

Windmoor Foundation Inc.

Safe Environment

Policies & Procedures Handbook

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The Prelature thanks Praesidium for providing the expert guidance that shaped this Model Third-Party Organization Safe Environment Policies & Procedures Handbook.

Praesidium has more than two decades of research and experience with more than 4,000 youth and vulnerable adult-serving organizations. <https://praesidiuminc.com/>

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## Introduction

Windmoor Foundation, Inc. (hereafter WFI) considers the safety and dignity of minors to be of the highest importance. The measures and procedures contained in this Handbook aim to establish and maintain an environment that manifests awareness of and respect for the rights and needs of minors, and which avoids any risk of exploitation, sexual abuse, and mistreatment in WFI's Programs.

WFI's Programs are rooted in Catholic moral and social teaching and embrace students regardless of their religious status. WFI has executed a Contract with the Prelature of the Holy Cross and Opus Dei – United States Region ("Prelature") to provide activities of a religious and spiritual nature for the individuals who participate in WFI's Programs.

WFI considers all sexual abuse of minors to be a grave offense against God. Such abuse does violence to central aspects of our Christian faith and life because it offends God's image in the most vulnerable persons—the object of his predilection—and leaves behind wounds that are very difficult to heal.

WFI's goals are:

- To prevent all forms of violence, physical or psychological abuse, mistreatment, exploitation, or negligence;
- To promote awareness of and respect for the rights and needs of minors and to ensure adequate training for their protection;
- To raise awareness of the obligation to make abuses known to competent authorities and to cooperate with these authorities in preventing and combatting abuses; and
- To respond effectively to any abuse or mistreatment against minors that might occur.

## Definitions

The following terms have a specific meaning in this Handbook.

**WFI**: Windmoor Foundation, Inc.

**Minor**: Anyone who participates in WFI's Programs and who is less than 18 years old.

**Adult**: Anyone involved in WFI's Programs and who is 18 years old or older.

**Adult Participant**: An Adult who participates in, but does not staff, WFI's Programs in which minors also participate.

**Parent**: The mother, father, or legal guardian of a minor. If the minor has two parents, then the term "Parent" refers to both parents together.

**Program Director**: The highest-ranking officer tasked by WFI's Board of Directors with operating WFI's Programs.

**Program Staff**: Adults who direct or help operate WFI's Programs. Program Staff include the Program Director and all other staff and volunteers.

**Junior Counselors**: Minors who are given responsibilities to help operate WFI's Programs.

**Abuse**: Any single act or failure to act (negligence) that causes serious physical or emotional harm to a minor or places the minor in proximate danger of such harm; or any sustained pattern of actions or neglect that causes serious physical or emotional harm to a minor, including actions such as belittling, frightening, insulting, discriminating, name-calling, making a person the butt of jokes, failing to provide adequate food, shelter, medical care, or supervision, etc. "Sexual abuse" includes non-touching and touching behavior engaged in for the sexual gratification or interest of the perpetrator or victim, including acts of looking or showing, and including any knowing touching or fondling,

either directly or through clothing, for the purpose of sexual gratification or arousal of the perpetrator or victim.

# 1. Policies

All policies in this Handbook apply to all Program Staff in all WFI Programs with Minors, whether they take place on or off WFI's campus.

## 1A. Code of Conduct

Every human being is endowed with dignity. WFI believes that every human being is a child of God and that Christian charity should guide all interactions between all individuals in WFI's Programs. Each person's dignity demands refined speech, refined behavior, and refined respect from other persons.

WFI has zero tolerance for any abuse of minors who participate in WFI's Programs, perpetrated by any adult or minor in connection with WFI's Programs.

This Code of Conduct applies to all Program Staff, Junior Counselors, and Adult Participants in their interactions with Minors enrolled in WFI's Programs, whether interactions occur during or outside of scheduled programming.

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

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

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



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

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

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

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

7. Any overnight programs or one-day trips should include a sufficient ratio of Program Staff to minors, and never fewer than two Program Staff.

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

9. Adults and minors should have separate bathrooms, showers, and/or changing areas, or use the bathroom, showers, and/or changing areas at separate times. No adult should use the bathroom, shower, or dress in the presence of minors and vice-versa. Whenever minors need to dress with other minors present, they should be instructed to use bathrobes or at least towels. All showers should be individual showers or have individual stalls. There should never be two minors alone together in a bathroom, changing area, or showering area, unless adults are supervising. Whenever supervision is necessary, at least two adults should stand outside the bathroom entrance, shower room,

or changing area, and at least two adults should enter the bathroom, shower room, or changing area together.

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

11. Before a minor attends an overnight program, Program Staff must obtain written approval from the minor's Parent.

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

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

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

15. Program Staff may exchange program-related text messages with minors who are high school students (and not with younger students), if they first obtain general approval from the minor's Parent.

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

or video interaction, Program Staff must first speak with the minor's Parent before asking to speak with the minor.

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

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

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

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

21. Anyone who knows or reasonably suspects that a minor has been abused in connection with any of WFI's Programs must immediately inform the Program Director. In many States, the law requires adults who work with minors to report to State authorities known or reasonably suspected child abuse or neglect. All Program Staff will undergo training on abuse reporting requirements in their State.

22. WFI takes every suspicion or allegation of abuse seriously and will cooperate with civil authorities to investigate suspected or alleged abuse. Program Staff are required to cooperate with any outside or internal investigation of suspected or alleged abuse of minors. Failure to cooperate may be grounds for termination from WFI's Programs.

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

I, \_\_\_\_\_, have read the above guidelines and agree to abide by them in connection with all of WFI's Programs involving minors. I understand that I will be asked to review and sign my agreement with WFI's guidelines annually.

\_\_\_\_\_  
Signature

\_\_\_\_\_  
Date

## 1B. Additional Policy Guidelines

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

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

### 1B.1 Christian Environment

Every human being is endowed with dignity. WFI believes that every human being is a child of God and that Christian charity should guide all interactions between all individuals in WFI Programs. Each person's dignity demands refined speech, refined behavior, and refined respect from other persons.

### 1B.2 One-on-One Interactions

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

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

### 1B.3 Physical Contact

Appropriate Physical Interactions with and between minors	Inappropriate Physical Interactions with and between minors
<ul style="list-style-type: none"> <li>• Handshakes</li> <li>• High-fives and hand slapping</li> <li>• Side hugs</li> <li>• Pats on the shoulder or back</li> <li>• Touching hands, arms, shoulders</li> <li>• Arms around shoulders</li> </ul>	<ul style="list-style-type: none"> <li>• Full-frontal hugs</li> <li>• Kisses</li> <li>• Showing affection in isolated areas</li> <li>• Lap sitting</li> <li>• Wrestling</li> <li>• Piggyback rides</li> <li>• Tickling</li> <li>• Exposing oneself</li> <li>• Any type of massage</li> <li>• Any form of unwanted affection</li> <li>• Touching bottom, chest, or genital areas</li> <li>• Hitting, spanking, shaking, slapping</li> <li>• Unnecessary restraints</li> <li>• Viewing or showing others pornography</li> </ul>

### 1B.4 Verbal Interactions

Appropriate Verbal Interactions with and between minors	Inappropriate Verbal Interactions with and between minors
<ul style="list-style-type: none"> <li>• Appropriate jokes</li> <li>• Encouragement</li> <li>• Praise</li> <li>• All other speech that accords with Christian virtue</li> </ul>	<ul style="list-style-type: none"> <li>• Name-calling</li> <li>• Bullying</li> <li>• Ridicule or Humiliation</li> <li>• Discussing sexual matters outside the context of specific spiritual help that the minor is seeking and that the minor has initiated</li> <li>• Cursing</li> <li>• Hazing</li> <li>• Off-color or sexual jokes</li> <li>• Shaming</li> <li>• Belittling</li> <li>• Derogatory remarks</li> <li>• Harsh language that may frighten, threaten, or humiliate another minor</li> <li>• Derogatory remarks about another person or his/her family</li> <li>• Inappropriate games, for example, <i>Truth or Dare</i> and <i>Never Have I Ever</i></li> </ul>

## 1B.5 Bullying

Bullying is never tolerated in WFI's Programs. Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength.

Bullying can take on various forms including:

1. *Physical bullying* – when one person engages in physical force against another person, such as by hitting, punching, pushing, kicking, pinching, or unreasonably restraining the other person.
2. *Verbal bullying* – when someone uses words with the intention of hurting another, such as by belittling or calling another a hurtful name.
3. *Nonverbal or relational bullying* – when one person manipulates a relationship or desired relationship to harm another person. This includes social exclusion, friendship manipulation, or gossip. This type of bullying also includes intimidating another person by using gestures.
4. *Cyberbullying* – the intentional and overt act of aggression toward another person by way of any technological tool, such as email, instant messages, text messages, digital pictures or images, or website postings (including blogs). Cyberbullying can involve:
  - a) Sending mean, vulgar, or threatening messages or images;
  - b) Posting sensitive, private information about another person;
  - c) Pretending to be someone else in order to make that person look bad; and
  - d) Hazing – an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers that person regardless of that person's willingness to participate.



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

## 1B.6 Electronic Communication

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

- 1) Rule of Three: Electronic communications between Program Staff and minors must occur in an open electronic environment, following the “Rule of Three.” Either another Program Staff or the minor’s Parent must be copied on the electronic communication, must have ready access to the electronic communication (such as an open Social Media forum), or must be within view when the communication is taking place (such as a video chat). Prior to the minor completing 7th grade, for each video interaction Program Staff must speak first with the minor’s Parent before asking to speak with the minor.
- 2) Social Media: Program Staff are prohibited from “friending” minors on Social Media and exchanging direct or private messages with minors via Social Media.
- 3) Phone Calls: With parental consent, Program Staff may conduct a traditional voice-only phone call with a minor. Prior to the minor completing 7th grade, for each phone call Program Staff must first speak with the minor’s Parent before asking to speak with the minor.
- 4) Text Messaging: With parental consent, Program Staff may exchange program-related text messages with a high school student (and not with younger students).

A Parent may provide consent for phone calls and text messages verbally or in writing, and the Parent may rescind consent at any time. The minor’s Parent should provide the

minor's phone number to Program Staff (i.e., the minor should not provide his or her phone number to Program Staff), and where practical Program Staff should obtain written approval (for example, clearly spelled out in a Program application or clearly spelled out on an Emergency Contact form that a Parent completes for their child).

### **1B.7 Gifts**

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

### **1B.8 Adult Participants**

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

An Adult Participant should not contact a minor outside of WFI's Programs unless that minor is the Adult Participant's own family member. If an Adult Participant attempts to contact a minor who is not a family member without consent from that minor's Parent, then the Adult Participant may be prohibited from participating in WFI's Programs. If the situation poses a threat to the minor involved then Program Staff will notify local civil authorities.

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

### 1B.9 Mandatory Reporting

In Indiana, adults are required to call the Indiana Child Abuse and Neglect Hotline, 1-800-800-5556, whenever they have reasonable cause to believe that a minor known to them in their professional or official (including volunteers) capacity may be an abused or neglected child. "Abuse" is defined in the Definitions section of this Handbook. "Neglect" refers to when a child has inadequate food, clothing, shelter, or needed medical treatment. The Hotline worker will determine if the information given by the reporter meets the legal requirements to initiate an investigation. Detailed information is available here: <https://www.in.gov/dcs/contact-us/child-abuse-and-neglect-hotline/#:~:text=1%2D800%2D800%2D5556,week%2C%20including%20weekends%20and%20holidays.>

### 1B.10 Cooperation in Investigations

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

Cooperation with investigations includes, but is not limited to:

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

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

Program Staff's failure to cooperate with an investigation will result in disciplinary action up to and including termination from WFI's Programs.

## 2. Screening and Selection of Program Staff

### 2A. Initial Screening and Selection

Program Staff are selected through the following process:

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

Junior Counselors are selected through the following process:

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

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

The decision to accept a candidate as Program Staff or as a Junior Counselor requires the participation of at least two people.

## 2B. Ongoing Screening

Criminal background checks must be repeated at least once every two years for Program Staff.

Seasonal Program Staff must have their background checks repeated at the time of re-selection as Program Staff.

Program Staff who are arrested or convicted of a crime must notify the Program Director. If the person arrested or convicted of a crime is the Program Director, then the Program Director must notify WFI's Board of Directors.

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

## 2C. Low Access Individuals

Low Access Individuals: Some individuals will have limited access to minors through WFI's Programs, but these individuals are not actually involved in WFI's Programs. Low Access Individuals have few or no opportunities to develop relationships with minors over time.

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

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

By contrast, High Access Individuals are presented with opportunities to develop relationships with minors in WFI's Programs. There may be some individuals who are not regular Program Staff but who nevertheless interact with minors in connection with WFI's Programs often and over an extended period of time. The Program Director is responsible for identifying such High Access Individuals and ensuring that they are held to all the standards and practices outlined in this Handbook.

### 3. Training

#### 3A. Initial Training

New Program Staff must complete training on the following topics before beginning to participate in WFI's Programs:

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

#### 3B. Training to Be Completed Within First 90 Days

New Program Staff must complete training on the following topics within their first 90 days of participating in WFI's Programs:

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

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

### 3C. Annual Training

Each year, Program Staff must receive training on the following topics:

- WFI’s Safe Environment Policies and Procedures;
- Maintaining appropriate boundaries with minors; and
- At least one additional review topic to be selected by WFI, based upon current needs to update Program Staff’s skills and knowledge related to abuse prevention.

### 3D. Training for Policy Changes

When there are changes to WFI’s Safe Environment policies, Program Staff will receive training on the changes within 90 days of the changes.

### 3E. Training for Program Directors

Program Directors must complete training on the following topics before they may direct WFI’s Programs:

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



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

### 3F. Training for Screening and Selection

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

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

## 4. Monitoring and Supervision

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

#### 4A. Identifying Clothing

In general, all Program Staff are required to wear professional or business casual attire during WFI's Programs. Appropriate sports clothes may be worn when needed. In general, Priests should dress as Catholic Priests with Roman Collars during WFI's Programs. Program Directors have the authority and discretion to determine when more specifically identifying clothing, such as polo shirts with logos, should be worn for safety and staff management, such as during large programs.

#### 4B. Adult-To-Minor Ratios

A minimum of 1 Program Staff member is required for every 15 minors participating in WFI's Programs. In all cases, there must be at least 2 Program Staff running and supervising an overnight program. Minors, no matter their role (including Junior Counselors), are never counted as Program Staff but always counted as minors.

#### 4C. Minors Arriving To and Leaving From Programs

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

Minors are required to greet the Program Director or a designated delegate when arriving to WFI's programs. Minors are also required to say goodbye to the Program Director or a designated delegate when leaving WFI's programs.

#### 4D. Supervising Minors During Programs

Minors (including Junior Counselors) are always supervised by Program Staff during programs. Junior Counselors should always be supervised by Program Staff and should generally not be alone with other minors.

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

- Minors should remain within the line of sight of Program Staff;
- When programs are large or spread out, Program Staff should split up into zones to monitor all locations where minors are;
- Zone monitoring is an appropriate solution for large games, such as Capture The Flag;
- Minors under the age of 12 should always be engaged in a scheduled, structured program; and
- Minors over the age of 12 should always be engaged in a scheduled, structured program, or should otherwise be only located in authorized, supervised locations.

#### **4D.1 Minors with Special or Unique Needs**

If a minor has special or unique needs, Program Staff will determine these needs at intake with the minor's Parent. If such needs become apparent after a minor has begun participating in programs, then Program Staff will hold a meeting with the minor's Parent before the minor continues participating. If the minor is accepted into the program or permitted to continue participating in a program, Program Staff will document with the minor's Parent an agreed plan for supervising and ensuring the safety of that minor.

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

- Minors who have life-threatening allergies
- Minors who have special health problems, such as severe asthma

- Minors recovering from broken bones or surgery
- Minors on the autism spectrum.

#### 4D.2 Cell Phone and Internet Use

To facilitate attention to minors, Program Staff may use cell phones and the internet during programs only for necessary program-related communications and tasks, and note-taking.

Internet access through program-provided equipment is filtered, fire-walled, and monitored. Program Staff should not allow anyone to use program-provided equipment or their own staff equipment to access pornography or other inappropriate material through the internet. Neither Program Staff nor minors may expect their internet use during programs to be private.

#### 4D.3 Overnight Programs And Camps

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

#### 4D.4 Bathrooms, Showers, and Changing Areas

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

#### 4E. Visitors

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

### 5. Reporting Concerns

Anyone – Program Staff, minors, parents, and anyone else – should be made to feel welcome to express any concerns or complaints, including observations of others whose interactions may be suspicious or inappropriate, in connection with WFI's Programs.

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

In general, if the concerns or complaints relate to the Program Director, the best person to speak with is either the Assistant Program Director or, if the matter is more serious, the someone on the Board of Directors.

However, if the concerns or complaints relate to the Program Director's interactions with Minors that may be suspicious or inappropriate, such concerns should be communicated immediately and directly to WFI's Board of Directors.

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

## 5A. Responding to Concerns

We will treat each concern or complaint regarding WFI's Programs with the seriousness it deserves. We will provide a timely, thorough, and objective response. If a concern is expressed in writing, or if the concern is regarding the safety of Minors, the Program Director will maintain documentation of the concern and the response to the concern.

When an individual shares a concern or complaint:

1. They will be given the time and attention necessary to allow them to share their thoughts in person;
2. They will be thanked for sharing their concerns and for contributing to maintaining a healthy environment for everyone;
3. They will be advised that their concerns will be taken seriously;
4. If the concerns require a response, once a response is decided, they will be informed, in general statements to protect others who may be involved, of the steps the Prelature will take in addressing the matter;

5. They will be encouraged to speak again with the person they first spoke with if they have additional information; and
6. They will be protected from any form of retaliation for expressing their concerns.

## 5B. Concerns about Sexually Inappropriate Behavior

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

1. The name(s) of the individual(s) involved;
2. The date(s) the behavior occurred;
3. The name(s) of any known witnesses; and
4. A summary of the inappropriate conduct, including:
  - a. The specific behavior involved;
  - b. Direct quotes, when available; and
  - c. Any relevant documentation or other evidence.

## 5C. Confidentiality

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

## 5D. Anonymous Reporting

Reporting sexually inappropriate behavior or other abuse can be difficult. Because it is important to us that everyone be able to report concerns, anonymous reports can be mailed to WFI at: [address of the Third-Party organization](#)

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

## 6. Participation of Minors and Parents in WFI's Maintenance of a Safe Environment

### 6A. Publication of Safe Environment Policies and Procedures

A copy of this Handbook will be published and available for easy download or viewing on the Safe Environment page of WFI's website: [URL](#).

Because WFI contracts with the Prelature of the Holy Cross and Opus Dei – United States Region ("Opus Dei"), by which WFI asks Opus Dei to provide activities of a religious and spiritual nature for the individuals who participate in WFI's programming, WFI will also publish a link to the Safe Environment page of the Opus Dei (United States) website: <https://opusdei.org/en-us/article/safe-environment/>

### 6B. Information for Minors

In ways appropriate to each program and the age of the minors involved, the Program Director should communicate the following information to minors who participate in WFI's Programs.



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

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

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

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

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

## 6C. Information for Parents

In ways appropriate to each program and to the atmosphere of confidence and trust that characterizes WFI’s Programs, the Program Director should communicate the following information to parents of minors who participate in WFI’s Programs.

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

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

If a Parent observes any behavior on the part of anyone else that is less than Christian, is suspicious, is inappropriate, or is a direct policy violation, then that Parent should share his/her observations with the Program Director. If the behavior concerns the Program Director, then that Parent should share his/her observations with the Board of Directors.

## 7. Responding To Potential Abuse

### 7A. Response of Program Staff to Red-Flag Behaviors or Policy Violations

Program Staff are obliged immediately to report their observations of red-flag (inappropriate) behaviors and/or policy violations to the Program Director or Board of Directors, in accord with WFI's reporting procedures.

The following are examples of red-flag or inappropriate behaviors that all Program Staff are required to report:

- Any violation of WFI's abuse prevention policies
- Anyone seeking unauthorized private time or one-on-one time with minors inside or outside of scheduled programs
- Anyone giving unauthorized gifts to individual minors
- Anyone sending unauthorized electronic communications through text messaging, social media, online gaming, etc. in violation of WFI's electronic communication policy
- Anyone making sexually suggestive comments to minors

- Anyone showing favoritism towards a minor or minors with specific characteristics
- Minors disclosing that an adult makes them feel uncomfortable.

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

- Interrupt the behavior;
- Report the behavior to the Program Director. If the concern is particularly serious, if possible, write down your observations;
- If you are not comfortable making the report directly, make it anonymously;
- If the report is about the Program Director, report to WFI's Board of Directors;
- Complete an Incident Report but do not conduct your own investigation;
- Report the matter again if you see that it has not been resolved.

## 7B. Response of Program Staff to Incidents or Allegations of Abuse

1. Program Staff are required to report any suspected or known abuse of minors perpetrated by other Program Staff or Adult Participants immediately and directly to the Program Director, so that immediate steps may be taken to ensure the safety of alleged victims and others who may be at risk. Such reports are confidential.
2. Program Staff are required to follow Indiana's mandated reporter requirements, set forth in Section 1B.9 above.

Additional guidelines for Program Staff responding to incidents or allegations of abuse:

- If you witness abuse, safely interrupt the behavior immediately.
- Be sure the minor is no longer in danger and take steps to prevent any further harm. Protect the alleged victim from intimidation, retribution, or further abuse to the extent possible.
- If an individual discloses an incident of abuse to you, assure the individual that they were correct to tell you.
- Immediately report the allegation or incident to the Program Director. If you report it to State authorities, make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency.
- Document the incident, disclosure, or any circumstances causing your suspicion of abuse. Gather as much information about the allegation as you can. For example, who made the report, who was allegedly abused, who was the alleged abuser, what was the nature of the alleged abuse, where and when did the alleged abuse occur, etc.
- Accurately record everything you learn in as much detail as you can. Remember, your notes may be read and relied upon by others. Stick to the facts.
- It is not your job to investigate the incident, but it is your job to report the incident as outlined here in a timely manner. WFI will follow its internal investigation procedures, in addition to cooperating with civil authorities.
- If it does not appear that any steps have been taken to correct the situation, you should report it again to the Program Director or the Board of Directors.

## 7C. Response of Program Staff to Minor-To-Minor Sexually Inappropriate Behavior

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

If Program Staff witness minor-to-minor sexual behaviors, they should do the following:

- Safely separate the minors as soon as possible
- Calmly explain that such interactions are not permitted
- Complete an Incident Report, including what you observed and how you responded
- If the behavior involves explicit physical sexual activity, notify the Program Director. Unless the Program Director does so, also notify the minors' Parents and State authorities as required by mandated reporting laws.
  - Do not attempt to determine when the minors' behavior was "sexual curiosity." There is no standard definition of what normal sexual curiosity looks like. Trained civil authorities use criteria to investigate and determine when the minor's behavior is sexual curiosity.
- If the problem is recurring, or if the single incident was serious, the minors may not be allowed to return to WFI's Programs.
- Identify how minors will be managed or supported to prevent further occurrences of sexual activity, including additional supervision requirements.

## 8. Governance

### 8A. Board of Directors

WFI is governed by a Board of Directors. The Board of Directors is responsible for promulgating WFI's Safe Environment Policies and Procedures, ensuring that WFI's Program Director properly implements and enforces WFI's Safe Environment Policies and Procedures, and responding to allegations of abuse in connection with 3PORG's programs.

### 8B. Contract with the Prelature of Opus Dei

WFI contracts with the Prelature of the Holy Cross and Opus Dei – United States Region. The Prelature provides activities of a religious and spiritual nature for the individuals who participate in WFI's programming. The Prelature's activities often occur in connection with WFI's programming. For this reason, WFI's contract with the Prelature requires WFI to meet minimum requirements for ensuring a Safe Environment for minors who participate in WFI's programming, in exchange for the Prelature's services.