

PRISON RAPE ELIMINATION ACT (PREA)

Procedure:

A. Prevention/Detection:

1. During the intake process, all residents receive information explaining Bridge's zero-tolerance policy regarding sexual abuse and sexual harassment, how to report incidents or suspicions of sexual abuse or sexual harassment, their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. New residents receive The Prevention of Sexual Abuse pamphlet for further review. Pamphlets are also made available in Spanish.
2. The residents review the DOCCS PREA videos monthly and discuss related information. Documentation of resident participation in these education sessions is maintained in a separate logbook.
3. New resident information is received from DOCCS prior to admission to include but not limited to the offender's age, criminal record, and prior identified history of sexual victimization. If the offender is identified as a potential victim, bed and work detail assignments will be assigned in accordance with the established protocols based on known information.
4. Within thirty (30) days from the client's arrival to the Center, the client will be reassessed for risk of victimization or abusiveness based upon any additional, relevant information received by the Center since admission. The client will continue to be assessed every thirty (30) days to assure of continued safety.

B. Staff:

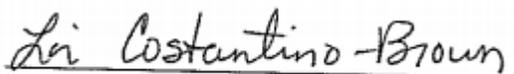
1. Centers will develop a staffing plan that provides adequate staffing levels and video monitoring to protect clients against sexual abuse.
2. Staff members of the opposite gender must announce their presence when entering an area where residents are likely to be showering, performing bodily functions, or changing clothes.
3. Any staff member will notify the supervisor if he/she observes a client acting in what appears to be a sexually threatening or coercive manner, or if the staff member has reason to believe that a client poses a risk of being sexually victimized.
4. Security/safety concerns will be immediately addressed by the Supervisor and he/she will take necessary steps to ensure the security and safety of the client(s).
5. Staff shall ensure that unannounced rounds are conducted in accordance with departmental procedure.
6. Staff who violate the Company sexual abuse or sexual harassment policies will be subject to disciplinary sanctions up to and including termination.

7. Any contractor or volunteer who engages in sexual abuse shall be prohibited from contact with clients and shall be reported to law enforcement agencies, unless the activity was clearly not criminal, and to relevant licensing bodies.
- C.** Training/Education: All staff and volunteers shall be thoroughly trained and informed regarding the company's zero-tolerance policy on sexual abuse, inclusive of staff sexual misconduct and sexual harassment at least every two (2) years. Staff shall be taught;
1. the Company's zero-tolerance for sexual abuse and sexual harassment;
 2. how to fulfill their responsibilities under the Company's sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
 3. the client/offender's rights to be free from sexual abuse and sexual harassment;
 4. that the rights of staff and clients are to be free from retaliation for reporting sexual abuse, and sexual harassment;
 5. how to detect and respond to signs of threatened and actual sexual abuse;
 6. how to avoid inappropriate relationships with clients; and
 7. how to communicate effectively and professionally with clients, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming inmates.
- D.** Clients/offenders:
1. The House Director/Supervisor will ensure that The Prevention of Sexual Abuse pamphlet is distributed to all clients entering the Center, and that all related PREA posters are clearly displayed in both English and Spanish, in areas easily accessible to clients, family members, and the public. Posters will identify how to report abuse or harassment to a public office that is not part of the agency and that is able to receive and immediately forward client reports of sexual abuse and sexual harassment to agency officials, allowing the client to remain anonymous upon request.
- E.** All staff, volunteers, and contractors will ensure that they foster an environment within their Center that clearly precludes sexual abuse and sexual harassment. This includes, but may not be limited to;
1. taking all reports concerning sexual abuse seriously;
 2. initiating immediate reporting of alleged sexual abuse, staff sexual misconduct and sexual harassment to DOCCS and/or local police department;
 3. taking immediate steps to ensure preservation of possible crime scenes;
 4. taking all appropriate measures to ensure the safety of a client who may have been sexually abused or of a client who may have reported the sexual abuse of another; and
 5. promptly report any allegation involving retaliation against alleged victims or identified reporters of sexual abuse and sexual harassment.

- a. No time limit shall be imposed for sexual abuse or sexual harassment grievances.

F. Response:

1. Any employee who has knowledge of or receives information, written or verbal (via firsthand or from a third party), regarding the fear of, coercion into, or actual sexual abuse, sexual misconduct, or sexual harassment will immediately notify the Supervisor or Executive Director.
2. Any employee who fails to report or take immediate action regarding these incidents, or intentionally manifest actions to embarrass, demean, or humiliate any victim or informant, or trivializes a report of sexual abuse will be subject to appropriate level of discipline. This discipline will possibly include termination of employment.
3. Clients who have been sexually abused or are aware of sexual abuse, sexual harassment, or sexual misconduct will immediately notify the nearest staff member and report the incident. All reasonable measures to secure the safety of the client(s) will be implemented by the Supervisor or Executive Director.
4. Clients who are victims of sexual abuse, staff sexual misconduct, or sexual harassment will immediately notify the nearest staff member and report the incident. Any client, staff member, volunteer, or contractor who knows or should have known any person has committed sexual abuse, sexual misconduct, or sexual harassment of a client shall notify the Supervisor or Executive Director. Upon notice, the Supervisor or Executive Director shall take all reasonable measures to secure the safety of the client(s), to include follow through with the local emergency services. The Department of Corrections and Community Supervision or a law enforcement agency shall conduct a criminal investigation of any reported staff sexual misconduct to a client.
5. Following a report of sexual abuse, BONY shall monitor the conduct and treatment of residents or staff who reported the sexual abuse and of residents who were reported to have suffered sexual abuse to ensure of no possible retaliation by resident or staff. This monitoring shall continue every 30 days if necessary.


Lori Costantino-Brown
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