

Archdiocese of Milwaukee Policies
Updated for the 2026-2027 School Year

4441: Electronic Resources and Communication

Electronic resources and communication systems provided by the parish or school are intended to support its educational, ministerial, and administrative mission. All personnel shall use these resources in a responsible, ethical, and lawful manner consistent with Archdiocesan policy, Catholic values, and applicable law.

The purpose of this policy is to establish expectations for the appropriate use of electronic resources and communication systems, to safeguard parish and school operations, and to ensure compliance with legal, ethical, and safeguarding standards.

This policy applies to all clergy, employees, and volunteers who are granted access to parish or school electronic resources and communication systems. It applies to all technology owned, operated, or made available by the parish or school, including authorized use of personal devices.

General Use of Electronic Resources

Electronic resources should be used primarily for parish or school purposes. Limited personal use may be permitted provided such use does not interfere with assigned responsibilities, compromise system integrity, or violate Archdiocesan policy.

Use of electronic resources constitutes acceptance of this policy and all related Archdiocesan policies governing ethical conduct, confidentiality, harassment, and safeguarding.

No Expectation of Privacy

All electronic communications and data created, transmitted, received, or stored on parish or school systems are the property of the parish or school. Personnel shall have no expectation of privacy in such communications.

The parish or school reserves the right to monitor, access, review, and disclose electronic communications and system usage at any time, with or without notice, in accordance with applicable law.

Security and Access

Personnel shall comply with all security protocols, including the safeguarding of usernames, passwords, and access credentials. Credentials shall not be shared except with authorized supervisors or designees.

Personnel shall not access systems using another individual's credentials or install unauthorized software or encryption tools. Any suspected breach of security shall be reported immediately.

Authorized Systems and Software

This policy applies to all electronic systems, including email, internet and intranet access, telephones, mobile devices, messaging platforms, and emerging technologies.

Personnel shall not download, install, or accept terms of external applications or services on behalf of the parish or school without proper authorization.

Professional Standards and Ethical Conduct

All electronic communication shall reflect professionalism, respect, and the mission of the Church. Personnel shall recognize that their role carries inherent authority and influence, particularly in relationships with minors, and shall not use electronic communication in any manner that exploits this imbalance or compromises professional boundaries.

Communication that is offensive, harassing, discriminatory, sexually inappropriate, or otherwise inconsistent with Archdiocesan standards is prohibited.

Telephone and Voicemail

Telephone and voicemail systems shall be used for parish or school purposes and shall not be used for personal commercial activity, political advocacy, or promotion of outside organizations.

Bring Your Own Device (BYOD)

Personal devices may be used for parish or school business only with prior authorization. The parish or school reserves the right to access business-related communications or data on such devices in accordance with applicable law. Personnel are responsible for maintaining the security of their devices.

Email and Messaging Systems

Personnel shall use email and messaging systems responsibly and shall report suspicious communications. Use of these systems must comply with Archdiocesan safeguarding and communication standards.

Personal Use

Limited personal use of electronic resources may be permitted during non-working time, provided it does not interfere with responsibilities or violate this policy.

Prohibited Use

Electronic resources shall not be used for unlawful, unethical, or inappropriate purposes, including but not limited to harassment, discrimination, accessing or distributing inappropriate material, misrepresentation, or unauthorized disclosure of confidential information.

Compliance with Law

Nothing in this policy is intended to restrict rights protected under state or federal law.

Disciplinary Action

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or volunteer service.

ADOPTED: 7/15/2019, REVISED: 6/1/2026

4441.1: Social Media

The use of social media by parish and school personnel shall reflect the mission of the Church, uphold the dignity of all persons, and support the educational and evangelizing work of the parish or school.

Social media should be used as a tool for communication, education, and evangelization, inviting others into a deeper relationship with Jesus Christ while maintaining appropriate professional and ethical standards.

General Expectations

Personnel shall use social media responsibly and in a manner consistent with Archdiocesan policy and Catholic values. Content shared publicly or privately may reflect on the parish or school and shall be appropriate at all times.

See the Archdiocese of Milwaukee Social Media and Digital Communications Policy for additional information.

Authorization and Representation

Personnel shall not represent themselves as speaking on behalf of the parish or school without authorization. All official social media communication must be approved by the pastor, principal, or designated administrator.

Transparency and Oversight

All parish or school social media platforms shall be administered in a transparent manner. At least two adult administrators shall be assigned to each official account. Administrators are responsible for monitoring content and ensuring compliance with Archdiocesan policy.

Use of Personal Accounts

Personnel shall not use personal social media accounts for ministry-related communication with students. Separate, approved parish or school accounts shall be used for all official communication.

Interaction with Minors

Personnel shall not initiate or accept social media connections with current students or minors through personal accounts. Communication with minors shall occur only through approved parish or school platforms that allow for appropriate supervision and transparency.

Protection of Confidential Information

Personnel shall not post or share confidential, sensitive, or proprietary information related to the parish, school, students, or personnel.

Use of Images and Identifiable Information

Personnel shall not post, publish, or share images, video, or identifying information of minors except in accordance with Archdiocesan policy and with appropriate parental consent.

Minors shall not be identified by full name, tagged, or otherwise made personally identifiable. Images shall generally depict groups rather than individual minors, and posting shall not occur in real time in a manner that could reveal a student's location.

Content Standards

Personnel shall not post content that is offensive, defamatory, discriminatory, or inconsistent with Catholic teaching. Social media content shall reflect respect for all persons and fidelity to the mission of the Church.

Ownership of Accounts

All social media accounts created for parish or school purposes, including content and contacts, are the property of the parish or school.

Compliance

Personnel shall comply with all Archdiocesan social media and Safe Environment policies.

ADOPTED: 6/1/2026

4441.2: Communication with Students (Electronic Communication)

Electronic communication with students shall be conducted in a manner that maintains appropriate professional boundaries, ensures transparency and accountability, and protects the safety and dignity of minors.

The purpose of this policy is to establish clear standards for electronic communication between personnel and students, in order to prevent misconduct and ensure compliance with safeguarding requirements and applicable law.

This policy applies to all clergy, employees, and volunteers who communicate electronically with students in an official capacity.

Approved Communication Methods

Communication with students shall occur only through parish or school-approved systems and platforms.

Electronic communication shall include appropriate transparency measures, including the participation of at least two adults or inclusion of a parent or guardian, unless otherwise approved for a specific purpose by administration.

Transparency and Accessibility

All electronic communication with students shall be transparent and accessible to parents/guardians and appropriate parish or school personnel. Parents and guardians have the right to review communications involving their child.

Retention and Documentation

All electronic communication with students shall be retained and retrievable in accordance with Archdiocesan guidelines and shall be available for review by parents, supervisors, and appropriate authorities.

Professional Boundaries

Personnel shall maintain professional relationships with students at all times. Communication shall be limited to legitimate educational, ministerial, or supervisory purposes and shall not create personal, exclusive, or secretive relationships.

Prohibited Practices

Personnel shall not engage in private, one-to-one electronic communication with students in a manner that lacks transparency or accountability.

Personnel shall not use personal accounts, unapproved applications, or platforms that prevent appropriate supervision, documentation, or retrieval of communication.

Content Standards

All communication shall be appropriate in content and tone. Communication that is suggestive, secretive, manipulative, or that fosters emotional dependency is strictly prohibited.

Parental Rights and Participation

Parents and guardians shall be informed of communication methods used with students and shall have the right to request alternative communication methods or to opt out of specific digital communication platforms.

Compliance with Safe Environment Policies

All communication with students shall comply with Safe Environment standards and all Archdiocesan policies governing conduct with minors.

Reporting Requirements

Any suspected inappropriate communication, boundary violation, or misconduct involving electronic communication shall be reported immediately in accordance with Archdiocesan policy and applicable law.

This includes misconduct occurring through digital platforms, such as harassment, exploitation, or inappropriate sharing of content involving minors.

Disciplinary Action

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or volunteer service.

ADOPTED: 6/1/2026

5140.1: Mandatory Reporting of Child Abuse and Neglect

All children and youth have the right to live, learn, and play in an environment free from abuse and neglect. As individuals who care about children, it is the duty of any adult, employee or volunteer, in a school and/or parish to report abuse, neglect, or maltreatment of a child.

The Archdiocese of Milwaukee requires all adults, employee, or volunteer to comply with reporting responsibilities for any suspected abuse or neglect of minors, whether or not designated as a mandatory reporter under Wisconsin law. Every instance of suspected child abuse or neglect must be reported no matter when it happened or where it happened.

A volunteer in any program should discuss any concerns about sexual abuse, physical abuse, emotional maltreatment, or neglect of a minor with his/her immediate supervisor (such as a DRE or teacher), and collaborate in making a report to local law enforcement officials or to local child protective service agencies. If his/her immediate supervisor is unavailable and the volunteer feels the child is in imminent danger, the volunteer is encouraged to make a report to the local law enforcement or to local child protective service agencies and then follow up with his/her immediate supervisor.

Paid personnel should directly report to local law enforcement officials or child protective service agencies. They should also notify their supervisor (such as a pastor or principal) that a report is being made.

In accordance with state law and moral obligation, any pastoral or school administrator, teacher, counselor, or related professional who has reasonable cause to suspect a child under the age of 18 seen in the course of their duties has been abused or neglected or has been threatened with abuse or neglect that is likely to occur is obligated to report the case immediately (as soon as possible but not more than 24 hours later). Reports must be made by telephone or personal visit to the local Child Protective Services or local law enforcement.

Definitions of Abuse and Neglect

- Child abuse is defined as any physical injury inflicted on a child by other than accidental means; sexual intercourse or sexual contact with a child; sexual exploitation of a child; permitting, allowing, or encouraging a child to be involved in prostitution; emotional damage inflicted on a

child; or forcing a child to view sexually explicit activity; exposing a child to pornography; participation in human trafficking; or exposing and/or participating in sexting.

- Neglect is defined as failure, refusal, or inability on the part of a parent, legal guardian, legal custodian, or other person exercising temporary or permanent control over a child for reasons other than poverty, to provide necessary care, food, clothing medical/dental care, and/or shelter to the child.

Mandatory Reporters

Wisconsin law lists many specific professionals who are mandated to report child abuse and neglect. Included among the list of mandatory reporters are the following:

School teachers, administrators, counselors, substitute teachers, school employees

- Child-care worker or day care provider/center, childcare provider, in or out of the child's home
- A member of the clergy must report if the member of the clergy has reasonable cause to suspect that child seen by the member of the clergy in the course of his or her professional duties is being abused or threatened with abuse or has reason to believe that another member of the clergy is abusing a child or threatening a child of abuse.
- Mental health professionals, social workers, marriage and family therapists, professional counselors, alcohol or other drug abuse counselor
- Administrators of social service agencies
- Speech-language pathologist, audiologist
- Physician, nurse, physical therapist, occupational therapist; dentist, chiropractor, optometrist, acupuncturist, dietitian
- Police or law enforcement officer, emergency medical technician; first responder
- Public assistance worker, including a financial and employment planner, mediator

Whoever willfully violates [Wis. Stat. § 48.981 \(2\)](#), Stats of the Wisconsin Children's Code by failure to report as required may be fined not more than \$1,000.00 or imprisoned not more than six (6) months or both [Wis. Stat. § 48.981 \(6\)](#). Any person or institution which reports in good faith is immune from either civil or criminal liability. All reports and records must be accorded confidential treatment by the authorities.

- In the State of Wisconsin, the privilege of the priest/penitent relationship is not explicitly abrogated by this law; therefore, a confessor is not personally obligated to report such information obtained within the context of a formal structured sacramental confession.
- Due to the seriousness of this matter, with the exception of the sacramental confession noted above, all priests and parish personnel are expected to comply with this statute. The archdiocese will take similar action if ever a matter of this gravity is brought to the attention of the archbishop or his representative.

Procedures for Reporting

Generally, a mandated reporter must speak with the child to determine if a reasonable suspicion exists to believe that the child may have been abused. Once the mandated reporter has determined that a report needs to be made (or not), any questioning of the child regarding possible abuse should cease. To continue with questions could potentially contaminate any subsequent investigation by Child Protective Services or law enforcement.

It is not unusual for a parent or a student to share concerns with an educator about the possible maltreatment of another child. A report should not be made at this point by the educator, unless there is a fear of serious and imminent danger to the child. Typically, the appropriate step is for the educator to meet with the child to gain first-hand knowledge of the situation (if time permits) to determine if a report is appropriate. The educator should encourage the person with the information to make a report to the Child Protective Services (CPS) agency. However, there is no assurance that will occur. It should be emphasized that an educator, as a mandated reporter, must have seen the child in the course of professional duties and have a reasonable suspicion that maltreatment has occurred. Those requirements are not necessary for an educator to make a report as a non-mandated reporter. Any person making a report in good faith is immune from civil and criminal liability.

Sometimes an educator may be unsure whether or not a report should be made. In addition, sometimes a person with clinical skills (e.g., pupil services professional) needs to interact with the child to determine whether or not a report is required. In short, consultation is acceptable, but it cannot result in delaying a report. Another consultation strategy is for the educator to contact the county Child Protective Services (CPS) agency or a law enforcement officer, explain the situation, and ask for advice regarding whether a report should be made.

If any mandated reporter has reason to believe that a child may have been abused or neglected, that person is legally required to report, even if others do not agree.

When more than one educator is involved, the educator with the greatest amount of first-hand knowledge of the child and the reasons for the report should make the contact with the Child Protective Services (CPS) agency or law enforcement. If more than one educator has firsthand and different knowledge of suspected child maltreatment, all of them should participate in the report. An educator with first-hand knowledge should not ask someone else with less knowledge to make a report. Asking someone else does not absolve the educator from the legal responsibility to report. However, another educator with less or no first-hand knowledge could help to facilitate the report, as long as this results in the educator with the most first-hand knowledge speaking directly to the CPS caseworker.

There are two ways to meet the legal requirement to report suspected abuse or neglect:

- Call the local Child Protective Services (CPS) agency, or
- Call local law enforcement

Report to Child Protective Services:

Intentionally inflicting injury (or death) of a minor

Suspicion that a child is going to be harmed

Neglect

Child-on-child sexual abuse (under 10 years of age. If older, report to law enforcement)

An individual engaged in behavior that was dangerous to the child (even if there was no intent to cause injury)

Manufacturing methamphetamines when a child is present, in the place where a child resides, or when a child could reasonably see, smell, or hear the manufacturing of methamphetamines

Concerns related to mental health and wellbeing of a minor if the parent/guardian is not able to keep the minor safe when there have been threats of harm to self or others.

Report to Local Law Enforcement (for the city or county where the incident occurred):

- If the child is in imminent danger
- Sexual abuse or assault
- Any illegal behavior
- Any image, video or social media content that contains a minor that involves nudity and/or sexual content
- If the matter involves child pornography, human trafficking, or sexting
- Any concern that involves imminent danger to a person's life
- If the matter involves a threat of violence to a school building, staff, or students

The reporter should be prepared to share detailed information, including:

- Reporter's name, position, parish/school, parish/school phone number.
- Child's name, address, and age.
- Reporter's relationship to the child.
- Parent's name, address, workplace (if applicable).
- Names and ages of siblings.
- Description of the suspected child abuse or neglect (or the threat of child abuse or neglect), statements made by the child, statements the child allegedly made to others, observations of the child that may indicate child abuse or neglect, past interactions with the parents or other caretakers that might be indicative of child abuse or neglect.
- Any previous reports of suspected abuse or neglect related to this child or family (if applicable).
- If a parent, guardian, or significant other could possibly be the abuser of the child or could be contributing to the maltreatment in some way, he/she should not be notified about the report. To do so would allow the accused, if he/she has maltreated the child or contributed to the maltreatment, to prepare an explanation that will make it more difficult for the Child Protective Services (CPS) initial assessment to result in services and better outcomes for the child. However, if any of the persons mentioned above are not suspected of being the abuser or of contributing to the maltreatment, then parents should be notified, in order for them to take steps to protect their child.
- Within 24 hours after receiving a report of abuse or neglect, the county CPS shall initiate an investigation to determine if the child is in need of protection or services. Elements of the investigation may include observation or interview with the child, visiting the child's home, or interviewing the parents/guardian. CPS can meet with the child in any public place without the parent/guardian's permission but may not enter the home without permission. Should CPS request to meet with a child on school premises, school staff may permit those meeting without parental consent as the United States Conference of Catholic Bishops Charter for the Protection of Children and Young People (Article 4) requires cooperation with the investigation of allegations of sexual abuse. The school will also cooperate in the investigation of other forms of suspected child abuse. Student safety is of the utmost importance to the school and the school will act as appropriate to ensure student safety.

Report of Suspected Parish/School Employee

In the presence of any suspicion that the allegation may involve a parish/network/school employee or staff member, the following steps should be taken by the local pastor/parish director/president or administrator in case of an allegation on the parish level or other non-parochial institution within the

archdiocese, or by the Archbishop or his representative regarding a cleric or lay person directly employed by the archdiocese.

1. The mandated reporter will immediately communicate his/her suspicions of child abuse or neglect to the proper authorities and allow the authorities to conduct the investigation which is required by law. The reporter is immune from liability, no matter what the outcome under, both the civil and archdiocesan Whistleblower Policy.
2. The pastor/parish director/president/school administrator must begin an internal investigation to determine if the employee (i.e., the suspected abuser) did anything that warrants disciplinary action. If there is any indication that an allegation of the child abuse may be founded in fact, the accused should be temporarily suspended (with pay) by means of a written and dated memorandum from his/her job pending fuller investigation.
3. The pastor/parish director/president/school administrator, as well as the accused, is advised to seek legal counsel immediately. The parish/network administrator shall consult with the director of the Safe Environment Office, parish and archdiocesan legal counsel, as well as the insurance carrier; the accused should consult other counsel to avoid conflict of interest.
4. Full cooperation shall be given by the archdiocese and its personnel to any investigation conducted by civil authorities. The archdiocese will suspend any internal investigation of an allegation of child sexual abuse until civil authorities either conclude their investigation or authorize the archdiocese to proceed with its own investigation. The archdiocese will not interfere in any way with any investigation being conducted by civil authorities.
5. Ordinarily, the accused employee should for the protection of all concerned avoid parish or institutional property until the full investigation has been completed.
6. Pastoral care should be extended to the alleged victim, as well as to the accused. The actions taken are not an expression of any judgment of guilt, but rather intended to indicate clearly the serious nature of such cases and to protect the rights of all concerned.
7. Care must be taken to avoid defamation of the character of the accused.
8. An employee may have his/her Safe Environment Certification suspended, revoked, or reinstated during or after the internal investigation or the investigation by the civil authorities.
9. If the accused is a cleric of the archdiocese, the following special steps will be taken by way of recognition of the privileged and trusted role of the clergy and in order to protect the good of the Church and its mission. The archbishop or his representative will report the matter immediately to civil authorities. The archdiocese will remove the cleric from any current assignment and exercise of ministry in any case where the district attorney pursues a criminal investigation.
10. If the civil authorities cannot proceed with criminal action for any reason and the case is returned to the Archdiocese, there will be a thorough investigation of allegations using an established process which includes the Archdiocesan Review Board and an independent investigator. In accordance with the provisions of Canon 1722, the cleric will be removed from any current ministry assignment or exercise of ministry and prohibited from any public exercise of ministry while the investigation is underway. The investigator will take whatever steps are needed to arrive at a compilation of facts in the case. The archdiocese commits itself to full cooperation in this independent investigative process. The Archdiocesan Review Board is charged with making recommendations to the archbishop regarding the substantiation of the allegation and suitability for ministry.
11. Alleged offenders will continue to receive necessary medical, psychological, and spiritual treatment.
12. If an accusation proves unsubstantiated, a cleric will be restored to the exercise of ministry. Both the accused and those with and to whom he ministers are to be provided with support services by archdiocesan personnel.

13. In every case, upon conviction, plea of guilty, or determination by the Diocesan Review Board process that there is a preponderance of evidence that a cleric has sexually abused a minor, the Archdiocesan Review Board will submit its findings and make its recommendation to the archbishop. If the allegation is substantiated, exercising his episcopal authority, the archbishop will permanently remove the cleric from active ministry and divest him of authority to function as a cleric in any capacity. Proper canonical procedures will be observed at all stages.
14. Any cleric with a substantiated case of abuse of a minor will be permanently prohibited from the exercise of ministry.

Screening, Background Checks, and Training

The following requirements must be met for all parish/school staff, employees, and volunteers who have contact with children or youth prior to employment or commencement of volunteer service:

- Be cleared through a state and national criminal background check. Selection.com is the background check provider
- Attend a Safe Environment Education Training session on recognizing the signs of, and reporting, child abuse and neglect.
- Read and sign the Code of Ethical Standards for the Archdiocese of Milwaukee and the Mandatory Reporting Responsibilities
- Read and sign the Social Media & Digital Communication Policy acknowledgement
- Be approved by a member of the professional staff

A criminal background check must be repeated every five (5) years.

All school employees and staff must be trained in mandatory reporting responsibilities within six (6) months of hire and at least every five (5) years thereafter.

LINKS:

[Form 5140.1: Report of Suspected Child Abuse/Neglect](#)

DPI resource: [The School's Role in Preventing Child Abuse and Neglect Indicators of Possible Child Maltreatment](#)

ADOPTED: 5/2/2000; REVISED: 8/5/2022

5140.12: Mandatory Reporting of School Violence Threats

Wisconsin Act 143 requires reporting of school violence threats by certain individuals, including teachers, school administrators, school counselors, other school employees, physicians, and other medical and mental health professionals. Specifically, an identified individual must report if the person believes in good faith, based on a threat made by an individual seen in the course of professional duties regarding violence in or targeted at a school, that there is a serious and imminent threat to the health and safety of a student, school employee, or the public. These individuals must immediately inform a law enforcement agency of the facts and circumstances contributing to the belief that there is a serious and imminent threat.

The full list of individuals required to report threats of school violence can be found in [Wis. Stat. § 48.981 \(2\) \(a\)](#) and is the same list of individuals required to report suspected child abuse and neglect.

The Act provides immunity from civil or criminal liability for any person or institution making a report in good faith, as well as immunity for health care providers who do not report based on their good faith belief and professional judgment that a report is not required. Act 143 also creates an exemption from mandatory reporting for members of the clergy if certain conditions are met. The Act mandates that school boards require employees to receive training regarding mandatory reporting of school violence threats.

The mandatory reporting created by Act 143 applies to threats of violence against public, private, or tribal elementary or secondary schools. An intentional violation of the reporting requirement is an unclassified misdemeanor, subject to a fine of \$1,000 or less, imprisonment of six months or less, or both.

ADOPTED: 7/15/2019

7102: Audiovisual Recording on School Buses

[2025 Wisconsin Act 160](#), effective April 4, 2026, specifically focuses on authorizing the use of audiovisual recording devices on school buses. It does not fundamentally change the existing statutory obligations of school districts to provide transportation for private school students, but it does establish new requirements for how private schools manage bus recording policies.

The impact of Act 160 on private schools in your requested areas is as follows:

Using Public School District Buses

Act 160 does not change the core requirement for public school districts to transport eligible resident private school students who live two miles or more from their school.

- **New Policy Requirement:** If a public district bus is equipped with audio or video recording devices, the private school's governing body must adopt a policy authorizing such recording if it wants those recordings to be used for school purposes.
- **Notice and Confidentiality:** The school must ensure students and parents are notified of the policy, and a sign must be clearly posted inside the bus. Recordings are strictly confidential and limited to use in school discipline, investigations, or criminal prosecutions.

Field Trips and Athletic Events

The Act explicitly covers the use of school buses for "transporting pupils to and from school and school-sponsored activities," which includes field trips and athletic events.

- **Contracted Buses:** If a private school contracts a bus for these events, the same recording authorization rules apply. The governing body must have a formal policy in place and provide proper notification to families to legally use recording devices on those vehicles.
- **Charges:** Existing law still requires school boards to charge private schools for the cost of providing transportation for extracurricular activities.

School-Owned Buses or Vans

Private schools that own their own buses or vans are directly impacted by the new standards for audiovisual equipment.

- Authorization: The private school's governing body is the authority that must adopt the recording policy for its own vehicles.
- Vehicle Compliance: For vehicles owned by the school (including vans), they must still meet standard inspection and insurance requirements under Section 121.555.
- Capacity Limits: Be aware that vehicles other than traditional school buses (like large vans) are generally prohibited from transporting 10 or more students.

See also: Policy 3541 — Transportation; Policy 3541.1 — Transportation of Students

ADOPTED: 6/1/2026

7103: Appropriate Communication with Students

All communication between parish/school personnel and students shall reflect the dignity of the human person, uphold the mission of Catholic education, and maintain appropriate professional boundaries. Communication practices must comply with Safe Environment requirements, Archdiocesan policies, and applicable state law, including [2025 Wisconsin Act 89](#).

This policy applies to all individuals acting in an official capacity on behalf of a parish or school, including clergy, employees, and volunteers, as well as coaches, catechists, and youth ministers. It applies to all forms of communication with students, whether occurring during or outside of parish/school hours and across all platforms, including digital, verbal, and written communication.

Standards for Communication

All communication with students shall be consistent with the role of the adult as a minister, educator, or supervisor and shall maintain appropriate professional boundaries. Communication must be related to legitimate educational, ministerial, or supervisory purposes and must never create or foster a personal or exclusive relationship with a student.

Personnel shall recognize the inherent imbalance of authority in relationships with minors and conduct themselves in a manner that reflects transparency, accountability, and respect for the student and the student's family.

Approved Methods of Communication

Communication with students shall occur through parish/school-approved systems and platforms. Acceptable methods include official parish or school email systems, approved learning management systems, and other communication platforms designated by the parish/school.

When group messaging is used, it shall include appropriate transparency measures, such as the inclusion of multiple adults or access by a parent or guardian, in accordance with Archdiocesan policy. Parish/school-sponsored social media accounts may be used when administered in compliance with established guidelines.

Prohibited and Restricted Communication

Communication practices that lack transparency or accountability are not permitted. This includes one-to-one private communication with a student through text messaging, direct messaging, or social media unless a parent/guardian or another authorized adult is included.

Personnel shall not use personal social media accounts for ministry-related communication with students, nor shall they use messaging applications or platforms that do not allow for appropriate supervision, documentation, or retrieval of communication.

The use of communication methods designed to conceal, delete, or obscure interactions is strictly prohibited.

Content of Communication

All communication must be appropriate in content and tone and must relate directly to parish/school programs or activities. Communication may include educational instruction, faith formation, scheduling, or other legitimate purposes.

Communication that is personal, intimate, secretive, or unrelated to parish/school activities is not permitted. This includes, but is not limited to, flirtatious or suggestive language, discussions that create emotional dependency, or communication that attempts to isolate a student from parents, guardians, or peers.

Transparency and Record Retention

All communication with students conducted in an official capacity should be capable of being documented, retained, and reviewed. Parents and guardians have the right to access communications involving their child.

Parish/school administrators and supervisors should have access to such communication upon request to ensure compliance with this policy and other safeguarding requirements.

Professional Boundaries

Personnel shall maintain clear professional boundaries in all interactions with students.

Personnel are permitted to participate in social media for personal use on their own time and with their own accounts, unrelated to school. However, personnel are encouraged to be mindful of what is shared or posted online as staff are examples of our school's values for our school families and the community.

Personnel are prohibited from accepting or initiating social media connections (e.g., Facebook friends and Instagram follows) with current or former students under the age of 21.

Reporting Requirements

Any staff member who becomes aware of inappropriate communication between another staff member and a student is required to report it to school leadership immediately.

If a staff member receives communication from a student that would reasonably be perceived as crossing appropriate staff-student boundaries or as being otherwise inappropriate, the staff member must report the contact to the school principal.

Consistent with the state's mandatory reporting requirements, any school staff member must report suspected child abuse, which includes behavior or communications that can be reasonably construed as grooming, to child protection authorities, law enforcement, or a designated school employee who will then report it to applicable authorities.

Disciplinary Action

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment or volunteer service. Disciplinary measures may include verbal or written warnings, suspension, or removal from ministry, depending on the severity of the violation and in accordance with Archdiocesan procedures.

Training Requirements

All personnel shall complete required training on an annual basis. Training shall include instruction on recognizing grooming behaviors, maintaining appropriate boundaries, and complying with reporting obligations.

Training programs may include those provided by the Wisconsin Department of Public Instruction or other approved equivalents.

Relationship to Other Policies

This policy shall be read in conjunction with existing Archdiocesan policies, including but not limited to those governing electronic communication, acceptable use of technology, and ethical standards for conduct. In the event of a conflict, the more restrictive standard shall apply in order to ensure the safety and protection of minors.

ADOPTED: 6/1/2026

7104: Parental Notification of Alleged Sexual Misconduct

Parish and school personnel shall ensure timely, transparent, and appropriate communication with parents or guardians when there is reasonable cause to suspect sexual misconduct involving a minor. All actions taken under this policy shall comply with Wisconsin law, uphold the dignity of the human person, and reflect the Archdiocese of Milwaukee's commitment to the protection of children and youth. This policy is adopted in compliance with [2025 Wisconsin Act 57](#) and applies to all Archdiocesan schools and parish-based educational programs and to all clergy, employees, and volunteers acting in an official capacity, for any report or allegation involving sexual misconduct directed toward a minor, regardless of when or where the conduct is alleged to have occurred.

For the purposes of this policy, sexual misconduct includes verbal or physical conduct of a sexual nature involving a minor, as defined by Wisconsin law. Reasonable cause means a determination based on

credible information, observable behavior, or statements made by a student or witness. Absolute certainty is not required to establish reasonable cause.

Requirement for Parent/Guardian Notification

Parent or guardian notification is required when a parish or school administrator determines that there is reasonable cause to suspect sexual misconduct involving a minor. The alleged conduct includes:

1. Sexual misconduct as defined in [Sec. 948.098](#) of the Wisconsin Statutes by a school staff member, which includes any person who provides services to the school, including an employee and a person who provides services under a contract, which can also include a bus driver.
2. That an individual who has been convicted of a serious child sex offense, as defined here, has engaged in an occupation or participated in a volunteer position that requires the individual to work or interact primarily and directly with children in a manner that would be a felony under [Wis. § 948.13](#).
3. That a sex offender has intentionally captured a representation of a minor student without the written consent of the minor student's parent or guardian.

Responsibility for Notification

The responsibility for ensuring that notification occurs rests with the principal, assistant principal, or other school administrator.

Timing of Notification

Notification shall be made to the parent or guardian as soon as practicable and in strict compliance with Wisconsin law. In no case shall notification occur later than 5:00 p.m. on the same school day on which reasonable cause is determined, or by 12:00 noon on the following calendar day if the determination occurs after school hours.

Failure to meet these timelines constitutes a violation of this policy.

Method of Notification

Notification shall be made through direct personal communication with the parent or guardian, either in person or by telephone. A voicemail message may be left when direct contact cannot be made.

Written or electronic communication may be used to supplement, but not replace, the required direct notification.

Content of Notification

Notification shall include a general description of the nature of the concern, an assurance that student safety is being addressed, and a summary of the steps being taken in response, including any required reporting to civil authorities and available support resources.

Information shared shall be limited to what is appropriate and necessary and shall not include confidential personnel information or details that could compromise an ongoing investigation.

Coordination with Mandatory Reporting Requirements

This policy does not replace or diminish any mandatory reporting obligations. All personnel are required to immediately report suspected abuse or neglect to the appropriate civil authorities in accordance with state law and Archdiocesan policy.

Parent notification and reporting to civil authorities are separate obligations, and both must be fulfilled.

Internal Response Procedures

Upon receiving a report of alleged sexual misconduct, parish or school leadership shall take immediate steps to ensure the safety of the student, fulfill all mandatory reporting requirements, determine whether reasonable cause exists, and initiate parent or guardian notification.

Leadership shall also consult with the Archdiocesan Safe Environment Office and begin any necessary internal administrative response in accordance with Archdiocesan policy.

Exceptions

Parent or guardian notification shall not be made when the allegation involves the parent or guardian of the student. In such cases, parish or school personnel shall follow the direction of child protective services or law enforcement.

Documentation and Record Retention

Parishes and schools shall maintain documentation of all actions taken under this policy, including the time the report was received, the determination of reasonable cause, the time and method of notification, and the individual responsible for making the notification.

Such records shall be retained in accordance with Archdiocesan record retention policies and applicable law.

Annual Parent Notification of Rights

Each parish and school shall annually inform parents and guardians of their rights under Wisconsin law to access certain records related to employee discipline. This information may be included in parent or student handbooks or in annual registration materials.

Training Requirements

Administrators and other designated personnel shall receive annual training on the requirements of Wisconsin Act 57, including the determination of reasonable cause, notification procedures, and coordination with mandatory reporting obligations.

Relationship to Other Policies

This policy shall be read in conjunction with Archdiocesan policies regarding mandatory reporting, Code of Ethical Standards for the Archdiocese of Milwaukee, and Safe Environment requirements. In the event of a conflict, the policy providing the greatest protection for the child shall apply.

ADOPTED: 6/1/2026

