) volunteer in any capacity in any CL US educational or pastoral activities involving Minors, Young People, or Vulnerable Adults, including but not limited to CL Knights, GS and CLU. Of special concern for the purposes of this Policy are those Adults working or volunteering in supervisory, mentoring, or leadership roles for CL US, whose duties include regular contact with Minors and Young People, the elderly, and the physically or mentally infirm; those who mentor or counsel others; and, generally, those who work with people who are vulnerable or less capable of protecting themselves.

**Section 6.15 “Policy Coordinator”** means an individual appointed by the HAC Board to assist the Committee for the Protection of Minors, the HAC Board, and the National Responsible of CL US with the administrative, organizational, and record-keeping requirements of this Policy.

- (a) The Policy Coordinator may be compensated for his/her services, in an amount to be determined by the HAC Board, and shall serve at the pleasure

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<sup>1</sup> Or 19 years of age in those jurisdictions where persons under the age of 19 are considered Minors under Local Civil Law.

of the HAC Board;

- (b) The principal duties of the Policy Coordinator are set forth in this Policy, and shall include but not be limited to: assisting the Committee for the Protection of Minors, as needed, in the performance of its duties and obligations under this Policy; facilitating and ensuring compliance with procedures for training, screening, and background checks of Personnel, 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, going forward.

**Section 6.16 “Policy for the Protection of Minors, Young People, and Vulnerable Adults” or “Policy,”** as used herein, means this Policy, including the Code of Conduct annexed as Appendix A, and any related procedures established for the protection of Minors, Young People, or others in connection with this Policy, as are or may be adopted and revised from time to time by the National Responsible of CL US and the HAC Board.

**Section 6.17 “Reasonable Cause”** as used herein means that a prudent person, in the totality of the circumstances, would conclude that there is sufficient semblance of truth that an allegation may be credible and is not manifestly false or frivolous.

**Section 6.18 “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 6.19 “Sexual Harassment”** is defined in accordance with applicable federal and state law, and shall include any unwelcome sexual advance(s) or request(s) for sexual favor(s) or any conduct of a sexual nature when:

- (a) Submission to such conduct is made either explicitly or implicitly a term or condition of an individual’s employment or education;
- (b) Submission to or rejection of such conduct by an individual is used as the basis for decisions affecting such individual’s employment or education; or
- (c) Such conduct has the purpose or effect of substantially interfering with an individual’s work or educational performance or creating an intimidating,

hostile, or offensive work or educational environment.

**Section 6.20 “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 6.21 “Sexual Misconduct”** shall mean any action(s) or word(s) of a sexual nature (other than Child Sexual Abuse, as defined herein), contrary to the moral doctrine and teachings of the Catholic Church and that causes harm to others, including, but not limited to:

- (a) Any Sexual Act with another person (minor or adult) without their consent;
- (b) Any sexual conduct that is a violation of Civil Law in the relevant civil jurisdiction;
- (c) Sexual Harassment as defined in this Policy;
- (d) The use of HAC or CL US computers or other equipment, including internet connections, to possess, obtain, or transmit Child Pornography or any other Sexual Materials (as those terms are defined herein); and
- (e) Sexual conduct in violation of appropriate professional standards within a pastoral relationship.

**Section 6.22 “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 offense alleged occurred.

**Section 6.23 “Vulnerable Adult” or “Vulnerable People,”** as used herein, are persons of any age who, due to age, mental, or developmental condition or

disability, habitually lack the use of reason or lack the capacity to give consent.

**Section 6.24 “Young Person” or “Young People,”** in the context of this Policy, means a person who is at least eighteen (18) years of age<sup>2</sup> but has not yet attained twenty-one (21) years of age and who is a participant in HAC or CL US educational or pastoral activities, including but not limited to GS, CLU, and/or a School of Community.

## **Article VII. IMPLEMENTATION AND DISTRIBUTION OF THIS POLICY**

**Section 7.01 Binding Effect:** This Policy and its Code of Conduct shall be binding upon all Adults and Personnel, as defined in Article VI above, involved in the educational and pastoral activities of CL US and/or HAC, particularly those in which Minors or Young People participate or are expected to participate.

**Section 7.02 Interpretation:** This Policy shall be implemented by and interpreted in accordance with the Code of Conduct and procedures identified herein, as well as with any other rules and procedures as may be adopted and implemented from time to time by majority vote of the HAC Board.

**Section 7.03 Effective Date:** This Policy, and any subsequent amendment(s), shall be in effect as of the date it is adopted by vote of the HAC Board of Directors, on behalf of HAC, and the National Responsible of CL US, on behalf of CL US (herein, the “Effective Date”).

**Section 7.04 Distribution:** Within thirty (30) days of the Effective Date, a copy of this Policy shall be published and/or distributed by the HAC Board, in a form and manner reasonably calculated to alert all Adults, as defined herein, of its existence and terms. Any subsequent amendments to this Policy shall likewise be communicated in similar fashion to all Adults, within thirty (30) days of any such amendment being adopted. In addition, the Policy, and any subsequent amendments thereto, shall be published and maintained online through a prominent link on the website of HAC and/or CL US, so as to be readily available for public

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<sup>2</sup> Or 19 years of age in those jurisdictions where persons under the age of 19 are considered Minors under Local Civil Law.

viewing and distribution at all times.

**Section 7.05 Record of Distribution:** Under the supervision of the Policy Coordinator, HAC shall keep and maintain at its National Office, in either hard copy or electronic form, a written record of the dates and manner of the publication and/or distribution to Personnel of this Policy and any subsequent amendments thereto.

**Section 7.06 Acknowledgement of Receipt:** A signed acknowledgment of receipt and understanding of this Policy shall be required of all Adults/Personnel whose service with or for HAC or CL US includes work with Minors, Young People, or Vulnerable Adults in any of the educational or pastoral activities of CL US. The required acknowledgment form is attached to this Policy as Appendix “B.”

- (a) Those Adults designated by the National Responsible of CL US to lead educational and pastoral activities with Minors, Young People, or Vulnerable Adults shall be tasked with the obligation to report to and assist the Policy Coordinator in ensuring that all Adults covered by this Policy have received a copy of this Policy and submitted a signed acknowledgement of receipt of this Policy, and have been deemed suitable by National Responsible of US, before they work with Minors, Young People, or Vulnerable Adults in any educational or pastoral activity of CL US;
- (b) Acknowledgment of receipt and understanding of this Policy shall be included in any written contracts of employment with HAC or CL US;
- (c) 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 at HAC’s National Office, in either hard copy or electronic form, for no less than the duration of the Personnel’s service for HAC or CL US (either employment or volunteer), plus six (6) years.

**Section 7.07 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 covered by this Policy to comply with this Policy.

## **Article VIII. PERSONNEL EDUCATION AND TRAINING**

**Section 8.01 Training Requirement:** In addition to receiving a copy of this Policy and Code of Conduct, all Personnel must also receive training regarding the prevention of Child Sexual Abuse and Sexual Misconduct, including identifying and responding to potential incidents or reports of Child Sexual Abuse or Sexual Misconduct.

**Section 8.02 Form of Training:** Such training may be online offered or in person, at the discretion of the HAC Board. Instructions for accessing, completing, and certifying completion of such training shall be maintained by the Policy Coordinator and provided to all Personnel within ten (10) days after the Effective Date of this Policy, and from time to time thereafter as needed.

**Section 8.03 Time of Training:** All Personnel must complete the training within the following time periods: (1) for Personnel commencing service for HAC or CL US after the Effective Date of this Policy, training must be completed within thirty (30) days of commencement of their volunteer service/employment and *before* they commence working with Minors or Young People, whichever is earlier; and (2) for Personnel whose service for HAC or CL US pre-dates the Effective Date of this Policy, training must be completed by September 1, 2021.

**Section 8.04 FOR THE SAKE OF CLARITY AND TO AVOID CONFUSION: UNTIL SUCH TIME AS AN INDIVIDUAL ACKNOWLEDGES RECEIPT OF THIS POLICY AND COMPLETES AND CERTIFIES COMPLETION OF THE TRAINING REQUIREMENTS, HE/SHE MAY NOT WORK WITH MINORS OR YOUNG PEOPLE IN ANY HAC OR CL US PROGRAM, ACTIVITY, OR MINISTRY.<sup>3</sup>**

**Section 8.05 Training Materials Must Conform to Catholic Teaching:** All training and educational materials to be provided to Personnel pursuant to this Policy shall be approved by the National Responsible of CL US to ensure that they

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<sup>3</sup> However, in the period between the Effective Date of this Policy and September 1, 2021, Personnel in good standing whose service pre-dates the Effective Date, as described in Section 8.03(2) above, may continue to work with Minors and Young People while pursuing the training, screening, and other steps required by this Policy, as long as the Personnel is personally known to and approved for such continued service by either the National Responsible of CL US, a Regional Responsible, or a Local Responsible. (The Policy Coordinator shall keep and maintain a list of all such Personnel who have received such approval.)

conform to the moral teachings of the Catholic Church. No educational materials may be used or distributed that fail to conform to the moral teachings of the Catholic Church.

**Section 8.06 Ensuring Compliance:** The Policy Coordinator shall be charged with working with coordinating with the National Responsible, the Regional Responsibles, and Local Responsibles to ensure that any and all Personnel working with Minors and Young People in CL US programs or ministries have timely completed such training, certified such completion, and provided proof of such compliance to the Policy Coordinator, as required by this Policy. For all programs and ministries sponsored or co-sponsored by HAC or CL US through the CL Knights, GS, and/or CLU, those persons designated by the National Responsible of CL US as Regional Responsibles or Local Responsibles shall each be tasked with the obligation to report to and assist the Policy Coordinator with ensuring compliance with this Article by the Personnel working with Minors and Young People in their respective programs and ministries.

**Section 8.07 Record-Keeping:** Records regarding such Personnel training, including certification of completion of training by Personnel of HAC and CL US, shall be kept and maintained by the Policy Coordinator at HAC's National Office, in hard copy or electronic form, for no less than the duration of the Personnel's service for HAC or CL US (either employment or volunteer), plus six (6) years.

## **Article IX. SCREENING, BACKGROUND CHECKS OF PERSONNEL**

**Section 9.01 Screening of Personnel:** Those Adults in leadership roles in the activities dedicated to Minors and Young People must in addition to expressing a sincere educational passion evidenced at the professional and vocational level, demonstrate emotional maturity, as well as embody a sincere dedication to and proven fidelity in following the path of Communion and Liberation. The National Responsible of CL US and HAC Board reserve the right to make decisions about employment or volunteer service in pastoral and educational activities of Communion and Liberation with Minors, Young People, Vulnerable Adults, or other adults.<sup>4</sup> All Adults shall be screened for suitability by the National

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<sup>4</sup> Notwithstanding the foregoing, HAC and the National Responsible of CL US provide equal employment opportunities to all employees and applicants for employment without regard to race, color, religion, sex, national origin, age, or disability.



Responsible or person(s) appointed by him, before participating in educational or pastoral activities with Minors, Young People, or Vulnerable Adults.

**Section 9.02 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 Committee for the Protection of Minors from time to time.

**Section 9.03 Personnel Must Submit to Background Check:** All Personnel working with Minors, Young People or Vulnerable Adults must provide written consent to submit to a background check, which consent shall be provided within thirty (30) days of being requested by the Policy Coordinator. 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, termination of volunteer service, and being barred from any activity of HAC or CL US.

**Section 9.04 Results of Background Check:** Results of background checks will be provided to the Policy Coordinator, who will initially review them to assess whether the results suggest there may be a risk to Minors or Young People. If the results of a background check suggest that there may be a risk to Minors or Young People, the results shall be referred by the Policy Coordinator to the Committee for the Protection of Minors, which shall then make a recommendation to the National Responsible of CL US and the HAC Board to either grant or deny approval for the Personnel involved to work or participate in CL US or HAC programs or ministries that will put them in contact with Minors and Young People. The Board of HAC shall then, by majority vote, make a final determination as to whether the Personnel involved should or should not be approved for contact with Minors and Young People. The determination to approve or deny such contact shall be communicated to the Policy Coordinator, who shall keep a written record of such determination, 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. In the event the determination is made to deny such contact, the determination shall also be communicated to the Personnel involved and such other persons who, in the judgment of the National Responsible of CL US and the HAC Board should be notified, so as to ensure that the Personnel involved does not thereafter engage with Minors or Young People in any CL US or HAC activity.

**Section 9.05 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 Personnel 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 9.06 Periodic Updates of Background Check:** The Policy Coordinator may periodically request a new background check for Personnel after the passage of six (6) years since the person's last check, or at any time if new information about the person is received regarding a potential incident in violation of the Code of Conduct or of any alleged criminal conduct. Refusal to submit to an updated background check upon request of the Policy Coordinator shall result in termination of employment, termination of volunteer service, and/or being barred from any activity of HAC or CL US.

**Section 9.07 Ensuring Compliance:** The Policy Coordinator shall be charged with coordinating with the National Responsible to ensure that any and all Personnel working with Minors or Young People in CL US have timely complied with this Article by submitting to the background check requirements outlined herein. For all activities sponsored or co-sponsored by HAC or CL US through the CL Knights, GS, and/or CLU, those persons designated by the National Responsible of CL US to lead and be responsible for these activities shall each be tasked with the obligation to report to and assist the Policy Coordinator with ensuring compliance by the Personnel working with Minors and Young People in their respective programs and ministries.

## **Article X. REPORTING REQUIREMENTS WITHIN HAC AND CL US**

**Section 10.01 Obligation to Report Personnel Conduct in Violation of this Policy:** Any person who suspects, witnesses, or receives a report or complaint of alleged Child Sexual Abuse, Sexual Misconduct, or other violations of the Code of Conduct or any other provisions of this Policy, shall immediately report it to any or all of the following people:

- (a) The Policy Coordinator;

- (b) A member of the Committee for the Protection of Minors;
- (c) A member of the HAC Board; and/or
- (d) The National Responsible of CL US.

In addition to the above reporting requirements, where Child Sexual Abuse or other criminal conduct is involved or suspected, a report should also be made to civil authorities, consistent with the requirements of Articles XII and XIII of this Policy.

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 10.02 Contact Information for Reports:** Contact information for each of the people with CL US and HAC to whom a report may be made, as well as the New York State Child Abuse Hotline, is set forth in Appendix “C” hereto.

**Section 10.03 Manner of Handling of Reports of Violations of this Policy:**

- (a) A report of a violation of this Policy or the Code of Conduct should be taken and recorded in the form and manner described in Article XI below;
- (b) Upon receipt of such a report, the person receiving it shall provide a copy of the report to the Policy Coordinator, the Committee for the Protection of Minors, and the HAC Board;
- (c) All such reports shall be processed in accordance with the appropriate provisions of Local Civil Law, Canon Law, and the procedures set forth in this Policy;
- (d) All such reports must also 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 alleged perpetrator.

#### **Section 10.04 Referral to Victims' Services and Other Available**

**Assistance:** When allegations of Child Sexual Abuse or Sexual Misconduct are made, contact with the alleged victim and, if appropriate, the victim's family should be promptly initiated by the Committee for the Protection of Minors and/or its counsel, unless reporting to the Minor victim's family is deemed unsafe for the Minor under the circumstances. The alleged victim (or, if the victim is a Minor, his/her parent or guardian) may be referred to any available victims' assistance services offered by local civil or ecclesial authorities. Medical, psychological, and spiritual assistance and, in appropriate instances, economic assistance may also be offered to the alleged victim in the spirit of Christian justice and charity if, in the judgment of both the Committee and the HAC Board, such assistance is necessary or warranted under the circumstances.

**Section 10.05 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.

### **Article XI. FORM AND INTAKE OF REPORTS OF CONDUCT IN VIOLATION OF THIS POLICY**

**Section 11.01 Form of Report:** Reports of Child Sexual Abuse, Sexual Misconduct or other violations of the Code of Conduct or any other provisions of this Policy should be made in writing, or, if made orally, written down by the person taking the complaint and signed by the person making the complaint (the "complainant").

**Section 11.02 Oral or Unsigned Written Report:** If the complainant fails or refuses to sign the written complaint for whatever reason, the person taking the complaint 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 11.03 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;
- (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 incident, 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 11.04      Anonymous Reports:** Anonymous reports will be given due consideration and such allegations will be promptly evaluated, where sufficient information is provided to allow such evaluation. 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.

**Section 11.05      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 to ensure the preservation and non-destruction of documents or other information within the possession, custody, or control of HAC, CL US, or their agents or assigns.

**Section 11.06      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 but not limited to 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 11.07 Committee Access to Relevant Files:** Upon request, the Committee for the Protection of Minors shall be given full and sufficient access to copies of the entire file gathered by the Policy Coordinator, with respect to any alleged misconduct 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.

**Article XII. REPORTING TO CIVIL AUTHORITIES WHERE CHILD SEXUAL ABUSE IS REPORTED OR SUSPECTED**

**Section 12.01 Child Sexual Abuse is a Crime:** Whenever a complaint or allegation is received by the Policy Coordinator, the Committee for the Protection of Minors, a member of the HAC Board, or the National Responsible of CL US 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 appropriate public prosecutor's office(s), police, or other appropriate civil authorities. **This recommendation that the complainant (or his/her parent or guardian) report the complaint or allegation to the prosecutor, police or other civil authorities should be made immediately and without regard to the commencement or results of the initial evaluation of credibility by the Committee for the Protection of Minors.**

**Section 12.02 Initial Report of Allegations of Child Sexual Abuse:** Immediately after receiving a report of Child Sexual Abuse, the person(s) receiving the report shall provide notice of same, and a copy of any written report, to the Policy Coordinator, the Committee for the Protection of Minors, and the HAC Board; provided, however, that if the alleged abuser is one of the aforementioned individuals, then the notice shall not be directed to him/her. If the person receiving the report is a mandatory reporter under Local Civil Law, then he/she shall also immediately discharge his/her duty to make a report to the appropriate civil authorities, without delay.

**Section 12.03 Immediate Reporting Steps by Committee, in Response to Allegations of Child Sexual Abuse:** Upon receiving a report of Child Sexual Abuse, the Committee 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) Report the allegation to the appropriate civil authorities, including but not limited to the police or public prosecutor's office(s) 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;
- (b) Report the allegation to the appropriate ecclesial authorities whose interests or jurisdiction are implicated by the report (including but not limited to the diocese within which the events are alleged to have occurred) – with such report to be made as quickly as possible, but in no event more than seven (7) days after receiving the report;
- (c) Recommend that the National Responsible of CL US and the HAC Board:
  - (i) notify the accused person in writing that an allegation of Child Sexual Abuse has been made against him/her; and (ii) suspend the accused person from employment, volunteer service or any ministry involving Minors or Young People, immediately and until such time as the allegations are resolved;
- (d) Urge the alleged victim (or, if the victim is a Minor, their parent or guardian) to immediately report the incident directly to the appropriate public prosecutor's office or the police, if this has not already been done; and
- (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.

After the above-outlined steps have been completed, the Committee for the Protection of Minors shall undertake an initial evaluation of the alleged conduct, as outlined in Section 12.04 and Article XIV herein.

**Section 12.04 Initial Evaluation of Allegations of Child Sexual Abuse by Committee:** Promptly after making the reports required by Section 12.03 above, the Committee for the Protection of Minors shall undertake an initial evaluation of the nature, substance, and details of the report, to establish whether there is reasonable cause to believe that the allegation(s) of Child Sexual Abuse is or may be credible (not manifestly false or frivolous). (*See* Article XIV for the purpose and procedures governing the Committee’s initial evaluation.) Upon completing this initial evaluation (which should be completed within several days or as soon as practicable after receiving the report), the Committee for the Protection of Minors shall immediately report its initial conclusions of Reasonable Cause or No Reasonable Cause to the Board of HAC and the National Responsible of CL US, in writing; provided, however, that if the alleged abuser is one of the aforementioned individuals, then the notice shall not be directed to him/her.

**Section 12.05 Immediate Suspension/Leave Based upon Credible Allegations of Child Sexual Abuse:** In the event that the Committee recommends, pursuant to Section 12.03 above, that an accused person be notified and suspended from employment, volunteer service or any other CL US activity involving Minors or Young People, the Committee and/or the HAC Board shall act immediately to implement such a suspension and provide such notice as is necessary and appropriate to ensure its effectiveness. Any such suspension shall remain in place at least until such time as the matter is resolved, whether pursuant to Article XVI of this Policy or to such other civil or ecclesial proceedings as may result. In the case of suspension of employment, such suspension may be with or without pay and/or benefits, as the HAC Board may decide, depending upon the circumstances.

### **Article XIII. MANDATORY REPORTING LAWS**

**Section 13.01** 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.



**Section 13.02** Any HAC or CL US officers, directors, agents, employees or other Personnel who are Mandated Reporters under New York’s Social Service Law (or the analogous Civil Law of another jurisdiction) shall fully comply with the requirements of the Civil Law, including by prompt reporting to civil authorities of suspected child abuse or maltreatment. Such obligations to report under the Social Services Law or other Civil Law are and shall continue to be distinct from, and in addition to, the reporting obligations created by this Policy. A Mandated Reporter’s failure to report as required by Civil Law may be grounds for disciplinary action by CL US or HAC, in addition to any penalties that may be imposed by Civil Law.

**Section 13.03** 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 their supervisor within CL US or HAC, to the Policy Coordinator, the Committee for the Protection of Minors, the National Responsible of CL US, or the HAC Board.

**Article XIV. INITIAL EVALUATION BY COMMITTEE FOR THE PROTECTION OF MINORS OF ALLEGATIONS/REPORTS OF CONDUCT IN VIOLATION OF THIS POLICY**

**Section 14.01** In implementing this Policy, the HAC Board and National Responsible of CL US are particularly mindful of their obligations, under Local Civil Law, to take reasonable steps to protect the Minors and Young People who engage in the pastoral and educational activities of CL US. For those allegations of Misconduct which do not involve Minors, Young People, or Vulnerable Adults, but which are nonetheless in violation of this Policy, the National Responsible or the HAC Board may refer such matters to the Committee for the Protection of Minors for its initial evaluation and recommendations, consistent with the terms of this Policy.

**Section 14.02** Upon receiving a report or allegation of conduct in violation of this Policy or its Code of Conduct, the initial and immediate goals of the Committee are: (1) where allegations of Child Sexual Abuse are involved, to immediately comply with any mandatory reporting obligations and the reporting requirements outlined in Articles XII and XIII above; and (2) undertake an initial evaluation as to whether the report or allegation of conduct in violation of this Policy or its Code of Conduct is supported by Reasonable Cause and thus warrants

further internal investigation.

**Section 14.03 Purpose of Initial Evaluation:** Reports of conduct in violation of this Policy will be initially referred to and evaluated by the Committee for the Protection of Minors which shall promptly consider the nature, substance, and details of the report to determine whether there is Reasonable Cause to believe that the report or allegation is credible (not manifestly false or frivolous). *See* Section 6.17 for definition of Reasonable Cause. This process is referred to herein as the “initial evaluation.”

**Section 14.04 Notice to Complainant:** The complainant shall be notified by the Committee for the Protection of Minors 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 14.05 Finding of Reasonable Cause After Initial Evaluation:** If, upon such initial evaluation, a majority of the Committee Members determines that there is Reasonable Cause to believe that the report or allegation is or may be credible (not manifestly false or frivolous), the Committee shall: (1) so advise the HAC Board and provide a summary of its initial evaluation in writing to the HAC Board; (2) promptly initiate an internal investigation to assess whether the allegations are Substantiated, with notice to the HAC Board; and (3) request that the Board of the HAC and/or the National Responsible of CL US direct and implement whatever interim suspension or other measures may be appropriate while an internal investigation is underway; (*See* Articles XII and XIII for the additional rules and procedures governing allegations of Child Sexual Abuse, Reporting to Civil Authorities, and Mandatory Reporting Laws; *see also*, Article XV below for the rules and procedures governing the conduct of internal investigations.)

**Section 14.06 Finding of No Reasonable Cause After Initial Evaluation:** In the event a majority of the Members of the Committee for the Protection of Minors finds that there is no Reasonable Cause to believe the report or allegation is or may be credible, the Committee shall so advise the HAC Board who shall then decide, by majority vote, whether (a) to accept the Committee’s finding and mark the matter as closed, with a finding of no Reasonable Cause; or (b) to reject the Committee’s finding of no Reasonable Cause and direct the Committee to commission an internal investigation in connection with the report or allegation, based upon the HAC’s Board’s independent finding of Reasonable Cause.

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

**Section 15.01 Commissioning of Internal Investigation:** In the event that, upon initial evaluation, there is a finding of Reasonable Cause to believe the allegations of conduct in violation of this Policy are credible (not manifestly false and frivolous), then the Committee for the Protection of Minors shall promptly commission an internal investigation into allegations covered by this Policy.

**Section 15.02 Scope, Duration and Nature of Investigation:** It shall be within the discretion of the Committee for the Protection of Minors to define the scope, duration, and nature of the internal investigation in any given case. The scope, duration, and nature of the 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.

**Section 15.03 Dispensing with Investigation in Certain Cases:** In the following circumstances, the Committee may dispense with the internal investigation and present its findings and recommendations directly to the HAC Board: (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 proven to have occurred in a civil court of law or in formal ecclesial proceedings conducted pursuant to Canon Law.

**Section 15.04 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 for the Protection of Minors by competent, objective persons selected by the Committee (*i.e.*, outside counsel and/or private investigator with a background in law enforcement).

**Section 15.05 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 15.06 Committee's Report and Recommendation:** At the conclusion of the internal investigation (or at the conclusion of the initial evaluation, if the internal investigation is dispensed with, pursuant to Section 15.03 above), the Committee for the Protection of Minors shall formulate a report and recommendation to the HAC Board and National Responsible of CL US to either: (a) sustain the charges as Substantiated (as that term is defined in Article VI, Section 6.22 herein) and impose appropriate responsive measures, or (b) dismiss the allegation as not Substantiated and, if appropriate, restore the accused to full service and/or take reasonable measures to mitigate any damage to the accused's reputation.

**Section 15.07 Independent Conclusions:** In overseeing the internal investigation and formulating a report and recommendation, the Committee for the Protection of Minors 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 for the Protection of Minors or on the HAC Board (unless binding pursuant to Local Civil Law or Canon Law). The Committee shall in any event make its own report and recommendations based upon the results of its own evaluation, internal investigation, and/or all other relevant circumstances.

**Section 15.08 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 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 15.09 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), although the precise form and content of such notice shall be within the discretion of the HAC Board.

**Section 15.10 Accused's Rights and Duties:** Accused persons have the following additional rights and duties in connection with an internal investigation:

- (a) The right to be notified that an internal investigation is underway and to be apprised of the general nature of the allegations if, but only if, such notice is not 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 retaliation, harassment, or intimidation; or (iii) expose the identity of a complainant, witness, or alleged victim who has come forward or offered information with a request to maintain anonymity;
- (b) The right to offer information and testimony relevant to the allegations if, in the discretion of the Committee for the Protection of Minors, eliciting such information or testimony from the accused is considered appropriate and necessary 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 15.11 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 shall be authorized to speak for or on behalf of HAC or CL US regarding any subject covered by this Policy.

## **Article XVI. FINAL RESOLUTION OF ALLEGATIONS FOLLOWING INTERNAL INVESTIGATION**

**Section 16.01** At the completion of the internal investigation, the Committee for the Protection of Minors shall consider the findings and report of the investigator and decide, by majority vote: (1) whether or not the allegation is Substantiated within the meaning of Section 6.22, *i.e.*, that, based upon 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 accused person committed the alleged conduct; and (2) if so, what measures are recommended, consistent with Article XVI of this Policy. Dissenting votes, if any, shall be recorded as set forth in Section 6.10.

**Section 16.02** The Committee shall then report its conclusions and recommendations to HAC Board and the National Responsible of CL US, in writing. After review of the Committee's report and any underlying investigative report(s), the HAC Board shall then decide, by majority vote, whether to accept the Committee's conclusions and recommendations as to (a) whether the allegations against the accused are or are not Substantiated, within the meaning of Article VI, Section 6.22 of this Policy, and (b) as to what measures shall be imposed, pursuant to Article XVII or Article XVIII of this Policy. Dissenting votes, if any, shall be recorded as set forth in Section 6.10.

**Section 16.03** For purposes of this Policy, a person shall be deemed to have committed an act of Child Sexual Abuse, Sexual Misconduct, or other Misconduct in violation of the Policy and Code of Conduct if:

- (a) The allegation is determined by the HAC Board, after considering the Committee's report and recommendation, to be Substantiated;
- (b) The accused person is found responsible for, or declines to contest, an allegation of Child Sexual Abuse, Sexual Misconduct, or other Misconduct in an action or proceeding brought against him or her in any civil, ecclesial, criminal, or administrative court, tribunal, or agency;
- (c) The accused person admits to having committed the alleged act; or
- (d) The accused person does not deny or contest the allegation, despite being given notice of the facts alleged and a full and fair opportunity to admit or deny it.

In the event a person is deemed to have committed an act in violation of this Policy, pursuant to paragraphs (a) through (d) of this Section, then the HAC Board shall consider the recommendations of the Committee and decide upon the measure(s) to be imposed, consistent with the parameters set forth in Articles XVII and XVIII of this Policy, below.

**Section 16.04 Allegations Found to be False or Not Substantiated After Internal Investigation:** In the event that the HAC Board concludes by majority vote, that an allegation is false or is not Substantiated, the conclusion shall be noted in the file and the matter shall be marked as closed. Dissenting votes, if any,

shall be recorded as set forth in Section 6.10.

**Section 16.05 Corrective Action Available:** 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 is not Substantiated, the HAC Board may take such appropriate corrective action, if any, to mitigate any damage to the accused person's reputation as they deem appropriate to the circumstances. In addition, the accused person may be eligible to return to employment or to participate in activities with Minors or Young People, at the discretion of the HAC Board and National Responsible of CL US, subject to any reasonable conditions or limitations as are merited under the circumstances.

**Section 16.06 False Allegations:** A person who knowingly and maliciously makes a false allegation of Child Sexual Abuse, Sexual Misconduct or other violations of this Policy may be subject to appropriate disciplinary action or canonical penalties and may be referred to appropriate ecclesial or civil authorities, if the circumstances warrant such referral.

## **Article XVII. MEASURES TO BE IMPOSED FOR SUBSTANTIATED ALLEGATIONS OF CHILD SEXUAL ABUSE AND SEXUAL MISCONDUCT**

**Section 17.01** If an allegation of Child Sexual Abuse or Sexual Misconduct is found to be Substantiated, or is otherwise established pursuant to Section 16.03, the accused person shall be permanently barred from exercising any employment, participating in any activity with Minors or Young People, or holding a position of leadership in any institution or program of the HAC or CL US. In the event that the accused is thereafter formally cleared of the allegation in a civil or ecclesial court of competent jurisdiction, he or she may seek to be reinstated to his or her prior position of employment, service or leadership. The decision whether or not to reinstate the accused shall be made by the HAC Board, at its discretion, based upon all of the relevant facts and circumstances.

**Section 17.02** In the event that the accused person is a member of the Fraternity of Communion and Liberation, the President of the Fraternity of Communion and Liberation, in conjunction with the Central Diaconia, has the right to apply Art. 35 and 36 of the Fraternity Statute, related to the expulsion of members for unworthy conduct. The investigation of allegations of misconduct and/or the imposition of any measures against an accused under this Policy shall



not and is not intended to replace, foreclose or otherwise limit any such action or any separate investigation or proceeding as may be undertaken by the President of the Fraternity or any other civil or ecclesial authorities in connection with the alleged misconduct.

**Section 17.03** In addition, consistent with the provisions of Articles X, XII and XIII of this Policy, written notice of such Substantiated allegations of Child Sexual Abuse or Sexual Misconduct shall be provided to: (i) the appropriate civil authorities, including but not limited to the public prosecutor's office(s) within the jurisdiction where the abuse is believed to have occurred if the conduct alleged involves Child Sexual Abuse or other criminal conduct; (ii) the appropriate ecclesial authorities whose interests or jurisdiction are implicated by the alleged abuse (including but not limited to the diocese within which the events are alleged to have occurred, to the President of the Fraternity of Communion and Liberation and, if the accused is a priest, deacon or consecrated religious, to his/her diocesan ordinary or religious superior); and (iii) any others, including the complainant, victim, witnesses, and those, within or without HAC and CL US, who 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 contents of any such notice(s) shall be approved, in each instance, by the HAC Board.

**Section 17.04 Record-Keeping:** Under the supervision of the Policy Coordinator, HAC shall keep and maintain at its National Office a written record of all such alleged violations (whether Substantiated or not), and any reports and notices related thereto for a period of not less than ten (10) years, or for such greater period as is deemed reasonable under the circumstances. Where, however, the alleged victim of such violations is a Minor, the record shall be maintained for no less than six (6) years after the alleged Minor victim reaches the age of majority.

**Section 17.05 Notice:** Upon request of the HAC Board, 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 HAC and CL US who 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 contents of any such notice shall be approved, in each instance, by the HAC Board.

**Article XVIII. MEASURES TO BE IMPOSED FOR SUBSTANTIATED ALLEGATIONS OF OTHER CONDUCT IN VIOLATION OF THIS POLICY OR ITS CODE OF CONDUCT**

**Section 18.01** Protecting the dignity of Minors and Adults is a constituent part of the educational and formative proposal of Communion and Liberation. Therefore, if an allegation of conduct in violation of this Policy (other than Child Sexual Abuse or Sexual Misconduct, which are addressed above) is found to be Substantiated, the accused person shall be given clear direction regarding what measures shall be implemented in response to such Substantiated allegation – including but not limited to whether, and to what extent, he/she may participate in activities with Minors or Young People, continue in employment, and/or continue in leadership in any institution or program of the HAC or CL US.

**Section 18.02** The HAC Board shall determine, by majority vote, what measures shall be implemented in response to such Substantiated allegations – including but not limited to whether, and to what extent, he/she may participate in activities with Minors or Young People, continue in employment, and/or continue in leadership in any institution or program of the HAC or CL US. Dissenting votes, if any, shall be recorded as set forth in Section 6.10.

**Section 18.03** The measures to be imposed shall be within the discretion of the HAC Board, depending upon the circumstances and severity of the conduct alleged, and may include such measures as: requirement to undergo counseling and/or additional training; increased supervision; imposition of limitations of or prohibitions on the involvement with Minors and Young People; and/or modification, up to permanent suspension or termination of employment, volunteer service, or ministry with any institution or program of the HAC or CL US.

**Section 18.04 Record-Keeping:** Under the supervision of the Policy Coordinator, HAC shall keep and maintain at its National Office a written record of all such alleged violations (whether Substantiated or not), and any penalties or measures imposed and any notices related thereto for a period of not less than ten (10) years, or for such greater period as is deemed reasonable under the circumstances. Where, however, the alleged victim of such violations is a Minor, the record shall be maintained for no less than six (6) years after the Minor victim

reaches the age of majority.

**Section 18.05 Notice:** Upon request of the HAC Board, 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 HAC and CL US who 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 contents of any such notice shall be approved, in each instance, by the HAC Board.

**Article XIX. COOPERATION WITH OUTSIDE INVESTIGATIONS CONDUCTED BY CIVIL OR ECCLESIAL AUTHORITIES**

**Section 19.01 Cooperation and Duty Not to Interfere:** The Committee, the HAC Board, the National Responsible of CL US, and all Personnel shall cooperate with any lawful investigation conducted by civil authorities of allegations of Sexual Misconduct, 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 competent ecclesial authorities.

**Section 19.02 Suspension of Internal Investigation Available:** In the event such an investigation by civil or ecclesial authorities is instigated, the Committee may elect to suspend any internal investigation of an allegation of Child Sexual Abuse until such civil or ecclesial authorities conclude their investigation, as long as the accused person is, and remains for the duration, suspended from working with Minors and Young People participating in events and ministries of CL US or HAC while such investigations are underway.

**Section 19.03 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 for the Protection of Minors 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 of CL US shall likewise act, 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.

**APPENDIX A**  
**CODE OF CONDUCT**  
**FOR ADULTS IN CONTACT WITH MINORS OR YOUNG PEOPLE**

**Article I. Maintaining Proper Boundaries: General Principles**

**Section 1.01**

The protection of Minors, Young People, and Vulnerable Adults is a constituent part of the common good. It concerns not only those involved in CL US activities dedicated to Minors and Young People, but all members, who are called, on the one hand, to maintain a lifestyle and personal relationships that are beyond reproach, and on the other, to actively commit to preventing abuse, raising awareness, and spreading a culture characterized by respect and care for the weakest persons.

**Section 1.02**

Those Adults in leadership roles in the activities dedicated to Minors and Young People must, in addition to expressing a sincere educational passion evidenced at the professional and vocational level, demonstrate emotional maturity, as well as embody a sincere dedication to and proven fidelity in following the path of Communion and Liberation.

**Section 1.03**

All Adults must cultivate in the educational relationship with Minors and Young People a deep respect for the freedom of conscience of those entrusted to their care and a highly sensitive concern for the protection of their personal privacy.

**Section 1.04**

Vigilance is advised in the use of language, which ought to always be respectful, seeking for and emphasizing all that is beautiful, noble, and pure, no matter the means of communication chosen, particular as it respects social media.

**Section 1.05**

The utmost discretion in physical gestures is also required. In these gestures, Adults should never exceed the limits of a cordial friendship that is always openly shared with other Adults and other Young People present.

### **Section 1.06**

To this end, self-referential attitudes and personalistic bonds that might generate misunderstandings and inhibit a healthy relational dynamic both at the educational level and in friendships among peers, must be avoided.

## **Article II. Responsibility of Adults Working with Minors and Young People**

### **Section 2.01**

All Adults must conform to the terms of this Policy, including its Code of Conduct for Adults in Contact with Minors and Young People.

### **Section 2.02**

All Adults must demonstrate that they are in full compliance with the training, background check, and other requirements of the Policy prior to participating in or leading any educational or pastoral activity involving Minors or Young People.

### **Section 2.03**

All Adults bear the responsibility to ensure that:

- (a) Proper boundaries are maintained at all times as between Adults and Minors or Young People;
- (b) Minors and Young People are made aware of these boundaries;
- (c) Any Minor or Young Person who breaches these boundaries is counseled as to proper behavior; and
- (d) Any breaches of boundaries or other violations of the Policy by Adults or Minors or Young People are promptly reported to the Policy Coordinator, the Committee for the Protection of Minors, the HAC Board, or the National Responsible of CL US.

## **Article III. Guidelines for Maintaining Proper Boundaries**

**Section 3.01 Proper Boundaries:** The following are guidelines for proper boundaries that must be observed at all times by Adults while working with, serving, or otherwise interacting with Minors or Young People:

- (a) Excessive familiarity or intimacy between Adults and Minors or Young People is not permitted;

- (b) Adults should not relate to Minors or Young People as if they were peers or contemporaries;
- (c) Adults should not take on a role of a “confidant” to a Minor or Young Person;
- (d) Adults should not show undue interest in the private lives of Minors or Young People (particularly in such areas as romantic relationships, dating, or sexual activity);
- (e) Adults should not share information or details about their own private lives with Minors or Young People (particularly in such areas as romantic relationships, dating, or sexual activity);
- (f) Adults should not engage in any form of private, one-on-one correspondence with Minors or Young People, except as to matters exclusively ministerial (or pastoral in the limited case of a member of the clergy acting in his role as a spiritual advisor);
- (g) Adults must take special care and vigilance to carefully observe clear boundaries when they are dealing with Minors or Young People who are especially vulnerable (*e.g.*, children who have experienced abuse or who are isolated by distance or circumstances from family);
- (h) Adults may not give undue attention or favorable treatment to a Minor or Young Person, such that there is the appearance that there is a “special” relationship with the Adult, or that the Minor or Young Person is a “favorite of” or “preferred by” the Adult;
- (i) Adults should not offer excessive or inappropriate compliments, remarks or gestures that focus on a Minor’s or Young Person’s physical appearance, gender, or clothing;
- (j) Adults must always be with another Adult or be in the proximity of another Adult when working with a Minor or Young Person in unsupervised settings;

- (k) Adults may not engage in purely social relations with Minors or Young People, except in special circumstances (*e.g.*, graduation parties or similar special occasions where families or groups of Minors or Young People are gathered) or where the Adult and Minor or Young Person are family members;
- (l) Adults may not enter into a dating, romantic, or physical relationship with a Minor or Young Person under any circumstances;
- (m) Adults should not use profane or sexual language or engage in sexual banter or sexually charged jokes in the presence of Minors or Young People.

**Section 3.02      Physical Contact with Unrelated Minors and Young People:**

- (a) Any physical contact between Adults and unrelated Minors or Young People must be rare and approached with a high degree of caution. Physical contact between Adults and unrelated Minors or Young People is strongly discouraged. Under no circumstances can it be regular or routine behavior;
- (b) Adults must use great caution to ensure that any kind of physical contact with a Minor or Young Person cannot be misconstrued by either an observer or by the Minor or Young Person involved, and that they do not violate appropriate boundaries;
- (c) Physical contact with an unrelated Minor or Young Person is only permissible if all the following conditions are met:
  - (i) *It is limited and fully appropriate to the situation;*
  - (ii) *It is in the presence of others and is appropriate to the age of the Minor or Young Person;*
  - (iii) *It is entirely and unambiguously nonsexual and nonromantic;*
  - (iv) *The Minor or Young Person consents to the contact and is fully comfortable with it;*



*(v) It cannot be misconstrued by the Minor, Young Person, or by others; and*

*(vi) It does not constitute an abuse of the Adult's position of power or trust.*

### **Section 3.03      Guidelines for Any Physical Contact with Unrelated Minors or Young People**

The following are guidelines to determine whether physical contact between Adults and unrelated Minors or Young People is appropriate:

- (a) Physical contact with unrelated Minors or Young People may never take place in private (*i.e.*, when no one other than the Adult and Minor or Young Person is present or in view);
- (b) Physical contact in the context of any kind of one-on-one encounter with an unrelated Minor or Young Person may never take place, unless it is merely a brief handshake of welcome or goodbye;
- (c) Physical contact with unrelated Minors or Young People may never be routine behavior for an Adult;
- (d) Otherwise unacceptable behavior does not become acceptable if it is initiated by a Minor or Young Person;
- (e) Cultural customs, or the ordinary behavior of Minors or Young People towards their peers, do not justify otherwise inappropriate physical contact or behavior with an unrelated Adult;
- (f) If a Minor or Young Person initiates inappropriate contact with an unrelated Adult, the Adult has an obligation to counsel the Minor or Young Person as to proper behavior and to report any such incident to their immediate responsible within CL US, to the Policy Coordinator, the Committee for the Protection of Minors, or the HAC Board.

### **Section 3.04          Examples of Inappropriate Physical Contact**

Some examples of inappropriate physical contact between an Adult and an unrelated Minor or Young Person include:

- (a) Any contact with the areas of the body that are ordinarily covered by a bathing suit;
- (b) Kissing or prolonged hugs; routine greeting/departure hugs or social kisses to the cheek, head, or lips; placing and leaving one's arm around an unrelated Minor's or Young Person's shoulder, back or waist for a prolonged period;
- (c) Patting an unrelated Minor or Young Person on the backside (even during a sporting event); holding hands, other than briefly holding the hand of a young child in public for their safety (for example, holding the hand of a Minor while crossing the street or in a large crowd to avoid separation); repeatedly touching the arm, back or legs of an unrelated Minor or Young Person; touching on any part of the body of an unrelated Minor or Young Person in a way that may be construed as a caress; or
- (d) Tickling, wrestling, play-fighting (including "chicken fights" or similar physical games involving Adults and unrelated Minors or Young People).

### **Section 3.05          Examples of Acceptable Physical Contact**

Some examples of physical contact by Adults with Minors or Young People that may be appropriate under the circumstances might include:

- (a) Briefly shaking hands as a social greeting; brief public social contact in connection with a special event or circumstance (*e.g.*, such as a public greeting hug, an arm placed around the shoulder for a moment in public, or a short pat on the back to congratulate a student);

- (b) Lightly and briefly tapping on the arm, shoulder, or back to get their attention; a “high five” or “fist bump,” such as during a sporting event or competition; or
- (c) An arm briefly placed around the shoulder of an upset or injured Minor or Young Person in the presence of others.

#### **Article IV.            Specific Rules Governing Overnight Events and Day Trips Involving Minors and Young People**

**Section 4.01** Overnight events and day trips present unique challenges due to the difficulties involved in supervising and protecting Minors and Young People in such situations. No overnight activity should take place without the express written approval of the HAC Board and the National Responsible of CL US. This Article, which must be read in conjunction with the entire Policy, provides additional rules for any CL US or HAC overnight events or day trips (*e.g.*, trips or retreats) involving participants who are Minors or Young People.

**Section 4.02** Adults involved in organizing, supervising, and/or participating in overnight events or day trips must be extra vigilant about observing proper boundaries at all times and ensuring that all other Adults are reminded and required to do the same.

#### **Section 4.03 Minor Participants:**

- (a) Children below the age of 13 may not participate in an overnight event unless they are accompanied by a parent or guardian;
- (b) All Minors on overnight events or day trips must have a signed permission slip from a parent;
- (c) Parents 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;

- (d) Parents of Minor participants are entitled to be fully informed of all activities that will take place during the overnight event or day trip;
- (e) Minors involved from time-to-time in educational, pastoral, and/or recreational activities intended for Adults shall receive the utmost respect and dedicated attention. Though parents and guardians remain responsible for the physical and moral integrity of the Minors they involve in such activities, proper and irreproachable behavior is required of all participating Adults in accordance with this Policy; and
- (f) The involvement of Minors – who will not, in any case be under the age of 16 – in charitable activities serving children or Vulnerable Persons may only take place under the guidance and supervision of an Adult.

**Section 4.04 Number of Adult Participants in Overnight Events and Day Trips:**

- (a) The minimum ratio for Adults to Minors or Young People on an overnight event or day trip is as follows:
  - (i) *Minors in Pre-school through Grade 5 – 1 Adult per 4 Minors (minimum 2 Adults);*
  - (ii) *Minors in Grade 6 - 8 – 1 Adult per 6 Minors (minimum 2 Adults);*
  - (iii) *Minors in High School and Young People – 1 Adult per 10 Minors or Young People (minimum 2 Adults);*
- (b) A minimum of two Adults are required as chaperones on all overnight events or day trips involving Minors or Young People;
- (c) All Adults must demonstrate that they are in full compliance with the training, background check, and other requirements of the Policy prior to the overnight event or day trip;

- (d) All priests and deacons participating in CL Knights, GS, or CLU overnight events or day trips must have current valid faculties and current valid safe environment certification from their bishop or superior.

#### **Section 4.05 Conduct During Overnight Events or Day Trips:**

- (a) It is absolutely forbidden to require Minors or Young People to make a promise of secrecy about what happens at CL events or about any aspect of CL;
- (b) It is absolutely forbidden during an overnight event for Minors or Young People to be physically restrained or deprived of their ordinary senses in any way (*e.g.*, blindfolded, kept in darkness, provided with alcohol), subjected to any humiliating or demeaning treatment (*e.g.*, any form of hazing), deprived of a reasonable amount of sleep, or deliberately frightened;
- (c) In transporting Minors or Young People to, from, or during an overnight event or day trip, two Adults should be present in each vehicle where Minors or Young People are present; if that is not possible, the minimum required is one Adult and two or more Minors or Young People. A Minor or Young Person may never ride in a vehicle alone with an Adult, except for their parent;
- (d) One-on-one private meetings between Adults and Minors is not permitted, except in the limited context of a confessional with a member of the clergy. If any other personal meeting is required with a Minor, it must be conducted at all times with or in view of another Adult(s);
- (e) An Adult may not engage in any private, one-on-one direct electronic communication with an unrelated Minor or Young Person (*e.g.*, text messaging, phone calls), unless it is necessary for safety (*e.g.*, to contact a lost child or to provide specific directions or instructions as to a meeting time or place);
- (f) A lone Adult may never enter a locker room, dressing room, bedroom, shower, or bathroom being used by a Minor or Young Person, except in the

case of an emergency to ensure safety or health or to preserve order.  
Routine room checks may never be conducted by a lone Adult;

- (g) Minors, Young People and Adults are not permitted to transmit, via any form of electronic communication, any photographs or images of other persons or themselves in any stage of undress, or in any situation that reasonably might cause embarrassment, humiliation, or distress to the person depicted or the person receiving the communication;
- (h) Minors or Young People 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 Adult chaperones.

#### **Section 4.06 Sleeping and Other Accommodations on Overnight Events:**

- (a) There must be separate bedrooms/sleeping areas, bathrooms, and showers for unrelated males and females on overnight events;
- (b) Male and female participants may not sleep in connecting rooms unless they are siblings or accompanied by their parents or guardians;
- (c) No Minor or Young Person is permitted to sleep in a bedroom with an Adult, except in the case of a Minor or Young Person sleeping in the room of their own parent or guardian;
- (d) In dormitory-style facilities, Minors and unrelated Adults; Young People and unrelated Adults; and males and females (unless siblings or married to each other), must sleep in separate areas;

- (e) Dormitory areas for Minors and Young People must be overseen by at least two Adults.

## **Article V. Use of Information Technology**

### **Section 5.01. Electronic Communication with Unrelated Minors:**

- (a) Regardless of the manner or method, all communication by Adults addressed to Minors and Young People must be undertaken carefully. Adults must respect the psychological, physical and behavioral boundaries of the Minor or Young Person and communications must be wholly appropriate to circumstances, and boundaries must be maintained, consistent with the Code of Conduct set forth in this Policy;
- (b) In virtually all circumstances, an Adult communicating with an individual, unrelated Minor via electronic means should include a parent, guardian, or another Adult as an addressee on all such communications;
- (c) Permission of the parent or guardian must be obtained, in writing, in order for any Adult to communicate with Minors via telephone, cell phone, text messaging, email, social networks, or other electronic means. 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.<sup>5</sup> See Appendix D, Parent/Guardian Consent Form for Electronic Communications with Minors;

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<sup>5</sup> Or 19 years of age in those jurisdictions where persons under the age of 19 are considered Minors under Local Civil Law.

- (d) In order to protect their privacy, permission must also be obtained, in writing, from the parent or guardian before an Adult may share/post pictures or videos of Minors, and before an Adult may share a Minor's email, telephone number, or other contact information with other Minors or Adults. 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.<sup>6</sup> *See Appendix D, Parent/Guardian Consent Form;*
  
- (e) Adults should never consider typed conversations with Minors or Young People that take place via electronic means (emails, social networking sites, text message, etc.) to be private and confidential, nor shall Adults ever instruct Minors not to share such communications with their parents, guardians, or other Adults;
  
- (f) 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;
  
- (g) Electronic communication between an Adult and a Minor should not be used to address/discuss confidential or personal matters;
  
- (h) If a Minor or Young Person sends an Adult an inappropriate message, the Adult should not respond to it, forward it, or delete it. The Adult should notify his immediate supervisor or the Policy Coordinator and await instructions from the Committee for the Protection of Minors as to what to do with the message – including, if necessary, printing it and/or providing it to the civil authorities and the Committee for the Protection of Minors;

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<sup>6</sup> Or 19 years of age in those jurisdictions where persons under the age of 19 are considered Minors under Local Civil Law.



- (i) If a Minor sends an Adult a message that causes the Adult to have concerns for the health and safety of that Young Person, the Adult should promptly notify parents, authorities (as needed), and/or their immediate superior. If the message causes the Adult to believe the Minor or Young Person is threatened with immediate harm (or threatening to harm him/herself), the Adult should immediately contact the Police, Child Abuse Hotline, or other emergency services to assist the endangered Minor or Young Person;
- (j) Adults must set appropriate boundaries around the times and circumstances when phone calls will be made/received and when electronic communications will be sent/received.

**Section 5.02      Specific Types of Communications, Included but not Limited to the Email, Instant Messaging, and Text Messaging:**

- (a) In order to protect the email addresses of Minors, Adults should use the blind carbon copy (BCC) feature when sending an email to more than one Minor;
- (b) If a group of youth need to be in contact with each other via email, permission must be obtained from the parent or guardian before sharing a Minor's email address with other members of the group. (A youth leadership team would be one example of a situation where Adults may seek permission to share email addresses among group members);
- (c) Adults should never consider email or text messaging with Minors or Young People to be private. Adults may wish to copy another responsible Adult (parent, supervisor, athletic director or alternate youth ministry leader) when sending an electronic message to a Minor or Young Person. This action demonstrates transparency and appropriateness when communicating with Minors and Young People;
- (d) All electronic messages of any kind should be relevant to the ministerial/professional relationship the Adult has with the Minor or Young Person, with due consideration for the age of the Minor or Young Person;

- (e) Adults should be brief in one-to-one, electronic conversations with a Minor. Messages should be kept short and to the point, and related to the professional/ministerial relationship between the Adult and the Minor.

**Section 5.03      Video and Audio Calls:**

- (a) Adults should not initiate one-on-one telephone or video conversations with unrelated Minors or Young People. Conversations initiated by unrelated Minors or Young People should be kept short and to the point, and related to the professional/ministerial relationship between the Adult and the Minor. Adults should notify parents or another responsible Adult when communicating in this way with a Minor.

**Section 5.04      All Types of Social Networking:**

- (a) Adults who use social networking sites to communicate with Minors or Young People about CL US activities or events should create a separate business or public account, and/or group, for this specific use whenever possible;
- (b) Adults should never communicate with unrelated Minors or Young People (including by posting messages, images or other content) on any social media website or application, unless such communications, including 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) Precautions should be taken to guard the privacy of anyone who has access to the page. The highest privacy settings must be used. In addition, Adults should encourage Minors, Young People, and parents who join the online community to set their privacy settings at the highest levels;
- (d) Written permission from a parent/guardian should be obtained prior to a Minor's participation on a social networking site, such as Facebook, sponsored by a CL US ministry or group;

- (e) Minors and Young People should not be given access to the private or personal postings of an unrelated Adult;
- (f) All online interactions by Adults with unrelated Minors or Young People should reflect the ministerial/professional role of the Adult.

**Section 5.05      Blogs and Microblogs:**

- (a) Blogs and microblogs used for educational or ministerial purposes should be conducted in a professional manner and the content should reflect the purpose;
- (b) It is recommended that the blog or microblog be set up so that comments are not posted until they are reviewed and approved by the owner of the blog or microblog. The practice prevents inappropriate and hurtful comments from being posted;
- (c) Personal blogs or microblogs of Adults should not be shared with Minors or Young People.

**Section 5.06      Websites:**

- (a) Websites used to represent CL US or HAC must be owned and managed by CL US, under the supervision of the National Responsible of CL US, or by HAC, under the supervision of the HAC Board of Directors;
- (b) Adults, Young People, and Minors must obtain permission from the National Responsible of CL US and the HAC Board to set up a web page that represents CL US or HAC;
- (c) Websites may be linked to other sites. It is recommended that all persons add this statement to any site created on behalf of CL US or the HAC:  
“Links to other sites may be provided on this site. These sites are provided for informational purposes only and are not necessarily sponsored by or otherwise approved by CL US or the HAC.”

**Section 5.07        Videos, Photographs, Other Images:**

- (a) Adults must obtain written permission from a parent or guardian to share a photograph or video with another party for any reason;
- (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 or Young Person depicted (*i.e.*, full name, addresses, birth date, etc.).

**Section 5.08        Online Gaming:**

- (a) This recreational activity is used by peers to play games and socialize. Adults involved in service and ministry to youth are not peers of the youth. For this reason, Adults should not be involved in online gaming with the Minors or Young People whom they serve. Adults should not engage in any personal, in-game communications with any unrelated Minors or Young People.

**Section 5.09        Illegal or Immoral Materials:**

- (a) Adults should never access, transmit, or create materials that are illegal or immoral. These include but are not limited to pornographic, stolen, sexist or discriminatory materials. The transmission of sexually explicit material to or involving Minors and/or the transmission of other illegal materials must be reported immediately to the proper authorities.

**Section 5.10        Important Reminders:**

- (a) Electronic communication is not private. Emails, text messages, and web postings establish a permanent record, which can be obtained and accessed. These means of communication can also be saved and forwarded. Proper boundaries must be maintained between Adults and Minors or Young People at all times, including in the context of electronic communications;

- (b) All expectations regarding the reporting of suspected Child Sexual Abuse, as set forth in this Policy and pursuant to Local Civil Law, including Mandated Reporters, are applicable regardless of the method by which the information reaches the Adults ministering to Minors or Young People.

**APPENDIX B**

**ACKNOWLEDGMENT OF RECEIPT OF THE POLICY FOR THE PROTECTION OF MINORS AND YOUNG PEOPLE**

I have received a copy of the Policy for the Protection of Minors, Young People, and Vulnerable Adults, 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 or Young People 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 May 15, 2021

#### POLICY COORDINATOR:

- Mr. Luigi Tanzi
  - [ltanzi@humanadventurecorp.org](mailto:ltanzi@humanadventurecorp.org)
  - (240) 793-7213

#### COMMITTEE FOR THE PROTECTION OF MINORS:

- Rev. Scott A. Hastings, JCL
  - [SHastings@clhac.com](mailto:SHastings@clhac.com)
  - (402) 679-4977
- Ms. Amy Hickl
  - [AHickl@clhac.com](mailto:AHickl@clhac.com)
  - (713) 665-2195
- Ms. Rachelle Ramirez
  - [RRamirez@clhac.com](mailto:RRamirez@clhac.com)
  - (980) 285-8338
- Mr. José Redondo, Sr.
  - [JPRedondosr@clhac.com](mailto:JPRedondosr@clhac.com)
  - (305) 903-4252
- Ms. Marcie Stokman
  - [MStokman@clhac.com](mailto:MStokman@clhac.com)
  - (218) 821-0878

## THE HAC BOARD:

- Mr. Marco Aiolfi
  - [marco.aiolfi@gmail.com](mailto:marco.aiolfi@gmail.com)
  - (917) 446-9025
- Mr. Jonathan Fromm – Secretary
  - [jffromm@gmail.com](mailto:jffromm@gmail.com)
  - (347) 886-5933
- Dr. Renzo Canetta, MD - Treasurer
  - [renzo.canetta@gmail.com](mailto:renzo.canetta@gmail.com)
  - (203) 710-7717
- Mr. Samuel Nelson
  - [Samjnelson7@hotmail.com](mailto:Samjnelson7@hotmail.com)
  - (507) 213-1159
- Mr. Marco Saccaggi
  - [msaccaggi@humanadventurecorp.org](mailto:msaccaggi@humanadventurecorp.org)
  - (937) 266-8792
- Ms. Barbara Gagliotti
  - [barbaragagliotti@gmail.com](mailto:barbaragagliotti@gmail.com)
  - (240) 731-4985

## THE NATIONAL RESPONSIBLE OF CL US:

- Fr. José Medina
  - [jmedina@humanadventurecorp.org](mailto:jmedina@humanadventurecorp.org)
  - (617) 821-8315



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 WITH MINORS

In order to ensure transparency and parental involvement, and consistent with the principles set forth in the Policy for the Protection of Minors and Young People, the Fraternity of 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 may communicate electronically with Minors.

Any and all digital networking and communication including but not limited to, email, texting, Facebook, Twitter, other Social Networking sites, etc., from Adults 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 and Young People.

Name of Parent/Guardian:

\_\_\_\_\_

Name of Minor Child(ren):

\_\_\_\_\_

Name of CL US or HAC Program:

\_\_\_\_\_

**Approved Parent/Guardian Communication Methods (Circle 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: \_\_\_\_\_

Social Media Account, if any – Please specify, 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 (Circle 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: \_\_\_\_\_

Social Media Account, if any – Please specify, if applicable: \_\_\_\_\_

Other (please explain): \_\_\_\_\_

**Use of Minor’s Image or Likeness, in Photos or Videos:**

**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.

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 my permission to use my child’s likeness for any purpose.

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 HISTORY**

- 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, Ms. 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.