



REVIEWING AND RESPONDING TO ALLEGATIONS OF SEXUAL ABUSE AND/OR SEXUAL HARASSMENT

POLICY

CT Renaissance requires all staff to report immediately and initiate a coordinated response to any knowledge, suspicion, or information regarding an incident of sexual abuse or harassment that may have taken place against a client by another client, employee, volunteer, intern or contractor. Residents / Clients shall be encouraged to and provided with a safe means of reporting such abuse. Anyone who reports an allegation of sexual abuse or harassment may do so without fear of reprisal. All reports/allegations of sexual abuse or sexual harassment shall be addressed and reviewed according to the following procedures.

PROCEDURES – STAFF FIRST RESPONDER DUTIES

- Upon learning of an allegation that a resident was sexually abused, the first staff person to receive the report must notify the Program Director.
- Arrangements will immediately be made to separate the alleged victim and abuser
- Law enforcement will immediately be called in the case of alleged sexual abuse
- The crime scene will be closed off until the arrival of law enforcement.
- The alleged victim will be asked not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking or eating.
- The alleged abuser will be asked to not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking or eating.
- The Program Director or first responder if Director is not available shall make immediate notification to the PREA Coordinator and the referral source.
- The PREA Coordinator will take the lead, provide direction and coordinate the activities necessary to ensure care to the victim. Law enforcement will be called immediately to investigate the allegations.

INVESTIGATIONS and INTERNAL ADMINISTRATIVE REVIEWS

- Investigations into allegations of sexual abuse and sexual harassment shall be done so promptly, thoroughly, and objectively for all allegations including third-party and anonymous reports. Investigations shall be conducted by law enforcement for sexual abuse reports, internal reviews and investigations of reports of sexual harassment incidents will be reviewed and coordinated by the PREA Coordinator.
- PREA Coordinator, Program Director or designee shall contact the State Police Department to initiate a criminal investigation when appropriate.

- Law enforcement will take the lead role in investigations for sexual abuse and CTR staff will cooperate with such investigations and shall endeavor to remain informed about the progress of the investigation.
- CT Renaissance Administrative Review shall include:
 - An effort to determine whether staff actions or failures to act contributed to the abuse
 - Shall be documented in written reports of the review and the findings

REPORTING TO ALLEGED VICTIMS

- Following a review into a client / resident's allegation of sexual abuse suffered while receiving services in a CT Renaissance facility, the PREA Coordinator shall inform the client / resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded. The client shall be informed (unless the alleged sexual abuse was determined to be unfounded) whenever:
 - The staff member is no longer assigned within the resident's unit;
 - The staff member is no longer employed at the facility;
 - CT Renaissance learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
 - The agency learns that the staff member has been convicted on a charge related to sexual abuse within the facility.
- Following a clients allegation that he/she has been sexually abused by another resident, CT Renaissance shall subsequently inform the alleged victim whenever:
 - CT Renaissance learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or
 - The agency learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.
- All notifications or attempted notification shall be documented and maintained in a file by the PREA Coordinator.
- CT Renaissance's obligation to report back to victims shall be terminated if the client / resident is released from the agency's custody.

DISCIPLINARY SANCTIONS FOR STAFF

- Staff shall be subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies.
- Termination shall be the presumptive disciplinary sanction for staff who has engaged in sexual abuse.
- Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history and the sanctions imposed for comparable offenses by other staff with similar histories.
- All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

CORRECTIVE ACTION FOR CONTRACTORS AND VOLUNTEERS

- Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with residents and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.
- The facility shall take appropriate remedial measures, and shall consider whether to prohibit further contact with residents, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

DISCIPLINARY SANCTIONS FOR CLIENTS / RESIDENTS

- Clients / Residents shall be subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the resident engaged in resident-on-resident sexual abuse or following a criminal finding of guilt for resident-on-resident sexual abuse.
- Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed from comparable offenses by other residents with similar histories.
- The disciplinary process shall consider whether a resident's mental disabilities or mental illness contributed to his/her behavior when determining what type of sanction, if any, should be imposed.
- CT Renaissance may impose upon the abuser therapy, counseling and other interventions as appropriate designed to address and correct underlying reasons or motivations for the abuse. When recommended interventions shall be required as a condition in receiving continued services with the agency.
- CT Renaissance may impose disciplinary sanctions on a client / resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact.
- For the purpose of disciplinary action, a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred shall not constitute falsely reporting an incident or lying, even if a review does not establish evidence sufficient to substantiate the allegation.
- CT Renaissance prohibits all sexual activity between residents and will follow up with disciplinary action for such activity. CT Renaissance will not deem such activity to constitute sexual abuse if it is determined that the activity is not coerced.
- Determination of appropriate disciplinary actions shall be a collaborative effort between CT Renaissance and the referral source.