SAFE ENVIRONMENT HANDBOOK

Policies and Procedures

U.S.C.C.B. Charter for the Protection of Children and Young People

Diocese of Bridgeport

March 29, 2026

The Diocese of Bridgeport urges every person who has information about any form of abuse or neglect, knowledge of someone in possession of child pornography or suspected boundary violations toward Minors or Vulnerable Adults, to report this information to Civil Authorities and to the Diocese of Bridgeport.

Bishops, all other members of the Clergy, Candidates for Ordination, Religious Sisters and Brothers, all categories of Employees, Lay Consecrated Religious, Volunteers, Tenants and Independent Contractors must report this information, regardless of whether the incident occurred recently or in the past. Immediately (within 12- hours) call:

The CT Department of Children and Family (DCF) Child Abuse and Neglect Careline

1-800-842-2288 (also required is a written DCF-136-form) to DCF and to the Safe Environment Office

AND call the police in the town where the incident occurred.

AND

Call Erin Neil, L.C.S.W., Director of Safe Environment and Victim Assistance Coordinator Office: (203) 416-1406, Cell: (203) 650-3265, eneil@diobpt.org

Always Immediately call (911) if there is imminent risk of harm to any person.

***Third Party Reporting*: Survivor and Witness Hotline 1-833-990-0004 or www.lighthouse-services.com/diobpt**

To Report Sexual Misconduct by a U.S. Bishop, call 1-800-276-1562
https://reportbishopabuse.org. Local Province (860) 541-06475

CT Protective Services for the Elderly: 1-888-385-4225 or Infoline 211
Adults with Disability (age 19-59): 1-844-878-8923

SUSPECTED BOUNDARY VIOLATIONS OR SUSPECTED GROOMING BEHAVIORS TOWARD MINORS OR A VULNERABLE ADULT

If you have any concern about the safety of a Minor or Vulnerable Adult or if you have observed early warning signs of inappropriate conduct or a violation of Safe Environment policies, please call the Safe Environment Office. Suspected grooming behaviors or risk of injury to Minors or Vulnerable Adults must be reported to the police and to DCF. Proof is not a requirement for a report, you need only to have reasonable cause to suspect abuse or a risk of injury. Injuries and accidents of unknown origin are reportable incidents.

Mandated reporters who fail to report abuse to DCF within 12 hours risk felony charges

(See Appendix A for Definitions of abuse, Link to CT DCF Policy. and warning signs of abuse)

The Most Reverend Frank J. Caggiano
By the Grace of God and Authority of the Apostolic See Bishop of Bridgeport

DECREE FOR THE PROMULGATION OF THE 2026 SAFE ENVIRONMENT HANDBOOK

As Catholics, we share a sacred obligation to protect all of God's Children

In the Diocese of Bridgeport, our Safe Environment program and victim assistance ministry has been in place since 2003 and has made great strides in the areas of child abuse prevention, and compassionate outreach to survivors of sexual abuse. We must remain steadfast in our commitment to meet the challenges faced by children and Vulnerable Adults in our Church; therefore, we are issuing our fourth update to our policies and procedures relating to our implementation of the U.S.C.C.B. Charter for the Protection of Children and Young People in the Diocese of Bridgeport.

I hereby issue an updated set of guidelines and procedures comprising the 2026 Safe Environment Handbook which includes more frequent Safe Environment training and background checks; updates to CT Mandatory reporting guidelines; *Vos Estis Lux Mundi* (2023), procedural updates to the Sexual Misconduct Review Board and added safeguards for the victim and the accused during an investigation.

The Diocese of Bridgeport utilizes the VIRTUS *Protecting God's Children for Adults* program, which includes online registration and a link to our criminal background check provider. Initial training consists of three hours of instructor-led training, offered either in person or virtually. Ongoing continuing education may be completed online. The Diocese utilizes the Kidsmartz and Netsmartz programs annually for students in grades K–12 in all diocesan Catholic schools. For children enrolled in parish faith formation, completion of the Connecticut public school child sexual abuse prevention curriculum, Healthy and Balanced Living, is verified by a parent or legal guardian at the time of enrollment. Safe Environment training materials are also provided to parents upon enrollment.

Safe Environment training through VIRTUS online and a criminal background check must be renewed every five (5) years for all clergy, religious, candidates for ordination, employees and volunteers who have scheduled contact with children or Vulnerable Adults. All members of the clergy and personnel who work in direct contact with children or Vulnerable Adults must complete ongoing training through LEAD on our Diocesan Code of Conduct.

Vendors, Tenants, Independent Contractors and Volunteers with no scheduled contact with children or Vulnerable Adults are required to renew both training and a criminal background check every ten (10) years.

The Safe Environment Handbook is available online and in limited printed format. Clergy, Candidates for Ordination and Employees are required to sign a printed version of the Handbook. The revised 2026 Safe Environment Handbook, and all its accompanying policies and procedures, is promulgated for use throughout the Diocese of Bridgeport effective March 29, 2026.

I order that the provisions of this decree have firm and stable effect, notwithstanding anything to the contrary, even if worthy of special mention, and that they be promulgated as particular law by publication on the official diocesan website. Furthermore, I order that the present provisions be duly communicated to all who are subject to them.

Given at Chancery Office in Shelton, CT on this 29th day of March 2026, the Fifth Sunday of Lent.

+Frank Caggiano

Most Reverend Frank J. Caggiano
Bishop of Bridgeport

Gerald Lambert

Deacon Gerald Lambert
Ecclesiastical Notary

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A. PREAMBLE

In accord with the *Charter for the Protection of Children and Young People*, the United States Conference of Catholic Bishops promulgated the *Essential Norms for Diocesan/Eparchial Policies Dealing with Allegations of Sexual Abuse of Minors by Priests or Deacons*, as approved by the Apostolic See.

The Charter addresses the Church's commitment to respond appropriately and effectively to cases of sexual abuse of Minors and Vulnerable Adults by priests, deacons, and other Church Personnel (including religious sisters and brothers, lay employees, and volunteers). The bishops of the United States have renewed their pledge to reach out to all who have been sexually abused—whether recently or many years ago by anyone serving the Church in ministry, employment, or a volunteer role. The bishops remain fully committed to transparency and compassionate care for survivors and their families.

Vos estis lux mundi (VELM) *Vos estis lux mundi* ("You are the light of the world"), made permanent in 2023, aims to combat sexual abuse within the Church by establishing clear procedures for reporting and investigating allegations. VELM strengthens the Church's commitment to transparency and accountability.

Key elements include: The mandatory reporting obligations for clerics regarding sexual abuse and any attempt to conceal such abuse; mechanisms for reporting abuse committed by a bishop and strengthened protections for those who report abuse. (*Apostolic Letter in the form of Motu Proprio of the Supreme Pontiff Francis, "Vos estis lux mundi" (Updated) – 25 March 2023*)

The bishops will continue to collaborate with parents, civil authorities, educators, and community organizations to maintain the safest possible environment for Minors. Likewise, they will continue thorough evaluations of seminary applicants and all Church Personnel entrusted with the care and supervision of children and young people.

The Diocese of Bridgeport will implement these Norms diligently, compassionately, and fairly.

The Diocese will make this Policy electronically available to all personnel, post this policy on the Diocesan website, and incorporate it into all Diocesan personnel guidelines. It will also be communicated to the appropriate ecclesiastical superiors of members of religious institutes and societies of apostolic life serving in the Diocese.

All personnel must electronically acknowledge receipt of the Policy during Safe Environment training registration and at each renewal. Clergy, ordination candidates, lay employees, and designated volunteers must also submit a signed physical acknowledgment of the Executive Summary for inclusion in their personnel file. Executive Summary acknowledgment forms are included in the Safe Environment Handbook following the Appendices.

This Policy and the procedures outlined herein will be reviewed annually by competent diocesan authorities, including the Diocesan Sexual Misconduct Review Board.

B. DEFINITIONS WITHIN CONTEXT OF SAFE ENVIRONMENT HANDBOOK

Adult: Adult is legally defined as a person age 18 or older and the age when a criminal background check is first required for all personnel. Adults must be 21 before holding any supervisory role over Minors, Youth, or Vulnerable Adults.

Bishop's Advisors: The Bishop's advisors may include, but are not limited to, the Vicar General, the Vicar of Clergy and Religious, Diocesan General Counsel and the Director of Safe Environment/Victim Assistance Coordinator.

Child Pornography: Child pornography is a form of child sexual exploitation. Under federal law, it is defined as any visual depiction of sexually explicit conduct involving a Minor (a person under 18 years of age),

whether the image is real or generated through artificial intelligence or other means. Such material is also referred to as child sexual abuse material (CSAM). Federal law strictly prohibits the production, distribution, importation, receipt, and possession of child pornography.

Cleared Adult: A Cleared Adult has fully met all Safe Environment requirements, including VIRTUS training (initial instructor led training and all continuing education requirements have been met), acknowledgment of the Safe Environment Handbook, and a cleared criminal background check. All requirements are current and compliant with the Diocese of Bridgeport policies and the USCCB Charter for the Protection of Children and Young People.

Credible allegation, accusation, or information related to Review Board procedure and the Canonical Investigation: Credible allegation, accusation, or information means that, based on all the circumstances known at the time of the determination, and following an investigation with corroboration of certain facts, a prudent person would conclude that the allegation is more likely than not to have occurred. A determination of credibility does not constitute a finding of guilt.

Diocese: Diocese encompasses the Roman Catholic Diocese of Bridgeport in accord with canon 369 of the Code of Canon Law; all parishes and other inferior canonical juridical persons whose competent ecclesiastical superior is the Bishop of Bridgeport; The Bridgeport Roman Catholic Diocesan Corporation as chartered by the State of Connecticut; all other corporations (including parish corporations) having the Bishop of Bridgeport or Administrator of the Diocese of Bridgeport as their presiding officer; and all institutions, agencies, and organizations sponsored by these canonical or civil entities.

Minor: A Minor is a person who has not yet reached his or her eighteenth birthday.

Personnel: Personnel include all persons (clergy, religious, and laity) who are employed by, are under personal contract with, or volunteer in any of the entities encompassed by the Diocese. Of special concern are those in supervisory capacities or in particularly sensitive areas, such as those who work with or around children, the very elderly and the physically or mentally infirm, those who counsel others, and generally those who work with people who are less capable of protecting themselves.

Independent Investigator: An individual appointed by the Bishop or Diocesan General Counsel to gather information related to an allegation of sexual abuse of a Minor or Vulnerable Adult. This role may be fulfilled by a private investigator(s) and/or a Canonical Investigator(s). A Canonical Investigator(s) is appointed by the Bishop to conduct investigations in accordance with Canon Law.

Reasonable cause: Reasonable cause means a prudent estimation based on trustworthy information that an incident occurred or been perceived as having occurred.

Sexual Abuse of Minors and Vulnerable Adults: Sexual abuse includes sexual molestation, child pornography, sexual exploitation, grooming behaviors toward a Minor or Vulnerable Adult or any behavior in which an Adult uses a Minor or Vulnerable Adult as an object of sexual gratification. (See appendix A. Definitions of Abuse, Neglect and Grooming Behaviors towards Minors)

Vulnerable Adult: Vulnerable Adult is defined as any person who habitually lacks the use of reason or who is in a state of infirmity, physical or mental deficiency, or deprivation of personal liberty that, in fact even if only occasionally, limits his or her ability to understand, consent, or resist an offense. This definition applies to Adults who are protected under the law due to conditions that affect his or her capacity to understand, consent, or resist harmful acts. Such conditions may be physical, mental, or related to deprivation of liberty and may be temporary or ongoing. (Vos estis lux mundi, 2023)

Young Adult: Young Adult (for the purpose of the policies within the Safe Environment Handbook) is defined as a person age 18–20. Both Minor and a Young Adult are defined as Youth.

C. PROHIBITION OF SEXUAL ABUSE or OTHER FORMS OF ABUSE (CHILD PORNOGRAPHY) INVOLVING MINORS OR VULNERABLE ADULTS

Under the universal law of the Church, the sexual abuse of Minors and Vulnerable Adults constitutes a grave delict, the judgment of which is reserved to the Dicastery for the Doctrine of Faith. A cleric who is found guilty of such an offense is subject to severe penalties, including dismissal from the clerical state, when warranted (cf. c. 1395, Code of Canon Law).

A single verified act of sexual abuse of a Minor or Vulnerable Adult—past, present, or future—will result in the cleric's **permanent removal from sacred ministry** (cf. *Charter for the Protection of Children and Young People*, Essential Norms, USCCB 2018, Art. 5; Norms 8–9).

Laypersons Any act of sexual abuse of a Minor or Vulnerable Adult by a lay employee or volunteer—past, present, or future—will result in immediate dismissal from any role and/or ecclesiastical office within the Diocese of Bridgeport.

Under both Federal and Connecticut civil and criminal law, the sexual abuse of Minors and the possession of child pornography are grave crimes. Offenders may be subject to severe penalties, including incarceration, fines, and/or monetary damages. Any applicable penalties under the Code of Canon Law may also be imposed by the Diocese or any diocesan organization or institution.

Canonical Standards

The relevant transgressions relate to obligations arising from divine commands regarding human sexual interaction as conveyed by the Sixth Commandment of the Decalogue. The standard for assessing an allegation of sexual abuse of a Minor or Vulnerable Adult is whether the conduct constitutes an external, objectively grave violation of the Sixth Commandment

A canonical offense against the Sixth Commandment (c. 1395 §2, Code of Canon Law):

- need not involve a complete act of intercourse,
- need not involve force, physical contact, or a discernible harmful outcome to be objectively grave, and
- presumes imputability for a canonical offense "upon external violation" (c. 1321 §3; cf. cc. 1322–1327 or art. 6 §1, 1º SST for clergy).

If there is any doubt whether a specific act qualifies as an external, objectively grave violation, it is the responsibility of the Bishop of Bridgeport, with the advice of the Diocese's Sexual Misconduct Review Board, to determine whether the allegation warrants further action.

D. SAFE BOUNDARIES WITH MINORS AND VULNERABLE ADULTS

Physical contact with Minors or Vulnerable Adults must be minimized wherever possible to safeguard everyone involved and prevent misunderstandings. Specific safety-related, sport-related, and developmentally appropriate forms of physical contact when greeting someone are permissible and are defined in further detail within the Diocesan Code of Conduct. It is expected that anyone who comes into contact with Minors or Vulnerable Adults, including those who work, volunteer, live on diocesan premises, or provide contracted services, must always establish and maintain the clear boundaries outlined in this Safe Environment Handbook and avoid even the appearance of impropriety.

Adults must establish clear boundaries with Minors and Vulnerable Adults who may attempt to hug, kiss or touch them. It is the responsibility of every Adult working or volunteering in any diocesan role with any person who may be vulnerable, especially Minors and Vulnerable Adults, to explain that such contact is not permitted because it is a policy that helps to keep all of us safe. It is critical to educate children and their parents about these safeguards. Even conduct that does not constitute sexual abuse, or may not be illegal or immoral, may still be offensive or create misunderstanding or embarrassment. Experience has shown that actions by priests, deacons, educators, coaches and others working in environments where children or

Vulnerable Adults are present such as sending or taking photos, electronic communication after school hours or weekends, sharing personal information, sending images or emojis, using pet names or nick names, hugging, patting, tickling, or similar "horseplay," even if intended innocently—may be misconstrued. Therefore, all personnel must be especially careful to avoid this conduct and to ensure the safeguarding standard of multiple Adults present and transparent electronic communications, is upheld at all times.

The Diocese of Bridgeport maintains a Code of Conduct applicable to all personnel, and all personnel will receive training regarding the Code of Conduct as well as early warning signs of abuse and grooming behaviors. All personnel must take great care to minimize engaging in even non-sexual physical contact and must avoid even the appearance of impropriety or grooming behaviors toward Minors such as the following:

(1) **Online grooming** Using digital platforms to build trust and lower boundaries with a child. *Example:* An Adult befriends a child in an online game and moves the conversation to private messages.
(2) **In-person grooming** Gradually build trust with a child through attention, favors, or gifts to normalize boundary violations. *Example:* An Adult gives a child special privileges or side with the child over the parent.
(3) **Authority-based grooming** Using one's position of trust to access, control, and silence a child. *Example:* An Adult uses one-on-one training sessions or tutoring to isolate a child or teen from others.
(4) **Situational grooming** Exploiting supervision gaps or circumstances to bypass safeguards. *Example:* An Adult offers to drive a child home alone when no other ride is available and or signals where they'll be in the community or online in order to create an opportunity for a private encounter.
(5) **Community grooming** Manipulating families and community to reduce suspicion, normalize behavior, and gain access to a child. *Example:* An Adult initially follows rules and initially uses appropriate boundaries hugging "only" the Adults or parents of the Minor to build trust. Over time, they become well-liked and highly involved in the community, causing boundaries to loosen, rules seem less necessary. (See Appendix A for additional examples of potential grooming behaviors towards Minors).

E. SAFE ENVIRONMENT PROGRAM AND PASTORAL CARE FOR VICTIMS

To protect against incidents of sexual abuse of Minors by Diocesan Personnel, the Diocese will maintain a Safe Environment Program designed to: prevent, identify, and respond to abuse; provide education and ongoing training to Personnel regarding inappropriate conduct and warning signs of abusive behavior.

The Office of Safe Environment will evaluate the background of all Diocesan Personnel in their ministerial or employment positions. Depending on the position, background checks may include fingerprinting and criminal background checks (See Appendix C. Criminal background check Policy)

The Bishop of Bridgeport will maintain the position of Safe Environment Director, responsible for operating the Safe Environment Program and ensuring compliance with all Policies and Procedures outlined in this document.

The Diocese of Bridgeport recognizes that sexual abuse of Minors and Vulnerable Adults can cause severe and lasting emotional and psychological harm. The Diocese is committed to offering victims appropriate professional assistance to address the consequences of abuse perpetrated by any Diocesan Personnel.

The Bishop of Bridgeport will maintain the position of Victim Assistance Coordinator, who is responsible for: Receiving all notifications of allegations of sexual abuse involving Diocesan Personnel; Informing alleged victims of their rights and the procedures that apply under this Policy.

When credible accusations of sexual misconduct and other forms of misconduct involving a Minor or Vulnerable Adult are made: The Victim Assistance Coordinator will initiate prompt contact with the alleged victim and his or her family. Contact is made to offer support, care, and concern without commenting on the truth of any accusation. Assistance may include medical, mental health, spiritual, and, when appropriate, economic support. Support is provided in the spirit of Christian justice and charity, tailored to the needs of the specific

situation. Under the direction of the Victim Assistance Coordinator, referrals will be made to competent counselors and social workers, including those designated by Catholic Charities. The Diocese will offer appropriate assistance to anyone making a credible claim of sexual abuse by Diocesan Personnel, whether the abuse is recent or occurred years ago. Support may include counseling, spiritual care, support groups, or other social services mutually agreed upon by the victim and the Diocese.

F. SEXUAL MISCONDUCT REVIEW BOARD

The Diocese will maintain a Sexual Misconduct Review Board, which will function as a confidential consultative body to the Bishop of Bridgeport in discharging his responsibilities under the United States Conference of Catholic Bishops Charter for the Protection of Children and Young People, (USCCB Charter). The functions of this Board may include:

(1) Advising the bishop in his assessment of allegations of sexual abuse of Minors and Vulnerable Adults in his determination of suitability for ministry or dismissal from employment or service to the Diocese as a layperson.
(2) Annually reviewing Diocesan policies for dealing with sexual abuse of Minors and Vulnerable Adults.
(3) Offering advice on all aspects of these cases, whether retrospectively or prospectively; and,
(4) Reviewing allegations involving sexual abuse of Minors by a member of the clergy who is deceased at the time of the allegation and advising the bishop in his assessment of the allegation for public notification and placement onto the diocesan list of credibly accused clergy.
(5) At least one meeting annually with the Bishop.

The Review Board will be appointed by the Bishop and will be composed of at least five persons of outstanding integrity and good judgment. The members of the Review Board will be selected to bring to their deliberations a variety of relevant skills and experience. The skills and experience may include psychology, expertise in technology, children's rights, law enforcement, Canon Law, civil law, personnel administration, cultural competencies and pastoral care. The majority of the Review Board members will be laypersons who are not employed by the Diocese. At least one member will be a priest who is an experienced and respected active or retired pastor of the Diocese of Bridgeport. At least one member must have expertise in treating individuals (and possibly their families) who have been sexually abused as Minors or as a Vulnerable Adult. The members will be appointed for a term of three years, which may be renewed. If not a member of the Review Board, it is desirable that the Promoter of Justice participates in the meetings of the Review Board. The Bishop will designate a member to chair the Board.

G. PROCESS FOR THE INVESTIGATION AND REVIEW BOARD PROCEDURES

Confidentiality All diocesan personnel involved in the investigation or disposition of an allegation of sexual abuse, including Review Board members, shall refrain from public comment and must maintain the highest level of confidentiality possible at all times. Public statements may be made only with the explicit approval of the Bishop. All media inquiries must be directed to the Diocesan Director of Communications. The limits of confidentiality, including mandatory reporting requirements, shall be clearly explained to all people who have come forward to report abuse or who are receiving counseling or pastoral care. All appropriate steps shall be taken to protect the identity of the victim, the mandated reporter, and the name and reputation of the accused during the investigation. The accused shall be encouraged to retain civil counsel and, if a cleric, canonical counsel.

Interim Measures and Preliminary Investigation
When circumstances warrant immediate action pending the completion of an investigation, the Bishop of Bridgeport may:

- Temporarily remove an accused cleric from ministry.
- Immediately suspend any lay employee (with pay) or volunteer.

With respect to clerics, precautionary administrative measures may be imposed at any time, including at the outset of a preliminary investigation, at the Bishop's discretion and in accordance with Canon Law (cf. n. 58, *Vademecum on Certain Points of Procedure in Treating Cases of Sexual Abuse of Minors Committed by Clerics*).

The alleged offender may be requested and strongly encouraged to voluntarily undergo an appropriate medical and psychological evaluation at a facility mutually acceptable to the Diocese and the accused.

Mandatory Reporting and Victim Assistance
All allegations of sexual abuse of a Minor by diocesan personnel shall be reported in full compliance with Connecticut mandatory reporting laws and to the Diocesan Victim Assistance Coordinator.

The Victim Assistance Coordinator shall ensure that the report is communicated within twelve (12) hours to the Bishop, Vicar for Clergy and Religious, Vicar General, and Diocesan General Counsel, and to any additional persons designated by the Bishop. The coordinator shall notify and serve as the point of contact with the Connecticut Department of Children and Families (DCF) and law enforcement.

When an allegation is communicated through a victim's attorney, Diocesan General Counsel shall inform the attorney of the Diocese's mandatory reporting obligations and offer communication with the Victim Assistance Coordinator and the opportunity to meet with the bishop.

Civil and Canonical Investigations
The Director of the Office of Safe Environment shall consult with law enforcement and DCF to ensure that no diocesan or canonical investigation interferes with a criminal investigation. Once it is determined that diocesan action will not interfere with civil proceedings, the Bishop shall initiate an independent diocesan investigation.

A canonical investigation shall be initiated by the Bishop in accordance with canon 1717 and the *Vademecum* (2023). In cases involving clerics, the Bishop shall conduct a Preliminary Investigation and, upon its completion, notify the Dicastery for the Doctrine of the Faith (DDF), which will advise the Bishop on further action.

Investigation
The Bishop may appoint one or more independent investigators with expertise in civil and/or Canon Law. All personnel shall take care to avoid interference with any confidential civil or criminal investigation.

The investigation shall be conducted with Christian care, concern, and confidentiality for the alleged victim, the victim's family, the reporting party, and the accused. Any new information related to abuse or neglect obtained during the investigation shall be promptly reported to the Bishop, the Victim Assistance Coordinator, and appropriate civil authorities.

If the alleged victim is not the reporting party, the Victim Assistance Coordinator, and/or the appointed investigator shall endeavor to contact the alleged victim directly. The alleged victim and witnesses may be encouraged to submit written statements; however, an investigation shall proceed even in the absence of a written complaint. Allegations involving deceased clerics whose names do not already appear on a list of credibly accused clergy shall also be reviewed.

Notifications
The Bishop and/or Vicar General will promptly inform the accused cleric of the substance of the allegation. The Bishop will appoint his delegate and the appoint any individual investigator(s) who will interview the accused and advise him of his right to civil and canonical counsel. The accused must avoid contact with the alleged victim and the victim's family during the investigation.

Any clergy member accused of misconduct will be offered counseling assistance. The accused may submit a written response and supporting witness statements, which will be provided to the Diocesan Sexual Misconduct Review Board as part of its review.

The Victim Assistance Coordinator and any appointed independent investigator(s) shall immediately notify the Bishop and the Vicar for Clergy and Religious of any information warranting immediate attention. In all cases, no later than thirty (30) days from receipt of the report, the status or results of the investigation, even if incomplete, shall be provided to the Bishop, and the Sexual Misconduct Review Board.

Investigation Report
Upon completion, the investigator(s) shall submit a written report to the Bishop of Bridgeport.

Report to Sexual Misconduct Review Board
The information conveyed to the Sexual Misconduct Review Board by Diocesan General Counsel, the Victim Assistance Coordinator and independent investigator(s) (where applicable), must include the following information:

(1) Unless the allegations are already well-known or unless personally identifying information is otherwise necessary, an anonymous reference to the accused person's age, current clerical assignment and date of ordination, if applicable, and a general history of prior assignments.
(2) An anonymous reference to the alleged victim (as well as to the person who initially submitted the report, if not the alleged victim), describing the alleged victim's gender, current age, and age at the time of the alleged incident(s), marital status, and current employment.
(3) A complete and thorough recapitulation of the facts as alleged by the victim and the accused or from any other person who reported the alleged incident, including:
- (a) the circumstances that lead to the person's decision to make the report, especially if the alleged incident occurred a long time in the past, and,
- (b) any professional psychological counseling or treatment the alleged victim would like to disclose as part of the investigation that may be related to the alleged incident.

(4) The accused and the victim will be offered the opportunity to submit a statement. A copy of any written statement submitted by the victim, the accused, or any other person, with personally identifying information will be redacted if requested to preserve the anonymity of the person.
(5) A description of all efforts to locate and contact any other persons with relevant knowledge of the alleged incident, including any persons who may have been suggested as witnesses by the cleric who is the subject of the report.
(6) A complete and thorough recapitulation of the facts as reported by such other people, including the witness's views about the probable credibility of the allegations; and,
(7) A description of further investigative steps the Review Board recommends be taken before any final recommendations to the Bishop.
(8) Redacted Independent Investigation report (only names of the victims, the accused and the witnesses are redacted from the report).

Recommendations by Review Board
After receiving the information conveyed, the Review Board may:
- (1) Request that further information be pursued by the Diocesan General Counsel or by other Personnel of the Diocese; or
- (2) Immediately proceed to make a recommendation to the Bishop.

The recommendations the Review Board may make to the Bishop include (but are not limited to) the following:

- (1) The allegations are not supported by sufficient evidence or otherwise are not credible and the matter should be closed without adverse action regarding the accused.
- (2) The allegations appear credible, but no final conclusions should be reached pending receipt of:
  - (a) a report of psychiatric or psychological evaluation of the accused, if the accused is willing to allow the release of such report to the Review Board,

(b) a similar report from the alleged victim's professional psychiatric or psychological counselor, if the alleged victim is willing to authorize their release to the Review Board, or
(c) additional specific information that still may be available.

(3) The allegations appear to be supported by sufficient, credible evidence and steps should be taken:
(a) to remove the cleric from ministry, either by his own consent (including retirement without faculties) or if he objects, in accordance with the procedures provided by Canon Law.
(b) to place the name of the accused on the diocesan website and notify parishes where the accused cleric has served, in accordance with section of transparency with USCCB Charter.
(c) to terminate the employment of a lay employee or to terminate the service of a lay volunteer.

Determination by the Bishop
The Bishop of Bridgeport and his advisors will review the written report reflecting the results of the investigation as well as the recommendations of the Review Board. If the alleged claim appears substantiated, then after consultation with competent Diocesan officials the Bishop of Bridgeport will notify the accused of his determination. The alleged perpetrator may be permitted to freely resign from his/her ministry, or may be relieved from the exercise of any function or responsibility or ministry and/or employment in the Diocese and placed on administrative leave pending the outcome of any further investigation, including an outside investigation.

Notifications of Decision
If the alleged perpetrator is a cleric incardinated in the Diocese of Bridgeport, the report and investigation will be referred to the Bishop of Bridgeport in accordance with Canon Law and subject to the provisions of Canon 1722. If he is a cleric incardinated in another diocese, the Bishop of Bridgeport will immediately refer the matter to his proper Ordinary for deliberation or further action. If the alleged perpetrator is a member of a religious institute or a society of apostolic life, the Vicar for Clergy and Religious and Religious of the Diocese of Bridgeport will immediately contact the competent ecclesiastical superior of such member for consultation on the proper procedure to be followed.

Report to Claimant
Except in unusual circumstances, the Victim Assistance Coordinator and/or investigator will notify the person who submitted the complaint about the results of the investigation and about any Personnel action taken as a result of the investigation.

H. CANONICAL ACTIONS TO ADDRESS INCIDENTS OF SEXUAL ABUSE OF MINORS OR VULNERABLE ADULTS

When even a single act of sexual abuse by a cleric is admitted or established after a Canonical process, the offending cleric will be removed permanently from ministry. In addition, other canonical penalties could be imposed, which may include dismissal from the clerical state. Permanent removal from ministry of a credibly accused cleric is required whether or not the cleric has been diagnosed with a mental illness or sexual disorder that may require professional treatment.

Jurisdiction
In every case involving canonical penalties, the processes provided for in Canon Law must be observed, and the various provisions of Canon Law must be considered (cf. Canonical Delicts Involving Sexual Misconduct and Dismissal from the Clerical State, 1995; Letter from the Congregation for the Doctrine of the Faith, May

18, 2001). The Bishop of Bridgeport will refer all cases to the Dicastery for the Doctrine of the Faith and proceed according to the directives of the Dicastery for the Doctrine of the Faith (Article 13, "Procedural Norms" for *Motu proprio Sacramentorum sanctitatistutela, AAS,* 93, 2001, p. 787).

Finding Culpability
When there is sufficient evidence that sexual abuse of a Minor has occurred, the Dicastery for the Doctrine of the Faith will be notified. The Bishop may apply the administrative precautionary measures mentioned in canon 1722; that is, At any stage of the process, in order to prevent scandal, protect the freedom of the witnesses and safeguard the course of justice, the Ordinary can, after consulting the promotor of justice and summoning the accused person to appear, prohibit the accused from the exercise of the sacred ministry or of some ecclesiastical office and position, or impose or forbid residence in a certain place or territory, or even prohibit public participation in the blessed Eucharist. If, however, the reason ceases, all these restrictions are to be revoked; they cease by virtue of the law itself as soon as the penal process ceases.

Sanction in Lieu of Dismissal from Ministry
If the cleric has either admitted culpability or been found culpable after a trial in accordance with Canon Law, and the perpetual penalty of dismissal from the clerical state has not been imposed (e.g., for reasons of advanced age or infirmity), the offender will be prescribed to lead a life of prayer and penance. He will not be permitted to celebrate Mass publicly or to administer the sacraments. He is to be instructed not to wear clerical garb, or to present himself publicly as a priest.

I. ADDITIONAL AUTHORITY OF THE BISHOP TO TAKE ADMINISTRATIVE ACTION

In addition to the sanctions that the Bishop of Bridgeport or the Dicastery for the Doctrine of Faith may impose under this Policy, the Bishop of Bridgeport has the executive power of governance, through an administrative act to remove an offending cleric from office, to remove or restrict his faculties, and to limit his exercise of priestly ministry. (cf. cc. 35-58, 149, 157, 187-189, 192-195, 277 §3, 381, 383, 391,1348, 1740-1747); and, to limit, suspend, or terminate the employment of any "at will" lay employee and to terminate the service of any lay volunteer and to apply any other sanctions permitted by Ecclesiastical Law.

"Single Incident" Policy
Because sexual abuse of a Minor is a crime in all jurisdictions in the United States, for the sake of the common good and observing the provisions of Canon Law, the Bishop of Bridgeport will exercise this power of governance to ensure that any cleric or lay personnel who has committed even one act of sexual abuse of a Minor as described above will not continue in active ministry.

Possible Administrative Measures
The Bishop may exercise his executive power of governance to take one or more of the following administrative actions relating to a cleric (cc. 381, 129ff):

(1) He may request that the accused freely resign from any currently held ecclesiastical office (cc. 187-189).
(2) If the accused declines to resign and if the Bishop judges the accused to be truly not suitable (c. 149, §1) at this time for holding an office previously freely conferred (c. 157), then he may remove that person from office observing the required canonical procedures (cc. 192-195, 1740-1747).
(3) For a cleric who holds no office in the Diocese, any previously delegated faculties may be administratively removed (c. 391, §1 and 142, §1), and any *de lege* faculties may be removed or restricted by the competent authority as provided in law (e.g., c. 764).
(4) He may also judge that circumstances surrounding a particular case constitute the just and reasonable cause for a priest to be allowed to celebrate the Eucharist with no member of the faithful present (c. 906) and, therefore, for the good of the Church and for the priest's own

good, the Bishop may urge the priest to celebrate the Eucharist only under such circumstances and not to administer the sacraments.

(5) Depending on the gravity of the case, the Bishop may dispense the cleric from the obligation of wearing clerical attire and may prohibit him from doing so (cc.85-88, 284).

Any of these administrative actions will be taken in writing and by means of decrees (cc. 47-58) so that the cleric affected is afforded the opportunity of recourse against them in accord with Canon Law (cc. 1734 ff).

Loss of the Clerical State

A cleric may at any time request a dispensation from the obligations of the clerical state. In exceptional cases, the Bishop may request of the Holy Father the dismissal of the cleric from the clerical state *ex officio*, even without the consent of the cleric.

J. RESTRICTION ON TRANSFERS BETWEEN DIOCESES

No cleric who has committed an act of sexual abuse of a Minor may be temporarily or permanently transferred (released or incardinated) for ministerial assignment to another diocese/eparchy or religious province. Before a cleric of the Diocese of Bridgeport may be transferred for residence to another diocese/eparchy or religious province, the Bishop will forward in a confidential manner to the local bishop/eparch and religious ordinary (if applicable) of the proposed place of residence any and all information concerning any act of sexual abuse of a Minor and any other information indicating that he has been or may be a danger to Minors or Vulnerable Adults. This requirement applies even if the cleric will reside outside of the United States, in the local community of an institute of consecrated life or society of apostolic life (or, in the Eastern Churches, as a monk or other religious, in a society of common life according to the manner of religious, in a secular institute, or in another form of consecrated life or society of apostolic life).

Before the Bishop of Bridgeport receives a cleric from outside his jurisdiction, the Bishop will obtain the necessary information regarding any past act of sexual abuse of a Minor by the cleric in question. A letter of Suitability for Ministry must be sent to the Office of Clergy & Religious Personnel.

K. TRANSPARENCY PROTECTION OF PERSONAL PRIVACY AND REPUTATION

Danger of False Allegations

Care will always be taken to protect the rights of all parties involved, particularly those of the person claiming to have been sexually abused and the person against whom the charge has been made. When an accusation has proved to be unfounded, every step possible will be taken to restore the good name of the person falsely accused. The following steps include but are not limited to

(1) letter from the Bishop stating that the cleric was falsely accused in every parish where it was first announced by letter

(2) a statement made on the diocesan website and social media

(3) and a public press release.

Publication of Diocesan Action

When an allegation of sexual abuse of a Minor or Vulnerable Adult has been verified, Diocesan General Counsel, with the assistance of the Diocesan Director of Communications, the Vicar for Clergy and Religious and/or the Vicar General and the Victim Assistance Coordinator, will notify the Pastor/Administrator and Lay Leadership of the parish where the priest served. The Pastor will read the official communication from the Bishop during all weekend Masses. The Diocesan Director of Communication will publish an appropriate announcement of the action taken in response to the abuse. The Diocese will maintain a public record, including a website, which lists the names of priests and deacons who have been removed from ministry or

found credibly accused under this Policy. During an ongoing criminal investigation, the police and/or DCF will be consulted regarding the Diocesan public announcement so as not to interfere with any ongoing investigation and where applicable, to include contact information for the investigative agency and the Victim Assistance Coordinator in the public announcement.

Confidentiality Agreements
The Diocese will not enter into confidentiality agreements regarding allegations of sexual abuse of Minors except for grave and substantial reasons advanced by the victim and noted in the text of the agreement.

Outreach to Affected Parishes
The Victim Assistance Coordinator will be responsible for taking immediate steps to assist and support parish and school communities directly affected by ministerial misconduct involving Minors. This outreach will be accomplished with the assistance of an Emergency Response Team under the direction of the Victim Assistance Coordinator. The outreach may consist of a parish and/or school meeting at the affected parish, an offer of counseling to members of the affected community, explanation of the response process and informing the affected community of the action taken in response to the allegation.

L. COMPLIANCE WITH CIVIL LAWS AND REPORTING LAWS

Opportunity to report Any person, whether or not employed by the Diocese, who believes that he or she, when a Minor, was subjected to sexual abuse by any Personnel of the Diocese, or who obtains information about such misconduct, is encouraged to report it immediately to the Diocese. The report is to be made to Victim Assistance of the Diocese. The reporting statement may be made by telephone, by mail, email, or through a third-party reporting hotline at 1-833-990-0004 or www.lighthouseservices.com/diobpt, which will allow any individual(s) to leave his or her name, contact information and the name of the cleric and the nature of the alleged misconduct. One person will be charged with responding to those making reports within 24 hours after receiving the message. The reporting statement should include where applicable the name and contact information of the complainant, the name and position of the person alleged to have engaged in the misconduct, and the details of the incident or practice. The Victim Assistance Coordinator will maintain a log of all such statements. The report will be handled with a high level of confidentiality at all times and no other Personnel, including supervisory Personnel, need be advised of this action. However, the Victims Assistance Coordinator may request the presence of Diocesan General Counsel or the Independent Investigator(s). All reports involving suspected abuse of a Minor or Vulnerable Adult or risk of injury to a Minor will be reported to DCF and or the police in full compliance with mandated reporting laws and procedures.

Anonymous Complaints While the Diocese will make every effort to be responsive to all reports, the Diocese reserves the right not to investigate anonymous reports depending on an assessment of the nature of the anonymous report. Anonymous reports not investigated will, however, be documented for review if additional information is received in the future.

Additional Actions The bishop may, at his discretion and for pastoral, legal, or canonical reasons, remove or restrict a credibly accused priest's name, title, or image from diocesan properties, publications, or events.

Funerals for Credibly accused priests For a priest who is credibly accused of sexual abuse, his funeral planning must exercise care and concern for the victims, the accused's family members as well as the faithful.

Records
The Diocese will maintain permanent, confidential records for each reported incident of abuse involving a Minor or Vulnerable Adult, including the canonical investigation and its findings. Investigation records will be maintained in paper format in full compliance with Canon Law, with access strictly limited to the Bishop of Bridgeport. The Bishop may grant time-limited access to designated advisors on a strict need-to-know basis. These records will be maintained permanently and will never be destroyed. All Department of Children and Families (DCF) records, including a copy of the DCF-136 report form, will be permanently

maintained in the Office of Safe Environment and the original documents will be filed within the personnel file, along with the official findings of the DCF and/or criminal investigation. All records will include a sign-in and sign-out log.

DIOCESE OF BRIDGEPORT CODE OF CONDUCT

II. THE DIOCESE OF BRIDGEPORT CODE OF CONDUCT (2026)

A. Preamble

Priests, Deacons, Men in Formation for Ordination, Religious Sisters and Brothers, Lay Employees, Volunteers, Pastoral Ministers, Spiritual Counselors, Administrators, Tenants and Independent Contractors in our parishes, schools, programs and organizations, hereafter referred to as **Personnel**, must uphold Christian values and conduct. This *Code of Conduct* provides a set of standards for conduct that apply to all Personnel within the Diocese. This document is subject to change.

B. Responsibility

Responsibility for adherence to the *Code of Conduct* rests with the individual. Personnel who disregard this *Code of Conduct* will be subject to disciplinary action which may take various forms up to and including dismissal from employment or volunteering depending on the specific nature and circumstances of the offense and the extent of the harm.

C. Conduct

1.0 Conduct for Pastoral Counselors, Professional Counselors and Spiritual Directors:

Professional Counselors, Pastoral Counselors, Case Managers, and Spiritual Directors within the Diocese of Bridgeport are required to uphold the rights and promote the well-being of all individuals under their care. It is essential to clearly differentiate among counseling roles in every context to ensure that recipients fully understand the scope of services provided, as well as the credentials, licenses, and professional qualifications of those offering support.

1.1 Professional Counselors and case management staff of Catholic Charities are mandated by state licensure and/or their credentialing organizations. Catholic Charities clinical counseling staff adheres to the policies of the Catholic Charities Mental Health Clinic Manual, as well as the National Association of Social Workers Code of Ethics which will supersede the Counseling Standards section of the Diocesan Code of Conduct. Catholic Charities is the primary referral source for counseling. If Catholic Charities is unable to offer immediate services, they will provide a referral to counseling services in the community.

(a) Personnel referrals for mental health counseling must be verified through a license lookup to confirm they are in good standing and qualified to practice in Connecticut. All mandatory continuing education requirements must be met for the year the services are provided, and the individual should have completed CT Mandated Reporting Training. Supervisors are required to obtain a certificate of attendance and proof of professional liability insurance from the counselor.

(b) Counselors shall not step beyond their competence in counseling situations and shall clearly state their credentials and refer clients to other professionals when appropriate. Counselors must carefully consider the possible consequences before entering into a counseling relationship with someone with whom they have a pre-existing relationship.

Counselors may not record/videotape sessions or implement use of AI without written consent.

(a) Counselors must never engage in sexual intimacies with the people they counsel. This includes consensual and nonconsensual contact, physical contact, and inappropriate sexual comments.

(b) Counselors must never engage in sexual intimacies with individuals who are close to the client such as relatives or friends of the client when there is a risk of exploitation or potential harm to the client. Counselors must presume that the potential for exploitation or harm exists in such intimate relationships.
(c) Counselors assume the full burden of responsibility for establishing and maintaining clear, appropriate boundaries in all counseling and counseling-related relationships. It is recommended that counselors maintain a log of the times, locations, and content of scheduled sessions whenever possible and meet only during times when others are able to view the counselor through a door or window.

2.0 Confidentiality

Information disclosed to a Counselor during the course of counseling, advising or spiritual direction shall be held in the strictest confidence possible. All legal requirements will be followed in any case where there is an allegation of abuse against a Minor **except when the information is obtained under the Sacramental Seal of the Sacrament of Reconciliation. Information obtained under the Sacramental Seal is absolutely prohibited from disclosure.**

2.1 Information obtained during counseling sessions shall be confidential, except as required by law. If there is clear and imminent danger to the person who is being counseled or to others, the Counselor must disclose only the information necessary to protect the parties affected and to prevent harm. Before disclosure is made if feasible, the Counselor should inform the person being counseled about the disclosure and the potential consequences.

2.2 While counseling a Minor, if a Counselor discovers that there is a serious threat to the welfare of the Minor and that communication of confidential information to a parent or legal guardian and to the proper civil authorities is essential to the child's health and well-being, the Counselor should attempt to secure consent from the Minor for the specific disclosure. If consent is not given, disclose the information necessary to protect the health and well-being of the Minor.

(a) Counselors may not discuss confidential information in any setting unless privacy can be ensured.
(b) DCF reports and ongoing investigations must be kept confidential.

3.0 Conduct with Minors and Vulnerable Adults

Personnel shall maintain open and trustworthy relationships with Minors and Vulnerable Adults and Adult supervisors, observing the following:

(a) The Rule of Two. Personnel must be aware of their own and others' vulnerability when working with Minors and Vulnerable Adults. Use a team approach by ensuring that there are always two or more Adults present in close proximity when managing all activities where Minors and Vulnerable Adults are present. (You should be able to see / hear another Adult).
(b) Use or possession of illegal drugs is prohibited at all times.
(c) Use of alcohol or other mood alternation drugs, including but not limited to, marijuana when working with Minors or Vulnerable Adults is prohibited. An abundance of caution must be used during any event serving alcohol where Minors may be present. If alcohol will be served, high school student volunteers must be supervised at all times by their parents, legal guardian or two cleared Adults. Alcohol is prohibited at diocesan events where middle school and elementary school students are not accompanied by their parents or legal guardians.
(d) Sexually inappropriate conversations with Minors and other Adults are prohibited. All human sexuality lessons and discussions must be part of an approved Diocesan curriculum or part of normal counseling. These lessons or counseling sessions will conform to the Church's teachings on the topic.
(e) Personnel will not use vulgarity or profanity in the presence of Minors.

(f) Being nude in the presence of Minors or Vulnerable Adults is prohibited. Personnel must adhere to a proper dress code at all times. Personnel must consult with their supervisor regarding appropriate dress codes.
(g) Viewing or taking sexually oriented, nude or morally inappropriate materials (magazines, calendars, cards, videos, films, website material, computer files, social media, cell phone camera images, art images, clothing or any other items containing inappropriate materials) on Diocesan property or showing them to Minors or Vulnerable Adults is prohibited.
(h) Diocesan Personnel are prohibited from creating a pattern of behavior or environment that a reasonable person would find shaming, threatening, frightening, derogatory, demeaning, or humiliating.
(i) Clergy and Religious Personnel shall not invite or allow a Minor, or Vulnerable Adult, unaccompanied by one of their Adult immediate family members, to visit or stay overnight on any premises used as the residence for Clergy or Religious Personnel, or other Personnel except for members of the Clergy or Religious Personnel's family. Clergy must not permit Minors, or Vulnerable Adults other than their own family members, to stay overnight nor allow them into a cleric's private accommodations at any time.
(j) Clergy as well as Lay Personnel of the Diocese of Bridgeport must not provide shared or private overnight accommodations for Minors for church sponsored activities including, but not limited to, accommodations in any Church-owned facility, private residence, hotel room, or any other place where there is no other Adult supervision present. In rare, emergency situations, when accommodation is necessary for the health and well-being of the Minor or Vulnerable Adult, the Clergy or Personnel of the Diocese must notify Diocesan General Counsel and take extraordinary care to protect all parties from the appearance of impropriety and from all risk of harm.
(k) Personnel may not meet alone with Minors in secluded areas away from other Adults. Two Adults must be present in close proximity where any tutoring or other similar activity takes place.
(l) Personnel who work with children must be aware of the boundaries that must always exist with a Minor and Vulnerable Adult both in person and while using technology. Maintain clear and professional boundaries in all conversations with Minors. Personnel are prohibited from discussing the details of sexual or romantic relationships with Minors or Vulnerable Adults

4.0 Electronic Communication with Minors and Vulnerable Adults

These universal principles apply to all forms of technology, including phones, computers, tablets, gaming systems, cameras, websites, blogs, and portable media devices. All interactions with Youth, whether in person or through any form of communication, must be transparent. Whenever possible, at least two unrelated Cleared Adults should have access to all communications.

Communication with Minors must remain transparent at all times. Parents must be fully informed of all methods used to communicate with their children for ministerial purposes. One way to ensure transparency is to copy a parent on all electronic communications.

(a) Adults who work with Youth must remain current on the risks associated with all forms of technology used to connect with Youth. Information must also be made available to parents and Minors on the safe use of technology.
(b) All Personnel must maintain appropriate boundaries with Minors in all electronic communication. Personnel shall communicate with Minors transparently through official school or parish e-mail accounts, discussion boards and websites.
(c) This policy does not prohibit Personnel from communicating through personal forms of technology (such as texting) through a personal phone or messaging system where a Minor is a family member or when the Adult is identified in writing by the parent or legal guardian on the child's emergency contact list.

(d) Information obtained through online communication concerning illegal activity involving Minors must be immediately reported to the appropriate civil authorities and the Office of Safe Environment in accordance with Diocesan reporting policies and Connecticut Mandatory Reporting Laws.
(e) The Children's Online Privacy and Protection Act or (COPPA) is a federal law to safeguard children's personal information Written permission must be obtained prior to requesting or storing children's data. This includes photos or posting photographs, or other identifying information, of Minors on websites. Adults who work, volunteer or provide contracted services in the Diocese of Bridgeport and may have access to Vulnerable Adult and/or Minor's personally identifying information are required to be in compliance with COPPA, in addition to all Safe Environment requirements.
(f) All communication with Minors must be transparent and Adults should avoid the use of acronyms or attachments that may be misunderstood by a Minor or by an Adult. Avoid late evening and early morning electronic communications and avoid frequent texting that may appear excessive to a reasonable person.
(g) If a Minor reaches out and initiates contact with the Adult member of the clergy, religious sister or brother, candidate for ordination, employee, volunteer or independent contractor through text, email or telephone, the Adult must inform the Minor of our diocesan policy which requires two cleared Adults on all electronic communications and copy the second Adult or merge a call with the parent or the second Cleared Adult when explaining this requirement.
(h) When sending messages via personal devices, one safeguard must apply:
    - A parent or Safe-Environment-compliant Adult is included, **or**
    - The Minor is a family member or Legal Guardian

Artificial Intelligence (AI) Awareness and Safeguarding Policy

All Adults who work with or supervise Minors and Vulnerable Adults are required to be aware of the potential risks associated with the use of artificial intelligence (AI) technologies and to use such tools responsibly and appropriately.

AI tools (including chatbots, image generators, voice generators and other automated systems) may pose risks to Minors, including exposure to inappropriate content, misinformation, privacy violations, over-reliance on technology, and reduced Adult oversight. Adults must take reasonable steps to safeguard Minors from these risks.

Adults are expected to:
(a) Use AI tools consistent with Diocesan Mission and Safe Environment requirements.
(b) Never use AI in ways that replace appropriate Adult supervision, judgment, or personal interaction with Minors.
(c) Protect the privacy and personal information of Minors and never input identifying or sensitive information about a Minor or Vulnerable Adult into AI systems.
(d) Monitor and guide any classroom or program use of AI to ensure content is age-appropriate, accurate, and respectful.
(e) Report any concerns related to the misuse of AI or potential harm to Minors in accordance with mandatory reporting laws and procedures and to the Office of Safe Environment.

Social Media
(a) Social media pages must be under the **parish, school, or program name**.
(b) Two Cleared Adults must be moderators with full access (shared password).
(c) All content must reflect Catholic teaching.
(d) Students under 18 or in high school may **not** be on a staff or volunteer's personal friends list.
(e) Privacy settings must be in place and routinely checked.
(f) "No tagging" must be enabled; Youth should not be identified by full name.
(g) Blogs may not be used for personal business or to divulge private information.
(h) Any information indicating illegal activity involving Minors must be reported immediately.

(i) Parents may opt out of photo or information posting.
(j) Use only first names when posting photos, and only when necessary.
(k) All postings must align with Catholic values.
(l) Use of diocesan/school logos requires permission.
(m) No expectation of privacy on official accounts; official accounts must be used for communication.
(n) No communication with Minors via personal accounts.
(o) Prohibited:
    - One-on-one video calls
    - Private messaging / Private direct messages outside official platforms

5.0 Guidelines for Church Related Activities Transportation and Trips

The following procedures are intended to prevent abuse of Minors by preventing situations where abuse can occur:

(a) When releasing Minors from one's care to someone else's care, they are to be released only to the custodial parent(s), legal guardians(s), or others who have the written permission of the custodial parent(s) and/or legal guardian(s). If unsure, consult supervisors before releasing the Minor and check a photo ID. Schools, parishes and programs must have written policies in place for arrival and dismissal to ensure that each Minor arrives safely to their destination and to ensure that the Minor is safely returned to the care of their parent or legal guardian at the end of the school day, the event or the activity. Each location must communicate to all parents the approved arrival and dismissal procedure for that location.
(b) No Minor or young Adult (18-20) may have principal responsibility for supervising or carrying out a church-related activity without two Adults (21 years of age or over) present. You may have a Minor assistant catechist in a classroom, however, a cleared Adult who is age 21 or older must be physically present in that immediate room and there must be a second cleared Adult in close proximity such as a hall monitor or a classroom immediately across the hallway.
(c) Uncontrollable or unusual behavior of Minors must be reported to parents or legal guardians and to supervisors.
(d) Use or possession of illegal drugs is prohibited at all times. Use or possession of alcohol or marijuana is prohibited at all times when working with Minors or during Youth events.
(e) Supplying alcoholic beverages, illegal drugs and/or tobacco products to Minors is prohibited.
(f) Supplying Minors with medications of any kind, including over-the-counter drugs, without the written consent of the custodial parent(s) or guardian(s) is prohibited.
(g) Transportation of Minors: The school or parish should first explore the use of a bus or other forms of public transportation. Using personal vehicles to transport Minors (other than their own child) should be considered only as a last resort.
(h) Personnel will refrain from giving gifts or money to Minors without prior approval from the parents or legal guardian. Personnel are prohibited from giving gifts containing sexual material or age-inappropriate content to Minors.
(i) Personnel will not use any discipline that a reasonable person would find humiliating, degrading or excessive based on the age and maturity of the Minor and the nature and extent of the Minor's violation of a rule or policy.

6.0 PHYSICAL CONTACT WITH MINORS AND VULNERABLE ADULTS

The Diocese of Bridgeport is committed to fostering a positive and nurturing environment for children and Youth while ensuring their safety and protection from harm. The following rules outlines the standards of conduct expected of all Diocesan Personnel when interacting with Minors, Youth, or Vulnerable Adults.

Physical contact with Minors, Youth, and Vulnerable Adults must be minimized to the extent possible. Any physical contact that does occur must be entirely non-sexual, consistent with this Code of Conduct, and must never take place in private.

(a) Corporal punishment (spanking, striking, shaking, slapping, shoving, pushing, pinching, hitting or any touching that a reasonable person would construe as punitive) is prohibited.

(b) Pursuant to CT Law (CGS Sect. 53a-18 (6)), a teacher or other Personnel entrusted with the care and supervision of a Minor, Youth or other Vulnerable person for school purposes may use reasonable physical force upon the Minor, Youth or other Vulnerable person when and to the extent that a reasonable person would find it necessary to: remove the Minor, Youth or Vulnerable person (Adult) in order to maintain order; to protect him/herself or others from immediate physical injury; to obtain possession of a dangerous instrument or controlled substance; or to protect property from physical damage.

(c) Pursuant to CT Law (CGS Sect. 53a-18 (1)), a parent, guardian, teacher or other Personnel entrusted with the care and supervision of a Minor, Youth or Vulnerable Adult for catechetical instruction and church related activities may use reasonable physical force upon the Minor, Youth or other Vulnerable person when and to the extent that a reasonable person would find it reasonably necessary to maintain discipline or to promote the welfare of such Minor, Youth or Vulnerable person.

- Physical force must be used only as a last resort of discipline after all other measures have proved to be inadequate. Use only the level of physical discipline minimally necessary to maintain order.
- Appropriate interaction between an Adult and a Minor is important for a child's safety and development. Non-physical forms of encouragement, affirmation, and support such as verbal praise or positive gestures are preferred.
- Limited, non-sexual physical contact may be appropriate only when it is necessary, developmentally appropriate, culturally appropriate, and respectful of the child's boundaries. Any such contact must be brief, observable by others, and never secretive.
- Examples of acceptable forms of physical contact: Handshakes; "High-fives," fist bumps, or similar brief celebratory gestures; Anointing and Liturgical Blessings, Holding hands with small children when required for safety (e.g., crossing a street); Sitting beside children; Holding hands during prayer; Brief, culturally appropriate pats on the head

(d) Examples of **INAPPROPRIATE physical** contact not to be used, include but is not limited to the following:

- Kisses and inappropriate or lengthy hugs or embraces; Spanking; Holding Minors on one's lap; touching buttocks, genital areas, or breasts, bra strap or touching knees, thighs or legs as a show of affection; showing physical displays of affection in isolated areas of the premises such as bedrooms, cars, closets, bathrooms, employee-only areas, sacristy, cry rooms or other private spaces; Sleeping in bed with a Minor, Youth or Vulnerable Adult; Wrestling with Minors, Youth or Vulnerable Adults except for legitimate sports coaching, in which case another Adult must be present; Tickling; Piggyback rides; Any type of massage between Adults and Minors, Youth or Vulnerable Adult; Any display of unwanted affection or physical contact towards a Minor, Youth or Vulnerable Adult; Actions that include compliments relating to sexual attractiveness or sexual development.

(e) Physical contact by coaches is permitted only when it meets **all** of the following criteria:

- **It is a sport-specific necessity** (e.g., spotting, preventing injury, correcting form)
- Never in private, two or more Cleared Adults must be in direct view of the coach at all times.
- Physical contact for sports must always be instructional, preventative, or safety-related.

(f) Ceremonial Oscula: There are moments within the liturgical year when ceremonial oscula are expected not simply from the ministers and servers, but from the faithful themselves (i.e. the distribution of candles at Candlemas, or of branches on Palm Sunday). In consideration of both modern-day circumstance and the Safe Environment initiative, members of the assembly who are children are to refrain from providing the customary ceremonial kiss to the celebrant's hand when receiving objects from him within the liturgical context; they are simply to kiss the object alone.

- All priest celebrants who have the faculty to celebrate Mass in the usus antiquior should make not only the faithful aware of this policy, but also their Masters of Ceremonies, especially as they prepare for Holy Week celebrations.

(g) Students who require assistance with correcting their attire (i.e. buttons, ties, shirts). Minors may be physically assisted only if they are physically unable to correct their own attire and must be assisted in the presence of another Adult. Adults must take care to ensure that comments about inappropriate attire are not misunderstood by ensuring this conversation is in the presence of another Adult and immediate contact is made with a parent or legal guardian. This includes but is not limited to questions about the length or appropriateness of clothing or school uniforms. Personnel are prohibited from touching a Minor's body to address uniform violations. This includes but is not limited to the use of a tissue placed on the face or other areas of the body for suspected use of cosmetics, suspected piercings or body art. Personnel may not place rulers against the body of a Minor to measure skirt length.

- Adults are charged with establishing boundaries with Minors, Youth or Vulnerable Adults. No Adult may allow or encourage a Minor, Youth or Vulnerable Adult to engage in any of the above actions with Adults or with other Minors, Youth or Vulnerable Adults.

(h) When a Minor is suspected of using, possessing or distributing an illegal substance, two Adults of the same gender must be present when investigating or conducting any search. No Adult may touch any Minor on his or her body and may not request a Minor to remove clothing while conducting a search. The proper authorities must be contacted, and parents must be immediately notified if the suspicion of the use, possession or distribution of an illegal substance is confirmed. The parent must be required to pick up the child.

(i) In situations where a Minor or Vulnerable Adult requires emergency assistance due to illness or incontinence, support must be provided by two Cleared Adults. For Minors, a parent or caregiver must be contacted immediately; for Vulnerable Adults, their caregiver must be notified. If a child's clothing is soiled, parents must be contacted to pick up the child or assist with a change of clothing. Assistance must preserve individual safety, modesty and must protect the Adults.

7.0 SUPERVISION AND SAFETY DURING PROGRAMS AND EVENTS THAT INVOLVE MINORS AND VULNERABLE ADULTS

The primary standard being implemented here is the presence of multiple Adults (at least two) at all church-related programs and activities for Minors. This standard does not apply to the Sacrament of Reconciliation or to situations where an individual is seeking unscheduled and immediate pastoral care or scheduled clinical counseling sessions. The goal of this standard is to lessen the chances of abuse occurring or going unnoticed. In this light:

7.1 THE RULE OF TWO. Personnel must be aware of their own and others' vulnerability when working with Minors or Vulnerable Adults. Use a team approach by ensuring that there are always two or more Adults present when managing all Youth activities.

(a) Religious education will take place on parish property or through a diocesan approved online program. The use of an outside facility must be reviewed and approved by the Pastor, Diocesan General Counsel and Office of Safe Environment.

(b) Personnel under the age of 18 in the Diocese of Bridgeport must work under the direction of a Cleared Adult supervisor, including classrooms, faith formation, retreats and babysitting on Diocesan premises.
(c) Pastors, Principals and Supervisory Personnel must be aware of and approve all programs for Minors that are sponsored by a parish, school, or institution and must do so only after the appropriate standards and safeguards are in place.
(d) There must always be at least one Adult present in each classroom, and another Cleared Adult supervisor or monitor must also be present in the same building in close proximity when faith formation classes, school classes or other Youth group meetings are being held.
(e) Outside meetings that are open to the public and Adult education classes that take place on Diocesan premises must have a written agreement for the use of that meeting space that is in full compliance with Safe Environment policies. The persons responsible for the activity or group must sign the executive summary which applies to their specific role or position, clear a criminal background check and attend Safe Environment awareness training.
(f) When Personnel of the Diocese of Bridgeport are working one-on-one with a Minor, the door to the meeting space must be left open and a second Adult must be present within the same building. The second Adult must be aware that the meeting is taking place and must be in close proximity. Professional Counselors who work one-on-one with Minors must follow professional licensing standards and agency protocol for regulating the supervision and use of appropriate counseling rooms and office space. Whenever possible, all classrooms and counseling rooms must have doors with a window. All future construction of confidential meeting spaces must contain glass doors or windows where practicable.
(g) Separate lavatories for Adults and children should be used whenever possible. Lavatory use by Minors must be monitored from outside of the door. Each location must develop a policy to ensure that appropriate safeguards are in place.
(h) Sleeping in the same room or sleeping area with Minors is prohibited. Unique accommodations or situations may be individually presented in writing to the Office of Safe Environment for consideration. If Adults must stay in the same open space as any Minors, overnight awake supervision must be in place and there must be two or more unrelated Adults in full compliance with Safe Environment policies of the same gender, staying in the facility or room. Adults may not sleep in close proximity to Minors on any floor area indoors or outdoors. Precautions must be taken to prevent abuse and to ensure the protection of Adults from any appearance of impropriety.
(i) Buildings and meeting space must be monitored and always inspected by a supervisor to ensure the safety of the meeting space, to address any safety concerns and to control access to the building. Report any concerns immediately to the pastor, lay supervisor or to a Diocesan official.
(j) Safeguards for Confession: To the extent possible, ensure privacy while avoiding isolation: use line-of-sight or supervised spaces where possible, place confessionals in plain view with monitors at an appropriate distance, provide doors or windows for the priest to be fully visible, consider installing a fixed partition and screen between the penitent and confessor and provide multiple confessionals in one area.
(k) Anonymous Self-Help groups are permitted to meet on Diocesan and parish premises provided that Minors and Adults can be fully separated from these spaces and there are separate restroom facilities with hallway supervision.
(l) Classrooms and Meeting must always have one Adult in that meeting space and another Adult in the hallway in view of the classroom or in close proximity.
(m) Celebrations, including but not limited to, end of year events for students may not take place in private homes of any Personnel unless approved in advance by Diocesan General Counsel and the Office of Safe Environment.
(n) All entertainers, vendors and guests for Youth retreats and public events where Youth may be present and unaccompanied by their parents or legal guardian, must be in full compliance with Safe Environment policies. Short-term visitors (less than 3 hours) and one-time only guest

speakers must be directly monitored by a Cleared Adult for the entire time they are present with Minors, and they must be instructed to use a faculty or staff-only bathroom.

(o) Weapons of any kind are not permitted on diocesan premises other than those carried by a police officer or licensed security guard.

(p) Registered Sex Offenders and others who are convicted of a sex crime or a crime against a child may arrange to attend a designated Mass with the permission of the pastor however, they are not permitted to work, volunteer, or provide contracted services within the Diocese of Bridgeport. If the person is a parent of a student in a diocesan school or faith formation program, begin by contacting the Director of Safe Environment for safety planning which may include consultation with law enforcement and/or a meeting with Adult probation,

7.2 Supervision of Events and Trips - The Diocese of Bridgeport is committed to providing a safe environment for children within all diocesan activities and ministries, both in person and while using technology. For purposes of these guidelines, *Cleared Adults* with oversight or supervisory authority over Minors participating in a particular Youth event or activity share in the responsibility and authority of the parish or diocesan staff person in ensuring these guidelines are followed.

Ratio of Adults to Minors or Vulnerable Adults

- Every event where Minors, Youth, and Vulnerable Adults are present must go through a review process to determine Cleared Adult-to-Minor ratios.
- An activity open to the public or held in a public space may require a smaller ratio and increased supervision than a closed venue with Adults monitoring doorways and hallways.

Minimum Required Cleared Adult / Minor Ratios
On-Site Events

- **1:7** for High School students (always at least 2 Cleared Adults)
- **1:5** for Middle School students (always at least 2 Cleared Adults)
- **1:10** for large, single-space gatherings and events where all entrances and exits are securely monitored: 2 Cleared Adults for every 20 students (e.g., school dances).
  - At least 2 Cleared Adults must be in each hallway**.**

Out-of-State and International Trips

- Determined on a case-by-case basis.

Liability Forms

- The Diocese of Bridgeport liability and waiver form **must be signed by all Adults** participating in any trip involving Minors.
- The student liability form must be signed by the parent(s) or legal guardian(s) *prior to each trip.*
- Offsite and overnight events must have a separate liability form for each event.
- All liability forms and all Safe Environment records must be filed permanently at the school, parish, or sponsoring diocese and never destroyed.

Supervision of Onsite Day Events with Minors ("In House") Including regular Youth group.

- Ensure at least 2 Cleared Adults are present (even if only one Minor is present).
- If other Adults will be at the event:
- It is mandatory to follow the Cleared Adult/Minor ratios.
- Minors must remain supervised at all times.
- Minors may not supervise other Minors.
- All supervisors must be Cleared Adults

Supervision of Offsite Day Trips and Transportation
Preferred transportation is Buses. If a bus is not possible, indicate "provide own transportation" on the permission slip and meet the Minor at the event location.
If a carpool is organized, verify:

- Drivers must complete the Diocesan approved Safe Driving course and sign the auto fleet safety policy.
- A separate Department of Motor Vehicle Check must be completed within one year of the activity. Contact the Office of Safe Environment and provide the office with a copy of the driver's license and criminal background check authorization form.
- All drivers are Cleared Adults
- At least 2 Cleared Adults must be in each car.
- Drivers must show proof of valid license and insurance.
- All trips begin and end at a school or parish.
- Two Adults must remain with Minors until the last Minor is picked up.

Supervision of Short-distance trips:

- One Cleared Adult may be in a vehicle if two or more Minors are present and…
- Vehicles must travel in a caravan, and no stops are permitted between the event and the parish or school.
- Ratios must still be followed.
- Minors must be in the back seats only.

Overnight Events

- A written proposal must be submitted to the Office of Superintendent for all Catholic school overnight trips.
- The Code of Conduct applies to all diocesan-sponsored overnight events.
- Male and female Minors must be segregated, as well as Adults unless married.
- A Minor may never stay alone in a room.
- Curfews are required; bed checks must be performed by paired male and female Cleared Adults (females check females, males check males).
- Always two Cleared Adults conducting bed checks.
- Alert Supervision is required 2 Cleared Adults must be present.
- Males and females must sleep in separate rooms or areas.

Accommodation (Dorms and Hotel Rooms)

- Alert supervision (2 Cleared Adults) at all times.
- Adults may enter Minor rooms only for emergencies or routine checks, and only with two Cleared Adults
- Tents are strongly discouraged due to risks.
- Adults and Minors may not sleep in the same room or sleeping area while maintaining supervision.
- Unique accommodation must be submitted in writing to the Office of Safe Environment
- In emergencies or unexpected changes, all safeguards must be maintained to avoid even the appearance of impropriety.

Out-of-State or International Trips

- Require early planning and prior approval.
- Written proposal submitted to:
    - Office of the Superintendent and Office of Safe Environment (for Catholic schools)
    - Office of Safe Environment (for parishes or other groups)

Proposal must include:

- Purpose, date, and location
- Transportation, supervision, staffing ratios, overnight accommodation.
- How the trip complies with Safe Environment requirements
- No money or deposits may be exchanged and no documents executed until final written approval is received.
- All background checks and VIRTUS requirements must be completed beforehand.

Swimming

- Swimming involves risk; use abundance of caution.
- Certified lifeguards must always be present.
- Separate showering and changing areas for Adults and Minors.
- Proper swimming attire required.

8.0 CONFLICTS OF INTEREST

A conflict of interest is a conflict between the private interests and the official or professional responsibilities of a person in a position of trust. Personnel of the Diocese of Bridgeport must avoid situations that might present a conflict of interest. Even the appearance of a conflict of interest can call integrity and professional conduct into question.

Clerics and Men in Formation must avoid situations that might present a conflict of interest. The clergy member, Seminarian and Candidate for the Diaconate must establish and maintain clear, appropriate boundaries at all times.

Outside Employment & Conflict of Mission
All personnel of the Diocese of Bridgeport are expected to conduct themselves in a manner consistent with the mission and moral teachings of the Catholic Church. Full-time employees must disclose any outside employment or similar activities to their supervisor. The Diocese may review such employment to determine whether it interferes with job performance, creates a conflict of interest, contradicts Catholic teaching, or risks scandal or reputational harm to the Church, and may require the employee to modify or discontinue the outside employment. Approval of outside employment is not guaranteed and may be withdrawn if circumstances change, employees have an ongoing duty to disclose changes, and employment remains at-will under Connecticut law unless otherwise stated in a written agreement. (insert Employee handbook link to section).

9.0 Reporting Ethical or Professional Misconduct & Compliance with mandated Reporting Laws

9.1 Personnel of the Diocese of Bridgeport have a duty to report their own ethical or professional misconduct and the misconduct of others and must hold each other accountable for maintaining the highest ethical and professional standards. Personnel may not harass, threaten, terminate, or otherwise jeopardize the employment or volunteer position of any Personnel for appropriately reporting a violation of this Code of Conduct, the Sexual Misconduct Policy or the Anti-Harassment Policy.

9.2 Reporting Suspected Abuse of a Minor or Risk of Harm to a Minor in the Diocese of Bridgeport This section summarizes Connecticut Mandated Reporting Law. The Policy may be found at www.ct.gov/DCF (See Appendix A) and Reporting Suspected Abuse of a Minor in the Diocese of Bridgeport. All personnel of the Diocese of Bridgeport are considered Ethical Mandated Reporters under this policy.

9.3 All Clergy, Religious Sisters and Brothers, Seminarians, Candidates for the Diaconate, Lay Employees, Volunteers, Tenants, and Independent Contractors of the Diocese of Bridgeport have a legal and/or ethical duty to report early warning signs of abuse or situations that could be a potential risk to a Minor and any form of suspected abuse of a Minor and Vulnerable Adult. If you have reasonable cause to suspect any

incident of abuse by a Priest, Deacon, Man in Formation, Religious Sister or Brother, Lay Consecrated Religious, Lay Employee, Volunteer, Tenant, Vendor or Independent Contractors of the Diocese of Bridgeport, whether the incident occurred recently or in the past, you must report that information immediately to the Diocese of Bridgeport Victim Assistance at (203) 650-3265 and to DCF Careline at 1-800-842- 2288 and to the local police. If you are unable to reach Victim Assistance, you must contact Diocesan General Counsel.

9.4 Mandated reporters must report orally to DCF Careline or to a law enforcement agency within 12 hours of suspecting that a child has been abused or neglected or is at risk of harm, and the mandated reporter must submit a written report (DCF-136 form) to DCF. within 48 hours of making the oral report.

9.5 Informing the Diocese: In the event that an investigator or a police officer arrives to a school, a parish, or a Diocesan program unannounced, immediately inform the supervisor and contact the Director of Safe Environment. A police officer may not speak with a Minor without parental consent. For all DCF investigations, the Diocese must be made aware that an investigation is taking place on the premises and a second Adult should be present in the room or in view of the investigator who is with the Minor. Request to see the photo ID of any Adult claiming to be a police officer or a DCF employee and record the name and badge number of the person who is onsite.

9.6 Incidents involving two Minors-In the case of an incident involving two Minors, where one Minor is suspected of inappropriate physical or sexual conduct with another Minor, immediately notify your supervisor and the Victim Assistance Coordinator, and DCF or the police.

9.7 Risk of Harm to Self or to Others-If you suspect (through information reported to you or observed) that a person is in danger of physical harm to his or herself or to others, or expressing thought of suicide, notify the police immediately (911) and contact the Victim Assistance Coordinator (203) 650-3265.

9.8 Mobile Crisis Services is a CT resource for a person experiencing a psychiatric emergency and can be reached by dialing 211. Parents of Minor children must be informed that 211 is being contacted and parents have the right to be present for any onsite evaluation at a school or parish. Parents may opt to take their child to the Emergency room in place of an onsite risk assessment through this service.

9.9 Child Pornography-It is a crime and includes knowingly producing, distributing, receiving or possession with intent to distribute child pornography. Personnel are required to report suspected child pornography to the police and to DCF within 12-hours of becoming aware and to the Victim Assistance Coordinator of the Diocese of Bridgeport.

9.10 Vulnerable Adults-To report an allegation of abuse or neglect involving a Vulnerable Adult and for additional resources, immediately contact the police in the town where the alleged incident occurred. Protective Services for the Elderly must be contacted at the Department of Social Services 1 (888) 385-4225 After business hours or on weekends or state holidays, please call Info-line at 2-1-1 For an allegation of abuse or neglect involving an individual with an intellectual disability between the ages of 18 and 59, call 1 (844) 878-8923. For questions or concerns relating to this Code of Conduct or the Safe Environment Program, please contact The Diocese of Bridgeport, Office of Safe Environment (203) 416-1406.

9.11 **Sextortion** is a form of blackmail where someone threatens to share sexual content unless demands (money, images, or favors) are met. If you or someone you know has been the victim of sextortion or a scam, immediately cease all contact with the scammer and contact your bank/card provider to block accounts and stop payments. Additional safeguards include changing your passwords and enabling two-factor authentication. Be sure to save evidence (messages, receipts, screenshots) and report the scam to your bank, to the police and all relevant authorities.

9.12 **Suspected Grooming Behaviors** toward Minors or Vulnerable Adults-If you suspect boundary violations or grooming behavior toward a Minor or Vulnerable Adult, contact the police and DCF at 1-800-842-2288 and the Office of Safe Environment (203) 650-3265

9.13 **Suspected Human Trafficking**-If someone appears controlled by others, cannot leave their workplace or home, or shows signs of abuse, contact the police. For help, call the National Human Trafficking Hotline at 1-888-373-7888 or CT DCF at 1-800-842-2288.

10.0 Administration

Pastors and Administrators are responsible for the protection of the children and young people to whom they serve. Pastors must ensure that all clergy, lay employees and volunteers in the parish are in full compliance with the USCCB *Charter for the Protection of Children and Young People* and the Safe Environment Policies of the Diocese of Bridgeport.

10.1 Safe Environment Coordinators-It is recommended that Pastors designate an Adult who will assist with ongoing tracking of all Safe Environment requirements. Pastors are ultimately responsible for ensuring every Adult who works or volunteers in the parish remains in full compliance with the Policies and Procedures contained within the Safe Environment Handbook.

10.2 Supervision of electronic devices and Social Media-Pastors or designated Personnel must carefully review and approve of all requests by volunteers and employees to use personal cell phones and social media accounts to communicate with parish Youth and all communications must be transparent to the greatest extent possible. Parents must approve of all electronic communications with their child.

10.3 Posting of Reporting procedures-Pastors must make publicly available to parishioners, employees and volunteers the procedures for reporting suspected abuse of a Minor or Vulnerable Adult and sexual harassment and include a link to Safe Environment policies on all parish, school and program website

Appendix A

Definitions: Child Abuse and Neglect & Summary of Connecticut Child Abuse Reporting Laws

DCF POLICY: https://portal.ct.gov/-/media/dcf/policy/chapters/22-3-operational-definitions-of-abuse-and-neglect-rev-4-12-2023.pdf

Category	Definition	Key Examples / Indicators
Physical Abuse	Non-accidental injury or cruel punishment; injuries inconsistent with explanation or injuries of unknown origin	Bruises, burns, fractures, head/internal injuries, deprivation of necessities, malnutrition, misuse of treatments
Sexual Abuse / Exploitation	Sexual misconduct includes any sexual contact or behavior involving Minors or Vulnerable Adults, such as intentionally touching their intimate parts for sexual purposes, asking them to touch an Adult's intimate parts, exposing one's own intimate parts to them, or requesting that a Minor or Vulnerable Adult expose their intimate parts to another.	Rape, penetration, fondling, indecent exposure, child pornography, online enticement, sexual coercion, STD related to abuse, Grooming Behaviors toward Minors and Human Trafficking.
Emotional Maltreatment/Verbal Abuse	Acts/threats causing or likely to cause emotional harm	Rejecting, degrading, racial slurs, isolating, intimidating; Signs include withdrawal, depression, anxiety, low self-esteem, suicidal thoughts, academic regression.
Physical Neglect	Failure to provide physical care, safety, or supervision	Lack of food/shelter/clothing, malnutrition, unsafe housing, caregiver substance abuse, exposure to danger, poor supervision, failure to thrive
Medical Neglect	Failure to obtain necessary medical/dental/mental health care	Missed appointments, untreated chronic/acute conditions, withholding needed treatment
Educational Neglect DCF & Police Youth Bureau referral	Failure to ensure required schooling. Truancy: Student with 4 unexcused absences in a month or 10 in a school year, and a habitual truant: 20 unexcused absences in a school year may lead to DCF Family with Service Needs petition	Not enrolled in school, chronic absences, tardies, failure to meet home-instruction requirements
Emotional Neglect	Failure to meet a child's emotional needs, causing harm	Lack of affection/support, inappropriate expectations, emotional impact from exposure to caregiver substance abuse/mental illness/family violence
Moral Neglect	Allowing or encouraging illegal or immoral behavior	Stealing, drug/alcohol use, involving a child in criminal activities

Suspected Grooming Behaviors toward Minors and Warning Signs of Child Sexual Abuse

Grooming is a gradual process in which an Adult intentionally initiates contact with a Minor with the intent of eventually sexually abusing the child. Offenders often go to great lengths to avoid detection.

In most cases, the abuser is known to the child or the child's family. Approximately 89% of victims know their abuser, 29% of child sexual abuse cases are committed by family members, only 11% are committed by strangers. There is no reliable way to identify an abuser based on physical characteristics, age, occupation, sexual preference, race, or gender. It is a person's behavior, not their appearance that distinguishes them.

For this reason, it is critical to recognize warning signs and to report any suspected behaviors immediately to a supervisor and to civil authorities.

All Adults who work or volunteer in the Diocese of Bridgeport are trained to minimize behaviors that could be perceived as grooming when interacting with Minors. Some of the most common grooming behaviors are listed below.

For more information, or to attend an upcoming VIRTUS workshop, please visit **www.virtusonline.org**.

Warning Signs: Abusers often exhibit one or more of the following behaviors:

- Seeks frequent or exclusive alone time with children.
- Gives gifts without parental permission, especially frequent or expensive items (e.g., money, electronics, trips, meals); may threaten the child if they disclose.
- Shows excessive praise, attention, or favoritism toward a child.
- Take photos or videos of a child without parental knowledge or consent.
- Make comments about a child's physical appearance or sexual attractiveness.
- Acts as though rules do not apply to them.
- Engages in private, one-on-one electronic communication with Minors (texts, calls, or messaging), often at night or when parents are absent; may provide the child with a device.
- Encourages children to break rules or laws, increasing secrecy and guilt i.e., ("don't tell your parents")
- Undermines parental authority or sides with the child against parents.
- Discusses details about a personal romantic relationship.
- Use inappropriate language, sexual jokes, or sexual discussions around children.
- Offers paid chores or "jobs" without parental permission or other Adults present.
- Introduces games or activities involving physical contact that appear accidental at first and escalates over time.
- Provides alcohol, drugs, or exposes a child to pornography or age-inappropriate content.
- Engages in excessive physical contact (e.g., wrestling, tickling, rubbing, hugs, poking, shoulder massage, lap-sitting, piggy-back rides) that progresses from public or accidental to private or sexual.
- Appears more interested in spending time with children than with Adults.
- Build trust by spending time with siblings, parents or peers of the victim.
- Make promises of fame, special opportunities, or access to famous individuals.
- Pressures a child to accept favors, gifts, or help (e.g., rides), using guilt or emotional manipulation.
- The Adult circumvents established policies and procedures to arrange or signal a meeting in person or online, outside of the School or Church setting to create an opportunity for a private encounter.

All boundary violations and suspected grooming behaviors involving Minors or Vulnerable Adults must be reported immediately to civil authorities and to the Diocese of Bridgeport Office of Safe Environment.

Appendix B
(To be Posted at all Schools, Parishes and Diocesan Programs)

Reporting Suspected Abuse in the Diocese of Bridgeport

The Diocese of Bridgeport urges anyone with information regarding abuse or neglect, possession of child pornography, or suspected boundary violations involving Minors or Vulnerable Adults to report it immediately. The information must be reported to both the Diocese of Bridgeport and the appropriate civil authorities. The Bishop, all other Clergy, Candidates for Ordination, Religious Sisters and Brothers, Employees, Volunteers, Tenants and Independent Contractors are **required** to report this information within 12-hours of becoming aware of it.

Immediately call (911) if there is imminent risk of harm to any person.

Non-emergency, Immediately call.

The CT Department of Children and Family (DCF) Child Abuse and Neglect Careline 1-800-842-2288. Failure to report within twelve (12) hours of becoming aware of the information may result in criminal penalties for Mandated reporters.

AND

Notify the police in the State and Town where the incident occurred.

AND

Contact: Erin Neil, L.C.S.W., Director of Safe Environment and Victim Assistance Coordinator Office: (203) 416-1406, Cell: (203) 650-3265, eneil@diobpt.org or

***Third Party Reporting*: Survivor and Witness Hotline 1-833-990-0004 or www.lighthouse-services.com/diobpt**

To Report Sexual Misconduct by a U.S. Bishop, call 1-800-276-1562 / https://reportbishopabuse.org or call province's local reporting individual: (860) 541-6475

For a report involving a Vulnerable Adult, call the police in the town where the incident occurred.

SUSPECTED BOUNDARY VIOLATIONS

If you have any concern about the safety of a child or Vulnerable Adult or if you have observed an early warning sign of inappropriate conduct or a violation of the Safe Environment policies, please call the Safe Environment Office with what you know. Suspected grooming behaviors toward Minors must also be reported to the police and to the DCF Careline.

Appendix C

CRIMINAL BACKGROUND CHECK POLICY AND PROCEDURES

Criminal background checks are required for all personnel in the Diocese and must meet the highest safeguards outlined in the U.S.C.C.B. *Charter for the Protection of Children and Young People*. Any crimes involving Minors, Vulnerable Adults, or sexual offenses will result in immediate and permanent disqualification. When disqualification is required, an adverse action notice will be issued in full compliance with the Fair Credit Reporting Act (FCRA). All other criminal history findings will be reviewed by Diocesan General Counsel and the Director of Safe Environment. This review will consider the nature of the ministry, the nature and severity of the offense, the date(s) of conviction, and whether the applicant disclosed the offense. When a background check reveals a conviction or pending charge, administrators and relevant diocesan officials involved in the hiring process may convene to evaluate eligibility and suitability. All personnel are required to immediately report any new or pending criminal proceedings to the Episcopal Vicar for Human Resources and to the Office of Safe Environment.

Renewal: Every five (5) Years or ten (10) years based on ministry. More frequent background checks are required when there is a change in role, a change in location or when there has been an extended leave of absence or pending charges.

Clergy Priests, Deacons, Religious, Seminarians, Candidates for Diaconate, Retired Clergy active in ministry, must submit the Mind Your Business Inc, (MYB). Criminal Background check Authorization form to the Office of Clergy Personnel. Clergy Personnel will provide a copy of the required documentation to the Office of Safe Environment. The background check will include but is not limited to State Conviction Records; National Crime Registry (this includes Sex Offender Registry (SOR); SSN Trace; DMV; Credit Check; Employment Verification. Pre-assignment clearance is required for all positions.

Visiting Clergy / Visiting Religious - Priests/Deacons visiting for sacraments, mission trips, overnight stays, ministry beyond a single Mass. **(Valid for five (5) years)**

Requirements: Letter of Suitability; Background check must be completed within five (5) yrs; VIRTUS training; Signed Executive Summary of the Safe Environment Handbook.

International Background checks: Requires a clear copy of the passport; The Criminal background check authorization form; Address in their home country, and international Authorization and Consent form. The Pastor or Administrator must inform the visiting clergy of the requirements and must instruct them to submit all necessary documentation to the Office of Clergy and Religious and to the Office of Safe Environment a minimum of six (6) weeks before a visit. All Documentation for visiting clergy is maintained with the Office of Clergy & Religious

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Diocesan Clergy Ministering Outside the Diocese of Bridgeport (Valid for 5 years)

Must be current with all required background checks, VIRTUS training, CT Sexual Harassment Prevention Training and the signed acknowledgement of Executive Summary of the Safe Environment Handbook Letters of suitability are issued only if fully compliant; request 4-weeks prior to visit or as soon as practicable

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Visiting Bishops with ministry (Valid for 5 years)

Requirements: Evidence of Background check & Safe Environment training Letter of Suitability addressed to Bishop & Vicar General; copy sent to the Office of Clergy Personnel

Seminarians & Candidates for Diaconate: (Upon admission, upon Ordination & five (5) Years)

Requirements: References, Personality Profile, Psychological Evaluation, State Conviction Records; National Crime Registry (NCR); Sex Offender Registry (SOR); Court Searches; SSN Trace; DMV; Credit History; Employment History Authorizations are obtained and processed by Director of Vocations

(seminarians) or Director of the Diaconate (candidates for Diaconate). Records transferred to Clergy Personnel upon ordination. The Office of Safe Environments must be notified of all new Candidates & Upcoming Ordinations.

🟦 **Lay Employees and Religious Sisters and Brothers (Valid for five (5) years)**
All parish/school/diocesan employees age 18+ Requirements: State Conviction Records; National Crime Registry and SOR registry search; SSN Trace; Job-specific checks (Education, Credit, DMV). Alias name search included. Renewal: Every 5 Years. Authorization required at time of hire; results received by Safe Environment and provided to Human Resources Director (HR) upon request; Adverse action notices managed by HR; background checks do not transfer.
🟥 **School Employees: All** Catholic School Personnel; Requirements: Diocesan Employee level background check five (5 yrs); State Fingerprint; FBI Fingerprint; CT DCF Registry Search. All results will be stored by HR for Schools in print-only format in full accordance with security awareness training protocols through the State of CT. **Notes**: Fingerprinting scheduled within 30 days of hire; negative results reviewed by Safe Environment. Legal, Superintendent & HR. Adverse Action notification: HR for Schools. Must be cleared/notified by HR for Schools prior to assignment.

🟫 **Lay Volunteers** (Valid for five (5) or (10) Visit: Background Checks – Diocese of Bridgeport for Chart
Requirements: National Criminal Registry/Sex Offender Registry Search
Renewal: Every 5 Years (supervisory/contact) / Every 10 Years (non-contact)
Must provide full name, Date of Birth, address history; SSN. Social Security # optional if no contact with Minors or Vulnerable Adults. Volunteer applications and reference checks required by local entities.

🟦 **Guest Speakers & Retreat Leaders: Require an Endorsement of Suitability letter and Employee Background check (Appendix I.)** M.Y.B. Criminal Background check form sent to the Office of Safe Environment.

🟧 **School Volunteers with routine contact** & **Clergy with School based assignments**
Coaches/Teachers/Counselors/Tutors/Interns/Clergy/Chaplains in Diocesan Catholic Schools must also complete the FBI & State fingerprints and the equivalent criminal background check of an employee, even if unpaid or providing contracted services.

⬛ **Independent Contractors / Vendors / Tenants (Valid for five (5) or (10) Years)**
Anyone aged 18 or older who provides onsite services for over three hours must be cleared before starting.
Requirements: Proof of a cleared background check through company or the Diocese conducts criminal background check through the VIRTUS registration
Renewal: Every (ten) 10 years for those with no scheduled contact with children or Vulnerable Adults and no data access and every five (5) years for those who have scheduled contact with children or Vulnerable Adults or for those who have access to personal data.
The diocese may deny contract based on findings; adverse action notice issued by the Office of Safe Environment to the applicant, the company owner & supervisor.

🟥 **DRIVERS (DMV search is Valid for one (1) Year)** All Clergy and other diocesan designated drivers must submit a copy of a valid driver's license, comply with all Safe Environment policies, complete the required safe driving course, and follow the Diocese's auto fleet safety policy **(link).**

🟫 **Tenants and Positions with Financial Responsibility** Additional credit check is required every (5) years. A new credit history search is completed for a new financial position even if under five (5) years.

Appendix D
Summary of Safe Environment Requirements and Schedule of Implementation

Pastors, School Principals, and Diocesan Program Directors are responsible for ensuring that all Clergy, Candidates for Ordination, Religious Sisters and Brothers, Lay Consecrated Religious, Employees, Volunteers, Tenants, Vendors and Independent Contractors under their supervision (18 and older) complete the following:

Register at https://www.virtusonline.org/virtus/; attend initial instructor led *VIRTUS, Protecting God's Children* awareness training; complete re-certification and continuing education as required.

Complete ongoing criminal background checks as required.

Acknowledge receipt of the Safe Environment Handbook Executive Summary. A new executive summary and criminal background check must be completed when there is a change in responsibility, change in ministry or a change in the person's location.

Each location must request proof of training attendance and obtain background check authorization for all Personnel. All of the above requirements are tracked through the VIRTUS system. Each location must designate a local Safe Environment coordinator to assist with local implementation and tracking of all Safe Environment requirements and this individual(s) will have access to the local VIRTUS database. It is important to immediately set the status to inactive in VIRTUS, any person who is no longer assisting at your location.

Safe Environment Training updates through VIRTUS and background checks are required every (5) years for all Clergy, Lay Employees and Volunteers who are in scheduled contact with children. Annual review of the Code of Conduct is required by all personnel who work with children. VIRTUS Training and background checks are required every ten (10) years for volunteers who do not have scheduled contact with children and who do not have any supervisory role.

To register: www.virtusonline.org. Select the word **REGISTRATION** and select **BRIDGEPORT DIOCESE** as your organization. If your information changes, select **UPDATE MY ACCOUNT** or contact the **VIRTUS helpdesk 1-888-847-8870** to have a VIRTUS training record transferred to a new location.

Minor employees (younger than 18) must always work under the supervision of two Adults who are in full compliance with Safe Environment policies. Catholic Schools are required to provide every student K-12 the opportunity to attend Safe Environment training annually at their school, which uses www.kidsmartz.org and www.netsmartz.org. Parents of students enrolled in religious education are provided with Safe Environment training upon enrollment to complement the programs that their child receives through the State of Connecticut Healthy and Balanced Living Curriculum. Completion of VIRTUS, Protecting God's Children for Adults, and all applicable Criminal background checks are required when an employee reaches their 18th birthday. Minor employees are required to complete CT Sexual Harassment Prevention Training and acknowledge receipt of the Safe Environment Handbook. A 17-year-old may attend VIRTUS with parents written permission,

All Adults (18 and older) working and volunteering in any capacity in our diocesan (full-time, part-time, per-diem), including Personnel with no scheduled contact with children, must also complete VIRTUS training and a criminal background check. Registration through the VIRTUS website is required. The polices related to Safe Environment programs should be placed on the official school, parish or program website.

Appendix E

Diocese of Bridgeport Safe Environment Compliance Self-Audit Year: _____
USCCB – The Charter for the Protection of Children and Young People

I. Parish/School/Program: _____ Pastor/Administrator/Principal/Director: _____

II. Statement of Compliance

This document verifies that the above-named parish, school, or program in the **Diocese of Bridgeport** remains in **full compliance** with Safe Environment Policies and The **USCCB Charter for the Protection of Children and Young People**. Compliance includes meeting **all** of the following requirements:

A. Adult Compliance Requirements

☐ All Adult Clergy, Religious, Lay Consecrated Religious, All Employees, Volunteers, Tenants, Contractors (Full-time, Part-time, Per-Diem, 1099) have **completed a criminal background check and VIRTUS, Protecting God's Children for Adults training (Synchronous learning).**

☐ All Adult Personnel have signed/**acknowledged receipt** of Safe Environment Handbook as required.
☐ All of the above personnel are **listed in the VIRTUS database** in **full compliance** with Safe Environments.

B. Child/Student Safe Environment Training

☐ CATHOLIC SCHOOL: Our School provided onsite Safe Environment training for all student's date: _____

☐ Absences#_____ Opt-out # _____were submitted to the Diocese in **writing** before classroom instruction.

☐ PARISHES: Students enrolled in faith formation. **Parent attestation collected (LEAD or in writing)**

C. Mandated Reporting & Safe Environment Handbook Information is made public.

☐ Information on **Reporting Suspected Abuse of a Minor** is posted in a **public, visible location/website**.

☐ All Mandated Reporters have completed their required training Mandated Reporter Training

D. CT Sexual Harassment training – Is complete for all Clergy and Paid personnel/Employees/Coaches/Other Personnel as assigned

By signing below, I affirm that all statements made on this audit are true and accurate.

Pastor / Administrator / Principal/Program Director:
_____ Date: _____

Safe Environment Coordinator:
_____ Date: _____ EMAIL: _____

Catechetical Leader (where applicable):
_____

Appendix F

Safe Environment for Independent Contractors, Subcontractors, Tenants and Vendors

Background checks and Safe Environment training for all personnel, including occasional contracted services, protect Minors and Vulnerable Adults and ensure overall safety. *(Examples of types of contractors: Construction, Musicians, Caterers, Painters, Cleaners, Plumbers, Roofers, Amusement Company, Exterminators, Landscapers, Tenants of a Diocesan owned property, Room Rentals, crafts/food booth)*

Legal Counsel Review
All contracts, leases, and service agreements must be reviewed by Diocesan General Counsel. Agreements must require that all Adults onsite clear a criminal background check and provide proof of successful completion of Safe Environment training before beginning services. Independent Catholic School Tenants must include Safe Environment training for Minor students. No employee with a sex crime or offense against a child or Vulnerable Adult related conviction may work on Diocesan property. All other convictions are reviewed based on role. If the contractor/vendor lacks a background check service, the Diocesan investigative agency may be used. Contractors/vendors must comply with the Fair Credit Reporting Act (FCRA)

Safe Environment Requirements:
Complete Safe Environment training or provide evidence to the office of Safe Environment of attendance at an equivalent instructor-led course on child sexual abuse awareness, prevention and mandatory reporting. CT Sexual Harassment Training or Anti-Harassment training is NOT the same as child sexual abuse prevention training. If a company has multiple employees who require training, contact the Safe Environment office (203) 416-1407 to schedule a class specifically for your team and we will work to make this as convenient as possible for you. For contractors who do not work with children, the class is completed in 1.5 hours of synchronous learning and is valid for ten (10) years.

Proof of a cleared criminal background check may be submitted in writing on official company letterhead to Diocesan General Counsel and the Office of Safe Environment. The letter must include the name of all Adults who will be on the premises and the date of the most recent background check clearance (Evidence of background checks & training may be accepted within five (5)-years.

Acknowledgement of receipt and understanding of the Diocesan Safe Environment handbook is collected online via VIRTUS registration or by submitting a signed Executive Summary of the Handbook to the Office of Safe Environment.

Emergency Repairs & Single Time-Limited Visits (<3 hours) with no Minors present: Safe Environment training and the background check is not mandatory; Adults must be supervised at all times by a Cleared Adult. (I.e. Surveyor, Architect's single visit, Unload cement, Food drop off to a pantry)

Longer visits (>3 hours)**; Multiple short visits, and Visits with direct interaction with Minors**: Examples:: Santa Claus, Magicians, Dancers, performances with audience participation, must register with www.virtusonline.org, complete VIRTUS training, clear a criminal background check through the Diocese, and sign the Executive Summary of the Safe Environment handbook.

Tenant Background Checks: Includes the NCR/SOR Search and Credit History Search (valid for term of lease). Notify the Office of Safe Environment of all lease renewals.

Appendix G

Code of Conduct for Clergy and Men in Formation

Clergy are held to higher standards of behavior than other church Personnel and are required to comply with the standards of behavior included in this Code of Conduct; they are also expected to avoid even the appearance of impropriety both inside and outside the scope of their ministry. This Code of Conduct applies to all Clergy and Men in Formation since they aspire to ordination. Responsibility for adherence to this Code of Conduct rests with each individual.

Sacramental Confidentiality must apply to everything in this Code of Conduct. All of these obligations listed in the document are independent of the confidentiality of the confessional. Under NO circumstances can there be any disclosure, even indirect disclosure, of information received though the confessional. The Code of Conduct provides a set of standards for our ministry to Minors. Violations of these standards must be reported to the appropriate authorities and to the Office of Safe Environment.

Safeguards for Pastoral Counseling
Clergy and Men in Formation, when acting as Pastoral Counselors or Spiritual Directors shall not step beyond their competence in counseling situations and will refer clients to other professionals when appropriate and must at all times be aware of the imbalance of power which exists in relationships. This is always the case with any person who is a subordinate, an employee, parishioner or volunteer.

Warning Signs of boundary concerns in or outside of counseling: It is important to identify, manage, document, and report any early warning signs of emotional dependency or boundary violations. Immediately notify the Vicar General and/or Office of Safe Environment.

Examples of early warning signs which must be reported include but are not limited to: Unwanted, intrusive behaviors that cause concern or distress; excessive or inappropriate contact outside scheduled meetings; repeated boundary testing; monitoring schedules and activities; waiting for people to leave a space to meet in private; excessive interest in personal life; late evening communications; showing up uninvited to events; persistent requests for personal information or special treatment; expressing an inability to live or function without them; seeking constant reassurance; resistance to referrals; idealization; and jealousy of other persons.

Imbalances of power in relationships involving clergy results from a combination of institutional authority, moral influence and social trust. Clergy possess disproportionate influence over another, even when no harm is intended. When misused, this imbalance can become deeply harmful and genuine consent can be compromised. Even if an interaction appears voluntary, the presence of authority, dependency, and fear of consequences may limit a person's ability to resist, challenge, or say no.

- Clergy and Men in Formation, when acting as Pastoral Counselors must carefully consider the possible consequences before entering into a counseling relationship with someone with whom they have a pre-existing relationship (i.e., employee, professional colleague, friend, or other pre-existing relationship).
- Clergy and Men in Formation must never engage in sexual intimacies with the persons they counsel. This includes consensual and nonconsensual contact, forced physical contact, or any physical contact that can be misconstrued and inappropriate sexual comments.
- Clergy and Men in Formation must maintain clear, appropriate boundaries in all counseling relationships.

- Clergy and Men in Formation are strongly encouraged to maintain a log of the times and places of spiritual counseling sessions with each person counseled. Ensure that all meeting spaces are carefully considered for transparency, safety and confidentiality. Meet in a location where other Adults are present and at a safe distance in order to maintain confidentiality.

Confidentiality

Information disclosed to Clergy or Men in Formation during counseling, advising, or spiritual direction shall be held in the strictest confidence possible. However, none of the obligations stated in this Code of Conduct supersedes the confidentiality of the confessional.

If there is clear and imminent danger to the client or to others, the Clergy Member and Men in Formation may disclose only the information necessary to protect the parties affected and to prevent harm.

Before disclosure is made, if feasible, the Clergy and Men in Formation should inform the person being counseled about the disclosure and the potential consequences.

Clergy and Men in Formation should discuss the nature of confidentiality and its limits with each person in counseling.

Clergy and Men in Formation should keep minimal records of the content of sessions, if any record is necessary.

While counseling a Minor, Youth or Vulnerable Adult, if Clergy or Men in Formation discover that there is a threat to the welfare of the Minor, first immediately report that information to civil authorities, even if the person asked you not to and even if the person mentioned that it has already been reported. Failure to report this information within 12 hours to CT DCF or to the police may result in criminal charges.

Conduct with Minors, Youth and Vulnerable Adults

Steps must be taken to the extent possible to ensure that two or more Adults are present when clergy and Men in Formation are working with Youth.

Even appropriate and non-sexual forms of physical contact with Youth can be misconstrued and should be minimized.

Clergy and Men in Formation must refrain from the illegal possession and/or illegal use of drugs and/or alcohol or mind-altering drugs including but not limited to recreational marijuana at all times when ministering to Minors or Vulnerable Adults.

Clergy and Men in Formation must not allow Minors to stay overnight in the cleric's private accommodations or residence unless the Minor is a family member.

Clergy and Men in Formation must not provide shared, private, overnight accommodation for Minors who are non-family members, including, but not limited to, accommodations in any Church- owned facility, private residence, hotel room, or any other place where there is no other Adult supervision present.

At all times, Clergy and Men in Formation must protect all parties from the appearance of impropriety and from all risk of harm.

Sexual Conduct

Clerics and Men in Formation must not, for sexual gain or intimacy, exploit the trust placed in them by the faith community. Clerics and Men in Formation who are committed to a celibate lifestyle are called to always be an example of celibate chastity in all relationships.

Allegations of sexual misconduct that are learned outside the seal of confession must be taken seriously and reported to civil authorities. Clergy are considered mandated reporters in Connecticut. Clerics must

be familiar with these regulations and the mandatory reporting requirements both within the Diocese of Bridgeport and in Connecticut. Clergy must follow those mandates in each instance and must fully cooperate in any investigation involving suspected abuse of a Minor.

Clergy and Men in Formation must never visit pornographic websites or participate in interactive websites for the purpose of initiating sexual contacts or dating, live or virtual.

It is illegal to possess or view child pornography in any form, and it is the policy of the Diocese of Bridgeport to report any suspicion of child pornography to the police and to the diocesan Victim Assistance Coordinator immediately upon becoming aware.

Harassment
Clerics and Men in Formation must not engage in any harassment of other clergy, employees, volunteers, or parishioners and must not tolerate such harassment by other clergy, employees or volunteers. See Appendix H of the Safe Environment Handbook: Anti-Harassment Policy.

Record Retention: Confidentiality will be maintained in creating, storing, accessing, transferring, and disposing of parish, religious community/institute, or organizational records, including all records related to Safe Environments.

Under the Diocesan Safe Environment programs in accordance with the *USCCB Charter for the Protection of Children and Young People,* Safe Environment records must be tracked and maintained permanently.

Safe Environment requirements for all members of the clergy are tracked and stored permanently in the Office for Clergy and Religious Personnel. Prior to the arrival of visiting clergy, check with the Office for Clergy and Religious Personnel to verify that all Safe Environment requirements are in place. A letter of suitability for ministry is required for all visiting members of the clergy.

Safe Environment documentation includes the following:

- A signed acknowledgement of the Safe Environment Handbook Executive Summary.
- Verification of attendance at VIRTUS and continuing education every five (5) or ten (10) years depending on the category of Personnel.
- Verification of an initial criminal background check and background check renewals every five (5) or ten (10) years based on the category of Personnel.

Background Checks and Ministerial Eligibility
The Diocese may deny ministry, employment, volunteer service, or contracts to anyone who fails to complete required screening or whose background check reveals adverse information. When adverse action is taken, the individual will receive a Notice of Adverse Action with a copy of the report and rights under the Fair Credit Reporting Act.

All clergy (active, retired, visiting, international, and religious order), religious sisters and brothers, seminarians, and candidates for the diaconate serving or residing in the Diocese.

Frequency
Criminal background checks are required every five (5) years and prior to ordination.
Process:

- Signed authorization form is required.
- Screening includes criminal records, sex offender registries, SSN trace, DMV, credit.
- Crimes against children or sexual offenses result in prohibition from ministry.
- Records are permanently and securely maintained.

Visiting Clergy

Short-term, no overnight stay:

- Testimonial of suitability (dated within six months).

Overnight on Diocesan Premise and regular ministry- More than a single event such as a wedding or baptism. The following is also required for foreign clergy:

- Testimonial of suitability
- Background check (within five years)
- Proof of VIRTUS training (Initial training must be instructor-led training). Continuing education may be online. A VIRTUS account must be created or duplicated in the Diocese of Bridgeport
- Signed Acknowledgement of the Safe Environment Handbook

Host responsibilities:

- Communicate requirements
- Ensure the visiting clergy is aware of Connecticut mandatory reporting laws

For questions and country specific forms concerning criminal background checks, please contact the Office of Safe Environment (203) 416-1406.

Appendix H

THE DIOCESE OF BRIDGEPORT ANTI-HARASSMENT POLICY SUMMARY (*LINK TO EMPLOYEE POLICY)*

Awareness of power imbalances in relationships is essential, as differences in authority, influence, or dependence can affect consent, decision-making, and professional boundaries. Individuals in positions of trust must act responsibly, maintain clear boundaries, and avoid any behavior that could exploit or appear to exploit others.

Personnel must not engage in physical, psychological, written, verbal, or any other form of harassment and must not tolerate such harassment by other Personnel. All employees will complete mandatory Commission for Human Rights and Opportunities CT Sexual Harassment Prevention Training every five (5) years utilizing the VIRTUS online platform to track training compliance. Personnel of the Diocese of Bridgeport shall provide a professional work environment that is free from physical, psychological, written or verbal intimidation or harassment from the perspective of a reasonable person.

Examples of Harassment: Harassment may include but are not limited to physical, verbal, written, or electronic behavior that is inconsistent with the mission, values, and teachings of the Church, including but not limited to:

- Unwelcome physical contact or gestures that violate personal boundaries.
- Verbal remarks, jokes, or comments that are demeaning, humiliating, or inappropriate.
- Sexual comments, innuendo, or discussions inconsistent with professional or ministerial conduct
- Displaying, sharing, or distributing inappropriate or offensive images, messages, or materials
- Repeated unwanted attention, advances, or communications
- Bullying, intimidation, or misuse of authority within ministries, programs, or employment
- Derogatory comments or actions based on race, sex, age, disability, religion, or other protected classes.
- Harassment or coercion involving a power imbalance between clergy, employees, volunteers, parishioners, or students.
- Actions intended to harm another's reputation or standing in the community.
- Retaliation against any individual who raises concerns or reports misconduct in good faith.
- Harassment through electronic communications, including email, text messages, or social media.
- Physical or mental abuse
- Comments about an individual's real or perceived disability and/or medical condition
- Racial insults and derogatory ethnic slurs
- Unwelcome sexual advances or touching, sexual comments or sexual jokes.
- Requests for sexual favors used as a condition for employment or to affect other Personnel decisions, such as promotion or compensation.
- Display of materials that would be found offensive to a reasonable person.

Harassment can be a single severe incident or a persistent pattern of behavior whereby the purpose or the effect is to create a hostile, offensive, or intimidating work environment. Allegations of harassment involving Adult employees and/or volunteers of the Diocese must be taken seriously and reported immediately to the Office of Human Resources Reporting Hotline (203) 416-1600. Information related to Adult harassment involving a member of the Clergy must be immediately reported to the office of Clergy and Religious Personnel (203) 416-1633. The ***Diocese of Bridgeport Anti-Harassment Policy*** will be followed to protect the rights of all involved. All reports involving any form of harassment will be handled with a high level of confidentiality at all times.

Appendix I

The Diocese of Bridgeport
Endorsement of Suitability for Lay Speakers and Retreat Leaders

(To be printed on official diocesan or religious institute letterhead and seal. This form must be completed and signed by the presenter's Chancellor or Religious Superior.)

Important: No event may be publicized, and no compensation may be requested or issued, until all Safe Environment requirements of the Diocese of Bridgeport have been completed and verified and this endorsement has been received and approved by the Office of the Chancellor:

Name of Speaker:__ _____**Email**:_____

Phone: _____ Address: _____
(Arch)diocese or Religious Institute Affiliation: _____Position (if applicable):___ _____

Event Information: Date (s) of Event: _____ _____

Describe the (Parish/School/Diocesan Event(s)) at which the guest speaker will speak:
_____
_____Website for this event: _____

Will you be charging a fee or stipend? Yes / No Fee:_____ Individual Participant Fee: _____
Will you be selling merchandise / Books / Music / Other during this event? If Yes, Please describe:
_____

Endorsement of Suitability
He or she is a person of good moral character and reputation.
I know of nothing that would in any way limit or disqualify him or her from this presentation/retreat.
I am unaware of anything in his or her background that would render him or her unsuitable to work with Minors or Adults
I know nothing that would disqualify him or her from receiving compensation for this event.
I have no concerns regarding the presenters' theological teaching or ministry.

Safe Environment Compliance:

Is the speaker in full compliance with the U.S.C.C.B. Charter for the Protection of Children and Young People and his or her (arch)diocesan or religious institute Safe Environment Policy? Yes / No **Safe Environment Training Date**: _____
Has the speaker attended Safe Environment Training with a live instructor in the past: Yes / No
Background check Date:_____

Endorsement Authorization

Name (Please Print): _____ Title: _____
Signature (Required): _____ Date: _____

Send original signed document with Official Seal to: The Diocese of Bridgeport Office of the Chancellor 100 Beard Sawmill Road, Shelton CT 06484

Executive Summary for Clergy and Men in Formation

As a **Cleric** or **Man in Formation**, I promise to strictly follow the rules and guidelines in this Code of Conduct set forth in the Diocese of Bridgeport Safe Environment handbook. I understand that this promise obligates me at all times to conduct myself transparently and professionally both in person and when using any form of technology. I understand that Clerics and Men in Formation are committed to a celibate lifestyle are called to be an example of celibate chastity in all relationships at all times.

As a Clergy Member or Man in Formation, I will:

- At all times avoid even the appearance of impropriety in person and while using technology.
- Avoid situations where I am alone with a Minor or Vulnerable Adult at all times.
- Be transparent and avoid the appearance of impropriety when giving and receiving gifts.
- Report any suspected abuse or risk of harm involving a Minor or Vulnerable Adult outside of confession, including child pornography, to the Pastor, Administrator, or appropriate supervisor, the police, the DCF Careline and to the Victim Assistance Coordinator of the Diocese of Bridgeport within twelve (12) hours of becoming aware of the information whether the abuse is alleged to have occurred recently or in the past.
- Cooperate fully in any investigation involving abuse of children, Youth or in any investigation of Adult-to-Adult misconduct.
- Uphold the standards of the USCCB Charter and the Safe Environment Policies of the Diocese of Bridgeport.

As a Clergy member or Man in Formation, I will not:

- Be under the influence of alcohol at any time while ministering to Minors, Youth or Vulnerable Adults.
- Use, possess, or be under the influence of illegal drugs, recreational marijuana at any time.
- Strike, spank, shove, shake, push, or slap others.
- Humiliate, ridicule, threaten, or degrade others.
- Touch a Minor and/or Vulnerable Adult in a sexual or other inappropriate manner.
- Use any discipline that frightens or humiliates Minors and/or Vulnerable Adults.
- Use profanity in the presence of Minors or Vulnerable Adults.
- Visit pornographic websites or participate in interactive websites for the purpose of initiating sexual contacts, live or virtual.

I have read the Safe Environment Handbook and I am aware of the sections of the Handbook which apply to my specific ministry, including but not limited to, The Code of Conduct for Clergy and Men in Formation; Guidelines for Trips, Events and Electronic Communication involving Minors and Vulnerable Adults and the sections on Mandatory Reporting. I agree to conduct myself accordingly.

Printed Name: _____ **Signature/Date:** _____

This page must be returned to the Office of Clergy and Religious Personnel

Executive Summary for Religious Sisters and Brothers

As a **Religious Sister** or **Brother,** I promise to strictly follow the rules and guidelines in this Code of Conduct set forth in the Diocese of Bridgeport Safe Environment handbook. I understand that this promise obligates me at all times to conduct myself transparently and professionally both in person and when using any form of technology. I understand that religious men and women are committed to a celibate lifestyle are called to be an example of celibate chastity in all relationships at all times.

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As a Religious Sister or Brother, I will:

- At all times avoid even the appearance of impropriety in person and while using technology.
- Avoid situations where I am alone with a Minor or Vulnerable Adult at all times.
- Be transparent and avoid the appearance of impropriety when giving and receiving gifts.
- Report any suspected abuse or risk of harm involving a Minor or Vulnerable Adult, including child pornography, to the Pastor, Administrator, or appropriate supervisor, the police, the DCF Careline and to the Victim Assistance Coordinator of the Diocese of Bridgeport within twelve (12) hours of becoming aware of the information whether the abuse is alleged to have occurred recently or in the past.
- Cooperate fully in any investigation involving abuse of children, Youth or in any investigation of Adult-to-Adult misconduct.
- Uphold the standards of the USCCB Charter and the Safe Environment Policies of the Diocese of Bridgeport.

As a Religious Sister or Brother, I will not:

- Be under the influence of alcohol or recreational marijuana at any time while ministering to Minors and/or Vulnerable Adults.
- Use, possess, or be under the influence of illegal drugs at any time.
- Strike, spank, shove, shake, or slap others.
- Humiliate, ridicule, threaten, or degrade others.
- Touch a Minor and/or Vulnerable Adult in a sexual or other inappropriate manner.
- Use any discipline that frightens or humiliates Minors and/or Vulnerable Adults.
- Use profanity in the presence of Minors and/or Vulnerable Adults.
- Visit pornographic websites or participate in interactive websites for the purpose of initiating sexual contacts, live or virtual.

I have read the Safe Environment Handbook, and I am aware of the sections of the Handbook which may apply to my specific ministry, including but not limited to the Code of Conduct and the Guidelines for Trips, Events and Electronic Communication involving Minors. I agree to conduct myself accordingly.

Printed Name: _____ Signature/Date: _____

This page must be sent to the Office of Clergy and Religious Personnel

Executive Summary for Lay Employees

As a **Lay Employee,** I promise to strictly follow the rules and guidelines in this Safe Environment Handbook when ministering to Minors or Vulnerable Adults. I promise to conduct myself transparently and professionally both in person and while using any form of technology.

As a Lay Employee, I will:

- At all times avoid even the appearance of impropriety in person and while using technology.
- Avoid situations where I am alone with a Minor or Vulnerable Adult at church or school activities.
- Be transparent and avoid the appearance of impropriety when giving and receiving gifts.
- Report any suspected abuse or risk of harm involving a Minor or Vulnerable Adult, including child pornography, to the Pastor, Administrator, or appropriate supervisor, the police, the DCF Careline and to the Victim Assistance Coordinator of the Diocese of Bridgeport within twelve (12) hours of becoming aware of the information whether the abuse is alleged to have occurred recently or in the past.
- Cooperate fully in any investigation involving abuse of children, youth or any investigation of Adult to Adult misconduct.
- Uphold the standards of the USCCB Charter and the Safe Environment Policies of the Diocese of Bridgeport.

As a Lay Employee, I will not:

- Be under the influence of alcohol or recreational marijuana at any time while ministering to Minors.
- Use, possess, or be under the influence of illegal drugs at any time.
- Strike, spank, shove, shake, push, or slap others.
- Humiliate, ridicule, threaten, or degrade others.
- Touch a Minor and/or Vulnerable Adult in a sexual or other inappropriate manner.
- Use any discipline that frightens or humiliates Minors and/or Vulnerable Adults.
- Use profanity in the presence of Minors and/or Vulnerable Adults.

I have read the Safe Environment Handbook, and I am aware of the sections of this handbook which may apply to my specific ministry, including but not limited to the Code of Conduct and the Guidelines for Trips, Events and Electronic Communication involving Minors. I agree to conduct myself accordingly.

Printed Name: _____ **Signature/Date:** _____

This page must be returned to your supervisor. Supervisors shall place this document in the Personnel file permanently and ensure that the receipt of this document has been recorded on the Employee's VIRTUS account.

Executive Summary for Lay Volunteers and Lay Consecrated Religious

As a **Lay Volunteer**, I promise to strictly follow the rules and guidelines in this Safe Environment handbook when ministering to Minors and Vulnerable Adults. I promise to conduct myself transparently and professionally both in person and while using any form of technology.

As a Lay Volunteer, I will:

- At all times avoid even the appearance of impropriety in person and while using technology.
- Avoid situations where I am alone with a Minor or Vulnerable Adult at church or school activities.
- Be transparent and avoid the appearance of impropriety when giving and receiving gifts.
- Report any suspected abuse or risk of harm involving a Minor or Vulnerable Adult, including child pornography, to the Pastor, Administrator, or appropriate supervisor, the police, the DCF Careline and to the Victim Assistance Coordinator of the Diocese of Bridgeport within twelve (12) hours of becoming aware of the information whether the abuse is alleged to have occurred recently or in the past.
- Cooperate fully in any investigation involving abuse of children, Youth or in any investigation of Adult-to-Adult misconduct.
- Uphold the standards of the USCCB Charter and the Safe Environment Policies of the Diocese of Bridgeport.

As a Lay Volunteer, I will not:

- Be under the influence of alcohol at any time while ministering to Minors.
- Use, possess, or be under the influence of illegal drugs at any time.
- Strike, spank, shove, shake, push, or slap others.
- Humiliate, ridicule, threaten, or degrade others.
- Touch a Minor, Youth and/or Vulnerable Adult in a sexual or other inappropriate manner.
- Use any discipline that frightens or humiliates Minors, Youth and/or Vulnerable Adults.
- Use profanity in the presence of Minors, Youth and/or Vulnerable Adults.

I have read the Safe Environment Handbook, and I am aware of the sections of the handbook which may apply to my specific ministry, including but not limited to, The Code of Conduct and the Guidelines for Trips, Events and Electronic Communication involving Minors. I agree to conduct myself accordingly.

Printed Name: _____ Signature/Date: _____

This page must be returned to your supervisor. Supervisors shall ensure that this document is recorded on the volunteer's VIRTUS account.

Executive Summary for Independent Contractors, Tenants and Vendors

NAME OF COMPANY: _____ **OWNER:** _____

STREET ADDRESS: _____**CITY/STATE/ZIP:** _____

EMAIL ADDRESS: _____ **PHONE NUMBER:** _____

As an Independent Contractor, Tenant or Vendor routinely on Diocesan Premises, I promise to strictly follow the rules and guidelines in this Code of Conduct as a condition of routine services I provide within The Diocese of Bridgeport.

As an **Independent Contractor, Tenant or Vendor, I will:**

- Clear a criminal background check through the online VIRTUS registration.
- Ensure that every Adult I assign to work on Diocesan premises has successfully pre-registered in the VIRTUS database and cleared a criminal background check.
- Attend VIRTUS training that teaches Adults about the warning signs of child sexual abuse and how to prevent it.
- Avoid situations where I am alone with Minors or Vulnerable Adults on church property.
- Report suspected abuse of a Minor or Vulnerable Adult to the pastor, the Victim Assistance Coordinator, the police and the CT (DCF) at 1-800-842-2288.
- Cooperate within the requirements of the law in any investigation of abuse.
- Conduct myself in accordance with the Safe Environment Policies of the Diocese of Bridgeport.
- Avoid making comments about the physical attractiveness of Minors who are on the premises.

As an **Independent Contractor, Tenant or Vendor, I will not:**

- Use, possess, or be under the influence of alcohol or illegal drugs at any time while working on Diocesan premises.
- Touch a Minor, Youth and/or Vulnerable Adult in a sexual or other inappropriate manner.
- Use profanity in the presence of Minors, Youth and/or Vulnerable Adults.
- Place any employee or volunteer of the company on Diocesan premises who has been convicted of a crime against children or a sex crime.

I understand that all employees or volunteers that I assign to work on Diocesan premises are required to successfully clear a criminal background check at my company's expense. I understand that depending on the specific nature of my work or position on Diocesan premises, I may also be required to attend a designated Safe Environment training and sign an Acknowledgement of Receipt for the Safe Environment Handbook.

Printed Name: _____ **Signature/Date:** _____

This form must be signed and returned to all locations where you are working within the Diocese of Bridgeport.