Prelature of the Holy Cross and Opus Dei

(Delegation of Central United States)

Safe Environment

Policies & Procedures Handbook

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Version Date: October 6, 2022

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Introduction

The Catholic Church, and as part of it, the Prelature of the Holy Cross and Opus Dei in the United States, considers all sexual abuse of minors to be a grave offense against God. Such abuse does violence to central aspects of our Christian faith and life because it offends God's image in the most vulnerable persons—the object of his predilection—and leaves behind wounds that are very difficult to heal. Crimes of this kind are particularly grievous when they are committed by persons who are committed to helping others follow Jesus Christ and his teachings more closely and hence should be giving faithful witness to God's loving care for his little ones. For these reasons the Church makes every effort to prevent these actions, and, when despite these efforts they do occur, to react against them with rigor, both legally as well as pastorally, since "[t]he effective protection of minors and a commitment to ensure their human and spiritual development, in keeping with the dignity of the human person, are integral parts of the Gospel message that the Church and all members of the faithful are called to spread throughout the world" (*Chirograph of His Holiness Pope Francis for the Institution of a Pontifical Commission for the Protection of Minors*, March 22, 2014).

The measures and procedures contained in this Handbook aim to establish and maintain an environment that manifests awareness of and respect for the rights and needs of minors, and which avoids any risk of exploitation, sexual abuse, and mistreatment in Activities of the Prelature with Minors. More particularly, the goals to be achieved are:

- To prevent all forms of violence, physical or psychological abuse, mistreatment, exploitation, or negligence;
- To promote awareness of and respect for the rights and needs of minors and to ensure adequate training for their protection;

- To raise awareness of the obligation to make abuses known to competent authorities and to cooperate with those authorities in preventing and combatting abuses;
- To respond effectively to any abuse or mistreatment against minors that might occur; and
- To offer victims and their families adequate pastoral attention and, to the extent necessary, suitable medical, psychological, and legal assistance.

Definitions

The following terms have a specific meaning in this Handbook.

Prelature of the Holy Cross and Opus Dei: A global entity within the Roman Catholic Church, governed by a Prelate appointed by the Pope, and with headquarters in Rome, Italy. Unless this entire formal title is used, this Handbook refers specifically and only to the Prelature of Opus Dei – Delegation of Central United States ("The Prelature").

Vicar: The Prelature is governed by the Vicar for the Delegation of Central United States and his councils (one for men and one for women), who have been appointed by the Prelate of the Prelature of the Holy Cross and Opus Dei.

Safe Environment Coordinator: Individuals to whom the Vicar has delegated the various duties of Safe Environment Coordinator described in this Handbook. There is also a Safe Environment Assistant Coordinator who will be a woman if the Safe Environment Coordinator is a man, and vice versa. Each will carry out the pertinent functions for their respective section. Wherever the term Safe Environment Coordinator is used it can also be understood to refer to the Safe Environment Assistant Coordinator.

Victim Response Coordinator: A person designated by the Vicar to be available to receive allegations of abuse and/or reports of incidents.

Standing Committee: The Standing Committees are composed of the Vicar or an individual to whom the Vicar has delegated this function, the relevant Safe Environment Coordinator, and at least one other member of the relevant council of the Vicar. There is a Standing Committee for the women's section of the Prelature and a Standing Committee for the men's section of the Prelature.

Activities of the Prelature with Minors: Activities that the Prelature operates and in which minors participate. Activities of the Prelature with Minors may or may not occur at a Third-Party Organization's location. Activities of the Prelature with Minors are limited to: Recollections, Retreats, Spiritual Direction, Mentoring that is primarily about the spiritual life, Sacramental Confession, Circles, classes on Christian doctrine, chapel talks, Meditations, or any liturgical activities presided by a Priest.

Minor: Anyone who participates in Activities of the Prelature with Minors and who is less than 18 years old.

Adult: Anyone involved in Activities of the Prelature with Minors and who is 18 years old or older.

Adult Participant: An Adult who participates in, but does not staff, an Activity of the Prelature in which minors also participate.

Parent: The mother, father, or legal guardian of a minor.

Activity Director: A lay faithful of the Prelature of the Holy Cross and Opus Dei who, under the Vicar's authority, directs Activities of the Prelature with Minors.

Personnel of the Prelature: Adult faithful of the Prelature (lay persons and priests) who, under the Vicar's authority, direct or help operate Activities of the Prelature with Minors. Personnel of the Prelature include Activity Directors and other staff. In the event that a person who is not a faithful of the Prelature helps staff an Activity of the Prelature with Minors, that person will be subject to the same requirements as Personnel of the Prelature.

Priest: A Roman Catholic priest who is incardinated in the Prelature of the Holy Cross and Opus Dei. In the event that a priest who is not incardinated in the Prelature staffs an Activity of the Prelature with Minors, he will be treated equivalently to a Priest who is incardinated in the Prelature.

Third-Party Organization: A Third-Party Organization is an entity that has an agreement with the Prelature for the Prelature to provide activities of a religious and spiritual nature for the individuals who participate in the Third-Party Organization's programming.

Abuse: Any single act or failure to act (negligence) that causes serious physical or emotional harm to a minor or places the minor in proximate danger of such harm; or any sustained pattern of actions or neglect that causes serious physical or emotional harm to a minor, including actions such as belittling, frightening, insulting, discriminating, name-calling, making a person the butt of jokes, failing to provide adequate food, shelter, medical care, or supervision, etc. "Sexual abuse" includes any external, objectively grave offense against the Sixth Commandment of the Decalogue committed with a minor. For a more detailed description of sexual abuse see Appendix 1 of *Policy and Procedures Relating to Allegations of Abuse of Minors or Vulnerable Adults in Activities of The Prelature of Opus Dei in the United States*.

1. Policies

All policies in this Handbook apply to all Personnel of the Prelature in all Activities of the Prelature with Minors, whether they take place at the premises of a Third-Party Organization or somewhere else.

1A. Code of Conduct

Every human being is a child of God. Christian charity should guide all interactions between all individuals in Activities of the Prelature with Minors. Christian charity demands refined speech, refined behavior, and refined respect for other persons and their dignity.

The Prelature has zero tolerance for any abuse of minors who participate in Activities of the Prelature with Minors, perpetrated by any adult or minor in connection with Activities of the Prelature with Minors.

This Code of Conduct applies to all Personnel of the Prelature and Adult Participants in their interactions with minors in Activities of the Prelature with Minors, regardless of whether the interactions occur during or outside a scheduled Activity of the Prelature with Minors.

For clarification about any guideline or about anything not specifically addressed here, speak with the Activity Director.

1. We do not tolerate any abuse of minors in connection with Activities of the Prelature with Minors, whether perpetrated by another minor or an adult. Abuse of a minor will result in disciplinary action, possibly including dismissal or termination from Activities of the Prelature with Minors and the Prelature's cooperation with law enforcement.

2. Whenever an individual adult is with an individual minor, they should always remain in view of other people and avoid being alone in any isolated place. When meeting in a room, they should meet with the door open or with a window in the door allowing them to be easily seen.

3. Priests should hear confessions and give spiritual direction to minors only in a confessional with a screen, in a room with a window in the door allowing them to be easily seen, or in a place where they are in the sight of other people (but out of earshot). Priests should hear the confessions of and give spiritual direction to females only in a confessional with a screen.

4. Priests will not provide spiritual direction to minors through electronic means. Spiritual direction may only be provided in person.

5. No adult should ever be alone with a minor in a bedroom. No minors should ever be in an adult's bedroom, and it is better if they do not enter the adult residents' area of a building.

6. In overnight activities, the Priest should have his own bedroom.

7. Any overnight activities or one-day trips should include a sufficient ratio of Personnel of the Prelature to minors, and never fewer than two Personnel of the Prelature.

8. In overnight activities, no adult should share a bedroom (or tent) with minors. Minors should sleep either in single rooms or in rooms with three or more.

9. Adults and minors should have separate bathrooms, showers, and/or changing areas, or use the bathroom, showers, and/or changing areas at separate times. No adult should use the bathroom, shower, or dress in the presence of minors and vice-versa. Whenever minors need to dress with other minors present, they should be instructed to

use bathrobes or at least towels. All showers should be individual showers or have individual stalls. There should never be two minors alone together in a bathroom, changing area, or showering area, unless adults are supervising. Whenever supervision is necessary, at least two adults should stand outside the bathroom entrance, shower room, or changing area, and at least two adults should enter the bathroom, shower room, or changing area together.

10. An adult should never be alone in a vehicle with a minor. If adults need to drive minors, there should be a minimum of three people in the car (two adults and one minor, or one adult and two minors). The only exception may be an emergency, such as driving a minor injured during an activity to the Emergency Room or Urgent Care.

11. Before a minor attends an overnight activity, Personnel of the Prelature must obtain written approval from the minor's Parent.

12. Adults and minors must never taunt, intimidate, belittle, bully or otherwise verbally abuse other minors.

13. Adults must avoid any physical contact that is sexual or could be misconstrued as sexual. In this area, it is better to err on the side of caution. Wrestling and rough-housing should be avoided.

14. Adults must never invite or aid minors to smoke, drink alcohol, or use illegal drugs. The possession and use of marijuana are always prohibited, regardless of its legality.

15. Personnel of the Prelature may exchange activity-related text messages with high school students (and not with younger students), but only after obtaining general approval from the minor's Parent.

16. Personnel of the Prelature may speak by phone or audio chat with a minor, but only after obtaining general approval from the minor's Parent. Personnel of the Prelature may interact with minors through video calls only within view of other Personnel of the Prelature or if the minor is within the view of his or her Parent. Prior to the minor completing 7th grade, for each audio or video interaction Personnel of the Prelature must first speak with the minor's Parent before asking to speak with the minor.

17. Personnel of the Prelature and a minor may meet with each other outside of regularly scheduled activity hours, but only after obtaining general approval from the minor's Parent and only if all other policies are followed.

18. Adults are prohibited from giving individualized gifts to minors, unless a minor's Parent has approved a particular gift for their child.

19. Adults must never give or show to a minor pornographic or indecent media or materials. In speaking about matters related to the virtue of chastity, it is best to emphasize the positive aspects of the ascetical struggle.

20. The access, display, production, possession, or distribution of pornography through any of the Prelature's property or equipment, or in association with any Activities of the Prelature with Minors, is strictly prohibited.

21. Anyone who knows or reasonably suspects that a minor has been abused in connection with any of the Prelature's activities must immediately inform the Activity Director or call the Prelature's reporting Helpline, 646-742-2741. In many States, the law requires adults who work with minors to report to State authorities known or reasonably suspected child abuse or neglect. All Personnel of the Prelature will undergo training on abuse reporting requirements in their State.

22. The Prelature takes every suspicion or allegation of abuse seriously and will cooperate with civil authorities to investigate suspected or alleged abuse. Personnel of the Prelature are required to cooperate with any outside or internal investigation of suspected or alleged abuse of minors. Failure to cooperate may be grounds for termination from Activities of the Prelature with Minors.

23. If a minor says that he/she has been abused, Personnel of the Prelature should listen calmly without disputing the story, ask for pertinent details (who, when, what), and tell him/her that he/she will speak to the Activity Director. The minor should be encouraged to tell his/her Parent.

I, _____, have read the above guidelines and agree to abide by them in connection with all Activities of the Prelature with Minors. I understand that I will be asked to review and sign my agreement with the Prelature's guidelines annually.

_____ _____

Signature Date

1B. Additional Policy Guidelines

These Additional Policy Guidelines expand upon the Code of Conduct above. All Personnel of the Prelature should be familiar with and abide by these additional guidelines.

Situations not directly addressed in this Handbook will occasionally arise. The following core principles should always guide these situations:

1B.1 Christian Environment

Every human being is a child of God. Christian charity should guide all interactions between all individuals in Activities of the Prelature with Minors. Christian charity demands refined speech, refined behavior, and refined respect for other persons and their dignity.

1B.2 One-on-One Interactions

An adult must never be alone with a minor outside the view of others. In the United States, most abuse occurs when an adult is alone with a minor, or when a minor is alone with another minor. If a situation arises in which an adult would be alone with a minor outside the view of others, then the interaction is prohibited.

In the event of an emergency, an adult may take necessary actions to address the emergency. For example, if a minor is injured during an overnight activity, and only one adult can take the minor to the hospital, the adult may do so. However, the adult must immediately inform both the Activity Director and the minor's Parent about the emergency situation.

1B.3 Physical Contact

Appropriate Physical Interactions with and between minors	Inappropriate Physical Interactions with and between minors
• Handshakes • High-fives and hand slapping • Side hugs • Pats on the shoulder or back • Touching hands, arms, shoulders • Arms around shoulders	• Full-frontal hugs • Kisses • Showing affection in isolated areas • Lap sitting • Wrestling • Piggyback rides • Tickling • Exposing oneself • Any type of massage • Any form of unwanted affection • Touching bottom, chest, or genital areas • Hitting, spanking, shaking, slapping • Unnecessary restraints • Viewing or showing others pornography

1B.4 Verbal Interactions

Appropriate Verbal Interactions with and between minors	Inappropriate Verbal Interactions with and between minors
• Appropriate jokes • Encouragement • Praise • All other speech that accords with Christian virtue	• Name-calling • Bullying • Ridicule or Humiliation • Discussing sexual matters outside the context of specific spiritual help that the minor is seeking and that the minor has initiated • Cursing • Hazing • Off-color or sexual jokes • Shaming • Belittling • Derogatory remarks • Harsh language that may frighten, threaten, or humiliate another minor • Derogatory remarks about another person or his/her family • Inappropriate games, for example, *Truth or Dare* and *Never Have I Ever*

1B.5 Bullying

Bullying is never tolerated in Activities of the Prelature with Minors. Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength. Bullying can take on various forms including:

1. *Physical bullying* – when one person engages in physical force against another person, such as by hitting, punching, pushing, kicking, pinching, or unreasonably restraining the other person.

2. *Verbal bullying* – when someone uses words with the intention of hurting another, such as by belittling or calling another a hurtful name.

3. *Nonverbal or relational bullying* – when one person manipulates a relationship or desired relationship to harm another person. This includes social exclusion, friendship manipulation, or gossip. This type of bullying also includes intimidating another person by using gestures.

4. *Cyberbullying* – the intentional and overt act of aggression toward another person by way of any technological tool, such as email, instant messages, text messages, digital pictures or images, or website postings (including blogs). Cyberbullying can involve:

    a) Sending mean, vulgar, or threatening messages or images;

    b) Posting sensitive, private information about another person;

    c) Pretending to be someone else in order to make that person look bad; and

    d) Hazing – an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers that person regardless of that person's willingness to participate.

5. *Sexualized bullying* – when bullying involves behaviors that are sexual in nature. Examples of sexualized bullying behaviors include sexting, bullying that involves exposure of private body parts, and verbal bullying involving sexualized language or innuendos.

1B.6 Electronic Communication

Technological developments tend to outpace existing policies. The following principles should be observed in every situation that may arise:

1) Rule of Three: Electronic communications between Personnel of the Prelature and minors must occur in an open electronic environment, following the "Rule of Three." Either another Personnel of the Prelature or the minor's Parent must be copied on the electronic communication, must have ready access to the electronic communication (such as an open Social Media forum), or must be within view when the communication is taking place (such as a video chat). Prior to the minor completing 7th grade, for each video interaction Personnel of the Prelature must speak first with the minor's Parent before asking to speak with the minor.

2) Social Media: Personnel of the Prelature are prohibited from "friending" minors on Social Media and exchanging direct or private messages with minors via Social Media.

3) Phone Calls: With parental consent, Personnel of the Prelature may conduct a traditional voice-only phone call with a minor. Prior to the minor completing 7th grade, for each phone call Personnel of the Prelature must first speak with the minor's Parent before asking to speak with the minor.

4) Text Messaging: With parental consent, Personnel of the Prelature may exchange activity-related text messages with a high school student (and not with younger students).

A Parent may provide consent for phone calls and text messages verbally or in writing, and the Parent may rescind consent at any time. The minor's Parent should provide the minor's phone number to Personnel of the Prelature (i.e., the minor should not provide his or her phone number to Personnel of the Prelature), and where practical Personnel of the Prelature should obtain written approval (for example, clearly spelled out in an Activity application or clearly spelled out on an Emergency Contact form that a Parent completes for their child).

1B.7 Gifts

Prizes earned in competitions are permitted. Gifts that are anonymous and generally available to all minors are permitted (for example, a Christmas gift swap, or a gift given by the Activity as a whole to every minor in the Activity). Adults are prohibited from giving individualized gifts to minors, unless a particular minor's Parent has approved a particular gift.

1B.8 Adult Participants

All policies contained in this Handbook apply to Adult Participants in Activities of the Prelature with Minors, although Adult Participants as participants are not required to undergo Screening and Selection, and Training procedures. Examples of Adult Participants are students who have turned 18 years old and older family members of minors who attend an activity with a minor (such as the minor's Parent). Personnel of the Prelature must ensure that Adult Participants are aware of these policies and should hold Adult Participants to the same standards that Personnel of the Prelature are held to.

An Adult Participant should not contact a minor outside of Activities unless that minor is the Adult Participant's own family member. If an Adult Participant attempts to contact a minor who is not a family member without consent from that minor's Parent, then the Adult Participant may be prohibited from participating in Activities of the Prelature with

Minors. If the situation poses a threat to the minor involved then Personnel of the Prelature will notify local civil authorities.

Because some Adult Participants are still high school students, Activity Directors will apply this policy with ordinary prudence to protect minors from inappropriate interactions with adults (for example, student classmates may freely contact each other outside of an activity).

1B.9 Mandatory Reporting

In many States, adults who work with minors are required by law to report suspected or known abuse to State authorities. For a complete list of each state's mandated reporting requirements and contact information, please see the U.S. Department of Health & Human Services guidelines for reporting abuse: https://www.childwelfare.gov/topics/can/.

1B.10 Cooperation in Investigations

The Prelature takes every allegation of abuse or misconduct seriously and will cooperate with legal authorities to investigate all cases of alleged abuse. Personnel of the Prelature must cooperate with any external investigation conducted by outside authorities or internal investigation conducted by the Prelature or persons given investigative authority by the Prelature.

Cooperation with investigations includes, but is not limited to:

- Promptly acknowledging and responding to requests for information;
- Making oneself available for meetings with investigating officials;
- Providing full, accurate, and truthful information;

- Keeping confidential any information learned or transmitted during the investigation, unless directed by the pertinent authorities; and
- Preserving relevant information and documents.

Personnel of the Prelature's failure to cooperate with an investigation will result in disciplinary action up to and including termination from Activities of the Prelature with Minors.

2. Screening and Selection of Personnel

2A. Initial Screening and Selection

Personnel of the Prelature are selected through the following process:

1. A written application
2. A face-to-face interview (a video interview is also permitted)
3. Three reference checks
4. Criminal background check
5. Agreement to Code of Conduct

A screening process that reveals a history of committing child abuse or sexual crimes is automatically disqualifying.

The decision to accept a candidate as Personnel of the Prelature is made by the Vicar and his relevant council, also in consultation with the Safe Environment Coordinator.

2B. Ongoing Screening

Criminal background checks must be repeated at least once every two years for Personnel of the Prelature.

Personnel of the Prelature who are arrested or convicted of a crime must notify the Activity Director. If the person arrested or convicted of a crime is the Activity Director, then the Activity Director must notify the Victim Response Coordinator or the Safe Environment Coordinator.

Personnel of the Prelature who are discovered to have personal problems with excessive use of alcohol or with using illegal drugs may be required to undergo drug screening as a condition of continuing to serve as Personnel of the Prelature.

2C. Low Access Individuals

Low Access Individuals: Some individuals will have limited access to minors through Activities of the Prelature with Minors, but these individuals are not actually involved in Activities of the Prelature with Minors. The Prelature considers Low Access Individuals to be the lay individuals who live in residences where Activities of the Prelature with Minors occur, but who are not involved in these activities. Low Access Individuals have few or no opportunities to develop relationships with minors over time.

Low Access Individuals are held to the following screening and training practices:

- A multi-state criminal records search and national sex offender registry check.
- Signed agreement to adhere to the Prelature's Code of Conduct.
- Review of the Prelature's abuse prevention policies, with particular focus on the prohibition of being alone with a minor outside the view of others and focus on to whom to direct questions or concerns.

By contrast, High Access Individuals are presented with opportunities to develop relationships with minors in the Prelature's activities over time. There may be some individuals who are not regular Personnel of the Prelature but who nevertheless interact

with minors in connection with Activities of the Prelature with Minors often and over an extended period of time. The Safe Environment Coordinator and Activity Directors are responsible for identifying such High Access Individuals and ensuring that they are held to all the standards and practices outlined in this Handbook.

3. Training

3A. Initial Training

New Personnel of the Prelature must complete training on the following topics before beginning to participate in Activities of the Prelature with Minors:

- The Prelature's Safe Environment Policies and Procedures;
- Maintaining appropriate boundaries with minors;
- Definitions of abuse;
- Facts about sexual abuse;
- How abuse happens in organizations;
- How to prevent false allegations of abuse.

3B. Training to Be Completed Within First 90 Days

New Personnel of the Prelature must complete training on the following topics within their first 90 days of participating in Activities of the Prelature with Minors:

- How to recognize and respond to inappropriate behaviors and policy violations, including:
    - High-risk circumstances for boundary violations;
    - How to recognize red-flag behaviors and boundary violations;

    - How to respond to boundary violations, suspicious or inappropriate interactions, or policy violations;
    - Mandatory reporting requirements; and
    - How to respond if a minor discloses abuse.
- Effective monitoring and supervision practices for managing minors and high-risk activities, including:
    - Overview of the Personnel of the Prelature's role in abuse prevention and monitoring;
    - Supervision strategies that can reduce risk;
    - Identifying and managing high-risk activities and circumstances;
    - Examples of minor-to-minor sexual abuse;
    - Characteristics of minors who are more likely to act out sexually;
    - Characteristics of minors who are more likely to be abused by another minor;
    - Steps for preventing inappropriate behavior or sexual activity between minors; and
    - How to respond to incidents of inappropriate behavior or sexual activity between minors.

3C. Annual Training

Each year, Personnel of the Prelature must receive training on the following topics:

- The Prelature's Safe Environment Policies and Procedures;

- Maintaining appropriate boundaries with minors; and
- At least one additional review topic to be selected by the Prelature, based upon current needs to update Personnel of the Prelature's skills and knowledge related to abuse prevention.

3D. Training for Policy Changes

When there are changes to the Prelature's Safe Environment policies, Personnel of the Prelature will receive training on the changes within 90 days of the changes.

3E. Training for Activity Directors

Activity Directors must complete training on the following topics before directing Activities of the Prelature with Minors:

- Effective supervision practices related to abuse risk management:
    - Overview of the Activity Director's role in abuse prevention;
    - Supervision strategies that can reduce risk;
    - Importance of their increased presence and observation of activities; and
    - Using teaching moments in supervision.
- Responding to inappropriate behaviors or allegations of abuse:
    - How to recognize red flags and boundary violations;
    - High-risk circumstances for boundary violations;
    - Steps for how to respond to boundary violations, inappropriate interactions, or policy violations;

- Creating a culture of responding and reporting; and
- Steps to take when someone reports suspicious or inappropriate behaviors.

3F. Training for Screening and Selection

Anyone involved in the process of screening and selecting new Personnel of the Prelature must complete the following training before carrying out this process:

- Screening and Selection:
    - Why screening and selection is important;
    - Managing the organization's screening resources;
    - Techniques for screening out potential offenders;
    - The limitations of criminal background checks;
    - How to use the application to assess for abuse risk;
    - Behavioral interviewing techniques using questions designed to assess for abuse risk;
    - Standards for conducting reference checks; and
    - How to identify red flags at any point in the screening process.

3G. Training for Members of the Standing Committee

The Standing Committee receives the same training as Personnel of the Prelature and Activity Directors. In addition, the Standing Committee's training includes the following topics:

- Scope and nature of the problem of abuse

- How abuse affects victims and organizations
- Commitment to abuse prevention efforts
- System-wide strategies for abuse prevention
- Abuse response mechanisms
- Critical steps each individual on the Standing Committee can take to promote a safe environment in Activities of the Prelature with Minors.

4. Monitoring and Supervision

Offenders need three things to commit abuse: access to minors, privacy with minors, and control over minors. Minor-on-minor abuse occurs in similar circumstances. Our Monitoring and Supervision policies aim to reduce an offender's opportunity to abuse.

4A. Identifying Clothing

In general, all Personnel of the Prelature are required to wear professional or business casual attire during Activities of the Prelature with Minors. In general, Priests should dress as Catholic Priests with Roman Collars during Activities of the Prelature with Minors. Activity Directors have the authority and discretion to determine when more specifically identifying clothing, such as polo shirts with logos, should be worn for safety and personnel management, such as during large activities.

4B. Adult-To-Minor Ratios

A minimum of 1 Personnel of the Prelature is required for every 15 minors participating in Activities of the Prelature with Minors. In all cases, there must be at least 2 Personnel of the Prelature running and supervising an overnight activity. Minors, no matter their role, are never counted as Personnel of the Prelature but always as minors.

4C. Minors Arriving To and Leaving From Activities

Because many minors arrive to and leave from activities independently of their Parent, it is important for Personnel of the Prelature to ensure that they have arrived safely and that they have left to return home when expected.

Minors are required to greet the Activity Director or a designated delegate when arriving to an activity. Minors are also required to say goodbye to the Activity Director or a designated delegate when leaving an activity.

4D. Supervising Minors During Activities

Minors are always supervised by Personnel of the Prelature during activities.

The following guidance will help ensure that Personnel of the Prelature know the whereabouts of all minors and that minors are interacting with each other appropriately:

- Minors should remain within the line of sight of Personnel of the Prelature;
- When activities are large or spread out, Personnel of the Prelature should split up into zones to monitor all locations where minors are;
- Minors under the age of 12 should always be engaged in a scheduled, structured activity; and
- Minors over the age of 12 should always be engaged in a scheduled, structured activity, or should otherwise be only located in authorized, supervised locations.

4D.1 Minors with Special or Unique Needs

If a minor has special or unique needs, Personnel of the Prelature will determine these needs at intake with the minor's Parent. If such needs become apparent after a minor has begun participating in an activity, then Personnel of the Prelature will hold a meeting with the minor's Parent before the minor continues participating. If the minor is accepted

into the activity or permitted to continue participating in an activity, Personnel of the Prelature will document with the minor's Parent an agreed plan for supervising and ensuring the safety of that minor.

Examples of special or unique needs requiring supervision plans to ensure a particular minor's safety include:

- Minors who have life-threatening allergies
- Minors who have special health problems, such as severe asthma
- Minors recovering from broken bones or surgery
- Minors on the autism spectrum.

4D.2 Cell Phone and Internet Use

To facilitate attention to minors, Personnel of the Prelature may use cell phones and the internet during activities only for necessary activity-related communications and tasks, and note-taking.

Internet access through activity-provided equipment is filtered, fire-walled, and monitored. Personnel of the Prelature should not allow anyone to use activity-provided equipment or their own personnel equipment to access pornography or other inappropriate material through the internet. Neither Personnel of the Prelature nor minors may expect their internet use during activities to be private.

4D.3 Overnight Activities

- Everyone must use a unique, individual bed or sleeping bag.
- Minors will sleep in separate rooms/tents from adults.

- Minors will either have single bedrooms/tents or will share rooms/tents with three or more people. Rooms/tents for just two persons are prohibited.
- Personnel of the Prelature will walk by rooms/tents until all minors are quietly in bed.
- Minors who are similar in age should be grouped together for sleeping arrangements.
- When minors are separated by two or more years of age, they must have separate rooms/tents. By exception, six or more minors of significantly different ages may sleep in a cabin together.

4D.4 Bathrooms, Showers, and Changing Areas

- Minors will use bathrooms, showers, and changing areas that are separate from those used by adults. If the facilities do not allow this, then minors and adults will use these facilities at strictly separate times to be determined by the Activity Director.
- Personnel of the Prelature will ensure that minors, while showering and dressing in these facilities, are aware they are being supervised. If it becomes necessary to enter the facility, at least two adults will enter the facility together to address the situation.
- When Personnel of the Prelature who are minors are two or more years different in age from other minors, then they must use separate facilities from the other minors. If facilities do not allow this, then they will use these facilities at strictly separate times or under supervision as determined by the Activity Director.

4E. Visitors

Only authorized persons may interact with minors during activities. The Activity Director monitors the presence of visitors to an activity. A visitor must not be left alone with a minor.

5. Reporting Concerns

Anyone – Personnel of the Prelature, minors, parents, and anyone else – should be made to feel welcome to express any concerns or complaints, including observations of others whose interactions may be suspicious or inappropriate, in connection with Activities of the Prelature with Minors.

In general, the best person to bring concerns or complaints to is the Activity Director.

In general, if the concerns or complaints relate to the Activity Director, the best person to speak with is either the Assistant Activity Director or, if the matter is more serious, the Vicar or someone on the Vicar's council.

However, if the concerns or complaints relate to an Activity Director's interactions with Minors that may be suspicious or inappropriate, such concerns should be communicated immediately and directly to the Safe Environment Coordinator or the Victim Response Coordinator (reachable at the Prelature's help line, 646-742-2741).

Concerns or complaints may be expressed verbally. Written communications are also encouraged, especially for more serious matters.

5A. Responding to Concerns

We will treat each concern or complaint regarding Activities of the Prelature with Minors with the seriousness it deserves. We will provide a timely, thorough, and objective response. If a concern is expressed in writing, or if the concern is regarding the safety of

Minors, Activity Directors will maintain documentation of the concern and the response to the concern. When an individual shares a concern or complaint:

1. They will be given the time and attention necessary to allow them to share their thoughts in person;
2. They will be thanked for sharing their concerns and for contributing to maintaining a healthy environment for everyone;
3. They will be advised that their concerns will be taken seriously;
4. If the concerns require a response, once a response is decided, they will be informed, in general statements to protect others who may be involved, of the steps the Prelature will take in addressing the matter;
5. They will be encouraged to speak again with the person they first spoke with if they have additional information; and
6. They will be protected from any form of retaliation for expressing their concerns.

5B. Concerns about Sexually Inappropriate Behavior

Concerns are especially serious if sexually inappropriate behavior is involved. To assist with the immediate and thorough investigation of the issue, a verbal or written communication about the concern should include:

1. The name(s) of the individual(s) involved;
2. The date(s) the behavior occurred;
3. The name(s) of any known witnesses; and
4. A summary of the inappropriate conduct, including:
    a. The specific behavior involved;

b. Direct quotes, when available; and

c. Any relevant documentation or other evidence.

5C. Confidentiality

To the extent possible consistent with the law, the Prelature will protect the confidentiality of anyone who reports concerns about abuse, or other violations of law or policy, as well as the confidentiality of other parties involved. Legal and civil authorities (for example, police or child protective services) may require confidential information in order to investigate any report of illegal conduct. However, confidential information will be disclosed only as strictly needed to conduct a proper investigation.

5D. Anonymous Reporting

Reporting sexually inappropriate behavior or other abuse can be difficult. Because it is important to us that everyone be able to report concerns, we provide the following mechanisms through which anonymous reports can be made:

1. U.S. Mail:

ATTN: Victim Response Coordinator
139 E. 34th St.
New York, NY 10016

2. The Prelature's reporting Helpline, 646-742-2741.

Please keep in mind that the Prelature's ability to respond quickly and adequately may be negatively affected if the information provided is limited. The credibility and subsequent investigation of any anonymous allegation will be determined on a case-by-case basis. However, the Prelature will respond to all anonymous reports to the extent possible.

6. Participation of Minors and Parents in the Prelature's Maintenance of a Safe Environment

6A. Publication of Safe Environment Policies and Procedures

A copy of this Handbook will be published and available for easy download or viewing on the Safe Environment page of the website for the Prelature of the Holy Cross and Opus Dei – United States Region, located in the "About Opus Dei" menu: https://opusdei.org/en-us/article/safe-environment/

Similarly, each Third-Party Organization that has contracted with the Prelature will publish its own Safe Environment policies and procedures for easy download or viewing on the Safe Environment page of its own website. On each Safe Environment webpage, each Third-Party Organization will provide an easy-to-find link to the Safe Environment page of the Opus Dei – United States Region website, described above.

6B. Information for Minors

In ways appropriate to each activity and the age of the minors involved, Activity Directors should communicate the following information to minors who participate in Activities of the Prelature with Minors.

The Prelature is committed to creating a Christian atmosphere in its activities where everyone feels welcomed, respected, and treated with the dignity of a child of God. The Prelature is committed to maintaining zero tolerance for abuse or behavior that detracts from the Christian atmosphere we should have in our activities.

It is imperative that everyone actively contributes to creating this Christian environment.

If a minor observes any behavior on the part of anyone else that is less than Christian, is suspicious, is inappropriate, or is a direct policy violation, then that minor should share his/her observations with Activity Personnel.

If a minor ever feels threatened, scared, or uncomfortable with any behavior of the adults involved in an activity, the minor should take one or more of the following actions:

- The minor should say “no” to the behavior
- The minor should try to leave the room as soon as possible
- The minor should tell Personnel of the Prelature
- The minor should tell his or her Parent.

6C. Information for Parents

In ways appropriate to each activity and to the atmosphere of confidence and trust that characterizes Activities of the Prelature with Minors, Activity Directors should communicate the following information to parents of minors who participate in Activities of the Prelature with Minors.

The Prelature is committed to creating a Christian atmosphere in its activities where everyone feels welcomed, respected, and treated with the dignity of a child of God. The Prelature is committed to maintaining zero tolerance for abuse or behavior that detracts from the Christian atmosphere we should have in our activities.

It is imperative that everyone actively contributes to creating this Christian environment.

If a Parent observes any behavior on the part of anyone else that is less than Christian, is suspicious, is inappropriate, or is a direct policy violation, then that Parent should share his/her observations with the Activity Director or the Prelature’s Safe Environment Coordinator, or call the Prelature’s reporting Helpline, 646-742-2741.

7. Responding To Potential Abuse

7A. Response of Personnel of the Prelature to Red-Flag Behaviors or Policy Violations

Personnel of the Prelature are obliged immediately to report their observations of red-flag (inappropriate) behaviors and/or policy violations to the Activity Director or other Prelature authorities, in accord with the Prelature's reporting procedures.

The following are examples of red-flag or inappropriate behaviors that all Personnel of the Prelature are required to report:

- Any violation of the Prelature's abuse prevention policies
- Anyone seeking unauthorized private time or one-on-one time with minors inside or outside of scheduled activities
- Anyone giving unauthorized gifts to individual minors
- Anyone sending unauthorized electronic communications through text messaging, social media, online gaming, etc. in violation of the Prelature's electronic communication policy
- Anyone making sexually suggestive comments to minors
- Anyone showing favoritism towards a minor or minors with specific characteristics
- Minors disclosing that an adult makes them feel uncomfortable.

If Personnel of the Prelature witness suspicious or inappropriate behaviors or policy violations from another Personnel of the Prelature or adult participant, the individual is instructed to do the following:

- Interrupt the behavior;
- Report the behavior to the Activity Director or the Safe Environment Coordinator. If the concern is particularly serious, if possible, write down your observations;
- If you are not comfortable making the report directly, make it anonymously;
- If the report is about the Activity Director, report to the Victim Response Coordinator or the Safe Environment Coordinator;
- Complete an Incident Report but do not conduct your own investigation;
- Report the matter again if you see that it has not been resolved.

7B. Response of Personnel of the Prelature to Incidents or Allegations of Abuse

1. Personnel of the Prelature are required to report any suspected or known abuse of minors perpetrated by other Personnel of the Prelature or Adult Participants immediately and directly to the Prelature's Victim Response Coordinator who can be contacted at the Prelature's reporting Helpline (646-742-2741) or to the Safe Environment Coordinator, so that immediate steps may be taken to ensure the safety of alleged victims and others who may be at risk. Such reports are confidential.
2. Mandated reporting laws may require Personnel of the Prelature to report to State authorities any suspected abuse or neglect of a minor – whether on or off the activity's normal location and whether perpetrated by Personnel of the Prelature or others. A person who is mistaken in his or her report of suspected abuse is immune

from civil or criminal liability if the report was made in good faith and without malice. More information is available through www.childwelfare.gov/can.

Additional guidelines for Personnel of the Prelature responding to incidents or allegations of abuse:

- If you witness abuse, safely interrupt the behavior immediately.
- Be sure the minor is no longer in danger and take steps to prevent any further harm. Protect the alleged victim from intimidation, retribution, or further abuse to the extent possible.
- If an individual discloses an incident of abuse to you, assure the individual that they were correct to tell you.
- Immediately report the allegation or incident to the Prelature's Victim Response Coordinator or Safe Environment Coordinator. If you report it to State authorities, make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency.
- Document the incident, disclosure, or any circumstances causing your suspicion of abuse. Gather as much information about the allegation as you can. For example, who made the report, who was allegedly abused, who was the alleged abuser, what was the nature of the alleged abuse, where and when did the alleged abuse occur, etc.
- Accurately record everything you learn in as much detail as you can. Remember, your notes may be read and relied upon by others. Stick to the facts.

- It is not your job to investigate the incident, but it is your job to report the incident as outlined here in a timely manner. The Prelature will follow its internal investigation procedures, in addition to cooperating with civil authorities.

- If it does not appear that any steps have been taken to correct the situation, you should report it again to the Victim Response Coordinator or Safe Environment Coordinator.

7C. Response of Personnel of the Prelature to Minor-To-Minor Sexually Inappropriate Behavior

Minor-to-minor sexual behaviors can include inappropriate touching, exposing body parts, using sexualized language, making threats of sexual activity, engaging in sexual activity, and similar types of interactions.

If Personnel of the Prelature witness minor-to-minor sexual behaviors, they should do the following:

- Safely separate the minors as soon as possible.

- Calmly explain that such interactions are not permitted.

- Complete an Incident Report, including what you observed and how you responded.

- If the behavior involves explicit physical sexual activity, notify the Activity Director. Unless the Activity Director does so, also notify the minors' Parents and State authorities as required by mandated reporting laws.

    - Do not attempt to determine when the minors' behavior was "sexual curiosity." There is no standard definition of what normal sexual curiosity

looks like. Trained civil authorities use criteria to investigate and determine when the minor's behavior is sexual curiosity.

- If the problem is recurring, or if the single incident was serious, the minors may not be allowed to return to the Prelature's activities.

- Identify how minors will be managed or supported to prevent further occurrences of sexual activity, including additional supervision requirements.

7D. The Prelature's Investigation of Allegations of Abuse

The Prelature's investigation of any allegation or report of abuse—sexual or otherwise—of a minor by Personnel of the Prelature will be carried out in accord with *Policy and Procedures Relating to Allegations of Abuse of Minors or Vulnerable Adults in Activities of The Prelature of Opus Dei in the United States* which can be found on the Prelature's Safe Environment webpage: https://opusdei.org/en-us/article/safe-environment/. If an allegation or report has to do with behavior occurring in a Third-Party Organization's programs, the Safe Environment Coordinator will inform that organization and the Prelature will collaborate in the Third-Party Organization's investigation to the extent needed.

8. Governance

8A. Standing Committee for Safe Environment

The Prelature's Standing Committee for Safe Environment is responsible for abuse prevention and response in connection with Activities of the Prelature with Minors. The Standing Committee meets to discuss Safe Environment matters at least once a year and is responsible for:

Staying current with best practices for abuse prevention and response, through regular training as recommended by Praesidium;

1. Specifying Screening and Selection requirements for applications, interviews, and reference checks;

2. Ensuring that red flags that appear during the Screening and Selection process are properly reviewed and addressed;

3. Providing or coordinating Safe Environment trainings;

4. Maintaining documentation showing completion of screening, selection, and training requirements for each High Access Individual and Low Access Individual;

5. Keeping records of the Activities of the Prelature with Minors;

6. Reviewing and maintaining documentation of all incident reports or complaints received;

7. Reviewing verbal and written reports from Personnel of the Prelature, adult participants, minors, and parents who are involved in Activities of the Prelature with Minors;

8. Reviewing reports from direct observations of Activities of the Prelature with Minors;

9. Ensuring that the Prelature responds to drift from organizational policies and standards with a specific corrective action plan that Activity Directors will be responsible for implementing;

10. Reviewing and approving requests for new Activities of the Prelature with Minors or requests to locate an Activity of the Prelature with Minors at a new location;

11. Ensuring that State mandatory reporting laws are followed in the case of an allegation or incident of abuse in connection with Activities of the Prelature with Minors;

12. Collaborating as needed with the Prelature's internal investigation of any allegation or incident of abuse in connection with Activities of the Prelature with Minors.

8B. Working with Third-Party Organizations

The Prelature contracts with various non-profit educational or cultural organizations that provide enrichment programming to minors. These organizations ask the Prelature to provide activities of a religious and spiritual nature for the individuals who participate in their programming. Most often, Activities of the Prelature with Minors take place at the Third-Party Organization's premises.

Written agreements between the Prelature and Third-Party Organizations include:

- **Commitment to Safe Environment**: The Third-Party Organization will have a clearly expressed commitment to preventing abuse and maintaining a Safe Environment for minors in its programming.

- **Code of Conduct**: The Third-Party Organization will adhere to a Code of Conduct that equals or exceeds the Prelature's standards set forth in the Prelature's own Code of Conduct outlined above in Section 1A.

- **Screening and Selection**: Third-Party Organizations must screen and select their personnel following standards that equal or exceed the Prelature's Screening and Selection practices, as outlined above in Section 2A.

- **Training**: Third-Party Organizations must ensure that all individuals who interact with minors receive training that equals or exceeds the Prelature's training requirements outlined above in Section 3.

- **Reporting**: The Third-Party Organization must comply with State law mandatory reporting requirements. The Third-Party Organization must adhere to internal and external reporting requirements that equal or exceed the Prelature's internal and external reporting requirements outlined above in Section 5. The Third-Party Organization must inform the Prelature of all serious policy violations, serious confirmed incidents of abuse, and all allegations or incidents of sexual abuse, whether or not the individuals involved are faithful of the Prelature.

- **Monitoring**: The Standing Committee will monitor Third-Party Organizations to ensure they are fulfilling these requirements. Third-Party Organizations agree to permit scheduled and reasonable unscheduled observation visits by members of the Prelature's Standing Committee.