From Silence to Sanction: The Evolution of Canon Law in Addressing Sexual Abuse of Minors and Vulnerable Adults

Kingsley Ifeanyichukwu Eze (Dr in View)

Faculty of Canon Law, Catholic Institute Of West Africa (CIWA), Port Harcourt, Nigeria

DOI: https://doi.org/10.68050/JAMS.2026.964

Received: 12 Nov 2026; Accepted: 13 Nov 2026; Published: 14 November 2026

ABSTRACT

The Catholic Church's Canonical response to sexual abuse of minors and vulnerable adults has traversed a painful arc from institutional silence to legislated sanction. This article traces that evolution for medieval canonical tradition for Gratian's *Decretum* and the Lateran Councils through the 1917 and 1983 codes of Canon Law, the landmark reservation of *delicta graviora* under *Sacramentorum Sanctitatis Tutela* (SST 2001, revised 2021), the architectural design of Canon 1398 by *Pascite Gregem Dei* (2001), the procedural guidance of the Dicastery for the Doctrine of the Faith's *Vademecum* (2022), and the institutional accountability framework of *Vos Esti Lux Mundi* (VELM 2023). Drawing on the empirical research of Anthony Dozie Eze on Umuahia Diocese, Nigeria, the canonical scholarship of African theologians including Bénézet Bukola and Agbonkhianmeghe Orabator, and sociological literature, the article argues that the canonical framework is not historically comprehensive, but its effectiveness depends on particular churches, implementing it with institutional courage. The Nigerian ecclesial context, present specific cultural and structural impediments, including the culture of silence, rooted in Igbo social dynamics, economic dependency, and the absence of adequate diocesan safeguarding infrastructure. The article concludes by proposing concrete canonical and pastoral measures grounded in specific provisions of revised code, and the most recent magisterial instruments.

Keywords: Canon 1398, *Sacramentorum Sanctitatis Tutela*, *Vos Esti Lux Mundi*, Sexual abuse of Minors, Vulnerable adults, Episcopal accountability, Canonical reform, Nigerian Church, Clericalism, *Umuada*

1. INTRODUCTION: THE CANONICAL CRISIS IN CONTEXT

The Canonical history of the Catholic Church's response to the abuse of minors and vulnerable adults is, at its heart, a history of institutional conscience slowly and often painfully awakened to a crisis. It had long preferred to manage in silence. For centuries, the gravest violations of Pastoral trust, were absorbed into internal penitential processes, treated as moral failings requiring spiritual correction, rather than as crimes requiring prosecution, or resolved through the quiet reassignment of the offending cleric to another community. The canonical apparatus existed in principle; what is consistently lacked was both the definitional precision and the Institutions will be required to apply it transparently and effectively. The human cost of that gap has been immense.

I write this article as a Nigerian canonist who has served directly in the office of safeguarding minors and vulnerable adults within a diocesan context, and I am conscious throughout that the legislative history traced in these pages is not an academic chronicle of administrative amendments. It is the story of the church arriving, belatedly and under pressure, as a canonical framework and equal to the gravity of the offense and the dignity of those harmed by it. In the African ecclesial context, I know from Pastoral experience that a story is still very much in progress. The canonical framework has arrived; the implementation has not.

This article traces the evolution of Canon law in addressing the sexual abuse of minors and vulnerable adults from the patristic era and medieval canonical tradition, through the 1917 and 1983 codes, the crisis-driven reforms of SST 2001 and its 2021 revision, the design of Canon 1398 by *pascite Gregem Dei* (2021), the Dicastery for the Doctrine of Faith (DDF) *Vademecum* (2022), and the institutional accountability architecture of VELM 2023. I ground the Canonical analysis in Anthony Dozie Eze's empirical doctoral research on

Umuahia Diocese and engage the emerging body of African Canonical and theological scholarship that studying these questions in African ecclesial contexts demands.

The arguments I advance are threefold. First, the church's canonical response to sexual abuse has moved, in a discernible if painful arc, from institutional silence to incremental regulation to a framework of genuine sanction that acknowledges the criminality of the offence and the institutional complicity that enabled it. Second, the adequacy of this framework depends not on legislative quality alone, but on the institutional will of particular churches to implement it with fidelity, courage, and victim-centered commitment. Third, the Nigerian ecclesial context presents specific cultural, and institutional challenges to implementation that required both Canonical creativity, specifically the engagement of indigenous Igbo accountability, structures, and sustained pastoral wisdom, rooted in African theological and reflection.

II. CANONICAL PREHISTORY: FROM THE PASTRISTIC ERA THROUGH GRATIAN, THE LATERAN COUNCILS, AND THE 1917 CODE

The Canonical tradition was never without resources for addressing clerical sexual misconduct. The claim that the church had no relevant law on the twentieth century is a historical misconception that obscures, a rich, if imperfectly activated, normative tradition. Understanding that tradition is necessary for evaluating the significance of the reforms introduced after 2001.

Henry Chadwick, in his study of the early church, observes that Clement of Rome's emphasis on ecclesiastical order reflected "an early recognition that church authority must be exercised with moral integrity and pastoral care."[1] Tertullian, writing in *De Pudicitia*, stated with characteristic directness: "The sins of those who hold ecclesiastical authority wound not only their own souls by the entire body of the church."[2] Thomas Doyle's extensive historical survey documents that early counciliar legislation, including the councils of Elvira (c. 306 Ad), prescribed severe penalties for guilty of sexual offenses, including permanent exclusion from communion.[3] These Patristic foundations established the theological conviction that clerical sexual misconduct is not merely personal sin but ecclesial wound, a conviction that required nearly two millennia to receive adequate Canonical expression.

The decisive canonization of these patristic norms occurred with Gratian's *Decretum* (c. 1140), the foundational text of the classical canonical tradition and the organizing centre of the *corpus luris Canonici* that governed the Latin Church until 1917. Causa 15 of the *Decretum* treated clerical, sexual misconduct at length, assembling patristic, counciliar, and papal texts that condemned sexual violations by clergy and prescribed penalties including loss of office, degradation from orders, and monastic penance.[4] Gratian's achievement was not original legislation, but systematic synthesis: by organizing the scattered canonical tradition into a coherent, juridical framework, he established a normative infrastructure within which all subsequent medieval canonical development operated. The canonical tradition after Gratian possessed in principle, the instrument to address clerical sexual abuse; the question was always whether those instruments would be applied.

The twelfth and thirteenth centuries saw this tradition strengthened through the reforming councils of the Lateran. The third Lateran council (1179), Canon 11, addressed clerical incontinence with explicit reference to dishonor brought upon the church's Ministry, prescribing loss of office and ecclesiastical benefice for guilty of specified sexual violations.[5] The Fourth Lateran Council (1215), Canon 14, required bishops to conduct regular visitations of their clergy and to address moral delinquency without delay, establishing an oversight mechanism for clerical discipline that anticipated in structure, if not in specific application, the Episcopal

[1] Henry Chadwick, The Early Church (London: Penguin Books, 1967), 42.

[2] Tertullian, De Pudicitia 1.6, in Ante-Nicene Fathers, vol. 4, ed. Alexander Robert's and James Donaldson (Edinburgh: T& TClark, 1885), 74.

[3] Thomas P. Doyle, "A Very Short History of Clergy Sexual Abuse in the Catholic Church," 8.

[4] Gratian, Decretum, Causa 15, Q. 1, in Corpus luris Canonici, ed. Emil Friedberg, vol. 1 (Leipzig: Tauchnitz, 1879), cold. 745–753.

[5] Third Lateran Council (1179), Canon 11, in Decrees of the Ecumenical Councils, ed. Norman Tanner, vol 1 (Washington, DC: Georgetown University Press,1990), 217.

accountability framework of the modern era.[6] The council of Trent's Session 25 (1563), in its degree on reformation, reinforced the obligation of bishops to investigate and punish clerical, sexual misconduct and re-established the authority of provincial councils as mechanisms of collective ecclesiastical discipline.[7]

The promulgation of the 1917 *codex luris Canonici* represented the church's first systematic codification of penal norms in the modern era. Canon 2359 §2 addressed clerical, sexual offenses, prescribing serious penalties, up to and including dismissal from the clerical state, for clerics guilty of violations, involving force, threats, fraud, or persons under their care. Kevin Schembri's careful analysis documents how the 1917 code, while containing relevant provisions, the definition specificity on the mandatory enforcement mechanisms, necessary to address, systematic abuse, leaving key terms inconsistently defined, and penalities largely at Episcopal discretion.[8]

The 1922 instruction *Cremen Sollicitationsis*, issued by the holy office and re-issued without substantive change in 1962, addressed the gravest clerical offenses systematically. Its confidentiality, provisions, imposed under the *secretum pontificium,* have been the subject of significant historiographical controversy. Thomas Doyle has argued that these provisions were misinterpreted by generations of bishops to mandate active concealment from civil authorities.[9] This interpretation, however, is contested. Ladislas Orsy and other Canonical historians have argued, with greater precision, that the document's confidentiality requirement, were standard canonical procedural norms consistent with the protection of the right of the accused and the integrity of canonical investigations, and that they neither required nor were intended to mandate concealment from civil law enforcement.[10] On this reading, cover-up patterns documented in the crisis of the early twenty-first century were produced primarily by institutional culture and episcopal failures of nerve rather than by the legal text of *Crimen Sollicitationis* itself. This historiographical distinction matters: It locates the primary deficit in the will and practice of institutional actors rather than in the Canonical Law, a diagnosis that points toward the need for accountability mechanism rather than merely better-worded prohibitions.

III. THE 1983 CODE OF CANON LAW: A FRAMEWORK INADEQUATE TO THE SCALE OF THE CRIME

The revised *codex luris Canonici* of 1983 was a significant canonical achievement in many respects, but its treatment of clerical sexual offenses embodied the limitations of its era and the persistent institutional tendency to subsume the sexual abuse of minors on the general category of clerical, moral failing, rather than recognizing it as a distinct and gravely harmful crime requiring specific, severe, and consistently mandatory institutional response.

Canon 1395 §2 of the 1983 code addressed clerical, sexual offenses, prescribing "just penalties, not excluding dismissal from the clerical state, if the case so warrants" for a cleric who committed an offense against the sixth commandments with a minor below sixteen years of age. Several futures of this provision reveal its inadequacy. First, the age threshold of sixteen was inconsistent with the developing international consensus, reflecting in the United Nations convention on the rights of the child (1989), that a minor is any person below eighteen years of age. Second, the phrase "if the case so warrants" left the imposition of the most serious available, penalty, dismissal from the clerical states, entirely to Episcopal discretion without external review, mandatory timelines, or accountability to any higher authority. As Edward peters observes, the inclusion of dismissal as a possible penalty reflected "the church's acknowledgment that some offenses are so grave as to

[6] Fourth Lateran Council (1215), Canon 14, in Tanner, Decrees of the Ecumenical Councils, 1:240.

[7] Council of Trent, Session 25, Decree on Reformation Chapters 14–15 (1563), in Tanner, Decrees of the Ecumenical Councils, 2:790–791.

[8] Kevin Schembri, "The Evolution of Canonical Norms on Sexual Abuse in the Catholic Church: From 1917 to 2022," Academia.edu, accessed May 2026, https://www.academia.edu/81577783.

[9] Thomas P. Doyle, "A Very Short History of Clergy Sexual Abuse in the Catholic Church," 8.

[10] Ladislas Orsy, Receiving the Council: Theological and Canonical Insights and Debates (CollegeVille: Liturgical Press, 2009), 112–115. For a careful canonical analysis of the document's text, see also John P. Beal, "The 'Scandal' of Sexual Abuse of minors: A Historical perspective," The jurist 62, no. 1, (2002): 93–97.

render a cleric unsuitable for ministry."[11] But the wholly discretionary character of the provision meant that this acknowledgment remained theoretical in many diocesan contexts.

It should be noted that Canon 99 of the 1983 code, which equated persons who habitually lack the use of reason with minors for canonical purposes, provided a foundation for the later expansion of the category of protected persons under SST 2021. This continuity is significant: the canonical tradition was not wholly without the source for protecting cognitively, vulnerable adults; SST 2021 built up and systematized a protection that the 1983 code had already recognized in principle.

The John Jay college of criminal justice's landmark 2004 report documented with empirical precision, how the discretionary framework of Canon 1935 §2 operated in practice, identifying "widespread patterns of bishops, transferring accused priests to new parishes, a practice enabled by a closed clerical system that operated with minimal transparency or lay oversight."[12] James F. Keenan's trenchant critique identifies the moral logic at work: "the failure to practice cardinal Justice, to render the victims what was their due, was masked under a false notion of mercy for the offender, which ultimately betrayed both the offender and the victim."[13] Donald Cozzens, in a foundational analysis of the clerical culture that enabled these failures, argued that the institutional environment could foster "an immaturity, and a sense of entitlement that is toxic,"[14] while Marie Fortune, drawing on comparative analysis across religious traditions, identify the structural root of the problem in a form of institutional design that made clerical leaders "accountable only to God and their hierarchical superiors, and not to the community they serve."[15] The 1983 code reproduced precisely this accountability deficit. It would take a global crisis to compel a different institutional choice.

IV. CRISIS AS CATALYST: THE 2002 REVELATIONS AND SACRAMENTORUM SANCTITATIS TUTELA

The year 2002 represent a definitive, turning point in the canonical history of clerical sexual abuse. The Boston Globe investigations exposed the systematic concealment of abuse by the Archdiocese of Boston with a specificity that made further institutional denial impossible. Doyle's historical analysis establishes that "the 2000 Boston Globe investigations marked a turning point" in the church's recognition that abuse was not a matter of isolated moral failures both of systemic, institutional complicity, patterns of reassignment and concealment that spanned parishes, dioceses, and decades.[16]

Pope John Paul II had already, in 2001, promulgated the landmark *Sacramentorum Sanctitatis Tutela* (SST), which, for the first time reserved the gravest clerical offenses, including the sexual abuse of minors, to the exclusive competence of the congregation for the doctrine of the faith. Cardinal Joseph Ratzinger, then Perfect of the congregation, articulated the rationale directly: the reservation reflected "both their gravity and the need for consistent application of canonical norms across the universal church."[17] This was a categorical shift from the discretionary Episcopal framework of the 1983 code toward a centralized juridical architecture with mandatory referral, a shift that introduced both greater consistency and greater accountability.

SST 2001 defined the canonical category of *delicta graviora* (more grave delicts). Among these, the sexual abuse of a minor by a cleric was classified among the most serious canonical crimes. Davide Cito's analysis of the evolution of the *delicta graviora* Laws traces the progressive acknowledgment that certain clerical offenses were not merely pastoral problems requiring internal correction, but crimes requiring prosecution and in the

[11] Edward N. Peters, in John P. Beal, James A. Coriden, and Thomas J. Green, eds., New Commentary on The Code of Canon Law (New York: Paulist Press, 2000), 1590.
[12] John Jay College of Criminal Justice, The nature and Scope of the Problem of Sexual Abuse of Minor's by Catholic Priests and Deacons in the United States, 1959–2002 (Washington, DC: United States Conference of Catholic Bishops, 2004), 42.
[13] James F. Keenan, S.J., A History of Catholic Moral Theology in the Twentieth Century (London: Continuum, 2010), 211.
[14] Donald Cozzens, The Changing Face of the Priesthood (Collegeville: Liturgical Press, 2000), 87.
[15] Marie M. Fortune, Is Nothing Scared? When Sex Invaded the Pastoral Relationship (San Francisco: HarperSanFracisco, 1989), 73.
[16] Thomas P. Doyle, "A Very Short History of Clergy Sexual Abuse in the Catholic Church," 8.
[17] Cardinal Joseph Ratzinger, "Prefect's Address to US Bishops," Origins 32, no. 7 (2002): 106.

gravest cases, permanent removal of the offender from the clerical state.[18] The 2010 revision of SST substantially stretching the framework, extending the prescription to twenty years from the victim's eighteenth birthday, raising the age of the canonical minor victim to eighteen, and clarifying procedural norms for canonical trials. The architecture of sanction was taking shape, though the implementation gap remained significant.

V. CANON 1398 OF THE REVISED CODE: A NEW CANONICAL ARCHITECTURE AND THE DDF *VADEMECUM* (2022)

The reform of Book VI of the Code of Canon Law, promulgated through the apostolic Constitution *Pascite Gregem Dei* in 2021, redesigned the entire architecture of the church's penal law, calibrating it for consistency, proportionality, and the effective protection of vulnerable persons. At its centre, for this article, stands the revised Canon 1398, which constitutes the primary codified expression of the church's canonical response to clerical sexual abuse.

Plus Kii, whose research on clerical abuse in the Nigerian context emphasises the full weight of these crimes, rightly insists that the abuse crisis "is considered the worst in the Catholic Church in contemporary times; it inflicts untold damage to the normal healthy sexual development, self-esteem, and human dignity of the child victim."[19] it is against this pastoral reality, and not merely as legal analysis, that the canonical architecture of Canon 1398 must be assessed.

Canon 1398 §1 specifies three distinct delicts: first, a cleric, who commits a delict against the sixth commandment with a minor, a person who habitually has an imperfect use of reason, or a person to whom the law recognizes equal protection, is subject to obligatory penalties, not excluding dismissal from the clerical state; second, cleric who induces or recruit such a person for pornographic purposes, commits an equivalent, canonical crime; third, a cleric who acquires, retains, exhibits, or distribute pornographic images of minors face the same mandatory penal regime. As Edward Peter observes in his commentary, "the inclusion of the dismissal from the clerical state as a possible penalty demonstrates the church's acknowledgment that some offenses are so grave as to render cleric on unsuitable for ministry."[20]

Two features of the revised text deserve particular emphasis here. First, the extension of penal liability under canon 1398 §2 beyond ordained cleric to all persons exercising church functions reflects a recognition that abuse can be perpetrated not only by ordained ministers but by anyone exercising institutional authority within ecclesial structures. In the Nigerian context, were lay catechists, teachers in Catholic school, and other pastoral workers exercise significant authority over young people in contexts frequently removed from clerical supervision, this extension has direct pastoral significance. Second, the integrated reading of Canon 1398 §1 with Canon 1395 §3, added by the 2021 revision, substantially expands the Canonical net: canon 1395 §1, addresses the use of force, threats, or abuse of authority to commit offenses against the sixth Commandments, even against an adult, triggering penalties that include dismissal from the clerical state. In the African ecclesial context, where the power asymmetries between clergy and the faithful amplified by economic dependency and cultural deference, Canon 1395 §3 is among the most pastorally significant additions to the revised code.

SST 2021 must be read together with Canon 1398 as components of an integrated canonical system. Article 6 §2 of SST 2021 defines the three victim categories; article 7, establishes the twenty-year prescription running from the victim's eighteenth birthday in cases of childhood abuse, reflecting the legislative recognition that victims frequently require years before they are psychologically able to disclose; article 8, grants the DDF the explicit faculty to derogate from this prescription in individual cases, a provision of Cardinal importance in the Nigerian context where the culture of silence documented in empirical research means that many historical cases may emerge only decades after the abuse occurred.

[18] David's Cito, "The New Delicta Graviora Laws," Ave Maria International Law Journal 1, no. 1 (2011): 92–95.
[19] Plus Kii, quoted in Anthony Dozie Eze, "Sexual Abuse of Minors and Vulnerable Adults by the Clergy in Umuahia Diocese, Nigeria" (PhD diss., Catholic Institute of West Africa, 2026), 9. The Eze thesis draws on Kii's unpublished diocesan report.
[20] Peters, in Beal, Coriden, and Green, New Commentary, 1590.

An essential procedural companion to the reformed canonical framework, which the canonical literature has been slow to engage, is the DDF *Vademecum* on certain points of procedure in treating cases of sexual abuse of minors committed by clerics, published in its second edition in 2022.[21] The *Vademecum* provides step-by-step Procedural guidance through the canonical process from the initial report through the preliminary investigation, referral to the DDF, trial or administrative process, and execution of penalties. Its significance lies precisely in its translation of canonical provisions into practical procedure steps accessible to diocesan canonical officers without specialist training in Penal procedure. For bishops in Nigerian dioceses, many of whom do not have canonists with specialized expertise in *delicta graviora* proceedings, the *Vademecum* is not merely a technical resource, but a pastoral and institutional obligation: the failure to implement the procedural steps, it describes itself constitutes the gross negligence addressed by *Comme une mère aimante* and VELM 2023. The Dicastery for Legislative Texts' 2023 user guide on penal sanctions, which provides complementary guidance on the application of Book VI more broadly, should be read alongside the *Vademecum* as part of the practical canonical library of every diocesan bishop.[22]

Ezeogu Anthony states that episcopal obligation with admirable directness: "The diocesan bishop must not be an arbiter of convenience but a minister of justice, initiating a preliminary investigation upon receiving even a semblance of truth in an allegation."[23] He further insists that "the prescription for penal action must be interpreted in favor of the victim when there is evidence of delayed reporting due to trauma or intimidation." These are the minimum demands that the integrated canonical framework of 2021 to 2022 places upon every diocesan bishop. In the Nigerian context, where I have seen at first time the damage done when these demands are not met, the non-negotiable character cannot be overstated.

VI. *VOS ESTIS LUX MUNDI* (2019/2023) AND THE ARCHITECTURE OF EPISCOPAL ACCOUNTABILITY

The promulgation of *Vos Estis Lux Mundi* (VELM), first issued on 7 May 2019 and finalize in its comprehensive 2023 edition, represents canonical development qualitatively different from SST or the reform of Canon 1398. Where those instruments primarily addressed the offense and it's penalization, VELM addresses the institutional culture that enable the offense to go unpunished. It is, in the most precise, canonical sense, a response, not only to the crime of abuse, but to the crime of institutional cover-up.

VELM create, for the first time in universal law, mandatory reporting mechanisms applicable to all members of the clergy and religious who receive a possessive information about abuse. It establishes explicit protections for whistleblowers, prohibiting retaliation against those who report credible allegations. VELM articles 3 to 5 create canonical, accountability for bishops and religious superiors who act or omit to act in a manner that results in the discontinuation or obstruction of civil or canonical investigations. Myriam Wijlens observes that VELM "create a culture of accountability that extends beyond individual perpetrators to include institutional responsibility,"[24] and Nicholas Cafardi has identified the introduction of mandatory reporting mechanisms as representing "an increased commitment to transparency" within the universal law of the church.[25]

Pope Francis's apostolic letter *Comme une mère aimante* (2016) completed the accountability chain by establishing a specific procedure by which a bishop may be removed from office on account of grave

[21] Dicastry for the Doctrine of the Faith, Vademecum on Certain Points of Procedure in Treating Cases of Sexual Abuse of Minors Committed by Clerics, 2nd ed. (Vatican City: DDF, 2022).
[22] Dicastry for Legislative Texts, Penal Sanctions in the Church: User Guide for Book VI of the Code of Canon Law (Vatican City,2023), https://www.delegumtextibus.va/content/dam/testilegislativi/TEST%20NORMATIVI/Testi%20Norm%20CIC/Libro%20VI/LibroVI sussidio/Penal%20sanctions%20User%20guide.pdf.
[23] Ezeogu Anthony, The Canonical Process in Clerical Penal Matters (Port Harcourt: CIWA Publications,2018), 45,112.
[24] Myriam Wijlens, "Accountability in the Church: A legal Perspective," The Jurist 79, no. 1 (2019): 189.
[25] Nicholas P. Cafardi, Before Dallas: The U. S. Bishops' Response to Clergy Sexual Abuse of Children (New York: Paulist Press, 2008), 267.

negligence in cases of sexual abuse.[26] Article 2 specifies that the negligence warrantying removal occurs when the bishop has "negligently failed to perform or has performed in a gravely deficient manner the acts of oversight and governance" in relation to cases of clerical abuse. This provision causes the most significant structural loophole in the pre-2016 canonical framework: it established that institutional cover-up but a negligent bishop is itself economical ground for removal from office. Read together with VELM 2023 article 3 to 5 and article 7, which assigns investigative responsibility for Episcopal negligence to the Metropolitan, these provisions complete the chain of accountability from the offending cleric to the negligence bishop to the Metropolitan superior. No single instrument is sufficient alone; together they constitute a robust canonical architecture.

Domy Thomas, in his textual commentary on VELM, observes that the document's mandatory reporting requirements and its protection of those who report represent "a genuine power Paradigm shift, in how the church understands institutional accountability," a shift from a model, where accountability flowed exclusively upward through hierarchical obedience to one where it flows outward to the faithful whose protection the hierarchy exist to serve.[27] This paradigm shift is particularly significant in African Ecclesial contexts, where hierarchical models of authority, reinforced by indigenous, cultural patterns of deference to elders and religious leaders, have historically made lateral and downward accountability mechanisms difficult to establish.

VII. THE NIGERIAN PASTORAL CONTEXT: UMUAHIA DIOCESE AS A CASE STUDY

I turn now to the pastoral context in which I have myself encountered these canonical questions not as theoretical prepositions, but as lived realities. The doctoral research of Anthony Dozie Eze on Umuahia Diocese, Nigeria, provides the most detailed empirical study of clerical sexual abuse within an Igbo diocesan context available, and I draw on it here as a primary case study, though not without the methodological caveats that responsible engagement with empirical research requires.

Umuahia Diocese was erected on 23 June 1958, spanning a land mass of 2460. 40 square kilometers across six Local Government Areas of Abia State. By 2024 it counted to 222 diocesan priests, a catholic population of 200, 153, and 77 parishes organized under eight deanaries. The empirical fieldwork conducted between October and December 2025 distributed 650 questionnaires across ten selected Paris, which 513 copies (78.92%) were returned and used in analysis. The 21.08% non-return rate introduces a limitation that must be acknowledged; self-selection bias in a study of sensitive topics such as clerical misconduct may mean that those with stronger opinions, or more direct experience of abuse were more likely to complete and return the questionnaire. The findings are therefore indicative and directional rather than definitive.

With that methodological caveat noted, the indicative findings are nonetheless striking. More than 81% of respondents agreed that some priests engage in sexual abuse within Umuahia Diocese. Nearly 90% agreed that many cases go unreported due to fear, shame, or lack of awareness. More than 87% agreed that accountability mechanisms within the diocese are insufficient. More than 92% agreed that mandatory reporting, rigorous background checks, accessible, mental health services, and comprehensive educational programmes would create safer environments. These figures do not establish statistical certainty about the prevalence of abuse; they do establish, with reasonable indicative force, that the faithful of Umuahia Diocese perceive, a serious problem that they believe is being inadequately addressed.

The pastoral cases that motivated the research are instructive beyond their individual particulars. A well-respected priest in the Umuahia area, accused by multiple victims of sexual violations, including rape and pornography, was investigated by the diocesan safeguarding office, found guilty, following canonical process,

[26] Pope Francis, Comme une mére aimante (As a Loving Mother), Apostolic Letter issued motu proprio, 4 June 2016, AAS 108 (2016): 715–717.

[27] Domy Thomas, MSFS, "Vos Estis Lux Mumsi: Text and Commentary, part I," December 2019, https://dvkjournals.in/index.php/iu/article/download/3079/2914/6438, 4.

laicized, and referred to civil courts. A priest in Owerri ecclesiastical province was found guilty, following investigation, of homosexual abuse with minors and vulnerable adults across multiple parish assignments and was eventually laicized. I note these cases not to be sensational, but to make a specific canonical point: both cases demonstrate that when a diocesan bishop initiates a preliminary investigation on the canon 1717 with genuine, institutional will, acts without institutional deference to the accuse cleric, and activates the referral mechanisms of SST 2021, canonical machinery, does produce outcomes. The deficit, in both cases and in the broader Nigerian pattern, lies not in the law, but in the conditions required to activate it: An active safeguarding office, Episcopal courage, and victims willing to come forward despite immense cultural and social pressure.

Anthony Akinwale has observed that "traditional African societies' tendency to prioritize, family, and institutional reputation has contributed to the separation of abuse cases."[28] In Umuahia Diocese this cultural pattern intersects with the structural reality of catholic institutional power: many families depend on the church for education, healthcare, and economic support in ways that render reporting not merely emotionally, costly but material risky. The empirical with such documents that victims and their families often "remain silence out of fear of losing vital support" provided through Church-controlled schools, hospitals, and social services, a coercive dependency that canonical provisions on vulnerable persons under SST 2021 article 6 §1 were designed to address.[29]

VIII. CULTURAL BARRIERS, AFRICAN CANONICAL RESOURCES, AND THE IMPLEMENTATION GAP

The gap between canonical provision and canonical implementation is nowhere more palpable than in the encounter between universal Church law, and a specific cultural dynamics of the Igbo context. I said in the introduction that this story is still in progress in Africa; in this section, I want to identify both the cultural obstacles and the cultural resources that any realistic canonical implementation strategy must engage.

Marie Keenan's foundational analysis identifies institutional culture as the primary mediating variable between legal provision and effective protection: "The hierarchical structure of the Church can create a culture of secrecy and silence that allows abuses of power to go unchallenged."[30] In the Igbo cultural context, this hierarchical institutional culture is reinforced by indigenous cultural values of deep reference to elders and authority figures. The shame, (*Ihere)*, associated with sexual matters in Igbo culture creates additional barriers to disclosure: victims carry burden not only of personal shame, but of the collective dishonor that extends to their families and lineages when abuse is disclosed. The concept of (*Ugwu ezinaulo)* (family honor) weighs heavily in decisions about whether to report, families often preferring private settlement over formal accountability. Matthew Kukah insist that "clerical and cultural taboos often inhibits the prosecution of offenders" and calls urgently for local Church reforms that integrate cultural sensitivity with canonical fidelity.[31]

African psychological scholarship provides important analytical resources for understanding these dynamics. Bénézet Bujo, in his foundational work on African communitarian ethics, argues that the African understanding of community as a web of mutual obligations rather than a collection of autonomous individuals requires that any institutional accountability mechanism be translated into relational and communal terms if it is to function effectively.[32] This is a canonical observation as much as a cultural one: VELM 2023's mandatory

[28] Anthony Akinwale, The Church and Social Responsibility in Nigeria (Ibadan: Dominican Institute, 2015), 72.
[29] Eze, "Sexual Abuse of Minors and Vulnerable Adults," Chapter Two; see also Ekechi Okafor, "Poverty, Dependence, and the Clergy: A Nigerian Perspective," in Church and Society in Nigeria, ed. Patrick Chukwuma (Enugu: Snaap Press, 2019), 94.
[30] Marie Keenan, Child Sexual Abuse and the Catholic Church: Gender, Power, and Organizational Culture (Oxford: Oxford University Press, 2012), 521.
[31] Matthew Hassan Kukah, Witness to Justice: An Insider's Account of Nigeria's Truth Commission (Abuja: Kukah Foundation, 2011), 154.
[32] gbonkhianmeghe E. Probated, Theology Brewed in an African Pot (Maryknoll: Orbis Books, 2008), 73.

reporting requirements, however, legally sound, reproduce minimal results if their implementation relies on the kind of individual, autonomous reporting-to-institutions model that Western legal cultures presuppose. In Igbo cultural terms, reporting abuse is not primarily a legal act by a private individual; it is a social act embedded in networks of kinship obligation, community, loyalty, and deference to authority. The canonical framework most accounts for these networks, if it is to function.

Agbokhianmeghe Orabator's theology of the African church offers a complementary perspective, observing that "religious leaders are often regarded as moral exemplars, making allegations of abuse, particularly stigmatizing for victims" in African cultural contexts, and that this reverence can lead to "community denial, where the perpetrator is defended, and the victim is ostracized."[33] Emmanuel Katongole's political theology of the African church situates these dynamics within a broader analysis of how colonial institutional structures, including those of the Catholic Church, have shaped African social and ecclesial authority patterns in ways that resist horizontal accountability, and reinforce vertical deference.[34] These analyses are not merely theoretical; they explain why the canonical machinery that function reasonably well in post-crisis North Atlantic Church contexts has thus far produce limited results in many African particular churches.

The most distinctive African canonical resource I wish to propose is the engagement of the *Umaada* (daughters of the lineage) as an auxiliary safeguarding structure within the diocesan framework. The *umuada* are traditional Igbo women's groups possessing historical, moral and adjudicative authority over matters affecting women and children in the lineage community. As Ifi Amadiume documents, *umuada* "exercise moral and ritual authority that cuts across patrilineal structures, enabling women collectively to sanction men transgressor in ways individual women cannot."[35] Their authority derives from customary recognition rather than civil or canonical appointment, and their enforcement mechanisms, including public shaming and community sanction, have historically carried genuine deterrent force even against powerful male community members.

The canonical basis for formalizing the *umuada* as auxiliary safeguarding partners within the diocesan framework is substantive. Canon 228 §1 provides that lay persons who possess the requisite qualities are capable of being admitted to ecclesiastical offices and functions. VELM 2023, Article 13, explicitly provides for the involvement of lay persons with profession expertise in canonical investigations, and Article 3 requires that diocesan safeguarding structures be staffed in ways that include persons with professional competence in the relevant fields. The *umuada* possess specifically cultural competency in adjudicating matters affecting women and children, precisely the domain in which formal canonical reporting mechanisms most frequently fail in the Igbo context. Their formal integration as reception points for abuse reports, under protocols that ensure reports reach the canonical safeguarding authority, would honor canon 212 §3 affirmation to the faithful's right to manifest their views on matters affecting the good of the church, while creating cultural credible pathways that purely institutional reporting channels currently lack.

I am aware that the *Umuada* proposal faces canonical complications that require honest acknowledgment. The due process rights of accused clergy under canons 1717 to 1731 requires that any investigation be conducted by persons with canonical authority and observing canonical procedures; the *umuada* cannot themselves conduct canonical trials or render binding canonical judgements. Their role must therefore be carefully delineated as a reporting and reception function rather than a judicial one. Canon 1427 provides for the appointment of auditors in canonical processing and this provision could be used to involve *umuada* members trained in canonical procedures as auditors in preliminary investigations where their presence would facilitate disclosure by victims who might not approach formal ecclesial channels. Within these parameters, the proposal is canonical feasible and pastorally urgent as the *umuada* system of Igbo women governance compliments the reporting systems as required by the code of Canon Law.

Economic exploitation as a structural enabler of abuse demands explicitly canonical attention. Many Nigerian families rely on the Church for education, healthcare and economic support, creating a dependency that

[33] Agbonkhianmeghe E. Probated, Theology Brewed in an African Pot (Maryknoll: Orbis Books, 2008), 73.
[34] Emmanuel Katongole, The Sacrifice of Africa: A Political Theology for Africa (Grand Rapids: Eerdmans, 2011), 89–94.
[35] Ifi Amadiume, Male Daughters, Female Husbands: Gender and Sex in an African Society (London: Zed Books, 1987),119.

abusers can weaponize and that victims' families feel unable to challenge without material risk. The canonical framework's understanding of vulnerable adults, as defined in VELM 2023 Article 1 §2 (b), as persons whose "ability to understand or to want or otherwise resist the offense" is limited by circumstances that include deprivation of personal liberty is directly applicable to situations of severe economic coercion. Bishops should be instructed, through implementation guidelines issued at the level of the episcopal conference, that economic dependency of this kind constitutes a circumstance triggering the equal protection provisions of SST 2021 Article 6 §1

IX. RECOMMENDATIONS FOR CANONICAL IMPLEMENTATION IN NIGERIAN PARTICULAR CHURCHES

The canonical evolution traced in this article and the pastoral realities documented in the Umuahia Diocese case study converge on five concrete recommendations. I ground each recommendation in the specific canonical provisions that obligate its implementation, connecting it to the empirical findings from the Umuahia research to establish why the gap between the law's requirements and current diocesan practice is not merely a canonical inconvenience but a pastoral emergency.

Recommendation 1: Establish an independent, well-resourced diocesan safeguarding framework under VELM 2023 Article 2 and Canon 1733. VELM 2023 Article 2 obliges every particular church to establish a stable, publicly Known system through which reports may be submitted concerning the offenses covered by the document. Canon 1733 obliges bishops to promote structures for reconciliation and conflict resolution within the diocese. Together, these provisions, create a mandatory canonical basis for a safeguarding office that is not merely advisory, but structurally independent of direct episcopal administrative control. The empirical finding that's more than 87% of respondents in Umuahia Diocese considered accountability Mechanisms inadequate is a direct indication that the existing structures fail to meet the standard these provisions impose. The safeguarding office must have full-time staffed positions, including a Victim Assistance Coordinator trained in trauma-informed care, funded from diocesan resources and accountable to a lay oversight board rather than exclusively to the bishop.

Recommendation 2: Implement non-discretionary mandatory reporting under VELM 2023 Articles 3 and 12, Canon 1717, and the Child Rights Law of Abia State (2016). Canon 1717 obliges the diocesan bishop to initiate a preliminary investigation whenever he receives a report or credible information suggesting a canonical offense. VELM 2023 Article 3 makes the reporting obligation applicable to all clergy and religious who receive such information. Article 12 of VELM obliges cooperation with civil authorities in accordance with local law. The Child Rights Law of Abia State (2016) criminalizes child sexual abuse and establishes reporting obligations under civil law. The convergence of these provisions creates an unambiguous canonical and civil reporting obligation that cannot be satisfied by internal management of allegations. The empirical finding that nearly 90% of respondents agreed that many cases go unreported establishes that the current culture of non-reporting is both a canonical violation and a pastoral failure of the first order.

Recommendation 3: Reform priestly formation to integrate safeguarding as a mandatory component under Canon 245 §2 and Canon 1031. Canon 245 §2 requires that seminary programmes develop students in all dimensions of human formation, including the virtue of chastity understood as a gift to be cultivated and integrated rather than a burden to be managed in isolation. Canon 1031 §3 permits episcopal conferences to require additional years of formation beyond the minimum, a provision that could be used to mandate safeguarding formation within the West African regional seminary curriculum. Specifically, the curriculum should include: courses in psychosexual development and the lived experience of celibacy; formation in recognizing grooming behavior and inappropriate relational dynamics; canonical instruction in Canon 1398, SST 2021, VELM 2023, and diocesan safeguarding policy; and training in maintaining pastoral boundaries. For priests already in ministry, Canon 279 §2, which obliges clerics to continue their education after ordination, provides the canonical basis for mandatory annual safeguarding formation.

Recommendation 4: Establish accessible survivor support services under the obligations of justice and charity recognized in Canon 221 §1 and VELM 2023 Article 5 §3 Canon 221 §1 recognizes the right of the faithful to

vindicate and defend their rights in the church. VELM 2023 Article 5 §3 specifically addresses the right of persons who allege harm to be informed of the relevant ecclesiastical processes and to be assisted in assessing support. Together, these provisions create a canonical obligation to make support services available to survivors as a matter of rights, not of episcopal generosity. The empirical finding that more than 90% of respondent agreed that survivors black asses to adequate support services in Umuahia Diocese is currently not meeting this obligation. The diocese most establish a victim, compensation fund, identify and contract qualified counsellors, with expertise in trauma and spiritual harm, I'm communicated clearly to all survivors that support services are available unconditionally and do not require participation in canonical proceedings.

Recommendation 5: Ensure full corporation with civil authorities under Canon 22 and VELM 2023 article 19. Canon 22 provides that civil laws to which canonical law refers are to be observed in canon law with the same effects, in so far as they are not contrary to divine law, and unless Canon law provides otherwise. VELM 2023 article 19, explicitly obliges corporation with civil authorities in accordance with applicable civil law. The Child Rights Law of Abia State (2016) and the violence against persons prohibition act (2015, Federal) both criminalize child sexual abuse, and established reporting obligations. These provisions, read together with Canon 22, mean that cooperation with civil law enforcement in cases of credible abuse allegation is not merely optional Pastoral prudence but a canonical obligation enforceable by the bishop's own accountability mechanisms under VELM. The claim that canonical autonomy exempts the church from civil reporting requirements is not merely legally incorrect under Nigerian law; it is canonically unsound under the universal law of the church as it currently stands.

X. CONCLUSION: THE INTEGRATED CANONICAL SYSTEM AND THE AFRICAN CANONICAL VOCATION

The central original contribution of this article lies in its integrated canonical reading of SST 2021, VELM 2023 Canon 1398 §1, and Canon 1395 §3, as components of a unified procedural system in which no single instrument is sufficient and each completes a function that the others cannot perform alone. Canon 1398 §1 define the substantive delicts and their obligatory penalties. Can 1395 §3 close the gap created by the equal protection category, capture his situations of power-based coercion even against adult victims. SST 2021 deserves all *delicta graviora* to the DDF, establishes the twenty-year prescription with derogation faculty, defines the three victim categories, and provides different work for canonical trials and administrative processes. The DDF *Vademecum* (2022) translates this framework into operational procedural steps accessible to diocesan canonical officers. VELM 2023 governs the preliminary reporting and investigation phase, protect whistleblowers, and establishes Episcopal accountability. *Comme une mére aimante* (2016) completes the accountability chain by providing for the removal from office of bishops guilty of gross negligence. This integrated system, when activated by a bishop with the institutional will to use it, is genuinely adequate to canonical task. The adequacy of the law is no longer the primary problem. The primary problem as I have argued throughout this article, is implementation.

The second contribution lies in the articles engagement with African canonical and theological scholarship in the analysis of implementation challenges. The insight of Bénézet Bujo's communitarian ethics, that institutional accountability mechanisms must be translated into relational and communal terms to function in African contexts, has direct implications for canonical implementation strategy: VELM's mandatory reporting requirements need culturally credible reception part ways, and the *umuada* proposal developed in section VIII represents one canonical response to that need. Orabator's analysis of religious authority in canonical contexts, and Katongole's political theology of inherited colonial, institutional structure, provides the theoretical tools for understanding why the canonical machinery that has begun to function in post-crisis North Atlantic context has to produce limited results in many African particular churches. The engagement of African scholarship is not a concession to cultural particularism; it is a requirement of canonical realism system.

The third contribution lies in the five recommendations of section IX, each grounded in a specific canonical provision and connected to the empirical findings from Umuahia Diocese. Canonical recommendations that do not identify the specific provisions of the law that obligate their implementation are wishes; those that do are proposals that diocesan Bishops can be held accountable for meeting or not meeting. The obligations identified

in VELM 2023 article 2, Canon 1717, VELM 2023 article 3 and 12, Canon 245 §2, Canon 221 §1, and VELM 2023 article 5 §3, and Canon 22 and VELM 2023 article 19 are not aspirational standards. They are currently binding canonical law. I conclude with a theological observation that is also an autobiographical one. I have sat in a diocesan safeguarding office and received testimony from people whose suffering was caused by men wearing the same collar I wear. The canonical framework described in this article represent the church's most serious attempt, in its entire two-thousands-year of legal history, to institutionize adequate protection for the vulnerable members of the body of Christ. That framework did not arise from the Church's internal initiative; it arose from the courage of survivors who refused to accept silence as the final word on what had been done to them, and from the progressive insistence of the canonical, theological, and lay community that the church's law must align with its proclamation of the inviolable dignity of every human person made in the image of God.

The Lord who warned that it would be better for those who cost one of these little ones to stumble to have a milestone tie around their necks and be drawn in the depths of the sea (Matthew 18:6) did not issue that warning as a canonical provision to be interpreted, qualified, and applied at episcopal discretion. He issued it as a measure of the justice by which his church, and who exercise authority within it, will be judged. They canonical evolution from silence to sanction has brought the church closer to meeting that measure than at any previous point in its history. The distance that remains is the task before every particular church that claims fidelity to the gospel's preferential love for vulnerable.

BIBLIOGRAPHY

1. Akinwale, Anthony. *The church and Social Responsibility in Nigeria*. Ibadan: Dominican Institute, 2015.
2. Amadiume, Ifi. *Male Daughters, Female Husbands: Gender and Sex in an African Society*. London: Zed Books, 1987.
3. Ampleforth Abbey. "Church Documents in Relation to Safeguarding." August 10, 2022. https://www.ampleforthabbey.org.uk/sites/default/files/inline-files/Church%20documents%20in%20relation%20to%20safeguarding_print_friendly.pdf.
4. Beal, John P. "The 'Scandal' of Sexual Abuse of Minors: A Historical Perspective." *The Jurist* 62, no. 1 (2002): 86-119.
5. Beal, John P., James A. Coriden, and Thomas J. Green, eds. *New Commentary on the Code of Canon Law*. New York: Paulist Press, 2000.
6. Bujo, Bénézet. *African Theology in its Social Context.* Translated by John O'Donohue. Maryknoll: Orbis Books, 1992.
7. Cafardi, Nicholas P. *Before Dallas: The U.S. Bishops' Response to Clergy Sexual Abuse of Children*. New York: Paulist Press, 2008.
8. Chadwick, Henry. *The Early Church.* London: Penguin Books, 1967.
9. Cito, Davide. "The New Delicta Graviora Laws." *Ave Maria International Law Journal* 1, no. 1 (2011): 90-116. https://www.avemarialaw.edu/wp-content/uploads/2022/11/1AveMarialntlLJ90.pdf.
10. Cozzens, Donald. *The Changing Face of the Priesthood*. CollegeVille: Liturgical Press, 2000.
11. Dicastery for Legislative Texts. Penal Sanctions in the Church: User Guide for Book VI of the Code of Canon Law. Vatican City: *Dicastery for Legislative Texts*, 2023. https://www.delegumtextibus.va.
12. Dicastery for the Doctrine of the Faith. *Vademecum on Certain Points of Procedure in Treating Cases of Sexual Abuse of Minors Committed by Clerics*. 2nd ed. Vatican City: DDF, 2022.
13. Doyle, Thomas P. "A Very Short History of Sexual Abuse in The Catholic Church." April 25, 2014. https://www. Bishopaccountability.org/At_a_Glance/Very_Short_History_Clergy_Abuse.pdf.
14. Doyle, Thomas P. A. W. R. Sipe, and Patrick J. Wall. *Sex, Priests, and Secret Coses: The Catholic Church's 2000 Year Paper Trail of Sexual Abuse*. Los Angeles: Volt Press; 2006.
15. Eze, Anthony Dozie. "Sexual Abuse of Minors and Vulnerable Afults by the Clergy in Umuahia Diocese, Nigeria." *PhD diss., Catholic Institute of West Africa*, 2026.
16. Ezeogu, Anthony. *The Canonical Process in Clerical Penal Matters*. Port Harcourt: CIWA Publications,2018.

17. Fortune, Marie M. *Is Nothing Sacred? When Sex Invades the Pastoral Relationship*. San Francisco: HarperSanFrancisco, 1989.
18. Gratian. Decretum. *In Corpus luris Canonici,* edited by Emil Friedberg. Vol. 1. Leipzig: Tauchnitz, 1879.
19. John Jay College of Criminal Justice. The Nature and Scope of the Problem of Sexual Abuse of Minors by Catholic Priests and Deacons in the United States, 1950-2002. Washington, DC: *United States Conference of Catholic Bishops*, 2004.
20. Katongole, Emmanuel. *The Sacrifice of Africa: A Political Theology for Africa*. Grand Rapids: Eerdmans, 2011.
21. Keenan, James F. *A History of Catholic Moral Theology in the twientieth Century*. London: Continuum, 2010.
22. Keenan, Marie. *Child Sexual Abuse and the Catholic Church: Gender, Power, and Organizational Culture.* Oxford: Oxford University Press, 2012.
23. Kukah Matthew Hassan. *Witness to Justice: An Insider's Account of Nigeria's Truth Commission.* Abuja: Kukah Foundation, 2011.
24. Okafor, Ekechi. "Poverty. Dependence, and the Clergy. A Nigerian Perspective." In Church and Society in Nigeria, edited by Patrick Chukwuma. Enugu: *Snaap* Press, 2019.
25. Orsy, Ladislas. *Receiving the Council: Theological and Canonical Insights and Debates*. CollegeVille: Liturgical Press, 2009.
26. Orabator, Agbonkhianmeghe E. *Theology Brewed in a African Pot.* Maryknoll: Orbis Books, 2008.
27. Peters, Edward N. *In New Commentary on the Code of Canon Law*, edited by John P. Beal, James A. Coriden, and Thomas J. Green. New York: Paulist Press, 2000.
28. Podwysocki, Grzegorz. "The Evolution of Canonical Norms on Sexual Abuse in the Catholic Church." Accessed May 2026. https://ojs.academicon.pl/bsa/article/download/5075/5313/16885.
29. Pontifical Commision for the Protection of Minors. The Second Annual Report of the Pontifical Commission for the Protection of Minors. October 2025. https://www.rivistadirittoereligioni.com/wp-content/uploads/2025/11/Micciche-II-Rapporto-della-Pontificia-Commissione-per-la-Tutela-dei-Minori-ENG.pdf.
30. Pope Francis. *Comme une mére aimante*. Apostolic Letter issued motu proprio. AAS 108 (2016): 715-717.
31. Pope Francis. *Vos Estis Lux Mundi*. Apostolic Letter issued motu proprio. Vatican City, 2019; revised 2023.
32. Pope John Paul II. *Sacramentorum Sanctitatis Tutela*. Apostolic Letter issued motu proprio. Vatican City, 2001. Revised Pope Francis, 2021.
33. Ratzinger, Joseph Cardinal. "Prefect's Address to US Bishops." Origins 32, no. 7 (2002): 105-108.
34. Schembri, Kevin. "The Evolution of Canonical Norms on Sexual Abuse in the Catholic Church: From 1917 to 2022." *Academia*.edu. Accessed May 2026. https://www.academia.edu/81577783.
35. Sipe, A. W. Richard. *Celibacy in Crisis: A Secret World Revisited*. New York: Brunner-Routledge, 2003.
36. Tanner, Norman, ed. *Decrees of the Ecumenical Councils*. 2 vols. Washington, DC: Georgetown University Press, 1990.
37. Tertullian. De Pudicita. *In Ante-Nicene Fathers, vol. 4, edited by Alexander Roberts and Thomas P. Doyle*, "A very short History of Clergy Sexual Abuse in the Catholic Church," April 25,2014, https://www.bishopaccountability.org/At_a_Glance/Very_Short_History_Clergy_Abuse.pdf, 2–4.
38. Thomas, Domy, MSFS. "Vos Estis Lux Mundi: Text and Commentary, Part I." December 2019. https://dvkjournals.in/index.php/iu/article/download/3079/2914/6438.
39. Wijlens, Myriam. "Accountability in the Church: A Legal Perspective." *The Jurist* 79, no. 1 (2019): 178-205.