

# **Clergy Sexual Misconduct Against Adults in the Roman Catholic Church: The Misuse of Professional and Spiritual Power in the Sexual Abuse of Adults**

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## **Abstract**

This article describes and discusses the power–vulnerability intersect in the lives of 23 women and 6 men who experienced clergy sexual misconduct against adults (CSMAA) within the everyday life of the Roman Catholic Church. It argues that framing CSMAA around a ‘vulnerable victim’ rather than an ‘abusive cleric’ has led to the misinterpretation and continuation of CSMAA, and an overall attitude of victim blaming. However, when victims/survivors of CSMAA are given the opportunity to tell their stories, a different picture emerges. The article concludes that CSMAA does not occur because there is a vulnerable adult but, rather, because there is an abusive cleric willing to misuse their powers to abuse adult vulnerabilities. This article also argues that the unique dynamics of CSMAA become more evident and understandable when those clergy powers and adult vulnerabilities are clearly delineated as being both positional and personal realities.

## **Keywords**

clergy sexual misconduct, professional misconduct, vulnerable adult, Roman Catholic Church, spiritual abuse.

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## **Introduction**

Within the context of the Roman Catholic Church (RCC) all sexual activity by clergy is forbidden (Provost 1992: 630). Unofficially though, according to psychotherapist to clergy, Richard Sipe, it is estimated that ‘no more than 50% of Catholic clergy [are] in fact practicing celibacy at any one

time' (Sipe 2003: 43-53). Accordingly, 50% of clergy are therefore engaging in sexual activity in some way, predominantly with adults (Sipe 1995: 61, 63-79; 2003: 43-53; see also Royal Commission 2017: Case Study 50 [Day 247], 25270). For many in the RCC such activity is simply tolerated, expected or even seen as necessary for some clerics' psycho-sexual development (Murphy 1992; Loftus 1994; Anderson 2006; Bordisso 2011). However, there appears to be a great deal of ambiguity or ambivalence within the RCC as to when this activity might also be considered abusive and therefore classified as clergy sexual misconduct against adults (CSMAA). Such ambivalence is revealed on occasions as, for example, in the case of Father Thomas Walshe and his sexual activity with an 18-year-old seminarian. The seminarian claimed he was sexually assaulted while drunk and unconscious (see *Broken Rites* 2017). Father Walshe strenuously denied committing any abuse, characterising the incident as 'completely consensual' (Jacks and Vedelago 2016). However, the independent commissioner for the *Melbourne Response*, the RCC organisation for dealing with clergy sexual abuse in the Melbourne Archdiocese (Victoria, Australia), accepted that 'Father Walshe had sexually abused the then 18-year-old seminarian' (Jacks and Vedelago 2016). Responding to the case, Melbourne's Archbishop Denis Hart made the following summation:

[It] was a consensual homosexual relationship that only breached the teachings of the church and vow of celibacy taken by both men... While it amounted to 'sexual abuse' within the meaning of the Melbourne Response, it was not illegal, it was not child abuse and there was no finding that it was non-consensual (Jacks and Vedelago 2016).

In this one statement then, Archbishop Hart oxymoronically summarises the sexual activity of Fr Walshe as 'legal', 'consensual' 'sexual abuse'. The 'legality' or not of this event rests on the contested existence of 'consent'. If there was consent, as Fr Walshe claimed, the event while 'illegal' under the RCC's canon law, would not be illegal according to state criminal law. If the event was non-consensual, which the victim claims, the event could be defined as sexual or at least indecent assault according to state criminal law. The *Melbourne Response* investigators defined the event as 'sexual abuse' but no further. Archbishop Denis Hart's summation disregarded the victims' standpoint and that of the *Melbourne Response* in favour of that of Fr Walshe, thus revealing an obvious struggle within the RCC to clearly comprehend and define CSMAA, particularly as in this case, against male adults. Hart is not alone in his ambivalence. A similar conceptual ambiguity could also be found in an older case involving the then Archbishop George Pell (see SMH 2008), and in the discussion of the sexual abuse of John Ellis as it moved past the 'age of consent' (see

Royal Commission 2014b: Case Study 8, [Day 54], 5538-5539 and [Day 60], 6300-6302; see also, Byrne 2010: 44).

Many of the cases of CSMAA included in this study, even those where consent confusion existed, could easily be defined as 'criminal abuse' (see NSW Gov. 2012: *Crimes Act 1900 No 40*. Sections 61H and 61HA). Furthermore, it is clear that the power-vulnerability nexus plays a major part in determining criminality in such cases. However, the issue of the criminality or not of CSMAA is beyond the scope of this article. This article is concerned first and foremost with discussing official RCC perceptions of CSMAA, particularly within the dynamics of power abusing vulnerability as presented in the cases of the victim/survivor participants. It is, nevertheless, hoped that what follows may help inform those within the legal profession in Australia to investigate this form of professional sexual misconduct more closely, as has begun to occur in the USA (see Byrne 2010: 10-16; Tobin and Helge 2013).

CSMAA cannot be seen simply and only as a breaching of RCC teachings and the vow of celibacy. For the few who have researched the phenomenon more closely, until CSMAA is primarily defined as the misuse of power to abuse another's vulnerability, it cannot be freed from such definitional oxymorons and ambivalence as is evident in the cases above (see Flynn 2003: 18-27, 182; Kennedy 2009: 20-52; Garland and Argueta 2010: 23; Garland 2013). Furthermore, and more broadly speaking, experts in professional sexual misconduct against adults all agree that CSMAA needs to be contextualised as *professional* misconduct and analysed within the broader ethical and legal context thereof (see also Fortune 1989; Rutter 1989; Peterson 1992; Russell 1993; Ormerod and Ormerod 1995; Benyei 1998; Poling 2005; Tschan 2014).

This article will argue that the broad and deep ambivalence surrounding CSMAA rests on a corresponding lack of understanding of the dual natures of positional and personal elements to be found in both power and vulnerability. What is also apparent is that there is an equally troubling lack of appreciation for how this dual power-vulnerability dynamic enables truly harmful and highly unethical and immoral sexual abuse against adults to occur. Supported by a review of the extant literature, this article seeks to contribute to furthering the understanding of this more complex power-vulnerability dynamic by the inclusion of the accounts of victims/survivors of CSMAA. Research participants in this study clearly articulated this power-vulnerability nexus. Utilising their experiences, this original study concludes that for many women and men, their sexual experiences with clergy were indeed professional sexual misconduct and exploitation. With these experiences and supporting literature, this article seeks to contribute to an academic and experience-based clarification of

when such clergy sexual activity becomes abusive, or, CSMAA. Its original contribution also rests in the definition, and analysis, of both power and vulnerability, specifically in the context of the RCC, as having both positional and personal expressions.

### **Clergy Sexual Misconduct Against Adults: A Known Unknown**

The condemnation of criminal sexual abuse of children by RCC clergy is a fact now virtually impossible to ignore (Royal Commission 2014a: Case Study 8; John Jay Report 2004; Death 2013: 6-7). However, clergy activity with adults is not at all condemned and often not even questioned. This is in part due to clergy sexual activity with adults, unlike as with children, not necessarily being a criminal offence. Furthermore, the dominant perception to date concerning clergy sexual activity, as presented in such books as Sheila Murphy's *A Delicate Dance* (1992), Jane Anderson's *Priests in Love* (2006) and Louis Bordisso's *Sex, Celibacy and the Priesthood* (2011), is one based on the standpoint of clergy usually struggling with the repercussions of mandatory celibacy. The assumption is that clergy sexual activities are legal, consensual affairs or relationships. As a result, dismissive, ambivalent or clergy-compassionate responses have tended to dominate the responses to such activity. However, for those who have 'studied up' this issue from the standpoint of the other adult, a very different picture emerges (Harding 2004: 31). Feminist researchers particularly point out that what has been missing from almost all discourses concerning clergy sexual activity are the voices of these 'other adults' caught up in the power–vulnerability nexus therein. For many of these 'other adults', their sexual experiences with clergy could never be classified as mutually consensual affairs or relationships, and may even be 'illegal' according to state laws (Woodward 2009). However, for the most, their perspective on the issue has been and is still being ignored.

Clergy sexual activity, including CSMAA, is a very well-'known' phenomenon within the hierarchical/clergy structure of the RCC (John Jay Report 2004: 258; Doyle, Sipe and Wall 2006). However, as was the case with clergy child sexual abuse, it is also a reality that the RCC has kept, and wishes to keep as 'unknown' as possible (Jenkins 1998; Byrne 2010: 9). As Francis Sullivan from the *Truth Justice and Healing Commission*, the RCC body set up to liaise with the Royal Commission, acknowledged: 'Priests in relationships—some of which result in children, then kept secret—are no uncommon occurrence' (Brereton 2014). The phenomenon of CSMAA, therefore, has needed and still needs a great deal more research and exposure (Kennedy 2009: 1, 6, 30; Byrne 2010: 16).

### Some Studies

In 1989, Rev. Dr Marie M. Fortune published what has become a seminal book on the issue of CSMAA—*Is Nothing Sacred: When Sex Invades the Pastoral Relationship*. Fortune's book was the first major exposé not only of CSMAA and the way it was being handled by Church authorities, but most significantly, of its effects on people's lives. In the almost 30 years since, only six victim/survivor-based research projects have been undertaken. Four studies concern female victims/survivors of CSMAA in Christian Churches, including the RCC. Kathryn Flynn's doctoral dissertation (Flynn 2000) and subsequent book (Flynn 2003) is a qualitative study of 25 women survivors in the USA. Her work establishes a convincing link between CSMAA and trauma. A second study by Margaret Kennedy (2009), also a doctoral dissertation, is based on 63 surveys followed up with 19 interviews in the UK. Kennedy (2009) presents a very thorough and complex overview of CSMAA, including adult grooming and control, the effects of CSMAA, and Church and government responses to the phenomenon. Mark Chaves and Diana Garland (2009) undertook the first attempt at quantifying the prevalence of CSMAA. Based on the survey responses of 3,151 women in the USA, they concluded that around 3.1% of women have been subjected to CSMAA. Finally, Diana Garland and Christen Argueta (2010) provide another qualitative study of 46 primary and 15 secondary victims of CSMAA. Garland and Argueta (2010) make a vital contribution to CSMAA by clearly articulating how and why CSMAA occurs and how to prevent it.

Only two studies deal specifically with CSMAA within the RCC: a quantitative study outlining and discussing sexual trauma experienced by nuns in the USA by John Chibnall, Ann Wolf and Paul Duckro (1998); and Kathryn Byrne's Master's study and book, *Understanding the Abuse of Adults by Catholic Clergy and Religious* (2010). Byrne's qualitative study presents 6 victims' stories from a database of 31, along with a short analysis of each. Byrne (2010) concludes her analysis with recommendations for healing. Only Byrne (2010) and this present study include male victims/survivors.

There has been almost no research on CSMAA within the Australian RCC context apart from one study, a PhD dissertation by Mary Medley (2001). Medley's dissertation primarily discusses the Australian RCC's responses to the then developing clergy sexual abuse crisis. While Medley's (2001) research is based primarily on childhood abuse, three adult victims are included, one being male. Only one other book, *When Ministers Sin: Sexual Abuse in the Churches* (Ormerod and Ormerod 1995) provides an Australian context for clergy sexual abuse, including CSMAA. Professor of Theology, Neil Ormerod, and his wife, social

worker Thea Ormerod, have approached clergy sexual abuse from a RCC-based pastoral and ecclesiological perspective. They also apply a solid sociological understanding of power and vulnerability to clergy sexual abuse, quite rare for its time.

The need for more research focusing specifically on CSMAA and its many expressions is obvious. Furthermore, this paucity of research is concerning given that in 1994 clergy psychotherapist and former priest, Richard Sipe, estimated that:

sexual abuse of minors is the tip of the iceberg when it comes to the violation of professional boundaries by clergy. Four times as many priests involve themselves sexually with adult women, and twice the number with adult men, as priests who involve themselves sexually with children (Sipe 1994: 134; 1995; see also Royal Commission 2017: 25270, line 32).

Sipe's 1995 therapy-based estimation has been supported by other researchers as attested by the following summarising statement from the John Jay Report (*The Nature and Scope of the Problem of Sexual Abuse of Minors by Catholic Priests and Deacons in the United States*):

Haywood and Green provided an overview of the literature pertaining to prevalence, offense/victim characteristics, and evaluation of cleric serial offenders. Depending upon the study, prevalence rates ranged from 2% to 6% (pedophilic and ephebophilic clerics), 20% to 40% (sexual misconduct with adults), 8.4% (in a sample of 1322), and 5.8% to 24% (boundary violations with adults)... In examining offense/victim characteristics, the authors concluded that clerics are more likely to engage in sexual misconduct with adults than minors (John Jay Report 2004: 258).

However, even with all this expert evidence, the reality of CSMAA and its impact on victims remains, for the most, troublingly under-acknowledged by the RCC, particularly in Australia.

The RCC is not the first institution to grapple with sexual misconduct against adults. The medical and therapeutic professions, the military, police, the legal profession, prisons, government, universities and schools have all sought to understand and address sexual misconduct, including sexual harassment, occurring within their organisations (Armstrong et al. 2014; Tschan 2014; Paul 2015; Stinson et al. 2015). In most professional circumstances, sexual misconduct involves any verbal or physical interaction of a sexual or romantic nature between the professional and their client (Tschan 2014: 46-48; Harkreader 2015). These may include activities that may be thought of as 'consensual' between parties as even these occur within the context of a disparity in power inherent in professional relationships. Accordingly, these, too, are violations of professional boundaries and fiduciary duty (Tschan 2014: 47, 185). Professional sexual misconduct may also include activities that may or may not be *criminal* in

nature, but may never the less be subject to *civil* liability (Woodward 2009; Tinkler 2012; Tobin and Helge 2013). Professional sexual misconduct can also extend to unwanted interactions of a sexual nature between senior and more junior personnel. In such cases, there is a direct line of management placing the more junior staff member in a compromised position whereby it may be difficult for them to refuse, or report, sexualised behaviours (Wynen 2016). As such, literature addressing workplace and professional sexual misconduct has become multidisciplinary, drawing on law, psychology, sociology and management (McDonald, Charlesworth and Graham 2015).

### **Clergy Positional and Personal Power**

*Positional power*, as presented in the broader literature on sexual assault, exists in many forms. It exists in socio-cultural androcentricity (Kelly and Radford 1998: 63-64; Buchbinder and Eisikovits 2003: 361). It can also be found in community/social status (Koss 2000: 1338). Positional power is particularly evident in the professional classes and bodies within society such as military, financial, academic/educational, legal, medical/therapeutic and religious institutions (Rutter 1989; Peterson 1992; Marshall 2004: 1926). Clerical positional power is particularly founded on the institutionally ordained religious role and spiritual expertise of the cleric (Flynn 2003: 4, 19-20; Kennedy 2009: 51, 76, 95, 98, 117-18; Garland and Argueta 2010: 22). Particularly in the religious context, those seeking out such religious ministers also often reveal deeply intimate details about their lives (Marshall 2004: 1926; Tobin and Helge 2013: 159). As Foucault (1994) explains, the cleric has power in relation to the soul of the congregant and is charged with the responsibility of guiding that soul to salvation and absolving it of sin. Trust is the hallmark of such close, spiritual relationships (Marshall 2004: 1926). This trust is usually accompanied by admiration and respect, not just personally for the cleric, but for their role and their institution as well. It has been noted in literature that Roman Catholics are deeply enculturated into having such admiration and respect for clergy and their institutional Church (Doyle 2003: 219; Frawley-O'Dea 2004). An added source of professional/positional power lies in the fact that, through ordination, clerics gain access to the protection offered by that institution's power, prestige, wealth and 'brotherhood' in ways that the laity do not. This inequity is especially evident when victims seek to have their abuse dealt with legally (Fortune 1989; Rutter 1989; Peterson 1992; Shupe 1995; Ormerod and Ormerod 1995; Flynn 2003; Garland 2013; see also Royal Commission 2014b: Case Study 8 [John Ellis]; and McCarthy 2016). According to Provost (1992: 629-30), support for such inequity is also scaffolded with Canon Law.

Within the broader literature, *personal power* can also be seen in action in sexual misconduct and sexual assault. Personal power may manifest itself in physical strength (Kaslow et al. 1981; Wang 2011; French et al. 2014); in expertise and experience, including psychological power (Buchbinder and Eisikovits 2003; Bourke, Ward and Rose 2012); or, as in cases of incest, it may simply exist because of the older age of the perpetrator (Kaslow et al. 1981). In the context of CSMAA one could add to these the idealised personality and charisma of a cleric (Fortune 1989: 6; Benson 1994: 115; Flynn 2003: 159). Ultimately, personal clerical power is embedded in the overall ‘God-Factor’ of the cleric (Flynn 2003). Particularly pertinent for younger or student clerics, as well as Religious Sisters and Brothers, is the personal authority and spiritual directorship that their Religious Superiors have over them. These are individuals who are required to be ‘obeyed’ because they represent God (Byrne 2010: 21). As with lay people, this requirement can also be accompanied by a deep personal, psycho-spiritual desire to submit to the pre-eminence of the ‘Superior’ (Benson 1994; Flynn 2003; Benkert and Doyle 2009). Further complicating any possible power and vulnerability issues, this desire may also be entwined in personal–professional transference/counter-transference issues emanating from both individuals’ unresolved psychological histories (Celenza 1991: 216, 221; Schaeffer 1994; Benyei 1998: 70-72).

### **Adult Positional and Personal Vulnerability**

*Positional vulnerability* is not related to a person’s character, but is situational and only exists in juxtaposition with another’s positional power. Positional vulnerability in general may refer simply to being female in a male-dominated social structure (Kelly and Radford 1998). It may also relate to a person’s position in the family (Carlson, Maciol and Schneider 2006); work status (Kelly and Radford 1998); and/or their position in society, including class and race (Kelly and Radford 1998; Koss 2000). Positional vulnerability can also be in the context of sexuality (Kelly and Radford 1998; Wang 2011); or age (Carlson, Maciol and Schneider 2006), or by simply belonging to a marginalised or minority group. All these realities also exist within religious institutions. Within the RCC, simply being a lay person, especially female, is to be positionally vulnerable with reference to clerics (Flynn 2003: 161; Kennedy 2009: 98). Positional vulnerability also exists in clerical hierarchies. Religious Sisters and Brothers, or trainee clerics, are lower in status than the male priesthood which is upheld as the ultimate expression of following Christ. Subordination to one’s superiors, while being the expectation, also leaves the subordinate person very vulnerable (Byrne 2010: 21).



*Personal vulnerability* results from specific events or issues within a person's life. It may also be felt because one belongs to a marginalised or minority group. Personal vulnerability may overlap with positional vulnerability. In the broader context of sexual assault, personal vulnerability may include having a disability (Teaster 2002), one's sexuality (Kelly and Radford 1998; Brady 2008; Wang 2011), or one's age (Teaster 2002; Klufft 2010). However, personal vulnerability lies more so in the existence of significant personal life issues, such as grief, trauma, relationship issues, historical psycho-social issues, or spiritual conflict (Buchbinder and Eisikovits 2003; Marshall 2004).

The studies of Flynn (2003), Kennedy (2009), Garland and Argueta (2010) and Byrne (2010) all showed very clearly that victims of CSMAA were positionally vulnerable, but even more so, personally vulnerable at the time of their abuse. It is therefore crucial that adult vulnerability in the context of professional relationships be clearly defined and framed, and accurately positioned in any discussion of CSMAA. There is evidence that this is something that different jurisdictions within the RCC have considered, some more carefully than others. However, there is no consistency across the global RCC regarding dealing with CSMAA.

### **Framing CSMAA**

One of the key questions that needs to be asked about CSMAA is, 'what is the most balanced, compassionate and just framework for this phenomenon?' At present, two existing frameworks within the RCC are offering considerably different perceptions of and, therefore, responses to CSMAA. Those two frameworks are the 'vulnerable adult' approach and the 'power-abusing cleric' approach. These two approaches can be found in both official and private approaches to CSMAA, the two often conflicting with each other.

While inklings towards the 'power-abusing cleric' approach can be found in the National Committee for Professional Standards document, *Integrity in Ministry* (NCPS) (see NCPS 2010a: 5, 8), it is the 'vulnerable adult' approach adopted by Australia archdiocese and Religious Orders that dominates Australian RCC official policies. This approach is found, for example, within the Archdiocese of Brisbane's *Safeguarding Children and Vulnerable Adults: Prevention and Protection Policy*. This diocesan policy was one of the first written in the wake of the revelations of the current Royal Commission into Institutional Responses to Child Sexual Abuse (Royal Commission). In it, the following definition appears:

**Vulnerable Adults** Those aged 18 or over, who may be in need of community services due to age, illness or a mental or physical disability; or who may be unable to take care of him/herself or protect him/herself against significant harm or exploitation (AoB 2014: 6; 2016: 7).

In the 2015 *Policy for Safeguarding Children and Vulnerable Adults* (SJ 2015), this same definition was adopted by the Jesuit Religious Order in Australia (see SJ 2015: 20 n. 1). Most other Australian diocesan and archdiocesan sites have adopted a similar definition of adult vulnerability or they refer readers to the NCPS documents *Integrity in Ministry* (NCPS 2010a) and *Towards Healing* (NCPS 2010b), which have a slightly broader though still similar definition of adult vulnerability. Because of these documents' relativity to the Royal Commission, the underlying assumption of their definition of 'vulnerable adult' is that any person outside this definition should be able to protect him/herself against the significant harm or exploitation of clergy sexual misconduct. There is little if any further elaboration or discussion of adult abuse other than in this definition. Following the definition, the bulk of these Australian RCC policies centre on the protection of children from clergy sexual abuse.

The 'vulnerable adult' definition adopted by the Archdiocese of Brisbane's protection policy, and those influenced by it, is a borrowed one, originating in the UK Department of Health (2000: 8-9; see also Kennedy 2009: 15). Here the emphasis is on the vulnerability level or status of an adult as applied to much broader physical and economic exploitation, abuse and neglect, and in more specific contexts such as care facilities for the physically and intellectually disabled, the ill and the aged (Teaster 2002: 11-12, 21).

However, within the broader RCC, there also exists the 'power-abusing cleric' approach to CSMAA. An example of this approach can be found in the 2014 Maltese RCC's protection policy, *On Cases of Sexual Abuse in Pastoral Activity* (MEP 2014). This document states clearly that:

When a pastoral functionary engages in sexual contact or sexualised behaviour in a pastoral relationship, or in cases of an existing power imbalance, such behaviour is considered to be always abusive whether with or without consent (MEP 2014: 13-14).

This statement unequivocally acknowledges the inherent power of clergy and focusses on *their* actions rather than any vulnerability or otherwise of the other person. Reflecting the arguments of such as Celenza (2004) and Tschan (2014), the ability therefore of the other adult to 'protect' themselves against the sexual advances of clergy, or indeed even whether 'consent' existed or was possible, is secondary, if not rendered moot (Celenza 2004: 216; Tschan 2014: 185). It is because of the existence of an abusive, unprofessional cleric, not of a vulnerable adult, that CSMAA occurs (Kennedy 2009: 46).

Furthermore, the experiences of most of the adults included in this present study would fall within the framework of 'abusive' under the Maltese protection policy (MEP 2014). In contrast, most participants in

this study would be dismissed under Australian RCC protection policies or any similar Church or Religion policies: They simply do not qualify as 'vulnerable adults'. Accordingly, these women and men are prevented from constructing and making claims of victimisation. Focusing on the status of the victim, as opposed to framing CSMAA in the context of abusive or unprofessional behaviour, is one reason why CSMAA remains unaddressed within many ecclesiastical provinces within the RCC, and its impact on victims unattended. If Sipe's observations are correct (see Sipe 2012), what lies particularly at the heart of this failure is a mysterious and even mischievous ambivalence towards clergy sexual misconduct and its effects, and a lack of comprehension or acknowledgement of the power-vulnerability interplay inherent therein.

### **When Clergy Power and Adult Vulnerability Intersect**

It is evident that CSMAA is occurring, and at a greater rate than the sexual abuse of children (Sipe 1995; John Jay Report 2004: 258; Royal Commission 2017: 25270). Previous research suggests CSMAA occurs when clergy abuse the positional and personal power inherent in their ministry, to opportunistically exploit or to purposively target the positional and personal vulnerabilities of adults (Irons and Laaser 1994; Fones et al. 1999; Frawley-O'Dea 2004, 2007; Plante and Aldridge 2005; Celenza 2004). Power imbalances are omnipresent in professional sexual misconduct, including CSMAA. However, power imbalances are also to be expected. Positional power is a natural and important positive dynamic of professional services. It is a power expected of and ascribed to professionals, clergy included, by the client seeking the guidance or help of that professional (Russell 1993: 75-80). However, such power is only ever meant to be used as 'power-with' or for the client and never misused as 'power-over' them (Cooper-White 1991).

For some clerics, such power sharing may be felt as a threat to or minimisation of their status and role. According to Celenza (2004: 219) and Doyle (2006), this seems particularly true for those clerics prone to clericalism. Clericalism is 'the erroneous belief that clerics constitute an elite group and, because of their powers as sacramental ministers, they are superior to the laity' (Doyle 2006: 190). Such clericalism is often a continuation of personal psychological development issues into clerical life (Celenza 2004; Doyle 2006). These issues can find expression in clericalist and personal misogyny and homophobia, which some clergy act out through CSMAA. As expounded in Andrea Celenza's in-depth psychological study of misconducting priests, many clerics already feel 'castrated' by their vows of poverty, chastity and particularly obedience (see Celenza 2004: 225, 230), and any further yielding of power to the laity can make them feel very vulnerable and even powerless (Celenza

2004). Accordingly, such clergy then seek the opposite—they desire the laity to submit to them personally. One example she cites is of a minister stating that he became involved in CSMAA because it was his way to ‘simultaneously fuck God and fuck the Church’ (Celenza 2004: 230). Such unresolved personal psychological issues are not uncommon amongst clergy (see John Jay Report 2004: 49; see also Sipe 1994, 1995; Frawley-O’Dea 2004; Podles 2008: 93-94; Royal Commission 2017: 25273-25276). When such clergy are also given the positional power of the clerical profession or ministry, the chances of sexual misconduct occurring are greatly increased.

Lawyer, rabbi and ethics professor, Arthur Gross Schaeffer (1994), also describes and warns against another danger befalling the combining of personal psychological problems with positional professional power: When involved in counselling or spiritual direction, clergy with unresolved personal issues and distorted approaches to power may inappropriately respond to transference-based expressions of personal affection or upward role admiration from their client. For the cleric with unresolved psychological issues there may also be further complications through counter-transference emerging from their own personal issues (Celenza 1991: 216, 221; Benyei 1998: 70-72). Transference and counter-transference is not uncommon in therapeutic-type relationships. However, what needs to be remembered is that this dynamic is also occurring within the context of a steep imbalance of power. In such a context only one party, the less powerful one, is required to provide personal information. This dynamic is only ever meant to be engaged for the benefit of the client, so that the more powerful professional party can promote their client’s ‘growth, development, maturity, improved functioning, [and] improved coping with life’ (Rodgers 1961, cited in Rodgers 2011: 266). However, if transference/counter-transference issues exist, this power imbalance can precipitate abuse (Schaeffer 1994).

There is one more factor which often contributes to CSMAA—the *communal* nature of the clerical ministry. While clerics may be confessors, spiritual directors and counsellors with access to the most private elements of many people’s lives, they may also be personal friends, relatives, friends of the family, or youth workers with free and common access to their ‘clients’ (Ormerod and Ormerod 1995; Lytton 2008: 1; Parkinson 2013). Psychologist Gerardine Robinson, from the now defunct *Encompass Program* for troubled clergy explains:

They [clergy] are the only group of mental health professionals who can go into a home uninvited. I can’t. A GP can’t. Nobody else can. But when somebody dies or somebody divorces or there’s a tragedy in the family, they [clergy] can be in there within minutes (Royal Commission 2017: 25273).

Schaefer (1994), Kennedy (2009: 136) and Garland and Argueta (2010) explain clearly how for some clergy, this crossing over of roles can exacerbate transference issues and boundary blurring. For immature and unprofessional clerics who put the needs and rights of the other adult as secondary, these situations can and have resulted in CSMAA.

There are many contexts in which CSMAA occurs. However, what most have in common is the misuse of power to target and abuse the vulnerabilities of others. One of the only ways we know this is when the experiences of those 'others' are included in discourses and analyses of CSMAA.

### **Methodology**

Due to the lack of research on CSMAA, particularly that involving male adults, the approach of this study was primarily exploratory. The data presented here is part of a larger study (de Weger 2016). For this study, Death's (2013) survey tool, designed for survivors of child sexual abuse by clergy, was adapted for use with adults. Death's extensive survey tool was developed with survivors of childhood sexual abuse by clergy and considers family history, the abuse experiences, disclosure and reporting, as well as the effects of abuse. Only the first four questions regarding consent and age at the time of survey were compulsory. Questions were in both multiple choice and open comment form. Themes emerging in the qualitative data were coded, using NVivo 10. The intersecting of power and vulnerability in CSMAA was one of three main themes identified in the broader study, the other two being language and constructs of harm.

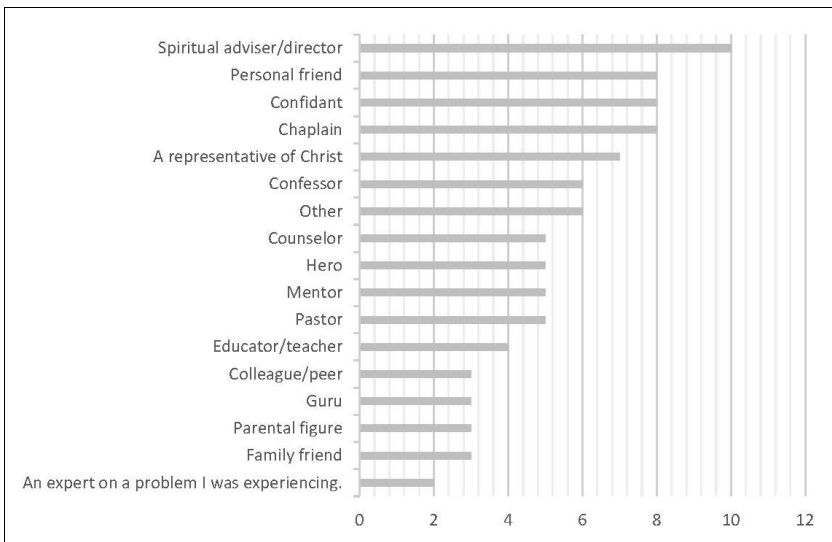
The study used a convenience sample due to the difficulty of identifying a random sample of the target population. Participants included women and men, both lay and Religious, who reported at least one experience of CSMAA. The survey was promoted using social media, and appeared on the webpages of two victim support groups—*Survivor Network of those Abused by Priests (SNAP Australia)*, *Living Well*, an Anglican-based support group for men—and an online discussion forum, *Catholica*. Most responses occurred following a survey-linked article about CSMAA published in an online Catholic magazine, *Eureka Street* (de Weger 2013). As this study involves a convenience sample, the findings are predominantly descriptive of that sample, rather than generalisable. This study also relied on participants having access to the internet to complete the survey and primarily gained access to victim/ survivors who maintained some contact with a RCC forum or a victim support agency. Ethical clearance for the study was obtained from Queensland University of Technology Ethics in Human Research Committee.

Twenty-three women and six men completed the questionnaire. The age of respondents ranged from 35 to 82. Sixty-nine percent of respondents were born in Australia, one identifying as Indigenous. Other respondents were born predominantly in Europe, these now living in Australia. Two women were born and live in the USA and another in South Africa. Participants have been given a pseudonym wherever their written responses are quoted. Identifying factors, such as location, have been removed to protect the confidentiality of participants.

## Findings

### Clerical Positional and Personal Power: Unlike other Professions

Participants were asked to identify the perceived role/s of the perpetrator of their CSMAA. Participants could identify multiple roles or provide their own definitions.



**Figure 1.** Perception/Role of Cleric at the time of CSMAA (n=25)

The role of the cleric as being a 'spiritual adviser/director' was foremost for 40% of participants (n=10), with related roles such as 'counsellor'; 'confessor', and 'representative of Christ' following closely. Most respondents selected more than one response, demonstrating the multiple roles of clergy in the lives of individuals (Kennedy 2009: 136). Participants such as Ann discussed this at some length:

He was the celebrant at the Folk Masses we had in the seventies at which I was the chief organiser, one of the guitarists, singer and announcer. I was also President of the [Church organisation] and he from time to time was part-time chaplain to the [Church organisation], including being the 'responsible adult' accompanying us on camps. Because of the grooming he became 'the family friend'. When I was 20 and he had visited the house often uninvited, Dad came home from work and said to my mother 'I would like to invite Fr T. to Ann's 21<sup>st</sup>'. My mother being the good Anglican said 'No I'm not having any priests'. Dad said 'I'm inviting him as the family friend, not as a priest'. Mum said 'oh ok'. So even adults and their fathers get groomed (*Ann*).

The merging of clerical roles and activities with other types of relationships, mostly unmonitored, is a crucial element in understanding CSMAA (Garland and Argueta 2010: 17-20). Unlike in other professional relationships, it is an added element that has facilitated sexual misconduct, as Ann's account shows.

For five of the respondents in this study, CSMAA occurred in the context of Religious Life. For those in Religious formation, theirs is a particularly subordinate relationship to the offender, not just psycho-spiritually but in their Religious status as well. Scott, Maria and James provide some examples:

He was a Brother Superior of the community and Novice Master and my spiritual guide. He controlled my life there (*Scott—postulant*);

She was the Mother Superior of the community in which I lived (*Maria—professed Religious Sister*);

Extremely powerful and highly respected within the order. I was in awe of him (*James—novice*).

For another respondent, Sarah, a Religious Sister in formation, her spiritual direction sessions with the Religious Order's chaplain were initially sessions of trust during which she revealed deep and personal elements in her life. However, as she says:

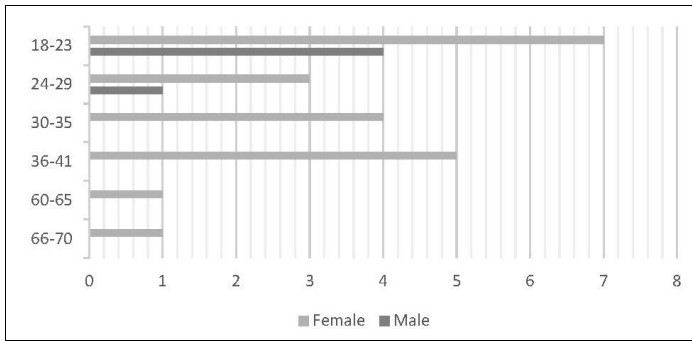
I trusted him with confidences, and only realised later that he was grooming me and waiting for his opportunity (*Sarah*).

In Sarah's account, it was not long before the 'spiritual direction' sessions became sexualised. Ultimately, Sarah left the Religious life.

### **Adult Positional and Personal Vulnerability: Under-acknowledged and Misunderstood**

Participants in this study, particularly male participants, were often young and single adults at the onset of CSMAA. The modal value for age at the time of CSMAA onset fell within the first (18 and 23) increment (Fig. 2). According to their own testimonies these participants had, at the time of

CSMAA, only tentative and naive understandings of their psychological, social, sexual and spiritual lives (Byrne 2010: 21, 26, 37, 56). As such, age is a key vulnerability in relation to the older clerics who perpetrated CSMAA (Doyle 2006: 208).



**Figure 2.** Age, in 5-year increments, at time of first experience of CSMAA (n=26)

The respondents who were younger at the time of CSMAA identified their vulnerability and how they were unable to recognise what was occurring. As such, their ability to ‘protect themselves from abuse or exploitation’ by older and more powerful clerics is highly questionable (AoB 2014: 6/2016: 7; NCPS 2010b: 5; SJ 2015: 20). Their self-descriptions clearly reveal how youthful naivety, and the related trust in and submission to clerical power, led to their being sexually abused:

I have come to realise how trusting and naive I was as a child/young adult and believed everything the Clergy and Religious said; I wish I hadn’t been so naive and trusting of Clergy and Religious (*Andy—20 years old when the CSMAA began*).

It was very confusing. He was a Brother of high standing and respect. I just trusted him but felt uncomfortable too (*James, 18 years old when the CSMAA began*).

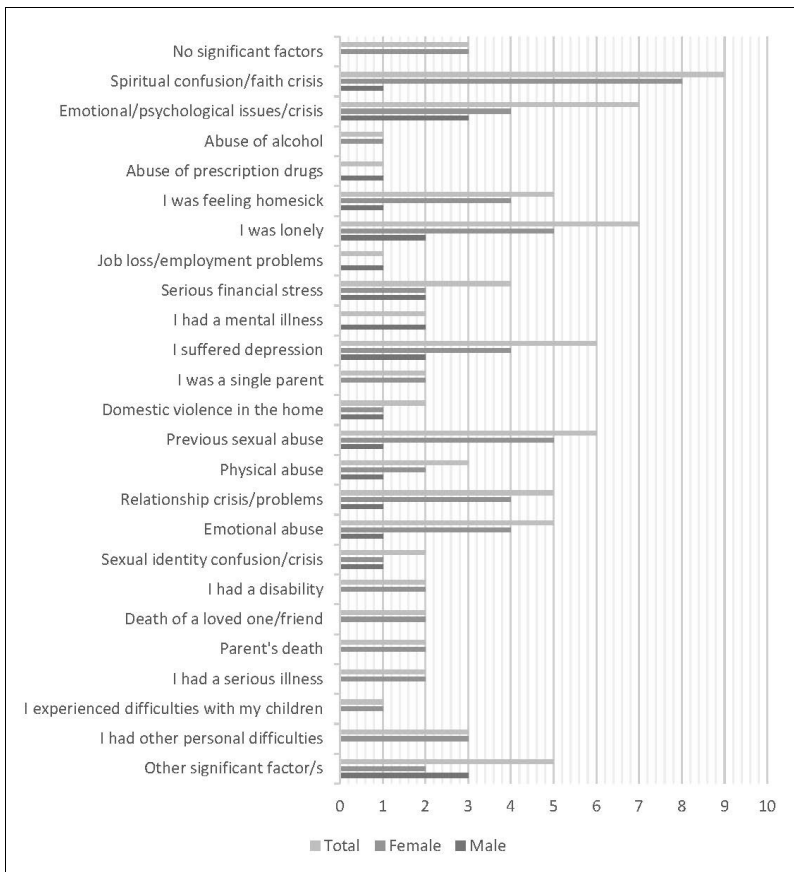
However, as Edith, 29 years old when the CSMAA began shows, such naivety, trust and submissiveness can still be present in older respondents:

I still can’t believe I was so naive that I was able to let this person get into my head and soul in the way that this person did (*Edith, 29 years old when the CSMAA began*).

In his observations of victims, Doyle (2006: 208), makes an important point: ‘These victims were almost universally devout, believing, and in most cases religiously naive Catholics’. Edith clearly articulates here and in all her written responses how both her positional and personal vulnerability intersecting with both the positional and personal power of the cleric enabled him to penetrate her very psyche.



In addition to age and naivety, most participants identified many other significant issues in their lives at the onset of CSMAA (Fig. 3). Inner-personal issues were by far the most frequently selected making up 76% of significant issues presented. The highest scoring personal significant issues were, in descending frequency, 'spiritual confusion/faith crisis', 45%; 'emotional/psychological factors/crisis', 35%; 'I was lonely', 35%; 'I suffered depression', 30%; and 'previous sexual abuse', 30%. Other issues included sexual identity issues; illnesses; alcohol and drug abuse; mental illnesses of varying degrees; and emotional and physical abuse in the home. While most of the significant issues were of this inner-personal kind, many were also inter-personal and/or practical in nature. Given the topic of this study, and their absence in official definitions of 'vulnerable adults', special attention has been given to two specific vulnerabilities—previous childhood abuse and spiritual or faith crises.



**Figure 3.** Significant issues at the time of CSMAA (n=23)

### Previous Childhood Abuse

Research shows a strong correlation between childhood abuse and re-victimisation at a later age (Chibnall, Wolf and Duckro 1998: 158; Cloitre, Cohen and Scarvalone 2002; Dong et al. 2003: 636; Classen, Palesh and Aggarwal 2005; Walker 2009: 86-87; Loeb et al. 2011; Chan 2011). When asked about significant issues at the onset of CSMAA, 26% (5 women and 1 man) selected childhood sexual abuse (see Fig. 3). However, when asked elsewhere, and more directly whether they had experienced childhood sexual abuse, 48% of participants (11 women and 2 men) reported such events. For example:

I was sexually abused as a child and it continued into adulthood but not at the hands of the same person/s although all clerics (*Maria*).

I think the first abuse did the damage. I was 9 when a newly ordained priest visited my grandma. He wanted to hear my confession. During the confession he took my hand and put it in his cassock pocket (a false pocket) and placed it on his erect penis. I kicked him and was told off by my grandma who wasn't aware of the happening (*Grace*).

Participants who reported childhood sexual abuse also reported a range of other comorbid concerns including relationship breakdown, spiritual confusion, poor mental health and confusion about their sexual identity. This is consistent with life outcomes reported by victims of childhood sexual abuse elsewhere and is recognised as contributing to the potential for revictimisation as adults (Chibnall, Wolf and Duckro 1998; Brady 2008: 364).

For the potentially abusive cleric, individuals with personal difficulties, engaging in help-seeking behaviours, searching for support, understanding and often love, are more readily manipulated (Flynn 2003; Fogler et al. 2008: 340-41; Garland and Argueta 2010). Cloitre, Cohen and Scarvalone (2002: 109) explain how boundary violations resulting from childhood sexual abuse can often result in later boundary confusion. Accordingly, some victims of childhood abuse may often suspend their own judgement and defer to the abuser's boundary violations, particularly when the abuser is a cleric (Garland and Argueta 2010). This occurs especially when that cleric adds confusing but often deeply appreciated proclamations of love and admiration for the victim and then defines these as proof of the 'rightness' of the 'relationship' (Garland and Argueta 2010). Tanya's story exemplifies this:

I was extremely confused. The priest was telling me this was 'love' and said I was 'beautiful'. I felt wonderful while he was there, because his definition of what was happening was dominant. But afterwards I felt awful, sinful, depressed, seriously bad and often suicidal (*Tanya*).

However, over time, Tanya, came to a more considered conclusion about her CSMAA:

I was depressed and frequently suicidal. In retrospect NONE OF IT WOULD HAVE HAPPENED except that HE INITIATED a sexual relationship. I can say for absolute certain that, if it was up to me at all, I would have followed my sense that he was celibate and out of bounds. I fell for his bull-shit because I was convinced he was truly holy (*Tanya*; emphasis hers).

Tanya is here articulating a central truth of CSMAA: while a history of childhood sexual abuse may increase vulnerability to adult sexual misconduct, as Kennedy (2009: 46) argues, having such a history ‘only increases risk/vulnerability to further abuse if there is a perpetrator who is prepared to take advantage of this’ (emphasis mine). In any professional misconduct, the responsibility for any interaction becoming sexualised is the professional’s/cleric’s (Kennedy 2009: 131; see also Schaefer 1994). This is now an accepted tenet in some RCC protection policies (e.g. MEP 2014) and one already generally accepted in secular codes of conduct for professions that work particularly with vulnerable people (Rutter 1989; Peterson 1992; Russell 1993; Tschan 2014).

### **Spiritual Confusion/Faith Crisis**

The majority of participants in this study, all but three, reported that they were seeking psycho-spiritual assistance in the context of their faith and saw the provision of such guidance as part of the role of the cleric (see Fig. 3). Eight women and one man (39%) reported experiencing a ‘spiritual/faith crisis’ at the onset of CSMAA. However, participants spoke clearly about the ways in which their pursuit of spiritual guidance was sexualised by the cleric. For example:

I had to agree to providing a body massage in order to receive forgiveness for my sins... (*Andy*).

I had to prove my physical sexuality to him so I could be a religious Brother with them (*James*).

Towards the end of the second meeting he asked me if he could reverence my breasts as he put it. He said that if I wasn’t comfortable, that was okay. I felt really weird about this because his very asking meant that it was a holy thing; I just felt exposed and quite embarrassed. I did what he had been encouraging me to do and that was to get out of my head and to trust because I had nothing to be embarrassed about in front of God and that this would only be another affirmation of how God saw me and loved and accepted me, so I let him... He didn’t tell me God wanted us to have sex. He made out that it was between God and me and that I was to detach from him and just look at God [during the sex]. He spiritualised the whole thing... He even said that when he offered Mass he would have me on the paten as he celebrated (*Edith*).

The paten is the sacred vessel which holds the bread which, according to Roman Catholic teaching, becomes the body of Christ during the Mass. As such, the abusive cleric was projecting a message to Edith that he, she and Christ were being transformed into one, a highly symbolic and given the context of abuse, highly deviant aberration of the meaning of the Eucharistic sacrifice.

Key manipulative and silencing strategies common in cases of sexual misconduct are evident in Edith's account of the way the abusive cleric constructed their relationship as very special and holy. Further, the abusive cleric convinced Edith that theirs was a relationship that others would not understand (McAlinden 2012). Edith clearly articulates how the abusive cleric in her case tried to ensure that his abuse would not be discovered or disclosed:

I believed I had been given some spiritual insight and I wanted to talk about it with others but he said that because of this special relationship with God other people would not understand its depth or significance and that therefore I should not tell anyone about what was happening (*Edith*).

For Edith, this priest, the 'provincial of his order', was a powerful-because-holy man of God. At her first meeting with him, Edith describes being in a very vulnerable state and she sought out the cleric believing he had the spiritual answers she desired. It is in this context of Edith's personal and positional vulnerability and the cleric's positional and personal power that sexual abuse occurred.

## **Discussion**

Participants in the study demonstrate what is known from the scant literature addressing CSMAA by clergy—that power and vulnerability are intrinsic to the perpetration of sexual misconduct (Garland and Argueta 2010; Kennedy 2009). Specifically, it is the combination of personal and positional vulnerability with personal and positional power that increases the risk of boundary violations. Most participants in this study were experiencing personal struggles at the onset of abuse and so were personally vulnerable. All participants were also positionally vulnerable in relation to the cleric as counsellor, spiritual guide and representative of Christ. In previous literature, the positional and professional power of clerics has in part been explained by clericalism. Such clericalist power is articulated as that which is exerted by clergy over lay people and more junior clergy, and as a power embedded in the privileging and idealisation of ordained clergy as 'holy', meaning 'set apart' by God (Shupe 1995; Doyle 2006). It is specifically in this idealisation of clergy as 'holy' that their ministry is usually perceived by Roman Catholics as different to those of experts in

other 'helping' professions (Flynn 2003). For Roman Catholics, clergy ministry and the power embedded within it, is perceived as being more 'divinely' based and energised (Doyle 2006: 194-95).

Unlike other helping professions, however, the position of clergy and the necessity of maintaining sexual boundaries in ministerial relationships has not been as well defined in literature (Garland and Argueta 2010). This may be in part because of assumptions, in the RCC at least, that any engagement in sexual misconduct was more a breach of vows taken by clergy and would be treated as such by the RCC, rather than being an abuse of power (Songy 2003; Garland 2013). It is evident from literature, and from participants in this study, that the diversity inherent in the role of clergy is part of what enables abuses to occur by providing access to vulnerable individuals in many varied contexts. This diversity of roles enables multiple positions of power for clergy, and vulnerability for potential victims, from which abuse and exploitation can be perpetrated. This is particularly a danger when the requirement of maintaining safe and respectful boundaries has become too difficult for clergy to manage because they themselves have unresolved personal issues making them ill-equipped to manage such boundaries in protective ways (Sipe 1995; Garland and Argueta 2010). Despite these complex realities, the responsibility for boundary maintenance remains with clerics and their institutional managers, as it remains with other professionals and their governing bodies (Benyei 1998: 155-66).

This research highlights that sexual misconduct by clergy follows similar patterns of sexual violations perpetrated by professionals. Specifically, the perpetration of this form of abuse involves victim targeting, manipulation of vulnerabilities, relies on the abuse of power, involves grooming behaviours and also cognitive distortions utilised by perpetrators, as strategies to gain access to adult victims and maintain their loyalty and silence. The significant difference in the case of clergy sexual misconduct is that often these strategies involve not only the manipulation of a victim's vulnerabilities, but manipulation of their spirituality as well (Sipe 1995). It has also been noted that these strategies are rooted in clericalism and are common in the perpetration of both child and adult sexual abuse by RCC clergy (Doyle 2006; Keenan 2012). Clericalism has also meant that ultimately there has been an institutional tolerance for sexual misconduct and the protection of perpetrators. What the literature on clericalism and professional sexual misconduct has taught us is that in comparison to other professional bodies the RCC has not yet fully, officially or culturally, accepted a framework for CSMAA that begins with the behaviour of the power-abusing cleric/professional, instead of with the status or behaviour of a vulnerable adult. This non-acceptance enables the RCC to avoid

openly and justly taking responsibility for the sexual misconduct of its clergy and for the effects of that misconduct in the lives of victims of CSMAA. Furthermore, it results in the covering-up and continuance of CSMAA (Keenan 2012). Whilst the issue of clergy-perpetrated child sexual abuse continues to be of concern in many jurisdictions, the sexual abuse of adults remains a further challenge for the RCC to address (Garland and Argueta 2010).

### Conclusion

This paper has demonstrated that CSMAA is an issue of significance for the RCC and exists in the same culture of power and vulnerability that enabled clergy-perpetrated child sexual abuse. CSMAA is a betrayal of the trust on which clergy ministry is built. This trust is evidenced in participants' constructions of clergy as professionals from whom they sought help when needed, placing deep faith in their capacity, willingness, and integrity as helping professionals and representatives of God. The violation of this trust has significant consequences of undermining victim's spiritual, emotional and physical well-being. This article builds on the small body of literature that addresses CSMAA and centralises survivor's voices in the process. The outcomes of CSMAA are worthy of further research in order to continue to challenge systems and individuals that enable CSMAA, and also to build meaningful support networks for survivors.

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