



Sexual Abuse and Molestation Training and Policy

I. General Definitions

A. Types of abuse

- A.** Physical abuse is injury that is intentionally inflicted upon an individual.
- B.** Sexual abuse is any contact of a sexual nature that occurs between an individual and an adult or between two individuals. This includes any activity which is meant to arouse or gratify the sexual desires of the adult or the other individual.
- C.** Emotional abuse is mental or emotional injury to an individual that results in an observable and material impairment in the individual's growth, development, or psychological functioning.
- D.** Neglect is the failure to provide for an individual's basic needs or the failure to protect an individual from harm.

II. Code of Conduct with Individual

The following policies are intended to assist staff and volunteers in making decisions about interactions with individuals. For clarification of any guideline, or to inquire about behaviors not addressed here, contact your supervisor.

CLI provides its individuals with the highest quality services available. We are committed to creating an environment for our individuals that is safe, nurturing, empowering, and that promotes growth and success.

No form of abuse will be tolerated, and confirmed abuse will result in immediate dismissal from our organization. All reports of suspicious or inappropriate behavior with individuals or allegation of abuse will be taken seriously. CLI will fully cooperate with authorities if allegations of abuse are made that require investigation.

The Conduct with Individual outlines specific expectations of the staff and volunteers as we strive to accomplish our mission together.

1. Individuals will be treated with respect at all times.
 2. Individuals will be treated fairly regardless of race, sex, sexual orientation, gender identification, age, or religion.
 3. Staff and volunteers will adhere to uniform standards of displaying affection as outlined by our organization.
 4. Staff and volunteers will avoid affection with individuals that cannot be observed by others.
 5. Staff and volunteers will adhere to uniform standards of appropriate and inappropriate verbal interactions as outlined by our organization.
 6. Staff and volunteers will not stare at or comment on individuals' bodies.
 7. Staff and volunteers will not date or become romantically involved with individuals.
 8. Staff and volunteers will not use or be under the influence of alcohol or illegal drugs in the presence of individuals.
 9. Staff and volunteers will not have sexually oriented materials, including printed or online pornography, on our organization's property.
 10. Staff and volunteers will not have secrets with individuals and will only give gifts with prior permission.
 11. Staff and volunteers will comply with CLI's policies regarding interactions with individuals outside of our programs.
 12. Staff and volunteers will not engage in inappropriate electronic communication with individuals.
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13. Staff and volunteers will not abuse individuals in anyway including (but not limited to) the following:

Physical abuse: hitting, spanking, shaking, slapping, unnecessary restraints

Verbal abuse: degrading, threatening, cursing

Sexual abuse: inappropriate touching, exposing oneself, sexually oriented conversations

Mental abuse: shaming, humiliation, cruelty

Neglect: withholding food, water, shelter, and other needs

14. All staff must follow state specific mandatory reporting requirements. Staff should be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. Staff will:
- a. Be familiar with the symptoms of abuse and neglect, including physical, sexual, verbal, and emotional abuse.
 - b. Know and follow CLI's policies and procedures that protect individuals against abuse.
 - c. Report suspected abuse or neglect to the appropriate authorities as required by state mandated reporter laws.
 - d. Follow up to ensure that appropriate action has been taken.
15. Staff and volunteers will report concerns or complaints about other staff, volunteers, adults, or individuals to CLI's supervisors.
16. CLI cooperates fully with the authorities to investigate all cases of alleged abuse. Any staff or volunteer shall cooperate to the fullest extent possible in any external investigation by outside authorities or internal investigation conducted by Community Living's staff or persons given investigative authority by Community Living. Failure to cooperate fully may be grounds for termination.
17. Staff and volunteers may not have engaged in or been accused or convicted of individual abuse, indecency with an individual, or injury to an individual.
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III. Policies

Policies define the bandwidth of acceptable behavior within Community Living. Because offenders often violate policies to gain access to individuals, when staff know and understand policies, they can identify, interrupt, and report policy violations. Simply interrupting a policy violation can prevent a false allegation of abuse or put an offender on notice that no one works in private, the rules apply to everyone, and violations will be detected.

A. Physical Contact

CLI's physical contact policy promotes a positive, nurturing environment while protecting individuals and staff. CLI encourages appropriate physical contact with individuals and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by staff towards individuals within CLI's programs will result in disciplinary action, up to and including termination of employment.

The organization's policies for appropriate and inappropriate physical interactions are:

<i>Appropriate Physical Interactions</i>	<i>Inappropriate Physical Interactions</i>
<ul style="list-style-type: none">• Side hugs• Shoulder-to-shoulder or "temple" hugs• Pats on the shoulder or back• Handshakes• High-fives and hand slapping• Verbal praise• Pats on the head when culturally appropriate• Touching hands, shoulders, and arms• Arms around shoulders	<ul style="list-style-type: none">• Full-frontal hugs• Kisses• Showing affection in isolated area• Lap sitting• Wrestling• Piggyback rides• Tickling• Any type of massage given by or to an individual• Any form of affection that is unwanted by the individual or the staff or volunteer• Compliments relating to physique or body development• Touching bottom, chest, or genital areas (Not in the provision of care)

B. Interaction

Staff and volunteers are prohibited from speaking to individuals in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Staff and volunteers must not initiate sexually oriented conversations with individuals. Staff and volunteers are not permitted to discuss their own sexual activities with individuals.

CLI's policies for appropriate and inappropriate verbal interactions are:

<i>Appropriate Verbal Interactions</i>	<i>Inappropriate Verbal Interactions</i>
<ul style="list-style-type: none">• Positive reinforcement• Appropriate jokes• Encouragement• Praise	<ul style="list-style-type: none">• Name-calling• Discussing sexual encounters or in any way involving individuals in the personal problems or issues of staff and volunteers• Secrets• Cursing• Off-color or sexual jokes• Shaming• Belittling• Derogatory remarks• Harsh language that may frighten, threaten, or humiliate individuals• Derogatory remarks about the individuals or his/her family

IV. Training Requirements

A. General Training Requirements

<i>Audience</i>	<i>Content</i>	<i>Timetable</i>	<i>Delivery Method</i>
All employees and volunteers with access to individual	Abuse Risk Management	Within 30 days of selection or prior to placement	Live Training or Armatus® Online Training*
All employees and high access volunteers	Prevention of individual -to-individual Abuse	Within 30 days of selection or prior to placement	Live Training or Armatus® Online Training
All employees who make hiring decisions	Screening and Selection	Prior to making hiring decisions	Live Training
All employees who conduct internal investigations	Incident Investigation	Prior to investigations	Live Training
All employees with access to individual	Refresher Abuse Risk Management	At employment or volunteer anniversary date	Live Training or Armatus® Online Training

*Armatus® is an online training platform offered by Praesidium. Courses include specific learning objectives, exceptional content, engaging graphics, frequent interactivity, and a content mastery quiz. Armatus® Online Training is a possible delivery method for the above-mentioned content areas. The following chart lists the Armatus® modules that personnel can complete in the certain situations:

<i>Audience</i>	<i>Armatus® Modules</i>	<i>Timetable</i>
Employees unable to attend live training AND Employees hired after live training conducted	<ul style="list-style-type: none"> • Meet Sam • It Happened to Me • Organization Policies • Preventing Sexual Activity between Young Children 	Within 30 days of live training or hire date
High Access Volunteers	<ul style="list-style-type: none"> • Organization Policies • Abuse Risk Management for Volunteers 	Prior to access with consumer
Employees who violate policies or exhibit questionable boundaries	<ul style="list-style-type: none"> • Organization Policies • Refresher Module 	Within 5 days of administrator notification
Returning employees (who previously participated in live or Armatus® training)	<ul style="list-style-type: none"> • Refresher Module 	At employment or volunteer anniversary date.

V. Monitoring and Supervision

When staff are adequately supervised, potential offenders are less likely to act on their impulses because they face detection. When individuals are adequately supervised, they too are less likely to engage in inappropriate interactions with others. Similarly, the physical plant must be monitored, particularly out-of-the-way locations or locations that might permit an offender undue access to or privacy with an individual. Effective supervision and monitoring require that a variety of methods be used frequently, at both scheduled and random times.

A. Facility Monitoring

Building architecture can increase or mitigate the risk of an incident or accident. Because most incidents of sexual behavior occur in private, the extent to which privacy is managed, risk is managed. In order to ensure that all of the locations are properly and consistently monitored, designate a staff member who must complete a site inspection checklist.

B. Checking Members into a Facility:

1. When anyone (members, guests, residents, construction workers, maintenance, cleaning crews, etc.) enters the facility during operational hours, they must check in with the front desk.
2. When possible, create a single point of entry and exit in the facility.
3. If there is more than one entrance or exit, ensure these other points of access are consistently monitored.

C. General Supervision

General supervision procedures:

1. **Administrative and Supervisory Visits to CLI Programs-** Supervisors/administrators will regularly visit all CLI programs to ensure that all activities are well- managed and that CLI policies are observed by all in attendance.
2. **Ratios-** Each program will follow the ratio requirements that are directed by the goals of the individual's plan, the services they receive, and the design of the program area.
3. **Mixed Age Groups-** In most incidents involving one individual abusing another individual, the individuals are from different age groups. Each program is responsible for establishing specific guidelines for additional monitoring and supervision of activities that involve individuals from different age groups. Staff and volunteers must be aware that close line of sight supervision is required when monitoring programs that mix age groups.

D. Monitoring High Risk Activities

1. Transportation Activities

Transporting individuals may increase the risk of abuse or false allegations of abuse because staff and volunteers may be alone with individuals or may make unauthorized stops with individuals. In addition, transportation activities may provide a time for unsupervised individuals to engage in individuals -to- individuals sexual activity.

In situations where staff transport consumers in non-organization vehicles:

- a. All transportation activities must be schedule by a supervisor.
- b. Individuals must be transported directly to their destination. No unauthorized stops may be made.
- c. A staff member must document beginning and ending times and mileage, purpose of the transportation, and destination on the mileage sheet located in each company vehicle.
- d. Staff must avoid unnecessary physical contact with individuals while in vehicles.
- e. When possible, staff should avoid engaging in sensitive conversations with individuals.

2. Off-Site Activities

The off-site procedures include:

- a. Requiring supervisor approval for all off-site activities.
- b. Specifying staff-to-individuals ratios for the activity.
- c. Including transportation procedures.
- d. Considering specific recommendations based on the location and type of activity (for example, Amusement parks, Water Parks, Arcades, etc.).

VI. Responding

How Community living responds to suspicious or inappropriate interactions, policy violations, and incidents or allegations of abuse can dramatically affect the harm to the individuals involved and the damage to the organization. Once a staff member, volunteer, individuals, or parent/guardian has expressed a concern or made an allegation about the treatment of a individual, swift and determined action must be taken to reduce any subsequent risk to the individual, to the accused staff member or volunteer, and to Community Living. CLI must establish precise, unequivocal requirements for reporting to the authorities and for adhering to a serious-incident response plan.

A. Responding to Suspicious or Inappropriate Behaviors or Policy Violations

Because Community Living is dedicated to maintaining zero tolerance for abuse, it is imperative that every staff member actively participates in the protection of individuals. In the event that staff observe any suspicious or inappropriate behaviors and/or policy violations on the part of other staff or volunteers, it is their personal responsibility to immediately report their observations.

Remember, at our organization, the policies apply to everyone.

<i>Examples of Suspicious or Inappropriate Behaviors Between Staff/Volunteers and Individuals</i>
<ul style="list-style-type: none">• Violation of the abuse prevention policies described above• Seeking private time or one-on-one time with individuals• Buying gifts for individual individuals• Making suggestive comments to individuals• Picking favorites

All reports of suspicious or inappropriate behavior with individuals will be taken seriously. Our procedures will be carefully followed to ensure that the rights of all those involved are protected.

1. Staff and Volunteer Response:

If staff witness suspicious or inappropriate behaviors or policy violations from another staff or volunteer, the staff or volunteer is instructed to do the following:

<i>Guidelines for Staff/Volunteers Response to Suspicious or Inappropriate Behaviors and/or Policy Violations</i>
<ul style="list-style-type: none">• Interrupt the behavior.• Report the behavior to a supervisor and director.• If you are not comfortable making the report directly, make it anonymously.• If the report is about a supervisor or administrator, contact the next level of management.• Document the report but do not conduct an investigation.• Keep reporting until the appropriate action is taken.

2. Supervisor and Administrator Response:

In the event that a supervisor or an administrator receives a report of suspicious or inappropriate behaviors or policy violations from a staff member or volunteer, the supervisor is instructed to do the following:

<i>Guidelines for Supervisors and Administrators Response to Suspicious or Inappropriate Behaviors and/or Policy Violations</i>
<ul style="list-style-type: none">• Report to the next level of administration and determine the appropriate administrator to respond to the concern.• Determine the appropriate response based on the report.• Speak with the staff or volunteer who has been reported.• Review the file of the staff or volunteer to determine if similar complaints were reported.• Document the report on the appropriate form.• If at any point in gathering information about a report of suspicious or inappropriate behavior, a concern arises about possible abuse, contact the state authorities, and file a report.• If appropriate, notify parents and/or guardians.• Advise the person who reported the behavior that the report is being taken seriously.

Based on the information gathered, the following may be required:

- a. Increase monitoring or supervision of the staff, volunteer, or program.
- b. If policy violations with individuals are confirmed, the staff or volunteer must be subject to disciplinary action up to and including termination and prosecution. Disciplinary action will follow the Progressive Disciplinary Process outlined in this manual.

If more information is needed, interview and/or survey other staff and volunteers or individuals.

3. Organizational Response:

<i>Guidelines for Organizational Response</i>
<ul style="list-style-type: none">• Review the need for increased supervision.• Review the need for revised policies or procedures.• Review the need for additional training.

B. Responding to Suspected Abuse

1. Staff or Volunteer Response to Abuse:

As required by mandated reporting laws, staff and volunteers must report any suspected abuse or neglect of Individuals —whether on or off CLI’s property or whether perpetrated by staff, volunteers, or others—to state authorities. Reports may be made confidentially or anonymously. A person who mistakenly reports suspected abuse is immune from civil or criminal liability as long as the report was made in good faith and without malice. **Refer to state specific mandated reporting requirements for definitions of abuse more specific reporting information.*

In addition to reporting to state authorities, staff and volunteers are required to report any suspected or known abuse of individuals perpetrated by staff or volunteers directly to leadership so that immediate and proper steps may be taken to ensure the safety of alleged victims and others who may be at risk. Reports of suspected or known abuse may be made confidentially to the following:

- a. Immediate supervisor
- b. Directors
- c. Administrators

Additional Guidelines for Staff/Volunteer Response to Incidents or Allegations of Abuse

- If you witness abuse, interrupt the behavior immediately.
- If abuse is disclosed to you, assure the individual disclosing that he or she was correct to tell you.
- Protect the alleged victim from intimidation, retribution, or further abuse.
- Immediately report the allegation or incident to the proper CLI authorities (based on mandatory reporting requirements) and the designated authority.
- Be sure to document the incident, disclosure, or any circumstances causing your suspicion of abuse. State only the facts.
- It is not your job to investigate the incident, but it **IS** your job to report the incident to your supervisor in a timely manner.
- Check back to make sure appropriate steps were taken. If not, report again to your supervisor or the designated CLI authority.

2. Supervisors and Administrators Response to Abuse:

In addition to the above response procedures, supervisors and administrators should ensure the following:

Guidelines for Supervisor and Administrators Responding to Allegations or Incidents of Abuse

- First, determine if the individual(s) is/are still in danger, and if so, take immediate steps to prevent any further harm.
- Gather as much information about the allegation as you can. For example, who made the report, who was allegedly abused, who was the alleged abuser, what was the nature of the alleged abuse, where and when did the alleged abuse occur, etc.
- Accurately record everything you learn in as much detail as you can. Remember your notes may be read by others. Stick to the facts.
- Contact the appropriate local authorities as indicated by your mandatory reporting procedures. Make sure you get a case number and the name and contact information of the person with whom you speak at the reporting agency.
- Suspend the accused staff or volunteer until the investigation is completed.

Acknowledgment of Abuse Prevention Manual

I have read and agree to comply with Community Living, Inc. policies regarding sexual abuse prevention.

Signature of Employee or Volunteer

Date