

**BETH TZEDEC CONGREGATION
SEXUAL MISCONDUCT, ABUSE AND HARASSMENT PREVENTION POLICY
A SAFE ENVIRONMENT FOR ALL**

(Approved March 27, 2018)

INTRODUCTION

The inherent right of all individuals to be treated with dignity and respect is central to Judaic values and beliefs. Beth Tzedec Congregation (the "Congregation") is committed to operating a religious institution which fosters mutual respect for the dignity and well-being of all Employees and members of, and visitors to the Congregation. In order to promote a healthy and supportive environment at the Congregation as a workplace, a religious institution and a place of study, worship and assembly, the Congregation fully supports and enforces the right of Employees and members of, and visitors to, the Congregation to be free from abuse, either while on the Premises or off the Premises while engaged in operations, activities and/or Programs related to the Congregation.

The abuse of a vulnerable person, whether the victim is a child or an adult, tears at the fabric of family and community life and has far-reaching consequences. A serious incident of abuse can undermine years of dedicated service by an organization, and can lead to declining business, low morale, and a diminished sense of confidence within the community. In the end, it is not just the victims that suffer, but also the people who have committed their lives to caring for them.

This document intends to highlight relevant issues surrounding abuse and highlights areas that we have reviewed to create an environment that is safe and secure for all. We have prepared this document to help us develop protocols that help ensure we are taking all possible steps to ensure that adequate measures are in place to protect those who may be vulnerable -- children/ youths/ adults.

The principles of accountability, confidentiality (to the extent reasonably possible), transparency (in dealing with the involved parties) and avoidance of conflict of interest will guide any actions taken to address a suspected incident.

Any Employee found to have engaged in any type of abuse will be subject to disciplinary sanctions up to and including dismissal (for just cause).

Any member of the Congregation found to have engaged in any type of abuse of: (i) an Employee while attending at the Premises and/or in respect of the conduct of operations, activities and/or Programs associated with or related to the Congregation; (ii) another member while attending at the Premises; or (iii) a visitor while attending at the Premises, will be subject to sanctions, which may include temporary or permanent loss of membership or being banned from the Premises.

Any visitor to the Congregation found to have engaged in any type of abuse of an Employee, member or other visitor while attending at the Premises, will be subject to sanctions which may include being banned from the Premises.

For certainty, this policy applies to all people performing services, such as delivery, catering, repairs, etc. while they are on the Premises or engaged in the Congregation's operations, activities and/or Programs.

For the purposes of this policy, being banned from the Premises includes being banned from all operations, activities and/or Programs of or related to the Congregation.

1. DEFINITIONS:

1.1 The following terms shall have the following meanings:

"abuse" or "harassment" wherever used in this policy includes abuse, harassment sexual misconduct and engaging in any other form of personal vexatious misconduct or comments that are known to be unwelcome or ought reasonably to be known to be unwelcome.

"Employees" include all permanent, full-time, part time and casual employees and contractors performing services for which they receive a salary paid directly by the Congregation.

"child" or "youth" means, unless otherwise explicitly set out in this policy, a person who is under 18 years of age.

"Event" means occasional or one-time activities run by the Congregation or community such as a concert, tea or lecture.

"Investigator" means an individual appointed by the MPA to conduct an investigation and who is qualified by training and/or experience to conduct an investigation.

"Leader" means a person at least 18 years of age who devotes significant portions of his / her time and energy in service and who has gone through a period of orientation and training, in order to hold a Leadership Position. Examples include: program director, youth leader, paid staff, and other professional workers. It is common practice at Beth Tzedec to use volunteers who are between the ages of 12 and 18. When Leaders are mentioned in this policy, we are referring to people of at least 18 years of age. Nevertheless, Leaders under the age of 18 are expected to follow the policy when acting as Leaders or volunteer helpers.

"Leadership position" means a leadership role occupied by an employee or volunteer where there is expected to be direct interaction with children, youths, or vulnerable adults. Examples include: the positions of program leader, youth group leader, teacher, after-school tutor, etc.

"Premises" means the lands and premises, including the building and all other improvements municipally known as 1700 Bathurst Street, and the lands and premises commonly known as Beth Tzedec Memorial Park.

"Program" means a structured series of similar activities or Events governed and run by the Congregation which spans a period of weeks or months, and in which the level of risk is expected to remain constant. (Examples include: a weekly extra-curricular class; the routine visitation of an elder in a care facility; weekly youth meetings; an out-of-the-cold program, etc.).

“pursuit of the Congregation’s business” includes: (i) activities within the Premises; (ii) activities associated with the Congregation, including extra-curricular activities; (iii) activities occurring outside the Premises including field trips, external work assignments, work-related conferences, training sessions, travel or social gatherings; and (iv) activities in other locations where abuse may have a subsequent impact on the work relationship, performance or environment.

“Risk Assessment” means a process by which Programs are rated according to risk factors

“vulnerable adult” means a person who, because of his / her age, a disability or other circumstances, whether temporary or permanent, is in a position of dependence on others or is otherwise at a greater risk than the general population of being harmed by persons in positions of authority or trust relative to him/her. (This definition is used in Bill C-7, proclaimed by the Government of Canada, August 1, 2000.)

“volunteer helper” means a person who is involved peripherally in Programs with children, youths, or vulnerable adults, but has not chosen to become a Leader. Examples include those who serve snacks to children at youth Programs, volunteers at special Programs or who may work with the homeless, etc.

The positions and the committees referred to herein have the same meanings as used in the by-laws of the Congregation.

2. GOALS OF SEXUAL MISCONDUCT, ABUSE AND HARASSMENT PREVENTION POLICY

The Congregation is committed to the safety and security of its staff, members and community who use its facility. The Congregation is committed to a policy that will provide for the:

- Prevention of abuse of children/ youths/ vulnerable adults. Prevention includes having adequate processes in place in order to prevent opportunities for abuse, neglect, and harm from arising.
- Protection of all the vulnerable in our midst. The protection of all children, youths and vulnerable adults is everyone’s responsibility.
- Establishment of a credible fact-finding and decision-making mechanism that is prompt, thorough, confidential (to the extent reasonably possible) and free from bias.
- Reporting of all incidents of abuse, harassment, neglect and harm. Such incidents, wherever, and whenever they are encountered, will be reported immediately to a designated internal authority, the police, and/or the appropriate agencies in accordance with civil law requirements (as appropriate).
- Compliance with civil law requirements, especially child abuse reporting laws.
- Training and Support for staff and volunteers, including recruiting, screening, training, supervising and supporting staff and volunteers. We provide formal training for new Employees and volunteers prior to their engagement in their duties and key staff participates in formal review and training each year. We conduct annual performance reviews for volunteers and Employees. There is a formal documented internal protocol on the supervision of children, youths and vulnerable adults.

- Demonstration of compassion for persons bringing a complaint as well as for persons about whom an allegation is made.
- Demonstration of care for all members of the Congregation.
- Assertion of the Synagogue's commitment to addressing abuse and/or harassment in a spirit of openness, transparency and accountability (while also recognizing the need to maintain confidentiality (as appropriate).
- Protection of the organization from lawsuits involving allegations of abuse. Abuse can place the reputation of the organization in jeopardy, and the financial costs of defending lawsuits can be devastating.

3. COMMUNICATING THE SEXUAL MISCONDUCT, ABUSE AND HARASSMENT PREVENTION POLICY

This policy and its procedures are communicated to all members of the organization (including board members, paid staff, and volunteers), and are made available to those who may use our facilities. In addition, the Congregation approved a Harassment Policy on October 29, 2010 (as amended from time to time the "Harassment Policy") which explicitly explains procedures for dealing with issues. This policy is a consolidation of and replacement of the Harassment Policy and shall be considered the comprehensive policy of the Congregation in respect of all manners of harassment, abuse and sexual misconduct.

4. TYPES OF ABUSE

4.1 Sexual misconduct – offensive conduct of a sexual nature that may affect the integrity or security of the person. It is an overarching term that encompasses sexual abuse, sexual exploitation of a ministerial or professional relationship, and sexual harassment by any employee or volunteer who is part of the Congregation.

4.2 Sexual abuse – sexual activity that may be criminal in nature. This may be any kind of sexual activity that is defined either as "child abuse" under the Child and Family Services Act of Ontario or as sexual offence under the Criminal Code of Canada. Sexual abuse includes sexual involvement or contact with a minor, with an adult without his or her consent, with an adult who is forced to engage in sexual behaviours, or with an adult who is legally incompetent.

4.3 Sexual Exploitation of a Ministerial Relationship – a betrayal of trust by any individual who is in a Leadership Position or engaged by the Congregation who engages in inappropriate sexual conduct with a person with whom she or he has a "ministerial" relationship of trust including without limitation, a fiduciary relationship.

4.4 Sexual Exploitation -- includes, but is not limited to, such activity as intercourse, kissing, touching of breasts or genitals, dating during the course of a counseling relationship, verbal suggestions of sexual involvement, or demeaning sexual comments. The apparent consent of a possible victim does not determine whether there has been sexual exploitation, because the imbalance of power between the staff or volunteer and the person in a "ministerial" relationship undermines the validity of apparent consent.

4.5 Sexual Harassment – unwelcome sexual conduct that interferes with an individual’s performance of duties or creates an intimidating, hostile or offensive environment. Sexual harassment includes, but is not limited to, sexually-oriented humour or language, questions or comments or gestures about sexual behaviour or preference, unwelcome or undesired physical contact, leering or inappropriate staring, inappropriate comments about clothing or physical appearance, expressing bias on the basis of sex through derogatory or denigrating remarks or repeated requests for social engagements in a situation where there is an employment relationship or a collegial relationship.

4.6 Physical Abuse -- May consist of just one incident, or it may happen repeatedly. It involves a deliberately using force against an individual in such a way that the person is either injured or is at risk of being injured. Physical abuse includes beating, hitting, shaking, pushing, choking, biting, burning, kicking or assaulting an individual with a weapon. It also includes holding a person under water, or any other dangerous or harmful use of force or restraint.

4.7 Emotional Abuse -- Involves harming an individual’s sense of self-worth

4.8 Neglect -- Is often chronic and usually involves repeated incidents. It involves failing to provide what one needs for his or her physical, psychological or emotional development and well-being. Neglect includes failing to provide a dependent with food, clothing, shelter, cleanliness, medical care, or protection from harm.

4.9 Harassment – involves engaging in a course of vexatious comment or conduct that is known or ought reasonable to be known to be unwelcome and includes all of the conduct set out in sections 4.1 to 4.8, both inclusive above and in addition, includes, but is not limited to:

- Discriminatory treatment of comments in respect of any prohibited ground of discrimination pursuant to the *Ontario Human Rights Code*;
- Letters, emails, texts, electronic postings, blogging, phone calls or visits of a sexually harassing or intimidating nature;
- Displaying of pornographic or other offensive or derogatory pictures, cartoons and graffiti;
- Coercive behaviour that asserts control and/or influence over the victim;
- Slurs or negative stereotyping;
- Denigrating jokes;
- The circulation of written or electronic material that shows aversion to an individual or group;
- Panhandling;
- Any other aggressive and verbal behaviour that is demeaning to the victim.

5. GOVERNANCE

5.1 This policy applies to all persons under the jurisdiction of the Congregation.

5.2 All matters related to sexual misconduct and harassment under this policy are dealt with by the Misconduct Policy Administrator (the “MPA”).

5.3 The President of the Congregation (the “President”) acts as the final adjudicators of complaints under this policy. To maintain as much objectivity and impartiality as possible, the President will not initiate or encourage any form of communication with complainants, accused persons, or their advocates until they have received a report and recommendations from the MPA that follows the procedures as set out in this policy.

6. APPOINTING PERSONS TO ADMINISTER THIS POLICY

6.1 Misconduct Policy Administrator - MPA - The MPA shall be the Executive Director of the Congregation. It is the role of the MPA in all situations to notify the Congregation's insurer of the incident that is being investigated.

6.2 Misconduct Advisory Team – MAT - The Executive Committee may appoint a team of up to five people who are qualified by training and/or experience to act as advisors to the MPA in administering the policy. The members of the team may also be appointed by the MPA to act as:

- investigators or support persons in investigations of a complaint of sexual misconduct,
- facilitators in informal processes dealing with complaints of harassment,
- intervenors in providing crisis intervention.

6.3 Communications Coordinator - The Board of Governors may appoint a person of sufficient authority and seniority that s/he may act credibly as a public spokesperson for the Congregation in matters related to sexual misconduct and harassment (the "Communications Coordinator"). The Communications Coordinator will work in consultation with the President and the Chair of the Board of Governors, the MPA and police and child protection officials in cases of alleged child abuse. The Communications Coordinator is responsible for ensuring that, to the extent appropriate, information about allegations of sexual misconduct or harassment is provided to members, members of clergy, staff and volunteers, anyone else affected by allegations of sexual misconduct or harassment and the general public.

7. STEPS THE CONGREGATION TAKES TO REDUCE RISK

- The Congregation maintains 24/7 security on its premises to help ensure that only authorized individuals – staff/ volunteers/ Program participants, are allowed on the premises.
- Follow a two-person policy whenever possible – where possible during any Program, including but not limited to day excursions and overnight trips, have at least two adults present. Where possible, the two adults should be unrelated.
- Where possible require two volunteers/ staff to transport children/ youths/ vulnerable adults in a volunteer's vehicle.
- When the two-person policy cannot be used, notify a parent before a proposed one-to-one contact with a child/ youth (e.g. in a mentoring relationship) and ask permission to meet.
- Where the two-person policy cannot be used, require that one-to-one contacts between a volunteer/ staff and child/ youth/ vulnerable adult take place in a public area either inside or outside the organization's facilities, where both people can be seen by others.

- Add a window in the door of each classroom/ activity room, or where possible leave the door open.
- All staff/ volunteers working with children/ youths/ vulnerable adults should wear name tags.
- Parent/ caregiver contact information should be carefully maintained.
- No parents or adults should enter a classroom/ activity room without permission.
- All clergy members sign a Professional Code of Conduct.
- Police reference checks are required for all current and prospective Employees, members of the Board of Governors, Committee Chairs and/or any volunteer who may be working on an ongoing basis with vulnerable children, youths or adults.
- The Congregation annually conducts a Risk Assessment.
- All staff sign a Covenant of Care reflecting a commitment to help protect the vulnerable.
- There is a standard reporting procedure for incidents of any nature as part of the Congregation's procedures.
- All parents and/or guardians of children are required to sign an Activity Program Waiver and Medical Release form when participating in extended youth activities.

8. HOW THE CONGREGATION RESPONDS TO COMPLAINTS OF ALLEGED CHILD ABUSE

8.1 In Ontario, anyone who suspects, on reasonable grounds, that a child may be in need of protection must immediately report this to a Children's Aid Society.

In Ontario a "child" is a person up to the age of 16 years, unless the child is in the care of a Children's Aid Society, in which case the age rises to 18 years.

Ontario places a special obligation on professionals to report suspected child abuse. The obligation to report a child in need of protection overrides the obligation to confidentiality. The term "professionals" specifically includes members of the clergy.

Anyone who is unsure about whether a situation should be reported is encouraged to seek advice from the MPA.

8.2 Any member of clergy, staff or volunteer who has actual knowledge or reasonable cause to believe that a child may have been sexually abused or is in danger of sexual abuse must advise the MPA. The incident must be reported to a Children's Aid Society.

8.3 Where the complaint involves alleged past sexual abuse of a child, adult complainants will be encouraged to make a report to appropriate civil authorities for investigation. If information related to past sexual abuse of a child indicates that other children may currently be at risk, the MPA must report this to child protection authorities.

8.4 The Congregation will cooperate fully in any child protection investigation.

8.5 Any Congregation clergy, staff or volunteer who is the subject of a criminal or child protection investigation related to sexual abuse will be placed on administrative leave.

9. HOW THE CONGREGATION RESPONDS TO ALLEGATIONS OF CONDUCT THAT MAY CONSTITUTE A SEXUAL OFFENCE UNDER THE CRIMINAL CODE OF CANADA

9.1 Where an adult alleges conduct that may constitute a sexual offence under the Criminal Code of Canada, the complainant will be informed of his or her right to make a report to the police.

9.2 The Congregation will cooperate fully with any police investigation.

9.3 If a complainant declines to report to the police, any action deemed necessary by the MPA or MAT, as applicable, will be taken to ensure the safety of the Congregation. This may include reporting to the police or instituting an internal investigation, and placing accused persons on administrative leave pending the outcome of the investigation.

10. HOW THE CONGREGATION RESPONDS TO COMPLAINTS OF ALLEGED SEXUAL EXPLOITATION WITHIN A MINISTERIAL RELATIONSHIP

10.1 Because of the inherent imbalance of power in a ministerial relationship, it is not appropriate to attempt an informal resolution or mediation when there is an allegation or apparent allegation of sexual exploitation. All complaints of sexual exploitation of a ministerial relationship must be responded to with an investigation.

10.2 The MPA must be notified of all complaints of alleged sexual exploitation of a ministerial relationship. If the MPA, having consulted whomever she or he wishes, determines that there is sufficient cause to initiate an investigation, s/he will appoint an investigator. The investigator will interview the complainant, further document the complaint in writing, and provide the accused person with opportunity for reply. The investigator will interview any witnesses and review any written documentation or other available evidence that may have bearing on the allegations. The investigator will prepare a written report for the MPA.

10.3 The MPA may consult with the MAT.

10.4 Both the complainant and the accused person will have the right to receive an Executive Summary of the written investigation report. Both the complainant and the accused person will have the right to make a written submission in response to the Executive Summary of the investigation report to be submitted to the MPA and the President within seven (7) days of receipt of the Executive Summary.

10.5 Following the passage of the above noted seven (7) day period, the MPA and the President will consult, as deemed appropriate (which may include consultation with the MAT or legal counsel) and will render a decision. The MPA and the President will give the decision in writing to the complainant and to the person who is the subject of the complaint.

11. HOW THE CONGREGATION RESPONDS TO COMPLAINTS OF ALLEGED SEXUAL HARASSMENT OR ABUSE

11.1 Process Management:

There are three distinct situations covered by this policy, depending on whether the complaint is against:

(A) an Employee;

(B) a member of the Congregation; or

(C) a visitor, including an independent contractor.

11.2 In each case, the following actions and steps will be taken and followed, as the case may be:

1. Identification of the problem:

(a) Where an individual believes that s/he has been the subject of or has observed sexual harassment or abuse on the Premises or in the pursuit of the Congregation's business, the following procedures apply:

(i) a member identifies the problem by bringing it to the attention of the President, the Senior Rabbi or the Executive Director, or any other Employee or security personnel;

(ii) a visitor identifies the problem by immediately bringing it to the attention of an Employee or security personnel.

(iii) an Employee identifies the problem by bringing it to the attention of his/her immediate supervisor, the Senior Rabbi, the Executive Director, the President, the Chair or any other member of the Executive of the Board of Governors.

(b) Any Employee made aware of any situation referred to above, is required to bring the matter to the attention of one of the following: the Executive Director, the President or the Chair.

2. Action to Resolve the Issue:

(a) Where, in the processes set out in this policy, the person to whom a complaint would otherwise be reported is the party alleged to be responsible for the objectionable behaviour or alleged to condone the objectionable behaviour, the complaint should be reported to the appropriate manager of, or the person above, such person, or, if this is not possible, to any person referred to in paragraph 11.2 1.(a) (iii) above, other than a person alleged to be responsible for the objectionable behaviour;

(b) In any meeting to investigate any complaint of abuse, the applicable authority shall ensure the presence of a member of staff to take confidential notes of the meeting, which notes shall be retained by the investigating authority and kept in a secure location;

(c) The MPA must be notified of all complaints. Where the complainant is an adult alleging abuse, the complainant may elect to attempt an *informal process* to resolve the complaint. An informal process may be facilitated by a person appointed by the MPA. With the agreement of both the complainant and the accused person, the facilitator may assist in discussions between the parties to attempt resolution. If a resolution is achieved, a resolution agreement will be drawn up, signed by both parties, and ratified by the MPA. A copy of the agreement will be kept in the confidential file of the MPA;

(d) If there is no informal process attempted, or if an informal process failed, the MPA will appoint an investigator. The investigator will interview the complainant, further document the complaint in writing, and provide the accused person with the opportunity for reply. The investigator will interview any witnesses and review any written documentation or other evidence that may have bearing on the allegations. The investigator will prepare a written report for the MPA;

(e) The MPA may consult with the MAT and will review the investigation report and any recommendation with the President;

(f) The complainant and the accused person each have the right to receive an Executive Summary of the investigative report. Both the complainant and the accused person will have the right to make a written submission in response to the Executive Summary of the investigation report to be submitted to the MPA and the President within seven (7) days of receipt of the Executive Summary.

(g) Following the passage of the above noted seven (7) day period, the MPA and the President will consult, as deemed appropriate (which may include consultation with the MAT or legal counsel) and will render a decision. The MPA and the President will give the decision in writing to the complainant and to the person who is the subject of the complaint.

(h) At any point prior to or during an informal process or an investigation, the complainant, the accused person, or the MPA may request a referral to mediation. If both parties and the MPA agree to mediation, the MPA will retain a professional mediator to mediate between the complainant and the accused person. If an investigation is in progress, at the time of the agreement to mediate, it will be suspended until the mediation is completed or until it is declared by the mediator to have failed. If mediation fails, the MPA will direct that the investigation be resumed or begun. Any mediation agreement between the parties must be provided in writing and ratified by the MPA. A copy of the agreement will be kept in the confidential file of the MPA.

(i) Statements made by the complainant and the accused person in the course of an intended informal resolution or a mediation are considered to be without prejudice in this policy and are not to be produced in investigation if a formal process occurs. However, in a judicial process, anyone may be required to give evidence and produce documents.

12. INVESTIGATIONS INITIATED BY THE CONGREGATION

12.1 There may be occasions when information comes to the attention of the MPA that appears to suggest to him or to her that misconduct may be occurring but there is no “victim” who wishes to make a complaint. In such a situation an investigation is to be undertaken to ensure, so far as possible, the safety of those for whom the Congregation may have a fiduciary responsibility.

In this case, the MPA of the Congregation would commence the investigation which would proceed like other investigations: an investigator is appointed; persons who are subject of the investigation are advised of this and of their rights; support persons are offered; the investigator conducts interviews and other enquiries and produces a report for the MPA.

12.2 Following receipt of the investigator’s report, the MPA may consult with the MAT and then review the report and any recommendations with the President.

12.3 The MPA and President may consult with the MAT and/or the Congregation's legal counsel and anyone else deemed appropriate. The MPA and President then makes a finding with respect to the conduct that has occurred and directs any measures to be taken to ensure, so far as is possible, the safety of all people in the Congregation, especially those for whom it has fiduciary responsibility.

12.4 In all cases where a person under this policy has been the subject of a child protection and/or criminal investigation, the MPA of the Congregation will order that an investigation be conducted to determine whether the accused person poses a hazard to others. The subject of the investigation may not return to active duty until the investigation is completed.

12.5 Following the completion of any criminal or child protection proceedings, the Congregation has the right and obligation to conduct an investigation to determine whether accused clergy, staff or volunteers pose a hazard to others. The findings of this investigation will be used to determine any future assignments of the accused person. The determination will be made by the Board of Governors in consultation with legal counsel and will be made on the basis of the balance of probabilities with primary consideration given to the safety of others, particularly children and vulnerable adults.

13. DECISION MAKING BY THE BOARD OF GOVERNORS AND DISCIPLINE

13.1 Any person under this policy who is the subject of a criminal or child protection investigation will be placed without prejudice on paid or unpaid administrative leave, pending the completion of all legal proceedings.

13.2 Any person who is the subject of a complaint of sexual harassment or sexual exploitation of the ministerial relationship may be placed on paid or unpaid administrative leave.

13.3 Where there is a finding that **no** sexual misconduct has occurred, there will be no notation made in the personnel file of the accused person, but a complete copy of the investigation report and the written findings will be kept in the confidential file of the MPA.

13.4 Where there is a finding that sexual misconduct **has** occurred, the decision will be placed on the file of the person who has committed the misconduct and the report will be placed in the confidential file of the MPA.

13.5 Where a complaint has been found to be frivolous or malicious the finding will be placed on the file of the complainant and the report will be placed in the confidential file of the MPA. 13.6 If an allegation is substantiated following an investigation, or if the complaint is found to be frivolous or malicious, the MPA and the President, will together determine how the matter is to be addressed. The MPA and the President may choose to consult with the MPA and legal counsel prior to rendering a decision.

14. CARE FOR COMPLAINANTS AND ACCUSED PERSONS

14.1 Persons bringing a complaint of alleged sexual misconduct, but subject to the permission of any insurer which provides insurance coverage, may be offered the assistance of a support person. This assistance is provided for pastoral reasons and does not constitute an admission of responsibility by the Congregation or an admission that the facts as alleged have occurred.

The support person may be from the staff of the Congregation or may be from the community at large.

14.2 Persons who are the subject of a complaint of alleged sexual misconduct may be offered the assistance of a support person. This assistance is provided for pastoral reasons and does not constitute an admission of responsibility by the Congregation or an admission that the facts as alleged have occurred.

14.3 Where there has been a finding that sexual misconduct has occurred, the MPA, President and the MAT may direct that the Congregation assist with therapy fees for the complainant. The MPA, President and the MAT may advise on matters such as the appropriate professional fee level and the therapist's projected time for the length of therapy. A cap may be set on the amount of fees. Requests for extensions may be reviewed by the President or the MAT at the request of the MPA. This assistance by the Congregation is provided for pastoral reasons and does not constitute an admission of responsibility on the part of the Congregation.