Abuse Prevention Manual

For

*Chatham Trades, Inc.*

*June 2020*

**Abuse Prevention Manual Record of Changes**

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| --- | --- | --- |
| **Description of Changes** | **Date** | **Review/Revision by** |
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**Table of Contents**

I. [General Definitions………………………………………………………………………………………………………………](#_TOC_250029)5

* 1. [Types of abuse](#_TOC_250028) 5
1. [Code of Conduct with Consumer](#_TOC_250027) 5
2. [Policies](#_TOC_250026) 8
	1. [Physical Contact](#_TOC_250025) 8
	2. Verbal Interaction 9
	3. [One-on-One Interaction](#_TOC_250024) 9
	4. [Off-site Contact 1](#_TOC_250023)0
	5. [Electronic Communication 1](#_TOC_250022)0
	6. [Gift Giving 1](#_TOC_250021)1
3. Training 12
	1. [General Training Requirements 1](#_TOC_250020)2
4. [Monitoring and Supervision 1](#_TOC_250019)2
	1. [Facility Monitoring 1](#_TOC_250018)2
	2. [Checking Members into a Facility 1](#_TOC_250017)3
	3. [General Supervision 1](#_TOC_250016)3
	4. Monitoring Consumers in Facilities 13
	5. [Monitoring High Risk Activities 1](#_TOC_250015)3
		1. [Bathroom Activities 1](#_TOC_250014)3
		2. Transition Times and Free Times 14
		3. Transportation Activities 14
5. [Responding](#_TOC_250012) 14
	1. [Responding to Suspicious or Inappropriate Behaviors or Policy Violations](#_TOC_250011) 15
		1. [Staff and Volunteer Response:](#_TOC_250010) 15
		2. [Supervisor and Administrator Response:](#_TOC_250009) 16
		3. [Organizational Response](#_TOC_250008) 16
	2. [Responding to Suspected Abuse by an Adult](#_TOC_250007) 17
		1. [Staff or Volunteer Response to Abuse:](#_TOC_250006) 17
		2. [Supervisors and Administrators Response to Abuse:](#_TOC_250005) 18
	3. [Responding to Consumer-to-Consumer Sexual Abuse and Sexualized Behaviors](#_TOC_250004) 18
		1. [Consumer-to-Consumer Interactions:](#_TOC_250003) 18
		2. [Staff and Volunteer Response](#_TOC_250002) 19
		3. [Supervisors and Administrators Response: 2](#_TOC_250001)0
		4. [Organizational Response 2](#_TOC_250000)0
6. Administrative Practices……………………………………………………………………………………………………..21

A. Critical Incident Management Plan 21

* + 1. Prior to Allegation/Incident……………………………………………………………………………………..21
		2. Immediate Safety…………………………………………………………………………………………………….21
		3. Initial Communication Plan……………………………………………………………………………………..21
		4. Ongoing Communication and Response…………………………………………………………………...22
		5. Promote Prevention at All Levels of the Organization……………………………………………….22

# General Definitions

## A. Types of abuse

* 1. Physical abuse is injury that is intentionally inflicted upon a consumer.
	2. Sexual abuse is any contact of a sexual nature that occurs between a consumer and an adult or between two consumers. This includes any activity which is meant to arouse or gratify the sexual desires of the adult or the other consumer.
	3. Emotional abuse is mental or emotional injury to a consumer that results in an observable and material impairment in the consumer’s growth, development, or psychological functioning.
	4. Neglect is the failure to provide for a consumer’s basic needs or the failure to protect a consumer from harm.

# Code of Conduct with Consumer

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

Chatham Trades, Inc. provides our consumers with the highest quality services available. We are committed to creating an environment for consumers 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 consumers or allegation of abuse will be taken seriously. Chatham Trades, Inc. will fully cooperate with authorities if allegations of abuse are made that require investigation.

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

 Consumers will be treated with respect at all times.

 Consumers will be treated fairly regardless of race, sex, sexual orientation, gender identification, age, or religion.

 Staff and volunteers will adhere to uniform standards of displaying affection as outlined.

 Staff and volunteers will avoid affection with consumers that cannot be observed by others.

 Staff and volunteers will adhere to uniform standards of appropriate and inappropriate verbal interactions as outlined.

 Staff and volunteers will not stare at or comment on consumers’ bodies.

 Staff and volunteers will not date or become romantically involved with consumers.

 Staff and volunteers will not use or be under the influence of alcohol or illegal drugs in the presence of consumers.

 Staff and volunteers will not have sexually oriented materials, including printed or online pornography, on Chatham Trades, Inc.’s property.

 Staff and volunteers will not have secrets with consumers and will only give gifts with prior permission.

 Staff and volunteers will comply with our organization’s policies regarding interactions with consumers outside of our programs.

 Staff and volunteers will not engage in inappropriate electronic communication with consumers.

  Staff and volunteers are prohibited from working one-on-one with consumers in a private setting.

 Staff and volunteers will use common areas when working with individual consumers.

 Staff and volunteers will not abuse consumers 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

 Chatham Trades, Inc. will not tolerate the mistreatment or abuse of one consumer by another consumer. In addition, our organization will not tolerate any behavior that is classified under the definition of bullying, and to the extent that such actions are disruptive, we will take steps needed to eliminate such behavior.

Bullying is aggressive behavior that is intentional, is repeated over time, and involves an imbalance of power or strength. Bullying can take on various forms, including:

1. *Physical bullying* – when one person engages in physical force against another person, such as by hitting, punching, pushing, kicking, pinching, or restraining another.
2. *Verbal bullying* – when someone uses their words to hurt another, such as by belittling or calling another hurtful names.
3. *Nonverbal or relational bullying* – when one person manipulates a relationship or desired relationship to harm another person. This includes social exclusion, friendship manipulation, or gossip. This type of bullying also includes intimidating another person by using gestures.
4. *Cyberbullying* – the intentional and overt act of aggression toward another person by way of any technological tool, such as email, instant messages, text messages, digital pictures or images, or website postings (including blogs). Cyberbullying can involve:
	* Sending mean, vulgar, or threatening messages or images.
	* Posting sensitive, private information about another person.
	* Pretending to be someone else in order to make that person look bad.
	* Intentionally excluding someone from an online group.
	* Hazing – an activity expected of someone joining or participating in a group that humiliates, degrades, abuses, or endangers that person regardless of that person’s willingness to participate.
	* Sexualized bullying – when bullying involves behaviors that are sexual in nature. Examples of sexualized bullying behaviors include sexting, bullying that involves exposures of private body parts, and verbal bullying involving sexualized language or innuendos.

Anyone who sees an act of bullying, and who then encourages it, is engaging in bullying. This policy applies to all consumers, staff and volunteers.

 All staff must follow state specific mandatory reporting requirements. Staff will be trained to be aware of and understand their legal and ethical obligation to recognize and report suspicions of mistreatment and abuse. Staff will:

1. Be familiar with the symptoms of abuse and neglect, including physical, sexual, verbal, and emotional abuse.
2. Know and follow organization policies and procedures that protect consumers against abuse.
3. Report suspected abuse or neglect to the appropriate authorities as required by state mandated reporter laws.
4. Follow up to ensure that appropriate action has been taken.

 Staff and volunteers will report concerns or complaints about other staff, volunteers, or consumers to their immediate supervisor, Quality Assurance Manager, Assistant Director, or Executive Director.

 Chatham Trades, Inc. 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 the organization or persons given investigative authority by the organization. Failure to cooperate fully may be grounds for termination.

 Staff and volunteers may not have engaged in or been accused or convicted of consumer abuse, indecency with a consumer, or injury to a consumer.

#

# Policies

Policies define the bandwidth of acceptable behavior in an organization. Because offenders often violate policies to gain access to consumers, 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.

## Physical Contact

Chatham Trades, Inc.’s physical contact policy promotes a positive, nurturing environment while protecting consumers and staff. Our organization encourages appropriate physical contact with consumers and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by staff towards consumers in the organization’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:

|  |  |
| --- | --- |
| ***Appropriate Physical Interactions*** | ***Inappropriate Physical Interactions*** |
| * 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
* Holding hands (with young children in escorting situations)
 | * Full-frontal hugs
* Kisses
* Showing affection in isolated area
* Lap sitting
* Wrestling
* Piggyback rides
* Tickling
* Allowing a consumer to cling to an employee’s or volunteer’s leg
* Any type of massage given by or to a consumer
* Any form of affection that is unwanted by the consumer or the staff or volunteer
* Compliments relating to physique or body development
* Touching bottom, chest, or genital areas
 |

## Verbal Interaction

Staff and volunteers are prohibited from speaking to consumers 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 consumers. Staff and volunteers are not permitted to discuss their own sexual activities with consumers. Our organization’s policies for appropriate and inappropriate verbal interactions are:

|  |  |
| --- | --- |
| ***Appropriate Verbal Interactions*** | ***Inappropriate Verbal Interactions*** |
| * Positive reinforcement
* Appropriate jokes
* Encouragement
* Praise
 | * Name-calling
* Discussing sexual encounters or in any way involving consumers 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 consumers
* Derogatory remarks about the consumer or his/her family
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## One-on-One Interaction

Most abuse occurs when an adult is alone with a consumer. Our organization aims to eliminate or reduce these situations and prohibits private one-on-one interactions unless approved in advance by the organization administration.

In those situations where one-on-one interactions are approved, staff and volunteers should observe the following additional guidelines to manage the risk of abuse or false allegations of abuse:

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| --- | --- |
|  | ***Additional Guidelines for One-on-One Interactions*** |
| * When meeting one-on-one with a consumer, always do so in a public place where you are in full view of others.
* Avoid physical affection that can be misinterpreted. Limit affection to pats on the shoulder, high-fives, and handshakes.
* If meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by.
* Inform other staff and volunteers that you are alone with a consumer and ask them to randomly drop in.
* Document and immediately report any unusual incidents, including disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted.
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## Off-site Contact

Many cases of organizational abuse occur off-site and outside of regularly scheduled activities. This contact outside of regularly scheduled activities may put staff, volunteers, and our organization at increased risk.

### Chatham Trades, Inc. prohibits interactions outside of regularly scheduled program activities unless approved by the organization’s Administration.

##

## Electronic Communication

Any private electronic communication between staff and consumers, including the use of social networking websites like - Facebook, Instagram, Snapchat, instant messaging, texting, etc. - is prohibited. All communication between staff and consumers must be transparent.

The following are examples of appropriate and inappropriate electronic communication.

|  |  |
| --- | --- |
| ***Appropriate Electronic Communication*** | ***Inappropriate Electronic Communication*** |
| * Sending and replying to emails and text messages from consumers ONLY when copying in a supervisor or the consumer’s parent/guardian
* Communicating through “organization group pages” on Facebook or other approved public forums
* “Private” profiles for staff and volunteers which consumers cannot access
 | * Harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning or humiliating comments
* Sexually oriented conversations
* Private messages between staff and volunteers with consumers
* Posting pictures of organization participants on social media sites
* Posting inappropriate comments on pictures
* “Friending” participants on social networking sites
 |

### Cell Phone Use:

While assigned to work with consumers, staff are not permitted to use electronic communications device except during approved breaks and emergency situations.

Use of personal electronic communication devices to contact (via voice, text, or pictures/video) organization members and/or program participants for personal and/ or inappropriate reasons shall be grounds for discipline up to and including termination of employment.

### Acceptable Use of Cell Phones during Program Hours:

There are occasions in which staff will need to use personal or organization issued electronic communication devices. In these cases, staff will have explicit direction from supervisors governing use. Situations which may require use of organization issued or personal electronic communication devices include:

* + - * Field Trips
			* Emergencies

## Gift Giving

Molesters routinely groom consumers by giving gifts, thereby endearing themselves to the consumer. They might instruct the consumer to keep the gifts a secret, which then starts teaching the consumer to keep secrets from family members/guardians. For this reason, staff and volunteers should only give gifts to groups of consumers, and only under the following circumstances:

* + 1. Administration must be made aware of and approve the gift.
		2. Family members/guardians must be notified.

# Training Requirements

## A. General Training Requirements

|  |  |  |  |
| --- | --- | --- | --- |
| ***Audience*** | ***Content*** | ***Timetable*** | ***Delivery Method*** |
| All employees and volunteers with access to consumer | Duty to Report: Mandated ReporterPreventing BullyingPreventing Abuse Against Adults with DisabilitiesOrganization Policies | Within 30 days of hire | Live Training or Online Training |
| All employees and volunteers with access to consumer | Refresher Module | Renewed Yearly | Live Training or 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 |
| Employees who violate policies or exhibit questionable boundaries | Organization PoliciesRefresher Module | Within 5 days of administrator notification | Live Training or Online Training |

# Monitoring and Supervision

When staff are adequately supervised, potential offenders are less likely to act on their impulses because they face detection. When consumers 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 a consumer. Effective supervision and monitoring require that a variety of methods be used frequently, at both scheduled and random times.

## 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.

## Checking into the Facility:

* + 1. When visitors enter the facility, they must check in with the front desk.
		2. Consumers must check in with their Unit Supervisor/Hab. Tech. when entering the facility. If it is after 8:30am, consumers must check in at the front desk.
		3. All entrances and exits will be consistently monitored.

## General Supervision

General supervision procedures:

* + 1. **Administrative and Supervisory Visits to Consumer Programs**- consumer supervisors and administrators will regularly visit all consumer programs to ensure that all activities are well- managed and that policies are observed by all in attendance.
		2. **Ratios**- Each staff member will follow the ratio requirements of the program.

## Monitoring Consumer in Facilities

That said, because the program is responsible for all consumers in the facility, we recommend implementing the following practices:

* + 1. All consumers must be signed-in AND signed-out of the facility.
		2. All consumers and their family members/guardians will be given a copy of the Consumer Handbook and will sign that they have received it. The Consumer Handbook outlines the program’s behavioral expectations and policies regarding appropriate and inappropriate interactions and includes a disciplinary policy which explains that consumers may be suspended or dismissed from the program for policy violations.
		3. While in the facility, all consumers must be supervised at all times.

## Monitoring High Risk Activities

### Bathroom Activities

Most incidents of consumer-to-consumer abuse occur in the bathrooms. Therefore, the following supervision guidelines are recommended:

* + - * + If the bathroom only has one stall, only one consumer should enter the restroom while the others wait outside with the staff.
				+ If there are multiple stalls, only send in as many consumers as there are stalls.
				+ Staff may stand outside the bathroom door but remain within earshot.

### Transition Times and Free Times

Transition times and free times pose a high risk for incidents. To decrease the risk of incidents, the following guidelines are recommended:

* + - * Consumers should remain in line-of-site of staff at all times.
			* Staff-to-consumer ratios must be followed.

### Transportation Activities

Transporting consumers may increase the risk of abuse or false allegations and may provide a time for unsupervised consumers to engage in consumer-to-consumer sexual activity.

The transportation guidelines:

* + - * Permission forms will be required from all consumers on the trip. Staff will take these permission forms and medical releases with them on the trip.
			* Staff will have a list of the consumers on the trip. Staff will take roll when boarding the bus, when leaving the bus, periodically throughout the trip, and then again when boarding the bus.
			* Staff-to-consumer ratios will be followed. The driver is not included in the supervision ratio.
			* Staff are required to sit in seats that permit maximum supervision.
			* When possible, high risk consumers are seated by themselves or with a staff member.
			* Drivers are prohibited from making unauthorized stops.
			* Documentation of any unusual occurrences is required.

# Responding

How an organization 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, consumer, or family member/guardian has expressed a concern or made an allegation about the treatment of a consumer, swift and determined action must be taken to reduce any subsequent risk to the consumer, to the accused staff member or volunteer, and to the organization. Organizations must establish precise, unequivocal requirements for reporting to the authorities and for adhering to a serious-incident response plan.

## Responding to Suspicious or Inappropriate Behaviors or Policy Violations

Because Chatham Trades, Inc. is dedicated to maintaining zero tolerance for abuse, it is imperative that every staff member actively participates in the protection of consumers. 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.

* Violation of the abuse prevention policies described above
* Seeking private time or one-on-one time with consumers
* Buying gifts for individual consumers
* Making suggestive comments to consumers
* Picking favorites

***Examples of Suspicious or Inappropriate Behaviors Between Staff/Volunteers and Consumer***

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

### 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:

* Interrupt the behavior.
* Report the behavior to a supervisor, director, or other authority.
* 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.

***Guidelines for Staff/Volunteers Response to Suspicious or Inappropriate Behaviors and/or Policy Violations***

###

### 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:

* 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.

***Guidelines for Supervisors and Administrators Response to Suspicious or Inappropriate Behaviors and/or Policy Violations***

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

* + - * Increase monitoring or supervision of the staff, volunteer, or program.
			* If policy violations with consumers 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 consumers.

### Organizational Response:

|  |  |
| --- | --- |
|  | ***Guidelines for Organizational Response*** |
| * Review the need for increased supervision.
* Review the need for revised policies or procedures.
* Review the need for additional training.
 |

## Responding to Suspected Abuse by an Adult

### Staff or Volunteer Response to Abuse:

As required by mandated reporting laws, staff and volunteers must report any suspected abuse or neglect of a consumer—whether on or off organization 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.

In addition to reporting to state authorities, staff and volunteers are required to report any suspected or known abuse of consumers 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:

* + - * Immediate supervisor
			* Executive Director
			* Assistant Director
			* Quality Assurance Manager
* 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 to you.
* Protect the alleged victim from intimidation, retribution, or further abuse.
* Immediately report the allegation or incident to the proper organization 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 organization authority.

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

### Supervisors and Administrators Response to Abuse:

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

* First, determine if the consumer is 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.
* If the alleged abuse involves a staff member or volunteer, notify your crisis management team and follow your crisis management plan.
* Suspend the accused staff or volunteer until the investigation is completed.

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

##

## Responding to Consumer-to-Consumer Sexual Abuse and Sexualized Behaviors

The thought that one consumer may sexually abuse another consumer does not occur to many people. Consumer-to- Consumer sexual activity and sexualized behaviors often remain unreported in organizations because staff and volunteers are not comfortable documenting these situations, or may not know how.

### Consumer -to- Consumer Interactions:

Most serious incidents of consumer -to- consumer abuse are preceded by more subtle incidents such as name-calling, taunting, or roughhousing. Interrupting these interactions early and establishing and communicating standards of conduct can keep the program environment safe. Chatham Trades, Inc. recognizes that the following interactions are high risk and should be prohibited:

|  |  |
| --- | --- |
|  | ***Prohibited Consume***r ***-to-Consumer Interactions*** |
| * Hazing
* Bullying
* Derogatory name-calling
* Games of Truth or Dare
* Singling out one consumer for different treatment
* Ridicule or humiliation
 |

In order to adequately respond to and track incidents within the organization, all sexual activity between consumers and sexualized behaviors of consumers must be consistently documented.

###

### Staff and Volunteer Response:

Consumer -to- Consumer sexual behaviors can include inappropriate touching, exposing body parts, using sexualized language, making threats of sexual activity, engaging in sexual activity, and similar types of interactions.

If staff witness consumer -to- consumer sexual behaviors, they are instructed to follow these guidelines:

* If you observe sexual activity between consumers, you should immediately separate them.
* Calmly explain that such interactions are not permitted and separate the consumers .
* Notify your supervisor.
* Complete the necessary paperwork including what you observed and how you responded.
* Follow your supervisor's instructions regarding notifying the authorities and informing the parents/guardians of the consumer involved.
* In some cases, if the problem is recurring discipline may be required including not allowing one or both consumers to return to the program.

***Guidelines for Staff and Volunteers Responding to Consumer-to- Consumer***

***Sexual Activity***

### Supervisors and Administrators Response:

In the event that a supervisor or administrator receives a report of a consumer’s sexualized behavior or consumer -to- consumer sexual activity, the supervisor should do the following:

* Meet with the staff who reported the sexual activity to gather information.
* Confirm that the consumers involved have been separated or placed under increased supervision.
* Review the steps taken by the staff on duty.
* Review the incident report to confirm it is accurately and thoroughly completed.
* Meet with parents/guardians of the consumers involved.
* Determine what actions should be taken to make sure there is no recurrence, including assessing the suitability of the program for the children involved.
* Notify the proper authorities.
* Develop a written corrective action or follow-up plan in response to the incident

***Guidelines for Supervisors and Administrators Responding to Consumer-to-Consumer Sexual Activity***

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

1. Review the need for additional supervision
2. Review the need for revised policies or procedures
3. Review the need for additional training
4. Alert others in the organization

###

### Organizational Response:

After the internal review of the sexualized behavior or consumer -to- consumer sexual activity, the organization will determine what can be done to prevent a reoccurrence, such as:

|  |  |
| --- | --- |
|  | ***Guidelines for Organizational Response*** |
| * Review the need for additional supervision.
* Review the need for revised policies or procedures.
* Review the need for additional training.
* Alert others in the organization.
 |

# Administrative Practices

* 1. **Critical Incident Management Plan**

##### Prior to Allegation/Incident

* Determine who from your Organization will be on the Critical Incident Management Team.
* Educate all employees and volunteers on what to do if someone alleges current or historical abuse involving an Organization member, employee or volunteer.
* All employees and volunteers should know how to fulfill their duties as mandated reporters (if they are mandated reporters according to state law).
* All employees and volunteers should be trained on how to complete the appropriate critical incident forms for your Organization.

##### Immediate Safety

* Follow all mandated reporting requirements and contact the authorities as appropriate.
* Where applicable, prevent the accused from having further access to consumers until a thorough incident review is completed. Before beginning an internal incident review, verify with local authorities that this will not interfere with their investigation.
* If the accused person is an employee, follow progressive discipline procedures accordingly. This may involve suspending the accused during the investigation.
* When applicable, notify other employees.

##### Initial Communication Plan

* Designate a point person to respond to all inquiries from parents, the media, and other stakeholders.
	+ Prepare a short media statement in advance of getting a media inquiry.
	+ All oral and written communication should speak with a voice of compassion and confidence.
	+ All employees and volunteers should know how to refer media inquiries to the appropriate person.
* As soon as possible, meet in person (not over the phone) with identified victims and their parents/guardians.
	+ Reassure them that you are taking this seriously.
	+ Find out what response they expect and be prepared to explain support you will offer, such as counseling.
* Consider reaching out in writing to parents/guardians of all consumers currently attending your Organization as well as those with past contact with the accused offender.
	+ The message should communicate:
		- **Empathy**: Begin by stating that such incidents run counter to your Organization’s values.
		- **Facts**: Include a summary of the incident, including information about the arrest, suspension, investigation, etc.
		- **Contact Request.** Ask family members/guardians to contact you or the specified authorities if they suspect their child may have been abused.
		- **Your Response**: Explain that you are fully cooperating with the authorities. Describe proactive steps you are taking such as offering resources to parents, hosting a parent meeting, training staff, and conducting an independent investigation to learn from this incident so you can prevent it from happening again.
* Host a family member/guardian meeting to speak directly with concerned families and directly answer any questions before rumors or misinformation is spread.
	+ Communicate as much information as you can about the incident.
	+ Provide information regarding the proactive steps leadership is taking in response to the incident.
	+ Describe resources you are providing families, and give parents a chance to ask questions.
	+ Provide parents with information about how to talk to their children about abuse.

##### Ongoing Communication and Response

* Determine how to manage ongoing relations with authorities, parents, the community, and media.
	+ Consider adding a page to your website with updated details about the incident.
	+ Designate specific individuals in your organization to handle various communications and outreach efforts.

##### Promote Prevention at All Levels of the Organization

* Educate parents on abuse prevention. Offer a workshop during which family members/guardians can learn how to protect their loved ones from abuse. This is an educational session that is different from the family member/guardian meeting described above.
* Provide an education program to all consumers involved with your Organization on how to protect themselves from abuse and how to express concerns.
* Train (or –re-train) all employees and volunteers on how to identify and report “red-flag” behaviors that do not rise to the level of suspected abuse.

**RECEIPT OF**

**CHATHAM TRADES ABUSE PREVENTION MANUAL**

Please sign below acknowledging that you have received the Chatham Trades Abuse Prevention Manual and that you have reviewed and understand the policy and agree to comply with Chatham Trades, Inc.’s policies regarding abuse prevention.

 **Keep the Chatham Trades Abuse Prevention Manual for your records.**

The provisions contained in the Chatham Trades Abuse Prevention Manual will apply whether or not this receipt is returned.

I \_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_\_(**print full name**) hereby acknowledge the receipt of the **Chatham Trades, Inc. Abuse Prevention Manual** and realize that it is my responsibility to read it in detail so that I clearly understand the material.

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Employee Signature Date