Appendix A

STANDARDS OF BEHAVIOR AND BOUNDARIES FOR ALL PRIESTS, DEACONS, RELIGIOUS, PASTORAL MINISTERS, PRINCIPALS, TEACHERS, EMPLOYEES, AND VOLUNTEERS IN THE ROMAN CATHOLIC DIOCESE OF TOLEDO IN AMERICA

Article I: Introduction

The goal and mission of all activities in the Church is to share the Good News of Jesus Christ and to announce his salvation and mercy for all people. With this as our focus, those who serve in the Diocese of Toledo as priests, deacons, consecrated religious and members of societies of apostolic life, principals, teachers, employees, and volunteers in the apostolate (church personnel) must be aware of the impact that their words and actions can have as they exercise their ministry or apostolate. This applies to all interactions, whether physically present or remotely through the use of technology.

The *Standards of Behavior and Boundaries* (hereafter "*Standards of Behavior*" or "*Standards*") are applicable to all church personnel. The *Standards* are intended to provide clear norms of behavior and boundaries for all interactions with children and young people (minors), as well as those who may be considered "vulnerable adults."

Article II: Responsibility

The public and private conduct of church personnel and volunteers can inspire and motivate people, but it can also scandalize and undermine the people's faith. Church personnel must, at all times, be aware of the moral responsibilities that accompany their work. They must also know that God's goodness and grace provide the means for them to fulfill their responsibilities.

Responsibility for adherence to these *Standards of Behavior* rests with the individual. Church personnel who fail to observe or disregard these *Standards* will be subject to remedial or disciplinary action by the Diocese. Corrective action may take various forms, including but not limited to a verbal or written reprimand, termination of employment, removal from the ministry/apostolate, or other remedial action, depending on the specific nature and circumstances of the offense and the extent of the harm.

Article III: Standards

1. Sexual Conduct

Church personnel must not, for sexual gain or intimacy, exploit the trust placed in them by those entrusted to their care and the faith community.

The Diocese strictly prohibits sexual misconduct by any church personnel. For the purpose of these *Standards*, sexual misconduct is defined as any unwelcome behavior of a sexual nature that is committed without consent, by force, intimidation, coercion, or manipulation, or is a violation of the sixth commandment. For purposes of this policy, a minor can never consent to sexual contact or sexual behavior with an adult. Sexual misconduct includes sexual harassment and voyeurism, as well as, for example, making and or sharing photographs, video, or other visual or auditory recordings of a sexual nature of another person without consent. For clerics, seminarians, and those in consecrated life, sexual misconduct would also include, but is not limited to, a violation of celibacy and/or actions of a sexual nature with another person or persons that would be inconsistent or incongruous with a vocation to priesthood, the diaconate, or consecrated religious life. For purposes of this policy, a minor cannot consent to sexual contact or sexual behavior with an adult.

Possession of any pornographic images or other sexually oriented material related to or of an adult or minor on church property is strictly prohibited.

The Diocese strictly prohibits anyone from interacting with minors on behalf of the Diocese who has a civil or criminal record that includes a disqualifying offense according to the Ohio Department of Education's current *Standards for Licensure and Employment of Individuals with Criminal Convictions* (*Ohio Administrative Code* Rule 3301-20-01). However, the Diocese reserves the right to prohibit individuals from interacting with minors on its behalf regardless of their criminal record.

Church personnel in ordained or consecrated life are obliged to be an example of celibate chastity in all relationships at all times. All other church personnel, the lay faithful, are obliged to be examples of virtue and chastity according to their state in life in all relationships at all times.

Church personnel should not exploit another person for any reason, including sexual purposes.

2. Harassment

Church personnel must not engage in physical, psychological, written, or verbal harassment of staff, volunteers, or parishioners and must not tolerate such harassment by other church personnel. The Diocese prohibits all such conduct, whether committed by supervisory or non-supervisory personnel, or by a third party (i.e., non-employee of the Diocese of Toledo).

a. Church personnel are to provide a professional work environment that is free from physical, psychological, written, or verbal intimidation or harassment.

b. Some examples of behavior or environment that could be considered harassment include:

   i. any derogatory jokes, comments or slurs;

   ii. any unwanted touching, assault, deliberate or intimidating action that interferes with free movement;

   iii. any unwelcome touching and/or demands for sexual favors, and also any unwelcome sexually oriented behavior, comments or visually derogatory or demeaning displays, written words, drawings, novelties or gestures which create a hostile or offensive environment.

c. Harassment can be a single severe incident or a persistent pattern of behavior that creates a hostile, offensive, or intimidating work environment.

d. Allegations of harassment are to be taken seriously and reported immediately to the individual's immediate supervisor, or other appropriate Church authorities.

3. Conduct with Minors

Church personnel working with minors shall maintain an appropriate and trustworthy relationship with both minors and adult supervisors.

Church personnel can and should develop a healthy, adult rapport with minors. They must also be vigilant to avoid the type of contact with minors that could raise questions about the appropriateness of the contact, or which may cause a reasonable person to believe or perceive that the contact violates these standards. Church personnel must not only refrain from inappropriate/improper contact with minors, but also refrain from engaging in any action that could give the appearance of inappropriate/improper contact.

a. The sexual abuse of minors by any church personnel is evil and criminal, and will never be tolerated. It is a breach of trust with the most vulnerable and a breach of trust with the Church whom they are called to represent.

   i. All allegations of sexual misconduct or suspected sexual abuse of a minor by church personnel will be taken with the utmost seriousness. **Church personnel in the Diocese of Toledo who have reason to suspect child abuse have a civil and moral duty to report the suspected abuse by following the mandated procedure detailed in the *Policy for the Protection of Minors and Young People*, which includes the requirement of notifying the appropriate civil agency and contacting the Office for Child and Youth Protection and Victim Assistance.**

   ii. Church personnel shall review and know the contents of the child abuse regulations and reporting requirements for the State of Ohio found in *ORC* §2151.421 and are to follow those mandates.

b. Church personnel must always exercise the highest degree of prudence in all of their interactions with minors.

   i. When church personnel are with minors, their parent(s) or guardian must always be explicitly informed of the minor's location and the purpose of the interaction.

   ii. Federal, state or local laws may limit or prohibit minors from engaging in certain work activities. Church personnel must always ensure that any activities in which they engage with minors are not prohibited by labor laws. All minors are required to obtain written permission from their parent(s) or guardian as a condition of employment.

   iii. Diocesan entities may direct any inquiries regarding the employment of minors to the Diocese's Office for Human Resources.

c. Christian, professional demeanor must always be observed in all interactions with minors.

d. Church personnel are not to have any unnatural or inappropriate emotional attachment to a minor and are to eschew any unnatural or inappropriate emotional attachment that a minor may have for them. Such attachments need to be recognized, acknowledged and properly addressed. In some instances, it may be necessary to terminate further contact with the minor.

e. Church personnel must always be aware of the "perceived power" of their role/position and be aware of the phenomenon of transference by which persons attach to a counselor or therapist feelings formerly held toward some significant other person who figured in a past emotional conflict.

f. Church personnel must be aware of their own and others' vulnerability when working alone with minors. Therefore, whenever possible, another adult should be present or nearby when church personnel are meeting with minors. Insofar as possible, church personnel should avoid being alone with minors. A team approach should be used when managing activities that involve minors.

g. Discussions of a sexual nature must be avoided and only occur, if necessary, to respond to a specific question posed by a minor. Any such discussion must use appropriate, professional, virtuous language. Slang or street words or phrases are not to be used.

h. Topics that could not be comfortably discussed with parents or another adult in the presence of a minor should not be discussed with minors. Church personnel should not use foul, offensive, lewd or rough language in talking to minors.

i. Meetings with minors should occur only on diocesan property if at all possible, and only during normal business hours. Minors should only be allowed in professional or public areas of Church property. Minors should not be invited or taken into living quarters or

private areas on church property or private homes. Church personnel should never have minors in their rooms or spend their days off with minors who are not related to them.

j. At least two (2) adults who are not secondary school students must be present at games or sporting activities involving minors.

k. Alcohol, tobacco, controlled substances or sexually explicit materials (i.e., pornography [adult or of minors], sexual paraphernalia, etc.) are never to be offered to, distributed to, or shared with minors by church personnel.

l. Church personnel are not to engage in physical discipline of minors. Discipline problems should be handled in coordination with the parent(s) or legal guardian of the child.

m. Church personnel are not to be alone with a minor in a residence, sleeping facility, locker room, restroom, dressing facility or isolated area that is inappropriate or inconsistent with a ministry or professional relationship.

n. Youth groups are to have at least two (2) adult chaperones for any activity. The adults may not be secondary school students who have reached the age of 18. While on youth group trips, church personnel are to maintain a professional stature and should socialize along with minors only when other adult chaperones are present. During such youth group trips, individual church personnel are not to sleep in the same room alone with a minor, unless a parental/guardian relationship exists.

o. Minors are not to be given keys to church facilities.

p. Church personnel are never to take photographs or video of minors while they are unclothed or dressing (e.g., in locker rooms or bathing facilities).

q. Church personnel are never to use inappropriate, sexually explicit language or engage in any joking that includes sexual innuendo or double entendre.

r. Physical contact with minors can be misconstrued and should occur (a) only when completely nonsexual and otherwise appropriate, and (b) never in private. Adults should not initiate physical contact with a minor.

4. Electronic Communications

General Standards for Electronic Communications with Minors

Communication with minors by church personnel must respect the psychological, physical and behavioral boundaries of the young person and be appropriate to the ministerial and professional relationship.

Permission of the parent or guardian must ordinarily be obtained, in writing, in order for church personnel to communicate with minors via any electronic means.

In order to protect the privacy of youth, permission must also be obtained, in writing, from the parent or guardian before sharing/posting pictures or videos of minors with identifying information, as well as before sharing email, telephone numbers, or other contact information with other minors or adults who are part of the class, group, or organization.

Church personnel should never consider electronic communication (i.e., emails, social networking sites, text messages, etc.) to be private or of a confidential nature.

If a minor sends any church personnel an inappropriate message, the adult should not reply to it. The adult should print it and notify his or her immediate supervisor. If a minor sends a message that causes the adult to have concerns for the health and safety of that young person, church personnel should, if required by law, report the concern to the appropriate civil authority and to his or her immediate superior.

Church personnel must set appropriate boundaries around the time when phone calls will be made or electronic communications will be sent.

Church personnel should take time to review internet safety practices with minors in their classes, groups, organizations, etc., especially if they are utilizing web-based technology to enhance outreach to the minors with whom they work.

Email, Instant Messaging, Text Messaging (SMS – Short Message Service), and "Chat Rooms"

This section refers to specific uses of technology tools. All church personnel are bound to follow the standards set forth in this section. In addition, those working in parish, regional and secondary schools of the Diocese should also refer to the established Department of Catholic Education's Appropriate Use Policy for Technology.

Church personnel, including parish staff, those involved in youth ministry and religious education programs, as well as teachers and administrative staff in Catholic schools, should only communicate with minors through the use of parish or school-based email accounts and/or parish or school-sponsored websites, and never through personal accounts or non-parish/school related websites. If it is not possible for an adult leader or volunteer to obtain a parish or school-based email account, the adult leader or volunteer must establish an email account that is separate from his or her personal email.

Church personnel should never consider electronic mail, instant messaging, or "chat rooms" as private or of a confidential nature. Adults should seriously consider copying another responsible adult (parent, supervisor, athletic director or alternate youth ministry leader) when sending an electronic message to a minor. This action demonstrates transparency and appropriateness when communicating with minors. All electronic messages should be relevant to the ministerial/professional relationship the adult has with the minor with due consideration for the age of the minor. Understanding that there are times when it is impractical to copy another adult

by email (e.g., students emailing teachers questions and submitting assignments, the inquiry of a minor who may be discerning a vocation to the priesthood or consecrated life, etc.), church personnel should use a diocesan, parish or school-based email account to reply in order to ensure that the email is retained on a server.

In order to maintain the privacy of the email addresses of minors, Church personnel should use the blind carbon copy (BCC) feature when sending an email to more than one minor.

If a group of youth need to be in contact with each other via email, permission must be obtained from the parent or guardian before sharing a minor's email address with other members of the group. (A youth leadership team would be one example of a situation where adult leaders may seek permission to share email addresses among group members.)

Church personnel should be brief in electronic conversations with minors. Messages should be kept short and to the point, and related to the professional/ministerial relationship between the adult and minor.

Pornographic or lewd pictures of adults or minors, as well as suggestive, crude, or luring language (vocal or text) sent via electronic means (including "sexting") are strictly prohibited between adults, between adults and minors, and between minors themselves.

Video Conferencing (i.e., Skype, FaceTime, etc.)

Church personnel may communicate with minors using video conferencing, as there are educational benefits to utilizing this technology appropriately. Distance or disability may create some instances when this type of communication is necessary or advisable. Another adult should supervise the interaction by either being present with the minor or the adult during the video conference.

Social Networking (i.e., Facebook, Instagram, etc.)

A social networking service utilizes software to build online social networks for communities of people who share interests and activities. Most services are primarily web-based and provide various ways for users to interact, such as chat, messaging, video, file sharing, blogging and discussion groups.

The pastor, administrator or immediate supervisor must give permission for an employee or volunteer to establish a social networking account related to the parish, school or ecclesiastical organization.

A supervisor or another adult leader must have access to the account so that there is more than one adult monitoring all activity posted to the site. The account must be monitored regularly by both adults for appropriate use. Inappropriate or hurtful postings must be removed and, if possible, addressed in an appropriate way with the individual who made the post.

Church personnel who use social networking sites to communicate with minors about their ministry should create a separate account and/or group for this specific use whenever possible. Minors should not be given access to the private or personal postings of an adult. All interactions should reflect the ministerial/professional role of the adult.

Precautions should be taken to guard the privacy of anyone who has access to the page. The highest privacy settings must be used. In addition, adults should encourage minors who join the online community to set their privacy settings at the highest levels.

Church personnel are not to interact with minors on social media sites where the content of the exchange cannot be monitored or recorded.

Blogs and Microblogs (i.e., Twitter)

Those who wish to publish and utilize a blog for an educational or ministerial purpose must obtain the permission of their pastor, principal or supervisor and make content easily accessible.

Blogs used for educational or ministerial purposes should be conducted in a professional manner and the content should reflect the purpose.

It is recommended that, if possible, the blog be set up so that comments are not posted until they are reviewed and approved by the owner/administrator of the blog. This practice prevents inappropriate and hurtful comments from being posted.

Personal blogs should not be shared with minors.

Websites

Websites used to represent a parish, school, or other affiliated organization must be owned and managed by the church entity. Church personnel must obtain permission from the pastor, principal, or supervisor to set up a website that represents the parish, school, or other diocesan entity.

Websites may be linked to other sites. It is recommended that all persons add this statement to any website created:

> *Links to other sites are provided on this site. These sites are provided for informational purposes only and are not necessarily sponsored by the parish or church organization.*

Videos, Photographs, Other Images

Videos, photographs, and other images, electronic or otherwise, should always reflect the ministerial/professional nature of the Church and should never contain offensive material (i.e., pornography [of adults or minors], etc.). Care should always be taken when sharing or posting videos to websites and/or social media sites.

Church personnel must seek written permission from a parent or guardian to share a photograph or video that contains identifying information about the child/children (i.e., full name, addresses, birth date, etc.).

Online Gaming

This recreational activity is used by peers to play games and socialize on the internet. Church personnel involved in ministry and service to youth are not their peers. For this reason, adults are not to be involved in online gaming with the youth whom they serve. Employees are not permitted to engage in online gaming, with adults or minors, during working hours.

Illegal or Immoral Materials

Church personnel should never access, distribute, or create materials that are illegal or immoral. These include but are not limited to pornographic (adult or minor), stolen, sexist or discriminatory materials. The accessing, distributing, or creating of illegal material must be reported immediately to the proper civil authorities and to the appropriate supervisor.

5. Conduct for Pastoral Counselors and Spiritual Directors

Pastoral Counselors and Spiritual Directors refers to any church personnel who provide formal or informal pastoral or spiritual counseling services to individuals, families, or other groups.

Pastoral Counselors and Spiritual Directors, by nature, respect the rights and promote the welfare of each person.

Pastoral Counselors and Spiritual Directors:

a. shall not go beyond their competence in pastoral or spiritual counseling and shall refer persons they counsel to other professionals when issues are beyond pastoral matters. In such cases, as a general rule, no more than four (4) pastoral counseling sessions shall occur before advising the individual to be seen by a licensed therapist/counselor of his or her choice.

b. are to consider carefully the possible consequences of pastoral counseling before entering into any pastoral counseling relationship with someone with whom they have a pre-existing relationship (i.e., employee, professional colleague, friend, etc.).

c. are not to undertake or allow the audiotaping or videotaping of sessions.

d. are not to engage in any form of sexual conduct with the persons they counsel.

e. must avoid developing intimate relationships with persons they counsel; they must behave in a professional manner at all times. Likewise, they are not to engage in sexual conduct with or foster an intimate relationship with any individual who is close to the persons they

counsel (e.g., relative, friend, etc.). Pastoral Counselors and Spiritual Directors should presume that the potential for exploitation or harm exists in any such relationship.

f. are responsible for establishing and maintaining clear, appropriate boundaries in all pastoral/spiritual counseling and related relationships.

g. are to avoid physical contact of any kind (i.e., inappropriate touching, hugging, and holding hands) between themselves and the persons they counsel. Pastoral Counselors, Spiritual Directors, and all church personnel should be mindful that not all members of the faithful are comfortable with physical touching.

h. are to conduct pastoral or spiritual sessions only in the professional area of the parish office or other church facility; sessions are never to be conducted in the private living quarters of the Pastoral Counselor or Spiritual Director. In those locations where sessions are held, there is to be a window enabling both the counselor/director and the other individual to be seen.

   Pastoral or spiritual counseling sessions are not to be held at times that would tend to cause confusion about the nature of the relationship for the person being counseled. Sessions should be scheduled during normal work hours—ordinarily between 7:00 a.m. and 9:00 p.m.

i. are to maintain a written log solely of the times and places of each counseling session with each person being counseled.

Counseling minors presents additional considerations for Pastoral Counselors and Spiritual Directors.

a. Unless the subject matter precludes it, the minor's parent(s) or legal guardian should be present or aware of the session.

b. Counseling of a minor must always take place in the public/professional areas of Church property. Counseling sessions are never to take place in private living areas or other non-public places.

c. The room or the door where the counseling session takes place should have a window, otherwise the door should be left open.

d. If possible, another adult should be in close proximity during the counseling session.

e. The relationship must always remain professional within the context of counseling sessions, as well as outside of formal counseling sessions.

f. If counseling entails more than (2) sessions, the minor's parent(s) or guardian should be consulted.

g. The Pastoral Counseling and Spiritual Director need to assess regularly the relationship to determine whether the minor is developing a personal/physical attraction to him or her. Such attractions need to be recognized and the minor immediately referred to another Pastoral Counselor or Spiritual Director.

h. Pastoral Counsels and Spiritual Directors shall abide by all of the other requirements of the *Standards of Behavior*.

Confidentiality Related to Pastoral Counseling and Spiritual Direction

Information disclosed to a Pastoral Counselor or Spiritual Director during the course of counseling, advising, or spiritual direction is to be held in the strictest confidence possible. The obligation of Pastoral Counselors and Spiritual Directors to report misconduct of the persons they counsel is subject to the duty of confidentiality. However, any agreement or duty to maintain confidentiality must yield to the need or mandate to report misconduct that threatens the safety, health, or well-being of any of the persons involved.

These obligations are independent of the confidentiality of the Sacramental Seal of Confession. Under no circumstances whatsoever can there be any disclosure-even indirect disclosure-of information received through the Sacrament of Reconciliation.

a. At the initial meeting, Pastoral Counselors and Spiritual Directors are to discuss the nature of confidentiality and its limitations with each person in counseling.

b. Information obtained in the course of the pastoral counseling sessions with an adult or a minor is to be confidential, except for compelling professional reasons or as required by law.

    i. If there is clear and imminent danger to the counselee or others, the Pastoral Counselor or Spiritual Director may disclose only the information necessary to protect the parties affected and to prevent harm.

    ii. Before disclosure is made, if feasible, the Pastoral Counselor or Spiritual Director should inform the person being counseled about the disclosure and the potential consequences. Consultation with the Office of Child and Youth Protection and Victim Assistance is encouraged.

c. Pastoral Counselors should keep minimal records of the content of sessions.

d. Knowledge that arises from professional contact may be used in teaching, writing, homilies, or other public presentations only when effective measures are taken to absolutely safeguard both the individual's identity and the confidentiality of the disclosures.

Article IV: Reporting Misconduct

Church personnel have a duty to report both their own ethical or professional misconduct and the ethical or professional misconduct of others. In addition to this, church personnel are to hold each other accountable for maintaining the highest ethical and professional standards. As a general rule, any conduct of concern should be brought by church personnel to the attention of his or her supervisor or other appropriate Church authorities.

Article V: Conclusion

The *Standards of Behavior and Boundaries* set forth above manifest the constant commitment of the Diocese of Toledo to always and everywhere provide an environment where the words and actions of its clergy, employees, educators and volunteers reflect the values and norms set forth by Jesus Christ and modeled by him in the Gospel. Those who exercise a ministry or apostolate within the Diocese of Toledo are to be committed to a life of unwavering integrity and fidelity to Christ and his Church. By their observance of these norms, church personnel—and all people of good will—give evidence of their personal commitment to a life of virtue and holiness, and will assist their neighbor to draw ever more perfectly in union with Jesus Christ and his Church.

Appendix B

GUIDELINES FOR THE PREVENTION OF ABUSE OF VULNERABLE ADULTS

In conjunction with the *Standards of Behavior and Boundaries*, the following information provides additional guidance to those who minister to vulnerable adults.

"Recognizing that individuals with disabilities have a claim to our respect because they are persons, because they share in the one redemption of Christ, and because they contribute to our society by their activity within it, the Church must become an advocate for and with them."[46] As advocates we must be aware of the unique circumstances of people with disabilities and all vulnerable adults, who live with higher risk to neglect and abuse.

This information is intended to educate church personnel about abuse and provide guidelines to follow for prevention, recognition and reporting of abuse when they encounter vulnerable adults in their ministry and apostolates. These guidelines will also serve to educate vulnerable adults in ways to protect themselves from neglect and abuse.

Although the following guidelines are modeled after the policies for the protection of youth and young people of the Diocese of Toledo and the Standards of Behavior, it is crucial to remember there are differences when ministering to vulnerable adults. Unlike minors, mentally competent adults have the right to make and live by the consequences of their own decisions, no matter how unwise a decision may appear to be. In addition, while protecting vulnerable adults from harm, one must ensure that isolation, segregation and discrimination do not result. Active participation of people with varying gifts and abilities is essential for the completeness of the Church community. Those who provide services, support, or pastoral care, however, should realize that such work always involves some degree of risk.

It is also important to note that disability does not equal vulnerability. Disability is a functional loss as a result of a physical, mental, or psychological impairment which significantly limits activities of daily living. Vulnerability cannot be assumed strictly on the basis of an apparent disability. A disabled person can be both the minister and the recipient of pastoral care, a victim of abuse and an abuser.

These guidelines seek to enhance the Church's ministry to and with vulnerable adults and therefore further the integration of all people in the Church.

[46] United States Catholic Conference, *Pastoral Statement of U.S. Catholic Bishops on Persons with Disabilities*, 1978, p. 3.

Individuals for whom these guidelines are of primary importance include, but are not limited to:

- Extraordinary Ministers of Holy Communion to homebound parishioners
- Facilitators for bereavement and other support groups
- Social outreach ministers
- Parish nurses
- Retreat leaders
- Jail and prison ministers
- Adult faith formation leaders
- Hospitality ministers

Pastoral Guidelines

1. Act in a way that reflects the teachings and values of the Catholic Church.

2. Speak and act with respect and loving regard for each person acknowledging his/her value and giftedness.

3. Recognize and respect every individual's cultural values, as well as their right to privacy and full participation in the life of the Church.

4. Recognize the importance one's role in the Church's ministry to vulnerable adults.

5. Use appropriate language, physical contact and displays of emotion. Do not engage in or encourage the use of offensive language, humor or media.

6. Be attentive to unusual or suspicious activity that suggests possible neglect or abuse.

7. If anything which appears to present a serious risk of immediate harm to any person is observed, treat it as an emergency and contact appropriate authorities.

8. Know to whom to communicate situations that cause concern, and report immediately to an appropriate parish or diocesan staff person, legal guardian or community agency.

9. Recognize the importance of both verbal and non-verbal communication, especially with individuals with speech and language disabilities.

10. Always dress in an appropriate manner.

11. Obtain guardian's permission before transporting a vulnerable adult in one's vehicle or visiting in their home or yours. If transportation is provided on a regular basis written guardian consent should be obtained.

12. Abide by the Standards of Behavior as promulgated by the Diocese.

13. Never engage in any type of abusive or inappropriate behavior.

14. Never offer to, distribute to, or share with vulnerable adults alcohol, tobacco, controlled substances or sexually explicit materials (i.e., pornography [adults or of minors], sexual paraphernalia, etc.).

15. Do not attempt to provide counseling unless you are a licensed professional counselor.

16. Avoid situations in which you are isolated with the person in your care for an extended period of time.

17. Do not take photos of a vulnerable adult without their consent, as well as the consent of their guardian.