## Code of Conduct

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

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

This Code of Conduct applies to all Program Staff, Junior Counselors, and Adult Participants in their interactions with Minors enrolled in Windmoor 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. Windmoor does not tolerate any abuse of minors in connection with Windmoor'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 Windmoor's Programs and Windmoor'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 rough-housing should be avoided.
- 14. Adults must never invite or aid minors to smoke, drink alcohol, or use illegal drugs. The possession and use of marijuana are always prohibited, regardless of its legality.
- 15. 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 Windmoor property or equipment, or in association with any of Windmoor Programs, is strictly prohibited.
- 21. Anyone who knows or reasonably suspects that a minor has been abused in connection with any of Windmoor 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. Windmoor 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 Windmoor 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.