

*Policy for
Members & Candidates
on the
Sexual Abuse of Minors
and Vulnerable Persons*

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Policy For Members and Candidates on the Sexual Abuse of Minors and Vulnerable Persons

1. Introduction and Rationale

- 1.1. The nature and purpose of the Society of St. Sulpice is described in the opening pages of its *Constitutions*. Article 1 contains the following passages:

Dedicated to Jesus Christ, the High Priest, the Society of the Priests of Saint Sulpice, born in the apostolate of Jean Jacques Olier, its founder, is a community of diocesan priests whose vocation is the service of those ordained to the presbyteral ministry.

With this fundamental purpose in view, they devote themselves to the discernment of vocations, to the initial and ongoing formation of priests or to the exercise of other ministries. They fulfill this work with the desire to instruct others in the “interior life” and to form in them the “apostolic spirit.”

“The seminary of Saint Sulpice. . . has consecrated and dedicated itself to Jesus Christ our Lord not only to honor Him as High Priest and the great Apostle of his Father, but also to respect him living in the Apostolic College. Daily, the seminary prays for an apostolic spirit for itself and for the whole Church so as to renew in her the love of Jesus Christ and his attitude of religion toward his Father, particularly among the clergy who, as the source of holiness, must then diffuse it among all peoples.”

(Divers écrits, I, 67)

- 1.2. It is clear from these words that the Society has been given as its mission the renewal of the Church in the love of Jesus Christ through the renewal of the Church’s ministers. This means that Sulpicians are to be models of Christian living and priestly ministry.
- 1.3. While Sulpician programs are designed to serve adults, they do, on rare occasion, offer training and/or pastoral services to minors and vulnerable persons. Therefore, a Sulpician might have pastoral contact with or special responsibility for minors and vulnerable persons at a Sulpician program. The intention of the U.S. Province of the Society of St. Sulpice is that all of its institutions, programs, and missions be safe places in which minors and vulnerable persons can work, study, or receive ministry. *Note: anywhere in this policy hereafter, “minor” encompasses “vulnerable person” as well. (See 2. Definitions.)*
- 1.4. Many Sulpicians also serve in other pastoral settings, especially in parishes. They should contribute to creating a safe environment there and always present themselves as trustworthy ministers of the Lord.

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- 1.5. The sexual abuse of a minor by a Sulpician is not only a violation of fundamental human dignity but also a contradiction of faith in Jesus Christ and of the mission of the Society of St. Sulpice. Therefore, beyond any provisions of civil law, the sexual abuse of a minor by a Sulpician is totally inappropriate, unacceptable, and outside the scope of his duties and employment.
 - 1.6. Moreover, since it is fundamental to the charism of the Society of St. Sulpice that Sulpicians adhere to the highest standard of Christian and ministerial behavior, any minor who has been abused by a Sulpician is of special concern to the Society and deserving of our special care and respect.
 - 1.7. Because of the seriousness with which we view the sexual abuse of minors, the U.S. Province of the Society of St. Sulpice has developed the following policy to deal with incidents and accusations of such abuse on the part of its members and candidates. The policy also treats those related acts of misconduct that can be signs of inadequate professional boundaries with a minor.
 - 1.8. The primary purpose of this policy is to prevent abuse and, if injury has already occurred, to care for the survivor and the survivor's family. The needs of others injured by sexual abuse, namely, those who have placed their trust in the Society of St. Sulpice as well as the many who have their service and reputation questioned because of the failures of a few, are also addressed in this policy.

2. Definitions

- 2.1. **Sulpicians:** priests who are definitive or temporary members of the Society of St. Sulpice, Province of the United States, or who are candidates for membership in the Society who have been released by their diocesan bishops and are serving in a Sulpician assignment.
- 2.2. **The Provincial Superior:** The Sulpician who exercises canonical authority over all Sulpicians who are members of the Province of the United States.
- 2.3. **A Minor, Vulnerable Person:** a “minor” is anyone under the age of 18, including those who are members of the Sulpician’s family. For the purposes of this policy “a minor” also includes “vulnerable person,” i.e., a person over 18 years of age who is deprived of personal freedom to control a situation, to give consent to sexual contact, or to resist sexual conduct that adversely affects their physical, spiritual, or psychological health.
- 2.4. **Boundaries:** the verbal, physical, emotional, and social distance that one must maintain in order to protect the vulnerability that arises from the imbalance of power (the ability or official capacity to exercise greater influence over another or to control the situation) that is inherent in different roles and relationships.
- 2.5. **Sexual Conduct:** any form of sexualized behavior, verbal or nonverbal, that expresses a sexual interest in another person, whether or not that person gives consent.

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- 2.6. **Sexual Contact:** some form of physical contact for the purpose of sexually arousing or gratifying either party, e.g., sexual intercourse, anal, or oral sex, or the touching of the erogenous zone of another (including, but not limited to, the thighs, genitals, buttocks, pubic region or chest). Other forms of physical contact that express sexual misconduct include, but are not limited to, actions that are never appropriate in a pastoral relationship, such as giving a sexually charged gift (e.g., lingerie), prolonged hugs, kissing on the lips, showing sexually suggestive objects or pornography.
- 2.7. **Sexual Abuse:** immoral and illegal activity in which a minor is manipulated, forced, or tricked into sexual contact. Because of the imbalance of power when relating to a Sulpician priest, sexual abuse is deemed to have occurred even when the minor initiates the sexual contact. The creation, acquisition, distribution, downloading and/or viewing images of child abuse or child pornography is also considered to be sexual abuse.
- 2.8. **Sexual Misconduct:** a range of sexualized behavior with a minor that adversely affects their physical, spiritual, or psychological health, or the reputation of the Society of St. Sulpice. Sexual misconduct includes sexual abuse as well as related boundary violations, such as harassment or exploitation.

3. Statement of General Principles

- 3.1. All Sulpicians have an obligation not only to avoid the sexual abuse and related misconduct of boundary violations with a minor but also to attempt to prevent such activities by creating and maintaining a safe environment.
- 3.2. All Sulpicians will comply fully with all applicable provisions of federal, state, and local law, with the requirements of canon law, and with the policies and procedures outlined in this document.
- 3.3. The Society of St. Sulpice is committed to responding to any person who reports sexual abuse or related misconduct of boundary violations in a comprehensive, objective, and pastoral manner so as to promote healing for survivors and to give due regard to the rights of all. To ensure that this commitment is fulfilled, the Society uses a Review Board to advise and assist the Provincial Superior.
- 3.4. All complaints and incidents are considered important. In light of the harm that can come from sexual misconduct and false accusations, the Provincial Superior will review each report carefully. Anonymous complaints will be investigated to the extent feasible.
- 3.5. To the extent not prohibited by law or duties of confidentiality, the Province will provide timely communication to all persons involved. Any communication or action taken will be done in a caring manner, so as not to compound the traumatic experience of the persons concerned.
- 3.6. The pastoral needs and the rights of the accused will also be respected and protected.

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- 3.7. The Society will avoid exacerbating the hurt of all persons involved by respecting their confidentiality in the public forum whenever possible. The Society also intends to preserve the due process of civil and canon law in any statements made at the public level.
 - 3.8. There is always the possibility of false accusations made for whatever reason. All should know that both civil and canon law may provide penalties for making false accusations of sexual misconduct.
 - 3.9. No requirement of this policy is to be construed in such a way that it would violate the priest/penitent relationship of the Sacrament of Penance.
 - 3.10. In the policy, some decisions assigned to the Provincial Superior are to be understood in light of the Sulpician *Constitutions*, i.e., these decisions may require the approval of the Provincial Council.
 - 3.11. To facilitate the implementation of this policy, Appendix A gives the contact information for the various representatives of the Society mentioned in this document.

4. Boundaries and the Prevention of Sexual Abuse

4.1. Boundaries

- a. Our firm belief is that Sulpicians must maintain appropriate boundaries with those they serve so as to create and maintain safe environments, to protect the vulnerability of those seeking their pastoral service, and to preserve the integrity of the ministerial relationship.
- b. Boundaries to prevent sexual misconduct protect everyone from becoming the object of various forms of sexual contact and conduct. These boundaries apply under all circumstances, including in social and familial settings and via electronic communications and social media.
- c. Behaviors that, in themselves, do not constitute sexual abuse but are often associated with it as a boundary violation of sexual misconduct in an occupational, educational, or ministerial setting include, but are not limited to, disciplining with spanking, slapping or hitting, sharing of sexually-oriented materials or jokes, making suggestive comments, innuendo, propositions, descriptions of sexual fantasies or experiences, being nude in the presence of minors, kissing on the mouth, giving or receiving a massage, wrestling, sleeping in the same bed or a similarly confined space, taking minors for overnights without written parental permission, persisting in the exchange of unwelcome and unwanted acts or words of affection, providing or allowing minors to use alcohol or illegal drugs and being under the influence of alcohol or illegal drugs when supervising minors.

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- d. Positive forms of affection and demonstrations of pastoral care that would be appropriate for members under most circumstances are not prohibited by this policy, e.g., pats on the shoulder or back, hand-shakes and hand-slapping, verbal praise, placing an arm around the shoulders, and, with small children, holding hands during a walk, kneeling or bending down for a hug, and patting on the head. (N.B. Cultural sensitivity is called for here; some of these signs may not be appropriate in certain cultures, e.g., patting a child on the head in some Asian cultures.)

4.2. **Prevention**

- a. Each adult is and must be responsible for his or her own sexual growth and maturity in order to maintain appropriate emotional and sexual boundaries with those with whom they work and/or serve. To support this responsibility, the Society of St. Sulpice is committed to providing appropriate programs for Sulpicians that include information and training applicable to the recognition and prevention of the sexual abuse of minors.
- b. With the exception of those members who do not engage in active ministry, all Sulpicians, including those returning from ministry outside of the U.S., as well as international members who are coming for ministry within the U.S., will be required to review this policy to understand the importance of boundaries and to attend a training program on the prevention of sexual abuse and creating a safe environment that includes a discussion of appropriate cultural boundaries and the warning signs associated with sexual abuse.

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- c. At least every five years, all Sulpicians have at least five hours of education that focuses on sexual abuse and related topics, such as boundaries in ministry, reporting requirements, pornography, sexual harassment, use of social media and cybersex. The Province will offer programs that fulfill this requirement, but it may also be fulfilled by attendance at special programs for pastors, youth ministers, etc., offered by the diocese in which the member serves.
 - d. From time to time, members will receive updated information on safe environment practices. Again, diocesan programs include annual updates.
 - e. The Province has a written transition plan to ensure that the Accreditation Standards for Catholic Men's Religious Institutes are maintained and critical information about members following these Standards are not lost when there is a change in leadership. (See Appendix E.)

5. Support and Accountability

- 5.1. As a further measure to prevent sexual abuse, the Province maintains a system of support and accountability for all members.
- 5.2. Most members belong to or are closely associated with a local Sulpician community. As such, they enjoy the normal systems of support and accountability that come with belonging to that community. These systems aim to make Sulpician communities places where members maintain mutual concern for one another's health – physical and psychological – to assure that confreres are not lapsing into conditions that can lead to boundary violations.
- 5.3. In addition to the rules that apply to all Sulpicians, e.g., in the Constitutions and Personnel Handbook, the Local Superior is responsible for having written policies about what is expected of every member of that community with respect to support and accountability, e.g., a faculty or resident handbook, or a contract or agreement. Moreover, the Local Superior is delegated by the Provincial Superior to meet at least annually with each Sulpician in that community to discuss his personal welfare and to address any concerns that may have arisen concerning his adherence to community expectations. The Local Superior is to maintain a written record of these annual meetings and he must submit the dates of these meetings to the Provincial Superior at the end of each school year.
- 5.4. With respect to support and accountability for the member who does not belong to or who is not closely associated with a local Sulpician community, the Director of Personnel, in consultation with the member, is to develop a written and individualized plan of support and accountability. (See Appendix C.) This plan is to be shared with the member,

and, at least annually, the Provincial Superior or his delegate will meet with each member to discuss his general welfare and to address any issues that may have arisen regarding his adherence to the plan. A written record of this meeting is to be filed at the Provincial House. Unless the member is consistent in following his individualized plan, the Provincial Council is required to assign him to a local community.

- 5.5. Even where there is no reason to believe that sexual abuse has occurred, if any Sulpician detects boundary violations among his confreres, he should communicate this either to the Local Superior or to the Provincial Superior. Such misconduct is a sign of unhealthy boundaries with minors but is not, in itself, an act of sexual abuse, and so the Provincial Superior responds to it differently.
- 5.6. If the Local Superior receives a complaint about a member of his own community, he will conduct an interview with the Sulpician about whom the concern has been expressed. During this interview, the Local Superior will review the concern and the relevant policies prohibiting such misconduct. He will then report about the interview in writing to the Provincial Superior.
- 5.7. If the Provincial Superior receives a complaint about a Sulpician who is a member of a local Sulpician community, he will inform the Local Superior who will conduct the interview as above. The results of the interview will be documented.
- 5.8. If the Provincial Superior receives a complaint about a Local Superior or about a Sulpician who is not a member of the local Sulpician community, he will delegate the Director of Personnel to meet with the individual and conduct the interview. The Director of Personnel will then report to the Provincial Superior in writing about the interview.

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- 5.9. In any case, should a member disclose voluntarily inappropriate attraction to minors, the interviewer will recommend or provide assistance, as appropriate, including evaluation and treatment.
 - 5.10. If the misconduct with a minor is serious or has been repeated after a previous warning, the Provincial Superior may consult the Review Board about it and may take any disciplinary action he deems appropriate.
 - 5.11. The disciplinary decision by the Provincial Superior regarding boundary violations of sexual misconduct may be appealed to the Provincial Mediation Committee and to the Superior General.
 - 5.12. The policy of the Province is that the Local Superior is responsible for the immediate supervision of any Sulpician from another province or member of any religious community that may reside in his house or community. (See Appendix D.) Should any concerns arise about the observance of professional boundaries by these priests, the Local Superior is to communicate these concerns to the Provincial Superior, who will determine what course of action is to be taken, including informing the priest's own superior about these concerns.

6. Specific Policies and Procedures for Responding to Allegations of Sexual Abuse and Boundary Violations

Allegations of sexual abuse and boundary violations of sexual misconduct may come from a variety of sources, not only from the direct recipient of the misconduct. Anyone may file a complaint including family members of the direct recipient of the offense, diocesan offices, members of the Society, or a colleague in the workplace. Allegations can even be made by anonymous sources.

While all sexual misconduct is wrong, not all misconduct is gravely wrong or criminal behavior. Because each case is distinct, the following is a general outline of the response system for such allegations. It is not a procedure that is to be followed in the same way for each unique case, and the actions to be taken are not necessarily listed below in chronological order. The process is to be modified by the Provincial Superior according to the nature of the allegation, the needs of the survivor and the circumstances of the accused.

6.1. Mandatory Reporting

- 6.1.1. Whenever a Sulpician has reasonable cause to believe that another Sulpician (current and former) has committed the sexual abuse of someone currently a minor, he must make an immediate report to civil authority and the appropriate authority of the Society.
- 6.1.2. The Province will report known or suspected sexual abuse of a minor by a current or former member when the survivor is no longer under 18 years of age in accordance with the civil laws of the state in which the sexual abuse was alleged to have occurred.

6.1.3. The Provincial Superior (or his delegate) will ensure that compliance with the legal reporting requirements of the state where the abuse took place is carried out in a timely manner as mandated by law. Even if reporting is not legally required in a certain jurisdiction, a prompt report will be made to civil authorities if the survivor is still under 18 years of age.

6.1.4. The Province also requires mandatory reporting to appropriate civil authorities of any member who is known or suspected to create, possess, distribute, download and/or view images of child abuse or child pornography.

6.1.5. The Province ordinarily suspends its own internal investigations until criminal investigations are concluded. Decisions to move forward with investigations during a criminal investigation are made in consultation with law enforcement.

6.2. **Responding to Complaints: Gathering Information**

In addition to the mandated reporting of sexual abuse, the Province investigates all complaints of sexual misconduct in order to respond properly to individuals who may have experienced harm and to preserve the right of due process for any member who has been accused of abuse. All complaints, including anonymous ones, are taken seriously. Lack of investigation may jeopardize the safety of a minor, the rights of a member, and the functioning of the Province.

6.2.1. When a complaint of sexual abuse by a Sulpician originates in a local setting, the complaint is usually addressed to the Local Superior, the Rector, or the Director of the program who, in turn, relays this information promptly to the Provincial Superior in order to initiate the response. In the absence of either

aforementioned officer, the First Consultor, Director of Personnel, or one of the other Provincial Consultors should be contacted.

- 6.2.2. The complaint may be communicated directly to the Provincial Superior. (See Appendix A: Contact Information.)
- 6.2.3. Interviews will be the primary method of collecting information, supplemented by relevant documents in the file of the accused.
- 6.2.4. The Sulpicians allow legal support people (civil and canonical) to be present during these administrative fact-finding interviews.
- 6.2.5. The person first receiving the complaint listens sensitively to the complainant to obtain the essential elements of the complaint without probing into unnecessary details.
- 6.2.6. The essential elements are put into a confidential written summary. The critical information at this stage would be:
 - a. Name of the survivor;
 - b. Current age of survivor;
 - c. Address and phone number of survivor;
 - d. Name of alleged perpetrator;
 - e. Approximate dates of the alleged abuse;
 - f. Nature, type, location, and witnesses of the alleged abuse;
 - g. Other essential details, e.g., what, if any, requests the survivor has made.

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- 6.2.7. The aim of the initial investigation is to determine a “semblance of truth,” i.e., the complaint is not manifestly false or frivolous.
- 6.2.8. If at the conclusion of the initial investigation, there is a “semblance of truth,” the Province ensures that the member against whom the complaint has been made will have no unsupervised access to minors during the pendency of a full investigation.
- 6.2.9. If at the conclusion of an initial investigation, there is a “semblance of truth,” the Province ensures a full investigation is conducted by a trained, third-party Investigator who will produce a full written report.
- a. The Investigator will advise any parties that he/she represents the Province and will also inform them that conversations with the Investigator, though confidential, may be subpoenaed in the event of a criminal investigation.
 - b. The Investigator will advise the parties that pastoral care is available but that the Investigator is not the one who will provide that care.
 - c. The Investigator, who shall obtain statements from the parties and any witnesses, will keep the Provincial Superior informed regarding the status of the investigation.
 - d. The Investigator will document the investigation in writing. This documentation is confidential, is the property of the Province, and will be kept permanently on file by the Provincial Superior.

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- e. The Investigator will inform the survivor of his or her right and duty to report the allegation to civil authorities.
 - f. When the investigation is complete, a confidential written summary of the findings will be presented to the Provincial Superior, who will then discuss the report with the Provincial Council before taking disciplinary action.
 - g. The Provincial will notify the Review Board within 30 days of when the investigation is complete and the report of sexual abuse is received, to advise him on the case.

6.3. Response of the Province to the Survivor

6.3.1. The Provincial Superior shall receive allegations of sexual abuse and coordinate the response of the Province to the survivor.

- a. A Survivor Assistance Coordinator (see Appendix B) will be appointed to offer assistance, when needed, to anyone who brings an allegation. But the Survivor Assistance Coordinator will not serve as a counselor for the survivor.
- b. The Provincial Superior, or anyone who speaks directly to the survivor, will maintain a compassionate and pastoral manner regardless of the demeanor or age of the survivor, recognizing that the experience of sexual abuse and the difficulty of coming forward may bring out strong emotions during the disclosure process.

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- c. The Provincial Superior will offer to meet in person with the survivor to promote the healing process and to understand how the sexual abuse has affected the individual.
 - d. In situations where the survivor has legal representation, the Provincial Superior offers to meet with the individual through their legal counsel. If this is not possible, the Province will maintain documentation of the reason(s).
 - e. The Provincial Superior will provide the survivor written information to explain the process that the Province typically follows in responding to an allegation.

6.3.2. If pastoral care for the survivor is needed or requested, the Provincial Superior, in collaboration with the Survivor Assistance Coordinator, will arrange for a trained pastoral minister to meet with the survivor and/or the survivor's family, offer to get the needed assistance and follow up to see if the assistance was received. Assistance may be offered regardless of the truth of the allegation.

6.4. Response of the Province to the Accused

6.4.1. The Provincial Superior (or his delegate) will maintain contact with the accused throughout the entire process.

6.4.2. The Provincial Superior will notify the accused of the allegation and its essential details. He will take steps to ensure that the accused receives the personal and spiritual support and assistance he needs during the process, including, if necessary, the designation of a priest to serve as confidential Pastoral Minister for the Accused.

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- a. Normally, the accused will be placed on a temporary paid administrative leave during the internal investigation.
 - b. The Provincial Superior will advise the accused to hire personal legal counsel and to obtain canonical counsel.
 - c. When the Provincial Superior has received the completed investigation report, he will orally summarize the results of the investigation in a timely manner to the accused for a response.

6.5. **Response of the Province to its Publics**

- 6.5.1. If at any time during the course of implementing these procedures, civil or criminal proceedings are initiated against the accused, these procedures may be suspended immediately, to be resumed, if deemed necessary, only after the completion of the civil or criminal proceedings. In such a case, the Provincial Superior shall ask the Review Board for a possible course of action with respect to the accused, in keeping with the intention of these procedures and in the interests of justice. Even in this situation, the Province must make an offer through legal counsel to arrange for a personal meeting with the survivor.
- 6.5.2. The Provincial Superior will also ensure compliance with diocesan reporting requirements in the diocese where the alleged sexual abuse has occurred, or with other institutional reporting requirements, where appropriate.
- 6.5.3. When an allegation has been substantiated, the Provincial Superior will also inform the placement(s) where the sexual abuse has happened or is suspected to have happened. He will document such communication(s).

6.5.4. When a member has repeated boundary violations with a minor or a minor is known to be in danger, the Provincial Superior will bring this situation to the Review Board to develop an intervention plan outlining how the boundary violations will be interrupted and how the implementation of the plan will be verified.

6.6. **The Review Board**

6.6.1. The Province uses the services of the Review Board of Region III of the Conference of Major Superiors of Men and follows its policies and procedures for the purpose of providing advice to the Provincial Superior on the implementation and administration of this policy.

6.6.2. In cases where alleged sexual abuse of a minor cannot be investigated or substantiated, the Review Board will make recommendations regarding the disposition of the case.

6.7. **Decision by the Provincial Superior**

6.7.1. Upon the conclusion of the investigation and after hearing the recommendations of the Review Board, the Provincial Superior will exercise his judgment in delivering an appropriate response. This response will be documented.

6.7.2. In those cases where it is required that the matter be referred to the Congregation of the Doctrine of the Faith (See, for example, the USCCB's "Essential Norms for Diocesan/ Eparchial Policies Dealing with Allegations of Sexual Abuse of Minors by Priests and Deacons," No. 6), the Provincial Superior will notify the Diocesan Bishop of the accused. The Provincial Superior and the Diocesan Bishop will jointly refer the matter. Church law prescribes that if it is substantiated that a cleric has abused a minor, no further public ministry may be exercised by that cleric.

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- 6.7.3. When the matter is not required to be referred to the Congregation of the Doctrine of the Faith and when the Provincial Superior determines that there is a substantiated or credible allegation that a member of the Society has committed sexual misconduct, the Provincial Superior will take the appropriate disciplinary action, up to and including dismissal from the Society in accordance with the Sulpician *Constitutions*. He will inform the Diocesan Bishop of the accused about the action(s) taken.
- 6.7.4. To demonstrate transparency in its response to an allegation, the Provincial Superior's decision will be communicated, as necessary and appropriate, to the person who made the complaint, to the accused, to the Diocesan Bishop of the accused, to the Review Board, and to other parties, including the Superior General.
- 6.7.5. In those cases where the Provincial Superior has taken disciplinary action, the accused has the right to appeal the decision to the Province's Mediation Committee and also to the Superior General.
- 6.7.6. If an allegation is deemed false, the Provincial Superior will:
- a. issue a decree containing this finding that will be kept in the Province's files;
 - b. coordinate communication with all appropriate parties so that reconciliation can take place where possible;
 - c. see that the accused is promptly returned to his duties;
 - d. assist, as necessary, in restoring the person's good name and assist him with financial needs, if necessary.

6.8. **Communication with the Media and the Public**

- 6.8.1. Unless determined otherwise by the Provincial Superior, any media contact or inquiries will be addressed only by the Provincial (or his delegate), who will respond after consultation with the Province's attorney.
- 6.8.2. Any communication with the Sulpician membership at large or with any person or community that may be affected by an act of or an accusation of sexual abuse, e.g., a parish, will be made by the Provincial (or his delegate) after consultation with the Province's attorney and, at the Provincial's discretion, after consultation with the Provincial Council and/or the Review Board.
- 6.8.3. In order to respect the rights of all concerned, Sulpicians should not discuss, make public comments, or offer an opinion on the accusation without specific permission of the Provincial Superior.

7. Policy on the Use of the Internet

All Sulpicians are expected to conduct their use of the internet and other computer technology and services, including interactions via electronic and social media, whether on equipment or facilities belonging to the Society of St. Sulpice, to the individual, or to others, in a manner that is ethically and legally proper. Improper use of the internet, e-mail, or other computer service for illegal activity will not be tolerated.

The Society reserves the right to examine computer files and usage information in those rare instances where it is deemed necessary to do so, by the Provincial or his delegate, to protect the safety, health or welfare of the community or to investigate allegations of misconduct.

(For a detailed development of the norms governing internet presence and social media, see Appendix F.)

8. Applicability

- 8.1. This policy applies to all Sulpicians as defined in this document.
(See 2.1., above.)
- 8.2. A copy of this policy is to be communicated by means of educational and training programs to all Sulpicians.

Approved: June 24, 1999

Amended: October 26, 2000

Further amended: April 11, 2002

Further amended: March 18, 2005

Further amended: April 24, 2009

Further amended: September 23, 2011

Further amended: October 27, 2011

Further amended: September 21, 2012

Further amended: February 9, 2021

Appendix A: Contact Information

Since the person holding each of the following offices may change during the period of this edition of the Policy, only the contact information is given for each office.

Provincial Superior:

5408 Roland Avenue
Baltimore, MD 21210
410 323 5070

Director of Personnel:

5408 Roland Avenue
Baltimore, MD 21210
410 323 5079

Direct your inquiry to the Director of Personnel for the contact information of the persons currently holding the following positions:

Provincial Consultors
Survivor Assistance Coordinator
Pastoral Minister for the Accused

Appendix B: Survivor Assistance Coordinator

The Survivor Assistance Coordinator is the person appointed by the Provincial who has expertise in counseling and dealing with survivors of sexual abuse. He maintains a professional relationship with the survivor and/or family and does not act officially as a therapist, attorney, or spiritual director.

The Survivor Assistance Coordinator's duties include the following:

1. To listen with respect to the survivor and/or family;
2. To offer support and professional resources to the survivor, the survivor's family and other affected persons, assisting with referrals to therapists and/or support groups;
3. To explain to the survivor the Province's response to the allegations raised;
4. To offer to be present during meetings between the survivor and/or family and the Province, including the Provincial and/or the Review Board;
5. To coordinate all communications between the survivor and/or family and the Province, keeping all parties apprised of developments in the case.

Appendix C: Support and Accountability for Members Living Outside a Local Sulpician Community

Elements of Support and Accountability Plan:

1. **Permission:**

The member must receive the Council's permission to reside outside a local Sulpician community and in a residence approved by the Council.

2. **Salary:**

The salary must be governed by Sulpician policy.

- For non-retired members, the salary is paid directly to the Society and the Society pays each member the Sulpician living allowance.
- Retired members are not required to turn in a salary and will receive the standard retirement pension and room and board allowance.

3. **Community Events:**

Each member is expected to participate in the required community events (e.g. Retreat, Community Day, Convocation) and, as for all province members, requires permission from the Provincial if he cannot attend for some good reason.

4. **Visitation:**

Each member must meet annually with the Provincial, Director of Personnel, or one delegated by the Provincial. Minimally, the meeting must cover the following:

- Health (present state of health, schedule of physical exams, any physical or mental conditions that we need to monitor)
- Documentation (the present status of formal documents: will, durable power of attorney, advance directive for health care, funeral arrangements)
- Living Situation (adequacy of living situation and living environment)
- Financial agreement (clarify policy and procedure if necessary)
- Ministerial commitment (ministerial duties)
- Community participation (clarify plans)
- Support Structures (social and ecclesial contacts, frequency of meetings)
- Future plans (project anticipated changes in assignment, residence, etc.)

Appendix D: Policy Regarding Visitors to the Province

This policy serves as a guide regarding Visitors to the U.S. Province from other Sulpician provinces or from other religious communities or dioceses who may reside in a house of the U.S. Province. Such Visitors may be hired to be on the faculty, to be enrolled in an educational program, or to be on sabbatical. In these cases, the following guidelines apply:

1. The Province must have the written permission of the Visitor's Major Superior to reside in the U.S. Province.
2. The Visitor's Major Superior must send a letter to the U.S. Provincial affirming the Visitor's good standing and suitability and attesting to the lack of reports of inappropriate behavior with minors.
3. The Visitor's Major Superior must also provide his written opinion regarding the Visitor's moral, intellectual, physical, and psychological attributes.
4. The Visitor's Major Superior must also provide a list of the ministries in which the Visitor participated, especially those involving youth, and the name of the Visitor's supervisor in those ministries.
5. The U.S. Provincial should request reference letters from the Visitor's supervisors which attest to the Visitor's cooperation, collaboration, and competence during the Visitor's employment.

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6. The Visitor's Major Superior, the U.S. Provincial, and the Visitor will sign an agreement that includes:
 - a. The reason why the Visitor will be residing in a house in the U.S. Province.
 - b. A description of the Visitor's role and expectations regarding his residence in the U.S. Province.
 - c. All ministries and volunteer assignments the Visitor will be participating in, especially those involving youth.
 - d. Indication of any violation that would merit immediate removal of the Visitor from the U.S. Province.
 7. The U.S. Provincial provides the Visitor with a copy of the Province's Policy on the protection of minors, and requests that the Visitor sign a document acknowledging its receipt and agreeing to adhere to the Policy. A copy of this document should be kept in the Visitor's file and be easily accessible by the Provincial.
 8. The Province provides the Visitor with an orientation program regarding the Province's Policy on the protection of minors, as well as other pertinent information established by the Province for Visitors, e.g., criminal background check, and educational training. This orientation program is done through the local house's standard training on the Province's Policy on sexual misconduct with minors.
 9. The Visitor will complete an educational training program in the local house covering basic concepts of the protection of minors, the state's mandatory reporting requirements, and the diocesan regulations before he begins working with minors.
 10. The Provincial will communicate with the Local Superior assigned to the Visitor in his volunteer assignments and ministries annually.

Appendix E: Transition Plan

The Province follows the schedule of a six-year term for the Provincial. The change of leadership generally includes a period of time to make a transition as the current Provincial reviews important issues and personnel matters with the incoming Provincial.

To ensure that the Accreditation Standards are maintained, and critical information is not lost, the Province will follow the following plan:

1. The outgoing Provincial will review with the incoming Provincial
 - all allegations, reports, and responses of sexual abuse and boundary violations from the previous six years;
 - all current Safety Plans, including risk evaluations, of the last six years;
 - all Individual Plans for those who are not living in a local community where there is a system of support and accountability;
 - the status of the Province in the Accreditation process.
2. Documents pertinent to the Accreditation Standards will be kept in a file dedicated to storing documents relative to the Accreditation process.

Appendix F: Internet Presence and Use of Social Media

1.1. Definitions

Internet presence refers to any form of electronic communication through which a member creates, utilizes, accesses, retrieves, and/or visits online communities or systems to share information, ideas, personal messages, pictures, text, audio and videos that present a member as a teacher or representative of the Church.

The kind of internet presence covered by this policy is restricted to acting in a ministerial capacity through the internet. This policy is not intended to restrict the use of the internet for commercial purposes (e.g., eBay, Amazon) or for communicating with family, friends, and confreres via email, texting, or Facebook, for example.

The primary channels of creating an *internet presence*, also known as “internet publishing” or “content creation,” can be divided into several categories of social media. *Social media* encompasses, but is not limited to, email, texting, chat rooms, instant messaging, video messaging, on-line message boards, gaming systems, landline and mobile phones, online voice communication, and others.

- a. *Social networking* is an online service, platform, or site focused on connecting individual users based on any number of interests, activities, or involvements. A social network typically allows users to share text, messages, video, pictures and other personal data with a selected community of friends and acquaintances. Examples include Facebook, Instagram, MySpace,

Digg, Bebo, Hi5, Friendster, LinkedIn, Snapchat, TikTok, among others.

- b. A *Blog* is a website maintained by an individual or group of individuals with regular commentary, articles, description of events or audio/photo/video content. Blogs are for the most part interactive, allowing readers to leave comments. For purposes of this policy, any site presenting such content, interactive or not, is considered a blog.
- c. *Micro blogging* is a simplified form of blogging consisting of much shorter entries than what is typical for a blog. Micro blogging platforms include Twitter and Tumblr, among others.
- d. *Rich Content* services allow users to easily publish pictures, music, audio presentations, and videos on the internet. Though many of these services share characteristics of social networking, blogging, and micro blogging platforms, their primary focus is the hosting and organization of such content. Flickr, YouTube, and Vimeo are popular examples of rich content services.

1.2. General Norms for the Internet Presence

- a. A member must make the Provincial and his local superior aware of his *internet presence* and provide them with instructions on how to access his *internet presence*.
- b. Opinions expressed through one's *internet presence* should not contradict the doctrine of faith and morals as proposed by the magisterium of the Church.

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- c. Content should contain nothing that defames the good reputation of another person or organization.
 - d. A member's *internet presence* should comply with any guidelines established by the institution where he works and any professional organizations to which he belongs.
 - e. A member's *internet presence* should comply with all applicable laws, including copyright, trademark, privacy, rights of publicity, financial disclosures, and other applicable laws; although the notion of fair use of copyrighted materials and trademarks of third party's material may apply in certain situations, a member should obtain permission from the copyright or trademark holder (e.g., the Sulpician Province) before using any written, visual, audio, or other works or logos or other trademarks of the Society.
 - f. A member's *internet presence* should respect the privacy of colleagues, students, staff, directees, and advisees/mentees by not disclosing personal confidential information or proprietary information that belongs to the Society, or to any institution where he is working (examples include Social Security numbers, financial data, personnel data, test results, evaluation reports, protected health information, personally identifiable information).
 - g. Unless a member is simply repeating something that is already in the public forum (e.g., the appointment of a bishop or rector), he should obtain the permission of the person or persons about whom he is referring in order to respect their privacy and reputation. Moreover, unless he has their permission, he should not use their names or photographs (or other

likenesses) or refer to them in ways that make their identity readily apparent to a knowledgeable person even if a name is not used. Use of any photograph requires the permission of the photographer and of the people depicted in the photo. If someone asks a member to remove a photo or video showing him/her, the member must do so immediately.

- h. Content that comments on the activities and opinions of those in leadership positions within the Roman Catholic Church and the Society of St. Sulpice must be respectful of those persons and the offices they hold and must avoid placing them in embarrassing situations or conflictive positions relative to each other.
- i. Internet content must not be false or misleading.
- j. Since there is nothing truly anonymous on the internet, the foregoing cautions and restrictions also apply to supposedly “anonymous” blogs, comments, posts, or other content.
- k. Members should remember general cautions about the internet: just because information is available on the internet does not mean the information is free to use without permission; also, members should assume that once something is placed on the internet or sent in any type of message through the internet, a member may not be able to control who it is forwarded to and who sees it.
- l. A member must remove any internet content detrimental to the Sulpician mission immediately at the request of the Provincial or local superior.

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- m. A member should respond appropriately to any *internet presence* by colleagues that does not comply with this policy.
 - n. The Province's policies as well as those of the local institution on sexual misconduct apply to social media and electronic communications as well.

1.3. Norms Governing Social Media Communication with Minors

- a. Members should not communicate with minors (*other than relatives*) using social media except as a part of their professional/ministerial responsibilities. This includes email, instant messaging, texting, or social networking sites.
- b. If a minor were to contact a member, a polite response is permitted, but future communications should be avoided.
- c. Use of social media communications for private one-on-one contact with minors is not permitted. In the rare event that these activities occur, the communication must be kept on file and in an easily accessible format that can be retrieved by the Provincial or his delegate.
- d. Written permission from their parent(s) or legal guardian is necessary prior to any social media communication with a minor that cannot be openly seen by the parents or guardian.
- e. All text-based communications sent to or received from a minor must be copied to their parents or guardian. These communications must be kept on file in an easily accessible format that can be retrieved by the Provincial or his delegate.

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- f. Communication with minors via social media is to be restricted to the hours that are appropriate for a phone call to the residence, except in the case of an emergency or to communicate time-sensitive information.
 - g. The “tagging” of a minor in a picture or video is prohibited.
 - h. If an electronic photograph or video is posted on any ministry site, all names related to minors must be removed.
 - i. During any usage of social media communications with minors, members are not to:
 - i. Make comments that are, or could be construed by any observer to be, harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating.
 - ii. Engage in sexually oriented conversations or discussions about sexual activities unless these are part of a pastoral situation.
 - iii. Post sexually oriented or morally inappropriate pictures, photos, or comments.
 - iv. Post photos of minors or details of ministry/program activities involving minors on any social media without the explicit, written permission of a parent or legal guardian.
 - v. Engage in one-on-one video chatting or have one-on-one interaction in a chatroom.

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- vi. Initiate or accept a “*friend*” request (*or similar social media “connection”*) using a personal account.
 - j. All communication between members and minors must be transparent and/or include the parent whenever possible.

1.4. Transparency

- a. When creating internet content by acting in his professional capacity as a minister of the Church, a member must identify himself and his current work affiliation to the Society and the Catholic Church, and not use screen names or pseudonyms.
- b. Internet content that is personal opinion must include a disclaimer that the member does not speak for the Society or for the Catholic Church: “*The views and opinions expressed in this site are solely those of the author and do not necessarily reflect the views or positions of the Society of St. Sulpice or the Catholic Church.*”

1.5. Relation to governance

- a. A member who uses social media services for his ministry must accept his local superior’s request to join his social media, including all networks, groups and applications which the member uses for social networking services.
- b. The Provincial and local superior retain the right to monitor the content of any member’s *internet presence* that is used for ministerial purposes. In assessing the member’s *internet presence*, superiors will use the Norms listed in 1.2 and 1.3 above.

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- c. Since all material that a member places on the social media site for ministerial purposes may be construed to reflect the views of the U.S. Province of the Society of St. Sulpice, the member must make the Provincial and his local superior aware of his practice annually, provide them with instructions on how to access that *internet presence* and provide them with all screen names and identifying names and addresses the member uses.
 - d. The Provincial and local superior reserve the right to request that certain subjects are avoided, certain posts are withdrawn, and inappropriate comments are removed. The member shall abide by such requests.