

DRAFT

Best Practices In Receiving, Investigating and Resolving Complaints of Clergy Sexual Misconduct

Congregational Boundaries Working Group, UUA Board of Trustees

February 2015

Executive Summary

The Congregational Boundaries Working Group recommends, for consideration by the Ministerial Fellowship Committee (“MFC”) the following as best practices in its process for receiving, investigating and resolving complaints of clergy sexual misconduct brought against ministers in Preliminary and Final Fellowship, and ministerial candidates:

- 1. Revision of the complaint process to reflect best practices includes direct consultation by the MFC with survivors of clergy sexual misconduct to ensure their concerns and recommendations are fully heard.**
- 2. The individual bringing a complaint, the alleged victim(s), and the minister or candidate each have a right to be heard and taken seriously.**
- 3. The parties in the complaint process, and individuals considering bringing a complaint, are clearly informed in writing of the process, including its expected timeline.**
- 4. The parties receive prompt responses to their concerns and participate in a process that is reasonably prompt, with clear timeframes for resolution of the complaint.**
- 5. Decisions to not refer a complaint to the UUA Consultant or the Executive Committee of the MFC require review and agreement of the Director of Ministries and Faith Development and two additional persons designated by the Office of Ethics and Safety in Congregational Life.**
- 6. If interviews are required of the parties as part of an investigation, both the individual bringing the complaint and the minister have a right to an individual interview, and to know the identity of the interviewer(s) and makeup of the investigation team before the interview.**
- 7. The process avoids conflicts of interest and minimizes perceptions of bias by ensuring staff, consultants, investigators, support persons and MFC members involved in the process disclose potential conflicts of interest with the parties and alleged victim(s), and recuse themselves in the event of a conflict of interest.**
- 8. The parties have, except where confidentiality and privacy concerns otherwise warrant, comparable access to information shared in the process.**
- 9. The parties, as well as an individual considering bringing a complaint, are offered a support person. No support person should be likely, by reason of his or her professional stature or relationships, to unduly influence the investigation or decision process. The**

support person may be present in interviews, in meetings, and at the time of learning of decisions. The families of the parties in the process are offered resources for support.

10. The individual bringing a complaint has an opportunity, on the basis of newly discovered evidence, to request reconsideration of a decision to not terminate Final Fellowship.

11. Any decision of the EC and the MFC regarding a minister that involves a finding of misconduct is promptly communicated to the Unitarian Universalist Ministers Association.

12. Members of the EC and MFC, in order to consider complaints related to clergy sexual misconduct, have training on clergy sexual misconduct in general, the UUMA Code of Conduct/Ethical Standards related to clergy sexual behaviors and relationships with those they serve as minister, the UUMA Standards of Professional Practices provisions relating to best practices regarding personal or romantic relationships, and the UUA Human Resources Manual definition of sexual harassment.

13. MFC members receive training that familiarizes them with (1) restorative justice principles that promote healing of the parties and affected communities and (2) trauma that is likely to affect some of the parties involved in these allegations , including victims of clergy sexual misconduct. Such training is intended to assist MFC members in interviewing parties in the complaint process and in considering appropriate resolution of a complaint.

A. Introduction

The UUA Board of Trustees in October 2014 charged the Congregational Boundaries Working Group to provide both the Board and the Ministerial Fellowship Committee (MFC) a set of “best practices for receiving, investigating and resolving complaints of clergy sexual misconduct.”¹ The call for this examination of the MFC complaint process has existed for many years and risen from several sources.² Most recently, *Safety Net*, a social justice team of the First Unitarian Universalist Church of Nashville, urged the Board to take full ownership of earlier recommendations of the Safe Congregations Panel (including the review of the MFC process).³

This report is provided to the MFC, as the body responsible for making rules governing ministerial fellowship, and to the UUA Board, accountable for the MFC complaint process.⁴

B. Summary of Current MFC Complaint Process.

¹ The full charge is in [Congregational Boundaries Working Group Report](#), p.2. The relevant Ethical Standards of the Code of Conduct of the Unitarian Universalist Ministers Association provide “I will not engage in sexual contact, sexualized behavior or a sexual relationship with any person I serve as a minister.” Complaints of sexual harassment may be related to those of clergy sexual misconduct. The Ethical Standards do not specifically address sexual harassment.

The 2010 UUA Human Resource Manual defines harassment as including: “unsolicited remarks, gestures or physical contact, display or circulation of written materials or derogatory pictures directed at any of these categories. In addition, sexual advances, jokes, explicit or offensive pictures, requests for sexual favors, and other verbal or physical conduct of a sexual nature constitute sexual harassment when:

1. Submission to such conduct or communication is made a term or condition either explicitly or implicitly to obtain or maintain employment; or,
2. Submission to or rejection of such conduct or communication by an individual is used as a factor in decisions affecting such individual’s employment; or,
3. Such conduct or communication is pervasive, severe, and persistent, and has the purpose or effect of substantially interfering with an individual’s employment or creating an intimidating, hostile, or offensive employment environment.”

² In 2000, the Safe Congregations Panel recommended a review of the complaint process so “that language and process provide respect, safety, and ease of use” for those bringing complaints, ensuring they are “informed and consulted at critical points in the process.” In 2010, the report of the Religious Institute, commissioned by the UUA, noted that responding to complaints of sexual harassment or misconduct was the “weakest area of sexual health for the denomination” and its congregations. [“Toward a Sexually Healthy and Responsible Unitarian Universalist Association,”](#) The Religious Institute and Rev. Debra W. Haffner (2010), pp. 29, 30. The report recommended the UUA adopt a more “streamlined, clearly articulated and standard” process--and prominently place those new procedures on a new section of the website or a separate webpage.

³ [“UUA Candidates for Board and Moderator: Open a National Conversation on Clergy Misconduct,”](#) First UU Church of Nashville Safety Net (2013)

⁴ MFC Rules are subject to approval by the UUA Board ([Bylaws of the UUA Board, section 11.2](#))

The current MFC complaint process, with respect to ministers in Preliminary and Final Fellowship, is summarized in Appendix 1. Appendix 1 includes two documents—(1) a chart that describes the roles of different parties to the process at its basic stages (prepared by Congregational Boundaries Working Group) and (2) a flow chart of the process prepared by *Safety Net*.

The process, which addresses complaints of ministerial misconduct and ministerial incompetency, is established by several different sources. They include Rules 16 and 20-28 of [the MFC Rules \(updated January 2014\) \(and revised January 2015\)](#), Policies 19,20, 22 and 23 of [the MFC policies \(updated January 2013\)](#), the UUA webpages “[Process for Handling Complaints of Misconduct in Your Congregations](#)” and “[Misconduct Complaint Process](#),” [Article XI of the UUA Bylaws and the Rules of the Board of Review](#). Staff practices, particularly those of the Office of Ethics and Safety, also inform the process.

C. Current UUA Statements of Principle in Responding to Complaints of Ministerial Misconduct.
The UUA Office of Ethics and Safety posts the following statement on the webpage “[Process for Handling Complaints of Misconduct in Your Congregation](#)”:

*The UUA Office of Ethics and Safety, in addition to broad support for safe congregations and right relations, provides a system for response to complaints of professional misconduct that is **grounded in principles of restorative justice and reconciliation**. These principles are expressed by:*

- *pastoral concern and response to persons victimized*
- *concern for the health and well being of congregations*
- *concern for the integrity of the ministry and the UUA*
- *congruency with UU principles*
- *transparency*

The statement further assures that “*your inquiry will be treated with compassion, respect, and care.*”

That webpage also provides a link, “Restorative Workshop,” further linking to “[Restorative Justice: A Transforming Philosophy](#),” which lists characteristics of restorative justice.

D. Formulation of Best Practices.

The best practices suggested below are based on a review of the principles outlined above, recommendations and discussion in the Safe Congregations Panel report, comments received from

the Congregational Boundaries Advisory Group and *Safety Net*, and the principles and processes of the United Church of Christ (“UCC”)⁵ and the Central Conference of American Rabbis (“CCAR”)⁶ for receiving, investigating and resolving complaints of professional misconduct. Comparison of aspects of the UUA, UCC and CCAR complaint process are provided in Appendix 3. Also helpful were comments by Rev. Debra W. Haffner, President of Religious Institute, Inc. and a review of the website maintained by the United Methodist Church, umsexualethics.org.⁷

Noteworthy in the UCC and CCAR processes is the extraordinary care taken to fully communicate and provide assurances to all parties of procedural fairness, respect, and pastoral support. These assurances are provided in statements of general principles and in the complaint process itself. We suggest that the MFC consider posting or publishing some general statements of best practice for the benefit of parties involved in the complaint process, and that the following practices be reflected in the complaint process:

E. Best Practices.

1. Revision of the complaint process to reflect best practices includes direct consultation by the MFC with survivors of clergy sexual misconduct to ensure their concerns and recommendations are fully heard. As a member of the Advisory Group has commented to the UUA Board:

“I’ve been involved in rewriting significant pieces of the policies related to CSM in my congregation, and from that have learned that how policies are formulated is actually the most important piece — more important than specific endproducts... As far as I can tell, the UUA’s CSM policies and procedures are formulated and reviewed only by those with the most power — not opening this work up to the powerless...And my voice is woefully inadequate. Somehow we must at a bare minimum find a way to have adequate representation of UU CSM survivors in the reformulation of CSM-related policies and procedures.”

⁵ [The United Church of Christ Manual on Ministry, Section 8, The Oversight of Ministries Authorized by the United Church of Christ.](#) The Manual on Ministry provides a model Fitness Review process for local UCC Association Committees on the Ministry. A Fitness Review is a “reassessment of a persons fitness for authorized ministry in and on behalf of the UCC, which may result in discipline, including the loss of authorization.” *Id.* at p. 30.

⁶ [Central Conference of American Rabbis, Code of Ethics for Rabbis.](#) The CCAR is the membership organization for Reform Rabbis. It provides placement services in congregations associated with the Union for Reform Judaism. The CCAR in its Code of Ethics establishes procedures for adjudicating complaints against members of the CCAR. Possible outcomes include reprimand, censure or recommendation of censure or expulsion from the CCAR.

⁷ The website, created by the UMC General Commission on the Status of the Role of Women, introduces the complaint process in the United Methodist Church and addresses the issues of sexual misconduct, abuse and harassment by those entrusted with ministerial roles in the UMC.

2. The individual bringing a complaint, the alleged victim(s), and the minister or candidate each have a right to be heard and taken seriously. The Office of Ethics and Safety makes the online statement, “your inquiry will be treated with compassion, care and respect.” The outline of the process of the Office of Ethics and Safety reflects its intent to take complaints seriously.⁸

To ensure individuals bringing a complaint are heard, the MFC has recently amended MFC Rules 16, 20 and 21. The [amendments](#) provide individuals bringing a complaint concerning a minister an opportunity to meet with the MFC Executive Committee (“EC”), accompanied by an advocate appointed by the Office of Ethics and Safety. A similar opportunity to meet with the EC may also be provided to representatives of victims or classes of victims.

This revision is consistent with UCC and CCAR processes, which both provide that the individual bringing a complaint and the minister or rabbi have similar rights to appear before a review committee. Both the UCC and CCAR processes also recognize that individuals other than the person bringing a complaint may meet with their review committees (See Appendix 3.)

The MFC has asked for guidance on how alleged victim(s), other than the individual bringing the complaint, might be identified and invited to speak to the EC. A member of the Advisory Group has commented that when an alleged victim is identified in the course of the investigation process, the EC *“explicitly state that they are open to hearing from anyone affected and will make accommodations as necessary to ensure that that happens.”*⁹

In response, the MFC revised Rule 20 to provide that an assessment of a complaint should take into consideration “statements by the persons filing the complaint about any other victims, or classes of victims, that should receive consideration if the complaint is referred to the MFC.”

⁸ Its role is to:

- receive and investigate complaints
- coordinate support services to affected individuals and congregations
- present cases for adjudication by the Ministerial Fellowship Committee
- involve investigators and advocates as needed, the latter providing both pastoral support and process information/advice to the complainant
- involve, when needed, a crisis response team, to provide support to congregational staff and leaders
- include an education and training component for congregational leaders

⁹ The full comments from the Advisory Group member are provided in Appendix 2.

We suggest that the Rules also give the EC discretion to meet with alleged victim(s) (beyond one representative), taking into consideration the victim's needs, the nature of the complaint and the need of all parties for a fair proceeding. Given the possibility of needing to meet with a number of alleged victims, we suggest the EC retain discretion to meet with them by secure video conference methods.

We suggest the Rules and Policies ensure that individuals bringing complaints will be asked what resolution they would like to see. The website states that when the EC negotiates a resolution agreement with a minister, "[t]he UUA Consultant will be a focal point for such negotiations and the complainant will be consulted with respect to the proposed resolution." However, MFC Rules and Policies make no reference at all to role of the UUA Consultant. Of course, an individual bringing a complaint might be asked questions regarding needs and resolution in various ways—through consultation with an advocate, when interviewed in an investigation process, and when meeting with the Executive Committee.

3. The parties in the complaint process, and individuals considering bringing a complaint, are clearly informed in writing of the process, including its expected timeline. This is consistent with the principle of transparency articulated by the Office of Ethics and Safety. The MFC Rules and Policies are posted online, and the Office of Ethics and Safety provides webpages to describe the complaint process. Unfortunately, it remains opaque. Confusion is caused by lack of (a) a single resource that comprehensively describes the complaint process, (b) clear statements that address confidentiality concerns and the lack of a role for legal counsel in the process, and (c) information regarding the background or qualifications of those performing critical roles in the process:

(a) Lack of Single Resource in Script that Comprehensively Describes the Complaint Process.

Recognizing that the complaint process is not always accessible, the Office of Ethics and Safety offers online assistance:

The process of making complaints can be complex. Our intake person... is at the UUA Monday-Friday during regular business hours, and is happy to speak with you in person: (617) 948-6462. We do not currently offer a 24/7 "hotline" but your call will be answered within 48 hours. [The Intake Person] offers completely confidential listening, and can explain the process for filing a complaint.

Despite this assistance, the burden is placed on persons who may have been victimized to rely on their own inquiries, notes, questions and conjecture to understand the process. The Rules and Policies do not require that an individual be clearly informed in writing of the process. Nor is a comprehensive summary of the process posted online. An online summary would provide greater transparency and assist those considering bringing a complaint who are understandably reluctant to confide in staff. We also suggest the process for bringing a complaint be easily found from a button or link on the home page that states “How to Report a Concern” or even more specifically, “How to Report a Concern About Professional Misconduct.”

The original sources that establish the process (Rules, Policies, statements of Office of Safety and Ethics, Bylaws) are not outlined or gathered in one place, nor are the Rules, Policies and website information easy to follow or consistent in use of language. (For instance, the MFC Rules refer to an “intake person” as charged with initially assessing complaints, but on the website, this also appears to also be the responsibility of the UUA Consultant. One option, to improve communications, might be to comprehensively edit the applicable Rules, Policies and website information for clarity and create a policies and procedures document. We also suggest clarifying the role of the UUA Consultant.

(b) Lack of statements that address confidentiality concerns and role of legal counsel in the process. Clearly informing individuals about the complaint process includes clearly addressing confidentiality concerns.¹⁰ The UUA website now states: “All participants in any complaint process will be informed that confidentiality may be breached if the UUA Consultant deems necessary to protect against harm.” At least one member of the Advisory Group believes this statement is too vague and questions when breaching confidentiality would be deemed acceptable. Parties should also be informed of the lack of a role for legal counsel in the complaint process.¹¹

¹⁰ While parties to the process need to be informed of the potential loss of confidentiality (as in cases involving abuse of minors or threats of imminent danger to any person), they also need to know how information they provide will be shared, and what information about the process they will be allowed to share. The umsexualethics.org website makes statements that clarify expectations, such as, “When you file a complaint, the accused will have a right to know of your name and your statement regarding the accused clergy’s conduct identified in the complaint,” and “You will be asked to keep the investigation and the complaint process confidential during the time of the investigation.”

¹¹ As an example, the UCC description of its Fitness Review process states: “Care should be taken to explain that there is no role for attorneys in ecclesiastical proceedings. While persons are free to engage legal counsel, federal and state constitutional jurisprudence makes clear that governmental

(c) Lack of information regarding the background or qualifications of those performing critical roles in the process. Individuals thinking of bringing complaints may need assurances that those who perform critical roles in the process have qualifications to carry out those roles. Parties may need to know the background of those conducting investigations, those being offered as advocates, and individuals who may be external consultants, such as the UUA Consultant.

4. The parties receive prompt responses to their concerns and participate in a process that is reasonably prompt, with clear timeframes for resolution of the complaint. The commitment to a timely process and prompt response is not assured in the MFC Rules and Policies. For instance, the MFC Rules and Policies do not provide timelines for:

- responding to initial action on a received complaint (i.e., referral to UUA Consultant or other resources),
- issuing an invitation to meet with the EC,
- conducting a Final Fellowship Review and informing the parties of the decision.

Understanding that the MFC generally meets 3 times each year, complaints might be brought at any point in that schedule, exact timelines are often not possible. However, the EC may be able to set reasonable deadlines for (1) the Intake Person's decision to refer an initial complaint to the UUA Consultant (or elsewhere) and (2) the time for the UUA Consultant to conduct an investigation and decide whether to refer to the EC (or elsewhere). With respect to meetings with the EC, further investigations, or a Fellowship Review, we suggest that parties be informed of a tentative schedule and any subsequent revisions. The Rules should generally provide that parties will be responded to promptly and a complaint will be dealt with in a timely manner.

The MFC and staff should also be committed to providing an immediate, personal response to an individual who is considering bringing a complaint. We suggest considering tools such as a 24/7 hotline to ensure that support and outreach is available.

5. Decisions to not refer a complaint to the UUA Consultant or the Executive Committee of the MFC require review and agreement of the Director of Ministries and Faith Development and at

bodies, including officers of the court, cannot interfere with a church's responsibility for determining who can and who cannot minister on its behalf."

least two additional persons designated by the Office of Ethics and Safety in Congregational Life. One member of the Advisory Group has observed that a preliminary complaint investigation may be conducted by the UUA Consultant alone and that investigation may determine the scope of the case, including whether or not it moves forward. Decisions regarding referral of the complaint and its preliminary investigation are critical steps in the process. To avoid any question of bias or lack of thoroughness, we suggest Rules and Policies ensure that the decision whether or not to refer a complaint to the UUA Consultant or the EC is made by at least three people. Additionally, individuals bringing complaints need assurances that decisions are not arbitrary but rely on clearly defined standards. MFC Rule 20 provides that the Intake Person “has the discretion to refer matters not suitable for adjudication by the Ministerial Fellowship Committee (MFC) to other resources...” Examples of or an explanation of matters that might not be “suitable for adjudication” are not provided in the Rules, Policies or other information provided online.

6. If interviews are required of the parties as part of an investigation, both the individual bringing the complaint and the minister have a right to an individual interview, and to know the identity of the interviewer(s) and makeup of the investigation team before the interview.

Section 19D of the Policies states, in part, “If it is determined that personal interviews would be appropriate, the appointed investigators will interview the complainant, the minister against whom the complaint is made, and as many other individuals with knowledge of the issues or circumstances raised by the complaint.” The Policies, Rules and website don’t describe the makeup of the investigation teams.

In instances of a preliminary investigation by the UUA Consultant, such rights to interviews should also apply.

7. The process avoids conflicts of interest and minimizes perceptions of bias by ensuring staff, consultants, support persons and MFC members involved in the process disclose potential conflicts of interest with the parties and alleged victim(s), and recuse themselves in the event of a conflict of interest.

Policy 20D of the MFC Policies provides that “each individual appointed to be an investigator is expected to maintain neutrality and an open mind throughout the investigation.” The MFC has revised Rule 21D to provide that if a full Committee Fellowship Review is called for, the EC will assign an investigative team from outside (rather than inside) the MFC’s membership to be in contact with complainants and other individuals the team deems relevant. This amendment is a significant step in minimizing perceptions of bias. Moreover, staff and the MFC members are subject to the [UUA Conflict of Interest Policy](#) which provides:

If a member of the Ministerial Fellowship Committee...has a conflict of interest with regard to an individual who is the subject of any action by the board or committee on which the member serves, the member shall disclose the relationship prior to the action, shall not participate in any way in gathering information about or otherwise evaluating the individual, and shall not attempt to influence the action...These committees may adopt additional conflict of interest rules or procedures, including additional requirements for recusal, which are not in conflict with this policy.

We suggest the MFC consider whether a conflict of interest policy applies to consultants, support persons and to members of investigative teams, and whether its Rules and Policies should be amended to ensure such application.

8. The parties have, except where confidentiality and privacy concerns otherwise warrant, comparable access to information shared in the process. Confidentiality and privacy are legal concerns; it is beyond the scope of this report to identify information that may appropriately be shared. This statement of practice simply confirms that, in the interest of transparency and equitable treatment of the parties, they have comparable access to information (while mindful of confidentiality and privacy concerns). For instance, parties should receive updates on the status of the complaint and next steps. One member of the Advisory Group wrote:

Overall, there is relatively little detail in the MFC rules about what happens when the MFC receives a complaint. There is nothing about any communications with the complainant (except if they contact the individual during an investigation by the full MFC). It is not clear that the person who files a complaint is ever told the outcome. I think having this explicitly spelled out in the MFC Rules is very important...the gaps I see are in describing how the person who has filed a complaint will be kept informed. In the past, I recall seeing documents (current during the time of my complaint) stating that complainants are kept informed at all critical junctures. This did not match with my experience. As such, I think it would be helpful for such communications to be more explicitly described either in the process page or the MFC rules or both. (See Appendix 2.)

The Rules do not require the individual bringing the complaint (or the UUA Consultant) be personally informed of important decisions in the process.¹² (The Policies do require that an individual bringing a complaint be informed of a finding of lack of sufficient grounds to bring a case to Fellowship Review.) The lack of requirements to inform complainants of outcomes contrasts with the process of the UCC and CCAR, which require that both parties be informed of important decisions.)

¹² This includes (1) the initial assessment (through Intake Person and UUA Consultant) to refer the complaint to the EC, (2) the EC decision to either conduct an investigation (in the case of a minister in Final Fellowship), take no further action or enter into a resolution agreement with the minister, (3) the second EC decision, after an investigation, to continue with a full Committee Fellowship Review, and (4) the decision following full Committee Fellowship Review.

9. The parties, as well as an individual considering bringing a complaint, are offered a support person. No support person should be likely, by reason of his or her professional stature or relationships, to unduly influence the investigation or decision process. The support person may be present in interviews, in meetings, and at the time of learning of decisions. The families of the parties in the process are offered resources for support. UUA staff is refreshing its advocate program, and has recently received a grant to train advocates that can be available as early as when one is considering bringing a complaint. However, the availability of advocates (or a Good Offices person) is not consistently described in the Rules, Policies and online materials. Though current staff practice may be to provide support to parties at the time an MFC or EC decision is communicated, the Rules or Policies do not now encourage that decisions be communicated with this support available.

Both the UCC and CCAR processes ensure families of parties to the process are offered support. While volunteer Good Offices persons and volunteer advocates might not be able to themselves provide such ongoing support to families, their training could include assisting families in finding available resources for support.

10. The individual bringing a complaint has an opportunity, on the basis of newly discovered evidence, to request reconsideration of a decision to not terminate Final Fellowship. In the MFC complaint process, the minister has a right to appeal a decision to terminate Final Fellowship and to request consideration of newly-discovered evidence. We recognize that a Fellowship Review is a process between the MFC and a minister concerning fitness for ministry, and that a complainant under the current process does have the opportunity to appeal a decision by the EC to **not** seek a Fellowship Review. We suggest the MFC consider whether it has an interest, in reaching a decision in a Fellowship Review, in newly-discovered evidence that might be offered by the individual bringing the complaint (offered under the same restrictions now applicable to ministers under the Board of Review Rules).

11 . Any decision of the EC and the MFC regarding a minister that involves a finding of misconduct is promptly communicated to the Unitarian Universalist Ministers Association. We suggest the MFC consider at what points in its process it notifies the UUMA .

12. Members of the EC and MFC, in order to consider complaints related to clergy sexual misconduct, have training on clergy sexual misconduct in general, the UUMA Code of Conduct/Ethical Standards related to clergy sexual behaviors and relationships with those they serve as minister, the UUMA Standards of Professional Practices provisions relating to

best practices regarding personal or romantic relationships, and the UUA Human Resources Manual definition of sexual harassment.

13. MFC members receive training that familiarizes them with (1) restorative justice principles that promote healing of the parties and affected communities and (2) trauma that is likely to affect some of the parties involved in these allegations , including victims of clergy sexual misconduct. Such training is intended to assist MFC members in interviewing parties in the complaint process and in considering appropriate resolution of a complaint.

Acknowledging the significant time commitment of MFC members to carry out its credentialing tasks, any such training would need to be a succinct and thoughtful introduction to relevant principles of restorative justice, and the effects of trauma, that would enable the MFC to better address the needs of parties in the complaint process.

CONCLUSION

We invite the MFC and Director of Ministries and Faith Development respond to the Board with (1) suggested revisions to the Rules and Policies in light of these best practices, or (2) concerns or disagreements with the suggested best practices. If additional resources are needed to implement revisions, we ask that information be noted in the response. We also recommend that the revision process include direct consultation with survivors of clergy sexual misconduct who have brought complaints under the MFC process. To ensure transparency, revised Rules and Policies, once approved, should be posted clearly on the UUA website on a single landing page, and the revisions publicly communicated through the UU World online, the UUMA e-newsletter, and other appropriate sources.

