

Community Renewal Team, Inc.

and

Fresh Start Program

The Prison Rape Elimination Act (PREA)

POLICY AND PROCEDURES

Approved by Program Director: _____

Date: _____

Approved by Vice President: _____

Date: _____

Approved by President/CEO: _____

Date: _____

Effective Date: _____

CRT and Fresh Start Program

PREA POLICY AND PROCEDURES

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Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Zero Tolerance of sexual abuse and sexual harassment (includes definitions); PREA coordinator.	Department: Fresh Start (FS)
Policy #: PREA- 1000	Primary Responsibility: CRT
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.211	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. (CRT) and the Fresh Start Program will provide a safe and secure environment for all residents. Community Renewal Team, Inc. and the Fresh Start Program, with the administrative support of the Community Renewal Team, Inc. and the Fresh Start Program ensures training, education, prevention, detection, response, investigation, and tracking of all reported acts of sexual abuse and sexual harassment.

Authority and Reference:

- 1) The Prison Rape Elimination Act of 2003, 45 U.S.C. § 15601, et seq;
- 2) Prison Rape Elimination Act Lockup Standards, 28 C.F.R. Part 115;
- 3) Connecticut General Statutes §§ 6-32d, 17a-101, 17a-101b, 18-81cc.

Definitions for Community Confinement Facility:

- A. Agency - For the purposes of this policy, Community Renewal Team, Inc. (CRT) and the Fresh Start Program operates a residential facility and are directly responsible for the implementation of this policy.
- B. Body cavity search - A search of the anal or genital opening.
- C. Contractor - A person who provides services on a recurring basis pursuant to a contractual agreement with the agency.
- D. Direct staff supervision - Staff that are in the same room with, and within reasonable hearing distance of, the resident.
- E. Exigent circumstances - Any set of temporary or unforeseen circumstances that require immediate action in order to combat a threat to the security or order of a facility.

- F. Gender nonconforming – A person whose appearance or manner does not conform to traditional societal gender expectations.
- G. Intersex – A person whose sexual or reproductive anatomy or chromosomal pattern does not seem to fit typical definitions of male or female. Intersex medical conditions are sometimes referred to as disorders of sex development.
- H. Pat-down search – Running of the hands over the clothed body of a resident by a staff member to determine whether the resident possesses contraband.
- I. Resident – A female residing in Community Renewal Team, Inc. and the Fresh Start Program.
- J. Retaliation – Any covert or overt action or threat of action taken against an employee, contractor, or resident in response to their complaint of sexual abuse or sexual harassment or cooperation in the reporting or investigation of sexual abuse or sexual harassment, regardless of the merits or the disposition of the complaint. Examples of acts of retaliation are unnecessary discipline, intimidation, unnecessary changes in work or program assignments, unjustified transfers or placements and unjustified denials of privileges or services.
- K. Sexual Abuse - Includes the sexual abuse of a resident by another resident and the sexual abuse of a resident by a staff member, contractor or volunteer.
- L. Staff - Employees of Community Renewal Team, Inc. and the Fresh Start Program, including any Community Renewal Team, Inc. and the Fresh Start Program staff.
- M. Strip search - A search that requires a person to remove or arrange some or all clothing so as to permit a visual inspection of the person's breasts buttocks, or genitalia.
- N. Transgender - A person whose gender identity (i.e., internal sense of feeling male or female) is different from the person's assigned sex at birth.
- O. Volunteer - means an individual who donates time and effort on a recurring basis to enhance the activities and programs of the agency.

Definitions related to sexual abuse:

- 1) Sexual abuse of a resident by another resident includes any of the following acts, if the resident does not consent, is coerced into such act by overt or implied threats of violence, or is unable to consent or refuse:
 - a) Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;
 - b) Contact between the mouth and the penis, vulva or anus;
 - c) Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument; and

- d) Any other intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or the buttocks of another person, excluding contact incidental to a physical altercation.
- 2) Sexual abuse of a resident by a staff member or contractor - Includes any of the following acts, with or without consent of the resident:
- a) Contact between the penis and the vulva or the penis and the anus, including penetration, however slight;
 - b) Contact between the mouth and the penis, vulva or anus;
 - c) Contact between the mouth and any body part where the staff member or contractor has the intent to abuse, arouse, or gratify sexual desire;
 - d) Penetration of the anal or genital opening, however slight, by a hand, finger, object, or other instrument, where the staff member or contractor has the intent to abuse, arouse, or gratify sexual desire;
 - e) Any other intentional contact, either directly or through the clothing, of or with the genitalia, anus, groin, breast, inner thigh, or the buttocks, where the staff member or contractor has the intent to abuse, arouse or gratify sexual desire;
 - f) Any attempt, threat, or request by a staff member or contractor to engage in the activities described in paragraphs (a) – (e) of this section;
 - g) Any display by a staff member or contractor of his or her uncovered genitalia, buttocks, or breasts in the presence of a resident, and
 - h) Voyeurism by a staff member or contractor, which means an invasion of privacy of a resident by staff for reasons unrelated to official duties, such as peering at a resident who is using a toilet to perform bodily functions; requiring a resident to expose his or her buttocks, genitals, or breasts; or taking images of all or part of a resident's naked body or of a resident performing bodily functions.
- 3) Sexual harassment includes -
- a) Repeated and unwelcome sexual advances, requests for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by one resident directed toward another; and
 - b) Repeated verbal comments or gestures of a sexual nature to a resident by a staff member or contractor, including demeaning references to gender, sexually suggestive or derogatory comments about body or clothing, or obscene language or gestures.

PROCEDURE:

A. Zero Tolerance:

- 1) Community Renewal Team, Inc. and the Fresh Start Program have zero tolerance for all forms of resident on resident or staff on resident sexual abuse or sexual harassment.
 - a) Community Renewal Team, Inc. and the Fresh Start Program has designated an upper level agency-wide PREA Coordinator to develop, implement, and oversee Community Renewal Team, Inc. and the Fresh Start Program efforts to prevent, detect, and respond to such conduct.
 - i) The PREA Coordinator is currently the Director of CRT's Quality Assurance Department.
- 2) Retaliation – Community Renewal Team, Inc. and the Fresh Start Program protects all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other residents or staff.
 - a) The PREA Coordinator will monitor retaliation for Community Renewal Team, Inc. and the Fresh Start Program staff.
- 3) All staff will:
 - a) Ensure that their conduct does not constitute or promote sexual abuse or sexual harassment as defined in this policy.
 - b) Report any known or suspected act which violates this policy in any way.
 - c) Cooperate truthfully and completely with any investigation conducted under this policy.

B. Education:

- 1) Staff will be trained in, and will sign a statement that they understand, the following:
 - a) Community Renewal Team, Inc. and the Fresh Start Program has zero tolerance for all forms of sexual abuse and sexual harassment;
 - b) The resident's right to be free from sexual abuse and sexual harassment;
 - c) The dynamics of sexual abuse and sexual harassment in residential settings, including determining which residents are most vulnerable,
 - d) The right of residents and staff to be free from retaliation for reporting sexual abuse or sexual harassment;
 - e) How to detect and respond to signs of threatened and actual abuse;

- f) How to communicate effectively and professionally with all residents, and
- g) How to comply with relevant laws related to the mandatory reporting of sexual abuse to authorities.

C. Formal Notice of PREA:

1) Informational and Acknowledgment of PREA:

- a) During the intake process, staff will notify all residents that Community Renewal Team, Inc. and the Fresh Start Program:
 - i) Have zero tolerance for all forms of sexual abuse and sexual harassment;
 - ii) That there are multiple ways for residents to privately report sexual abuse and sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment and staff neglect or violation of responsibilities that may have contributed to such incidents, and;
 - iii) The ways to report sexual abuse or sexual harassment to authorities, which allows the reporting resident to remain anonymous.
- b) Each resident will complete the required PREA forms which indicate the resident has received the notice. This form will be retained in the resident's file.
 - i) Once a resident has received this notice, the resident does not need to acknowledge receipt of notice again, for a period of one year, so long as they remain in Community Renewal Team, Inc. and the Fresh Start Program.
- c) Refer each resident to signage posted in the facility stating this policy.
- d) How to utilize language assistance services to obtain a translation of this notice, if necessary.

2) Screening:

- a) All residents will be screened to assess their risk of being sexually abused or being sexually abusive toward other residents. Staff will follow the instructions on the assessment form for making this assessment by asking each resident question about their perceived risk of being abused. Staff may also consider their own assessment of risk factors. These forms will be retained with the daily paperwork as well as in the resident's file.
 - i) If risk factors indicate that a resident is either at risk of being abused or being an abuser, staff will utilize steps to mitigate any danger to resident(s), which may include:
 1. Consultation with Referral Source,
 2. Direct sight and sound supervision,
 3. Single room housing if available,

4. Placement in a room with a staff member close enough to intervene quickly.
- ii) Any resident found to be at risk will be segregated during transportation in a Fresh Start staff vehicle.

D. Response Planning:

1) Reporting Duties

- a) All staff will immediately report to the PREA Coordinator, the Program Manager/supervisory designee, the HR Director, or any supervisor or manager or senior management staff any knowledge, suspicion, or information regarding:
 - i) An incident of sexual abuse or sexual harassment that occurred in the program,
 - ii) Retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment.
 - iii) Any staff neglect or violation of responsibilities that may have contributed to such an incident or retaliation.
- b) All reports of sexual abuse and sexual harassment that are received from third parties will be received and responded to by all staff as according to the policy.
- c) As soon as practical, Community Renewal Team, Inc. and the Fresh Start Program staff must report all allegations of sexual abuse, including third party and anonymous reports, to the local authorities for further investigation.
 - i) Call 911 to obtain transportation for the resident to the nearest acute care hospital for care and examination.
 - ii) When a resident states that they have been sexually abused, staff will request that the resident not take any action that could destroy physical evidence, including washing, drinking or eating, unless medically indicated. If toileting needs to take place, the resident should be instructed to not wipe.
 - iii) The Program Manager/supervisory designee will contact Connecticut Sexual Assault Crisis Services to arrange for a sexual assault advocate to go to the hospital where the resident is being transported.
- e) All allegations of sexual harassment will be reported for investigation to the PREA Coordinator.
 - i) Allegations of sexual harassment between residents will be reported for investigation by Community Renewal Team, Inc. and the Fresh Start Program.
 - ii) Allegations of sexual harassment of residents by staff will be reported for investigation by the Administrative Office of Fresh Start program.

- f) Upon receiving an allegation that a resident was sexually abused while residing at Community Renewal Team, Inc. and the Fresh Start Program, the staff receiving this information will immediately notify the PREA Coordinator, the Program Manager/supervisory designee, the HR Director, or a supervisor, manager, or senior management staff.
 - i) The person receiving such notice will immediately notify the PREA Coordinator, if the PREA Coordinator was not initially notified.
 - ii) The PREA Coordinator will notify the Administration of Community Renewal Team, Inc. and the Fresh Start Program as soon as possible, but not longer than by the end of the business day on the day the report of the allegation was received.
 - iii) The senior management of Community Renewal Team, Inc. and the Fresh Start Program will:
 - 1. Institute the Incident Report process;
 - 2. Call the local authorities to begin a criminal investigation.
- g) Upon receiving an allegation that a resident was sexually abused the Supervisor/Manager receiving this information must immediately notify the PREA Coordinator and document such report and notification in the facility log.
 - i) The PREA Coordinator will notify the Administration of Community Renewal Team, Inc. and the Fresh Start Program as soon as possible, but not later than the end of the next business day after the report of the allegation was received.
 - 1. The PREA Coordinator will keep a record of the details of the notification, including:
 - A. All persons notified;
 - B. Date and time of notification;
 - C. Date and time notice of allegation was received;
 - D. Any details of the allegation.
- h) If the allegations of sexual abuse are reported to staff after the alleged victim has been transported to a medical facility, staff must:
 - i) Notify the receiving facility of the allegation of sexual abuse and the victim's potential need for medical or social services unless the victim has requested otherwise.
 - ii) Complete an Incident Report in accordance with Community Renewal Team, Inc. and the Fresh Start Program procedures.

2) Confidentiality:

- a) After reporting the sexual abuse, staff shall not reveal any information related to the report to anyone other than to the extent necessary to make treatment and investigation decisions.

3) Administrative Investigation:

- a) Community Renewal Team, Inc. and the Fresh Start Program will ensure that all protocols are followed for crime scene preservation in order to enable the local authorities to conduct a proper investigation of all allegations of sexual abuse.
- b) Community Renewal Team, Inc. and the Fresh Start Program staff will complete an Incident Report in accordance with Community Renewal Team, Inc. and the Fresh Start Program procedures. An Incident Report must also be completed for all allegations of sexual harassment.
 - i) Reports should include:
 1. Description of physical evidence;
 2. Testimonial evidence;
 3. Credibility assessments and the reasoning behind them;
 4. Investigative facts and findings;
 5. Documentary evidence, if any, should be attached.
- c) Staff must cooperate fully with the local authorities and any administrative investigators in all facets of any criminal and/or administrative investigations.

4) Records Retention:

- i) If the alleged abuser is incarcerated, all written reports of the investigation will be retained while the abuser is incarcerated plus an additional five years.
- ii) If the alleged abuser is a staff member, all written reports of the investigation will be retained while the staff member remains employed plus an additional five years.

5) Data Collection and Review:

- a) The PREA Coordinator will collect data for all allegations of sexual abuse, will securely retain this data, and will produce a report annually which must be provided to the Administration of Community Renewal Team, Inc. and the Fresh Start Program:
 - i) This data shall be retained for at least 10 years after initial collection, unless other law requires otherwise.

E. Response to Victim:

- 1) Substantial Risk of Imminent Sexual Abuse - When the program learns by any means of notice listed in this policy or by any other means that a resident is subject to a substantial risk of imminent sexual abuse, staff will take immediate action to protect the resident.
- 2) Allegation of Sexual Abuse – Upon learning that a resident was sexually abused the first staff member to respond will:
 - a) Not leave the victim alone.
 - b) Call the Person in Charge to request the assistance from the Residential Supervisor, Program Manager, or senior management staff (i.e. PREA Coordinator);
 - c) Separate the alleged victim and abuser;
 - d) Preserve and protect the crime scene;
 - e) If the abuse occurred within a time period that would still allow for the collection of physical evidence, request that the alleged victim not take any action that could destroy physical evidence, including washing, drinking or eating, unless medically indicated. If toileting needs to take place, the resident should be instructed to not wipe.

F. Protection Against Abuse and Retaliation:

- 1) Community Renewal Team, Inc. and the Fresh Start Program will employ all available measures to protect vulnerable residents from abuse or prevent abusers from having the opportunity to abuse by:
 - a) Consultation with Referral Source.
 - b) Removing alleged resident abusers from contact with victims.
 - c) Removing alleged staff abusers from contact with victims.
 - d) Monitoring resident rooms, including by direct observation, if necessary.
 - e) Transferring potential victims/abusers to other facilities, if operationally possible.
 - f) Segregation during transportation in transport vehicles.
 - g) Actively monitoring the conduct and treatment of residents or staff who have reported abuse and of residents who have reported to have suffered abuse for signs of retaliation.
 - i) The program will remedy any signs of retaliation detected.
 - h) Protecting individuals who cooperate in investigations who express fear of retaliation.

- 2) The program's obligation to protect against retaliation ends if any allegation is unfounded.

Deviations

Any deviation from the policy and procedure in this section requires prior written approval from the Executive Director of Community Renewal Team, Inc.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Contracting with other entities for the confinement of residents	Department: Fresh Start (FS)
Policy #: PREA-1001	Primary Responsibility: CRT
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.212	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

CRT is a private, non-profit agency. CRT and the Fresh Start Program do not contract for the confinement of its residents with other agencies or entities.

PROCEDURE:

Not applicable.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Supervision and monitoring	Department: Fresh Start (FS)
Policy #: PREA-1002	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: CRT
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.213	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

CRT and the Fresh Start Program developed and documents a staffing plan that provides for adequate levels of staffing, and, where applicable, video monitoring to protect residents against sexual abuse and sexual harassment at its Fresh Start Program.

PROCEDURE:

- 1) Staffing – The Fresh Start Program Manager/supervisory designee has developed a written plan that provides for adequate levels of staffing to protect residents against sexual abuse. The staffing ratio is based on the CT Dept. of Public Health’s guidelines.
 - i) The 1st and 2nd shift (M-F) staffing to residents ratio is 3/4 to 21;
 - ii) During the 3rd shift & weekends the staff to resident ratio is 2/3 to 21;
 - iii) Whistles are also located in all of the resident bedrooms and residents are allowed to have cell phones 15 days after admission. A blown whistle indicates that someone is in crisis.

Such staffing plan takes into consideration the following:

- a) The physical layout of the facility;
- b) The composition of the resident population;
- c) The prevalence of substantiated and unsubstantiated incidents of sexual abuse and sexual harassment; and
- d) Any other relevant factors.

In any situation in which a deviation is made from the staffing plan, written justification for such deviation will be documented and sent to the PREA Coordinator.

- 2) Video Monitoring – The Fresh Start program has a surveillance system to cover blind spots and to protect residents against all forms of sexual abuse and sexual harassment. The Program Manager/supervisory designee has developed a written plan for the use of video monitoring to protect residents against sexual abuse.
 - i) The plan specifies how existing technology will be used in sexual abuse prevention and what additional specific technology would be helpful.

- 3) Breakdown of the facilities surveillance status to date:
 - There are a total of 14 cameras:
 - 2 cameras on the 2nd floor;
 - 3 cameras on the 3rd floor;
 - 3 cameras on the 4th floor;
 - 6 cameras on the 5th floor.

 - Cameras cover the corridors, common areas, and children’s play room.

 - Cameras are in color.

 - **Note:** There are no cameras in the resident bedrooms.

 - The surveillance monitor in the sign in/intake office captures every camera simultaneously.

 - Program Manager’s computer has Remote Administration System (RAS) installed on it which allows remote surveillance of the surveillance monitor in the sign in/intake office/room from their laptop.

- 4) Reassessment - At least once annually, or whenever necessary, the PREA Team will reassess the program and make adjustments, if necessary, to:
 - i) The staffing plan;

 - ii) Prevailing staffing patterns;

 - iii) The video monitoring plan; and

 - ii) The resources available to commit to ensure adequate staffing levels.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Limits to cross gender viewing and searches	Department: Fresh Start (FS)
Policy #: PREA-1003	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility:
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.215	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program do not conduct strip searches, physical pat down searches (including cross-gender pat-down searches of female residents, absent exigent circumstances), or visual body cavity searches. It is prohibited for staff to search or physically examine a transgender or intersex resident for the sole purpose of determining the resident's genital status. Staff shall enable residents to shower, perform bodily functions, and change clothing without staff of the opposite gender viewing such activity.

PROCEDURE:

- 1) If the resident's genital status is unknown, it may be determined during conversations with the resident or by reviewing records from the referral source(s), if deemed necessary by the Program Manager.
- 2) Staff of the opposite gender will announce their presence when entering a resident housing unit.
- 3) Staff shall enable residents to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks (this includes viewing via video camera).
- 4) Transgender and intersex residents will be given the opportunity to shower separately from other residents.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Residents with disabilities and residents who are limited English proficient (LEP)	Department: Fresh Start (FS)
Policy #: PREA-1004	Primary Responsibility: CRT
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.216; Cross Reference with CRT's LEP Policy	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program shall take appropriate steps to ensure residents who are LEP or have disabilities (including, for example, residents who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment.

Please review the agency's (CRT) Employee Handbook pgs. 44-46 (attached in the PREA Standard: 115.216 folder) for the Residents with Disabilities and Residents who are limited English proficient policy and procedures.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Hiring and promotion decisions	Department: Fresh Start (FS)
Policy #: PREA-1005	Primary Responsibility: CRT
Original Policy Date:	Coordinating Responsibility:
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.217	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. has a policy prohibiting hiring or promoting anyone who may have contact with residents and prohibits enlisting the services of any contractor who may have contact with residents who:

- 1) Has engaged in sexual abuse in a prison, jail, lockup, community confinement facility, juvenile facility, or other institution (as defined in 42 U.S.C. 1997);
- 2) Has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or
- 3) Has been civilly or administratively adjudicated to have engaged in the activity described in paragraph (a) (2) of this section.

Community Renewal Team, Inc. policy requires the consideration of any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with residents.

It is the policy of Community Renewal Team, Inc. that before it hires any new employees, who may have contact with residents, it:

- (a) Conducts criminal background record checks, and;
- (b) Consistent with federal, state, and local law, makes its best efforts to contact all prior institutional employers for information on substantiated allegations of sexual abuse or any resignation during a pending investigation of an allegation of sexual abuse.

Community Renewal Team, Inc. policy requires that a criminal background record check be completed before enlisting the services of any contractor who may have contact with residents.

Community Renewal Team, Inc. policy requires that either criminal background record checks be conducted at least every five years for current employees and contractors who may have contact with residents or that a system is in place for otherwise capturing such information for current employees.

Community Renewal Team, Inc. policy states that material omissions regarding such misconduct, or the provision of materially false information, shall be grounds for termination.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Upgrade to facilities and technologies	Department: Fresh Start (FS)
Policy #: PREA-1006	Primary Responsibility: CRT
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.218	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program shall ensure PREA standards are considered when designing or acquiring or upgrading facilities and technologies.

PROCEDURE:

- 1) Facilities: When designing or acquiring any new facility and in planning any substantial expansion or modification of existing facilities, Community Renewal Team, Inc. and the Fresh Start Program shall consider the effect of the design, acquisition, expansion, or modification upon the agency's ability to protect residents from sexual abuse.
- 2) Technologies: When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, Community Renewal Team, Inc. and the Fresh Start Program shall consider how such technology may enhance the agency's ability to protect residents from sexual abuse.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Evidence protocol and forensic medical examinations	Department: Fresh Start (FS)
Policy #: PREA-1100	Primary Responsibility: CRT; Fresh Start
Original Policy Date:	Coordinating Responsibility: PREA Coordinator
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.221	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program shall contact local authorities to investigate allegations of sexual abuse. Community Renewal Team, Inc. and the Fresh Start Program staff shall offer all victims of sexual abuse access to forensic medical examinations without financial cost. Community Renewal Team, Inc. and the Fresh Start Program staff shall attempt to make available to the victim a victim advocate.

DEFINITIONS:

Rape Crisis Center: an entity that provides intervention and related assistance to victims of sexual assault.

Qualified Agency Staff/Community Based Staff: an individual who has been screened for appropriateness to serve in this role and has received education concerning sexual assault and forensic examination issues in general.

PROCEDURE:

- 1) Access to Forensic Medical Examinations: Community Renewal Team, Inc. and the Fresh Start Program shall offer victims of sexual abuse access to forensic medical examinations via Hartford Hospital, without financial cost where evidentiary or medically appropriate. Such examinations shall be performed by Sexual Assault Forensic Examiners (SAFEs) or Sexual Assault Nurse Examiners (SANEs) where possible. If SAFEs or SANEs cannot be made available, the examination will be performed by other qualified medical practitioners. Community Renewal Team, Inc. and the Fresh Start Program staff shall document its efforts to provide SAFEs or SANEs.
- 2) Victim Advocate: Fresh Start staff shall attempt to make available to the victim a victim advocate from a rape crisis center.

If a rape crisis center is not available to provide victim advocate services, Community Renewal Team, Inc. and the Fresh Start Program shall attempt to make such services available through a qualified staff member from a qualified community based organization. Community Renewal Team, Inc. and the Fresh Start Program shall document efforts to secure services from rape crisis centers.

- 3) Staff Support: As requested by the victim, the victim advocate, qualified Community Renewal Team, Inc. and the Fresh Start Program staff, or qualified staff from a community based agency shall accompany and support the victim through the forensic medical examination process and investigatory reviews and shall provide emotional support, crisis intervention, information, and referrals.
- 4) Qualifications of Investigating Agency: Community Renewal Team, Inc. and the Fresh Start Program shall request that the investigating agency abide to PREA requirements/standards.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Policies to ensure referrals of allegations for investigations	Department: Fresh Start (FS)
Policy #: PREA-1101	Primary Responsibility: CRT; PREA Coordinator
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.222	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program shall ensure that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

PROCEDURE:

- 1) Sexual Abuse/Harassment Allegations: Community Renewal Team, Inc. and the Fresh Start Program staff maintains policies to ensure that allegations of sexual abuse or sexual harassment are referred for investigation to local authorities to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. This policy is maintained on the Community Renewal Teams Intranet website. Community Renewal Team, Inc. and the Fresh Start Program staff shall document all such referrals.
- 2) Conducting Criminal Investigations: Local authorities shall be responsible for conducting criminal investigations, not Community Renewal Team, Inc. and the Fresh Start Program staff. Community Renewal Team, Inc. and the Fresh Start Program staff shall attempt to secure the publication describing the responsibilities of the local authorities and publish it on the agency's website.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Employee training	Department: Fresh Start (FS)
Policy #: PREA-1200	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility:
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.231	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program shall ensure that all employees who have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

The Fresh Start Program trains all employees who may have contact with residents on the following matters:

- 1) Agency's zero-tolerance policy for sexual abuse and sexual harassment;
- 2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
- 3) The right of residents to be free from sexual abuse and sexual harassment;
- 4) The right of residents and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
- 5) The dynamics of sexual abuse and sexual harassment in confinement;
- 6) The common reactions of sexual abuse and sexual harassment victims;
- 7) How to detect and respond to signs of threatened and actual sexual abuse;
- 8) How to avoid inappropriate relationships with residents;
- 9) How to communicate effectively and professionally with residents, including lesbian, gay, bisexual, transgender, intersex, or gender-nonconforming residents; and
- 10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

PROCEDURE:

- 1) Such training shall be tailored to the gender of the residents at the Fresh Start program facility.

- 2) All current employees who have not received training shall be trained within one (1) year of the effective date of the PREA standards, and the agency shall provide each employee with refresher training every two years to ensure that all employees know the agency's current sexual abuse and sexual harassment policies and procedures. In years in which an employee does not receive refresher training, the agency shall provide refresher information on current sexual abuse and sexual harassment policy.
- 3) The agency shall document, through employee signature or electronic verification that the employees understand the training they have received.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Volunteer and contractor training	Department: Fresh Start (FS)
Policy #: PREA-1201	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility:
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.232	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program shall ensure that all volunteers and contractors who have contact with residents have been trained on their responsibilities under the agency's sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

PROCEDURE:

- 1) Zero Tolerance: All volunteers and contractors who have contact with residents will be notified and provided a copy of the programs brochure regarding zero tolerance towards all forms of sexual abuse and sexual harassment and informed how to report sexual abuse.
- 2) Training: The level and type of training provided to volunteers and contractors will be based on the services they provide and the level of contact they have with residents.
- 3) Documentation: The agency will maintain documentation confirming that volunteers and contractors understand the training they have received.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Resident education	Department: Fresh Start (FS)
Policy #: PREA-1202	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility:
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.233; Cross reference with PREA Overarching Policy	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program shall ensure residents receive information explaining the agency'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.

PROCEDURE:

- 1) During the intake process, Community Renewal Team, Inc. and the Fresh Start Program will notify all residents that Community Renewal Team, Inc. and the Fresh Start Program:
 - Has zero tolerance for all forms of sexual abuse and sexual harassment;
 - Has multiple ways for residents to privately report sexual abuse and sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment and staff neglect or violation of responsibilities that may have contributed to such incidents; and
 - Has a way to report sexual abuse or sexual harassment to authorities, allowing the reporting resident to remain anonymous.

- 2) During intake, staff will complete the required form for each resident which indicates the resident has received the required notices. This form will be signed by the resident, along with the staff conducting the intake, and retained in the resident's file.
 - Once a resident has received the notices the resident does not need to acknowledge receipt of notice again, for a period of one year, so long as they remain in Community Renewal Team, Inc. and the Fresh Start Program.

- 3) During intake, the resident will be referred to signage posted in the facility stating the zero tolerance policy.
- 4) Community Renewal Team, Inc. and the Fresh Start Program staff will utilize language assistance services to obtain a translation of this signage, if necessary. Community Renewal Team, Inc. and the Fresh Start Program staff will not rely on the services of residents to provide assistance to other residents with disabilities or who are limited English proficient.
- 5) Community Renewal Team, Inc. and the Fresh Start Program staff will provide refresher information whenever a resident is transferred from a different community confinement facility.
- 6) Community Renewal Team, Inc. and the Fresh Start Program will provide resident education in formats accessible to all residents, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled as well as residents who have limited reading skills.
- 7) Community Renewal Team, Inc. and the Fresh Start Program will maintain documentation of resident participation in these education sessions.
- 8) In addition to providing such education, Community Renewal Team, Inc. and the Fresh Start Program will ensure key information is continuously and readily available or visible to residents through posters, resident handbook, or other written formats.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Specialized training: Investigations	Department: Fresh Start (FS)
Policy #: PREA-1203	Primary Responsibility: CRT
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.234	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program will rely on local and/or state authorities to investigate sexual abuse.

PROCEDURE:

- 1) Allegation of Sexual Abuse: upon learning a resident was sexually abused, the first Community Renewal Team, Inc. and/or Fresh Start Program staff member to respond will:
 - Not leave the victim alone;
 - Call the lead individual on duty to request assistance from the Residential Supervisor, Program Manager, or senior management staff (i.e. PREA Coordinator);
 - Call 911 to obtain transportation for the resident to Hartford Hospital for care and examination. Hartford Hospital is PREA compliant.
 - Separate the alleged victim and abuser, if applicable.
 - Preserve and protect the crime scene, if applicable.
 - If the abuse occurred within a time period that would still allow for the collection of physical evidence, request that the alleged victim not take any action that could destroy physical evidence, including washing, drinking or eating, unless medically indicated. If toileting needs to take place, the resident should be instructed to not wipe.
 - As soon as practical, Community Renewal Team, Inc. and the Fresh Start Program staff shall contact the CT Sexual Assault Crisis Center Services to arrange for a sexual assault advocate to go to the hospital where the resident is being transported.

- 2) Community Renewal Team, Inc. and the Fresh Start Program staff shall obtain copies of the documentation from local and/or state authorities investigating the abuse.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Specialized training: Medical and mental health care	Department: Fresh Start (FS)
Policy #: PREA-1204	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility:
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard:115.235	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program have policy related to the training of mental health practitioners (Clinicians) that work regularly in its facility. CRT and the Fresh Start Program do not employ medical practitioners for the Fresh Start Program.

Community Renewal Team, Inc. and the Fresh Start Program maintain documentation showing that medical and mental health practitioners have completed the required training.

PROCEDURE:

Not applicable.

Date Reviewed: _____ Changes made to P & P: YES NO
 Date Reviewed: _____ Changes made to P & P: YES NO
 Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Screening for risk of victimization and abusiveness	Department: Fresh Start (FS)
Policy #: PREA-1300	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility:
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.241	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program ensure all residents are screened to assess their risk of being sexually abuse victimization or being sexually abusive toward other residents using an objective assessment/screening instrument.

PROCEDURE:

- 1) Assessment: Staff will follow the instructions on the assessment/screening instrument form for making this assessment by asking residents questions about their perceived risk of being abused. Staff may also consider their own assessment of risk factors. Completed assessments will be retained with the program's daily paperwork as well as in the resident's file.
- 2) Assessment Timeframe: Residents shall be assessed during the intake process or upon transfer from another facility. The assessment will take place within 72 hours of arrival at the facility.
- 3) Assessment Content: The screening shall consider, at a minimum, the following criteria to assess residents for risk of sexual victimization:
 - Whether or not the resident has a mental, physical, or developmental disability;
 - The age of the resident;
 - The physical build of the resident;
 - Whether the resident has previously been incarcerated;
 - Whether the resident's criminal history is exclusively nonviolent;
 - Whether the resident has prior convictions for sex offenses against an adult or child;
 - Whether the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender nonconforming;
 - Whether or not the resident has previously experienced sexual victimization; and
 - The residents own perception of vulnerability.

The assessment screening shall consider prior acts of sexual abuse, prior convictions for violent offenses, and history of prior institutional violence or sexual abuse, as known to the agency, in assessing residents for risk of being sexually abusive.

- 4) Re-assessment: Within a set time period, not to exceed 30 days from the resident's arrival at the facility, the facility will reassess the resident's risk of victimization or abusiveness based upon any additional, relevant information received by the facility since the intake screening.

A resident's risk level shall be reassessed when warranted due to a referral, request, incident of sexual abuse, or receipt of additional information that bears on the resident's risk of sexual victimization or abusiveness.

Failure to Answer Assessment Questions: Residents will not be disciplined for refusing to answer, or for not disclosing complete information in response to assessment questions regarding:

- Whether or not the resident has a mental, physical, or developmental disability;
- Whether or not the resident is or is perceived to be gay, lesbian, bisexual, transgender, intersex, or gender non-conforming;
- Whether or not the resident has previously experienced sexual victimization; and
- The residents own perception of vulnerability.

- 5) Confidentiality: Community Renewal Team, Inc. and the Fresh Start Program staff shall implement appropriate controls on the dissemination within the facility of responses to questions asked pursuant to this PREA Standard to ensure sensitive information is not exploited to the resident's detriment by staff or other residents.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Use of screening information	Department: Fresh Start (FS)
Policy #: PREA-1301	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility:
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.242	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program are responsible for ensuring the safety of each resident.

PROCEDURE:

- 1) Risk Screening Information: Community Renewal Team, Inc. and the Fresh Start Program staff shall use information from the risk screening required in PREA Standard 115.241 to inform housing, bed, work, education, and program assignments with the goal of keeping separate those residents at high risk of being sexually victimized from those at high risk of being sexually abusive.
- 2) Individualized Determinations: Community Renewal Team, Inc. and the Fresh Start Program staff shall make individualized determinations about how to ensure the safety of each resident.

A. Transgender or Intersex Residents:

- In deciding whether to assign a transgender or intersex resident to Community Renewal Team, Inc. and the Fresh Start Program and in making other housing and programmatic assignments, Community Renewal Team, Inc. and the Fresh Start Program staff shall consider on a case – by – case basis whether the placement would ensure the residents health and safety, and whether the placement would present management or security problems.
- A transgender or intersex resident's own views with respect to his safety shall be given serious consideration.
- Transgender and intersex residents shall be given the opportunity to shower separately from other residents.

- 3) Residential Placement: Community Renewal Team, Inc. and the Fresh Start Program staff shall not place lesbian, gay, bisexual, transgender, or intersex residents in dedicated facilities, units, or wings solely on the basis of such identification or status, unless such placement is in a dedicated facility unit, or wing established in connection with a consent decree, legal settlement, or legal judgment for the purpose of protecting such residents.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Resident reporting	Department: Fresh Start (FS)
Policy #: PREA-1400	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility:
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.251	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program shall provide multiple internal ways for residents and staff to privately report sexual abuse and sexual harassment, retaliation by other residents or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents.

PROCEDURE:

1) Resident Reporting:

- During the intake process, residents will be informed about the multiple ways to privately report sexual abuse and sexual harassment, retaliation by other residents or staff for reporting such behavior and staff neglect or violation of responsibilities that may have contributed to such incidents. The following reporting options are available to residents or staff:
 - Reports can be made anonymously at any time by contacting Community Renewal Team, Inc. (CRT) Confidential Hotline at 1-866-211-0805.
 - Reports can be made verbally to any Fresh Start program staff member, or to the residents Probation Officer, Court Officials (i.e. Bail), Clergy, etc.
 - Reports can be made in writing (even confidentially) to Community Renewal Team, Inc. Human Resources Dept. at 555 Windsor St. Hartford, CT 06120, any Fresh Start program staff member, or to the residents Probation Officer, Court Officials (i.e. Bail), Clergy, etc.
- Residents will also be informed of at least one way to report abuse or harassment to an office that is not part of the program and that is able to receive and immediately forward resident reports of sexual abuse and sexual harassment to Community

Renewal Team, Inc. and the Fresh Start Program staff senior management, allowing the resident to remain anonymous upon request.

- Reports can be made anonymously at any time by contacting the CT Sexual Abuse Crisis Services (CONNSACS) at:
 - Statewide 24 Hour Toll Free Hotline:
 - 📞 1-888-999-5545 (English)
 - 📞 1-888-568-8332 (En Español para Todo el Estado)
 - Local New Britain- 860-223-1787
 - Local Hartford- 860-547-1022

2) Staff Reporting:

- Staff shall accept reports of sexual abuse and sexual harassment, retaliation by other residents or staff for reporting such behavior and staff neglect or violation of responsibilities that may have contributed to such incidents made verbally, in writing, anonymously, and from third parties. Within one (1) hour of accepting a verbal report the staff member will document the details/information of that report. The report will be completed as soon as possible, but no later than prior to the end of staff members shift.
- Community Renewal Team, Inc. and the Fresh Start Program shall provide a method for staff to privately report sexual abuse and sexual harassment of residents as described in the Employee Handbook pgs.11-13 (attached in the PREA Standard: 115.251 folder).

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Exhaustion of administrative remedies	Department: Fresh Start (FS)
Policy #: PREA-1401	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility:
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.252	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program shall ensure a formal administrative process to address resident grievances regarding sexual abuse. Community Renewal Team, Inc. and the Fresh Start Program allows an informal grievance process or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.

PROCEDURE:

1) Time Limit:

- Community Renewal Team, Inc. and the Fresh Start Program shall not impose a time limit on when a resident may submit a grievance regarding an allegation of sexual abuse.

2) Grievance Process:

- A resident who alleges sexual abuse may submit a grievance without submitting it to the staff member who is the subject of the complaint.
- Such grievance is not referred to a staff member who is the subject of the complaint.
- Community Renewal Team, Inc. and the Fresh Start Program shall issue an agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance.
- Computation of the 90-day time period shall not include time consumed by residents in preparing any administrative appeal.
- Community Renewal Team, Inc. and the Fresh Start Program may claim an extension of time to respond, of up to 70 days, if the normal time period for response is insufficient to make an appropriate decision.

- Community Renewal Team, Inc. and the Fresh Start Program shall notify the resident in writing of any such extension and provide a date by which a decision will be made.
- At any level of the administrative process, including the final level, if the resident does not receive a response within the time allotted for reply, including any properly noticed extension, the resident may consider the absence of a response to be a denial at that level.

3) Third Party Reporting:

- Third parties, including fellow residents, staff members, family members, attorneys, and outside advocates, shall be permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of residents.
- If a third party files such a request on behalf of a resident, the Community Renewal Team, Inc. and the Fresh Start Program may require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.
- If the resident declines to have the request processed on his or her behalf, Community Renewal Team, Inc. and the Fresh Start Program shall document the residents decision.

4) Emergency Grievances:

- Community Renewal Team, Inc. and the Fresh Start Program staff shall establish procedures for the filing of an emergency grievance alleging that a resident is subject to a substantial risk of imminent sexual abuse.
- After receiving an emergency grievance alleging a resident is subject to a substantial risk of imminent sexual abuse, Community Renewal Team, Inc. and the Fresh Start Program staff shall immediately forward the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action may be taken, shall provide an initial response within 48 hours, and shall issue a final agency decision within 5 days. The initial response and final decision shall document Community Renewal Team, Inc. and the Fresh Start Program determination whether the resident is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

5) Unsubstantiated Grievances:

- Community Renewal Team, Inc. and the Fresh Start Program has limits on its ability to discipline a resident for filing a grievance related to alleged sexual abuse only where the agency demonstrates that the resident filed the grievance in bad faith.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Resident access to outside confidential support services	Department: Fresh Start (FS)
Policy #: PREA-1402	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility:
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.253	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program staff shall provide residents with access to outside victim advocates for emotional support services related to sexual abuse.

PROCEDURE:

- 1) Community Renewal Team, Inc. and the Fresh Start Program staff shall provide residents with mailing addresses and telephone numbers, including toll free hotline numbers where available, of local, state, or national victim advocacy or rape crisis organizations. Community Renewal Team, Inc. and the Fresh Start Program staff shall enable reasonable communication between residents and these organizations in as confidential a manner as possible.
- 2) Community Renewal Team, Inc. and the Fresh Start Program staff shall inform residents, prior to giving them access, of the extent to which their communications with outside victim advocates will be monitored. As well as to the mandatory reporting rules governing privacy, confidentiality, and/or privilege that apply to disclosures of sexual abuse made to outside victim advocates, including any limits to confidentiality under relevant federal, state, or local law.
- 3) Community Renewal Team, Inc. and the Fresh Start Program staff shall maintain or attempt to enter into memoranda of understanding or other agreements with community service providers able to provide residents with confidential emotional support services related to sexual abuse. Community Renewal Team, Inc. and the Fresh Start Program staff shall maintain copies of such agreements or documentation showing attempts to enter into such agreements.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Third-party reporting	Department: Fresh Start (FS)
Policy #: PREA-1403	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility:
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.254; Cross Reference with 115.252	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program ensure a method exists to receive third party reports of sexual abuse and sexual harassment and shall distribute publicly information on how to report sexual abuse and sexual harassment on behalf of a resident.

PROCEDURE:

Third-Party Reporting:

- 1) All reports of sexual abuse and sexual harassment received from third-parties shall be responded to according to Community Renewal Team, Inc. and the Fresh Start Program policy by agency staff.
- 2) Any staff receiving a third-party report of sexual abuse or sexual harassment shall forward such report to their immediate supervisor who will in turn forward to the Program Manager and/or PREA Coordinator who will follow the proper PREA reporting guidelines.
- 3) Third-parties, including fellow residents, staff members, family members, attorneys, and outside advocates, shall be permitted to assist residents in filing requests for administrative remedies relating to allegations of sexual abuse, and shall also be permitted to file such requests on behalf of residents.
- 4) If a third-party files such a request on behalf of a resident, Community Renewal Team, Inc. and the Fresh Start Program staff require as a condition of processing the request that the alleged victim agree to have the request filed on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative remedy process.

- 5) If the resident declines to have the request processed on his or her behalf, Community Renewal Team, Inc. and the Fresh Start Program staff shall document the residents decision.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Staff and agency reporting duties	Department: Fresh Start (FS)
Policy #: PREA-1500	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility:
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.261	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency; retaliation against residents or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

PROCEDURE:

Reporting Duties: All staff must immediately report to the PREA Coordinator, the Program Manager/supervisory designee, the HR Director, or any supervisor or manager or senior management staff any knowledge, suspicion, or information regarding:

- An incident of sexual abuse or sexual harassment that occurred in the program.
 - Retaliation against residents or staff who reported an incident of sexual abuse or sexual harassment.
 - Any staff neglect or violation of responsibilities that may have contributed to such an incident or retaliation.
- a. All reports of sexual abuse and sexual harassment that are received from third parties must be received and responded to according to policy by all staff.
 - b. As soon as practical, Community Renewal Team, Inc. and the Fresh Start Program staff must report all allegations of sexual abuse, including third party and anonymous reports, to the local authorities for further investigation:
 - Call 911 to obtain transportation for the resident to Hartford Hospital which is PREA compliant.

- When residents' states they have been sexually abused, staff must request that the resident not take any action that could destroy physical evidence, including washing, drinking or eating, unless medically indicated; If toileting needs to take place, the resident should be instructed to not wipe.
 - The Program Manager/supervisory designee must contact Connecticut Sexual Assault Crisis Services to arrange for a sexual assault advocate to go to the hospital where the resident is being transported.
- c. All allegations of sexual harassment must be reported for investigation to the PREA Coordinator:
- Allegations of sexual harassment between residents will be reported for investigation by Community Renewal Team, Inc. and the Fresh Start Program.
 - Allegations of sexual harassment of residents by staff will be reported for investigation by the Administrative Office of Community Renewal Team, Inc. and the Fresh Start Program.
- d. Upon receiving an allegation that a resident was sexually abused while residing at Community Renewal Team, Inc. and the Fresh Start Program, the staff receiving this information must immediately notify the PREA Coordinator, the Program Manager or supervisory designee, the HR Director, or a supervisor, manager, or senior management staff.
- The person receiving such notice will immediately notify the PREA Coordinator, if the PREA Coordinator was not initially notified.
 - The PREA Coordinator will notify the Administration of Community Renewal Team, Inc. and the Fresh Start Program staff as soon as possible, but not longer than by the end of the business day of the day the report of the allegation was received.
 - The senior management of Community Renewal Team, Inc. and the Fresh Start Program staff must:
 1. Institute the Incident Report process; and
 2. Call the local authorities to begin a criminal investigation.
- e. Upon receiving an allegation that a resident was sexually abused the Supervisor/Manager receiving this information must immediately notify the PREA Coordinator and document such report and notification in the facility log:
- The PREA Coordinator will notify the Administration of Community Renewal Team, Inc. and the Fresh Start Program staff as soon as possible, but not later than by the end of the business day of the day the report of the allegation was received.

1. The PREA Coordinator will keep a record of the details of the notification, including:
 - All persons notified;
 - Date and time of notification;
 - Date and time notice of allegation was received;
 - Any details of the allegation.

- f. If the allegations of sexual abuse are reported to staff after the alleged victim has been transported to a medical facility, staff must:
 - Notify the receiving facility of the allegation of sexual abuse and the victim's potential need for medical or social services unless the victim has requested otherwise.
 - Complete an Incident Report in accordance with Community Renewal Team, Inc. and the Fresh Start Program procedures.

- g. Apart from reporting to designated supervisors or agency officials, agency policy prohibits staff from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Agency protection duties	Department: Fresh Start (FS)
Policy #: PREA-1501	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility:
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.262	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program once it learns that a resident is subject to a substantial risk of imminent sexual abuse will take immediate action to protect the resident.

PROCEDURE:

- 1) Community Renewal Team, Inc. and the Fresh Start Program once it learns that a resident is subject to a substantial risk of imminent sexual abuse will take immediate action to protect the resident. This includes but is not limited to taking some action to assess and implement appropriate measures without unreasonable delays.
- 2) Notifying local and state law enforcement agencies
- 3) Notify PREA Coordinator and follow the coordinated response plan.
- 4) Meeting with the resident to gather information in order to better assess the risk and determine appropriate immediate action.
- 5) Assign a staff member to accompany the resident at all times.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Reporting to other confinement facilities	Department: Fresh Start (FS)
Policy #: PREA -1502	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.263	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program require all staff to report upon receiving an allegation that a resident was sexually abused while confined at another facility, the head of the facility that received the allegation shall notify the head of the facility or appropriate office of the agency where the alleged abuse occurred.

PROCEDURE:

- 1) Upon receiving an allegation that a resident was sexually abused while confined at another facility, the Program Manager will document and report the allegation to the head of the facility or appropriate office of the agency where the alleged abuse occurred.
- 2) Such notification shall be provided as soon as possible, but no later than 72 hours after receiving the allegation. Such report will be documented on incident report.
- 3) The Fresh Start program will document that it has provided such notification on Incident report.
- 4) The agency office that receives such notification shall ensure that the allegation is investigated in accordance with PREA standards.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Staff first responder duties	Department: Fresh Start (FS)
Policy #: PREA-1503	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.264	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program require all staff upon learning of an allegation that a resident was sexually abused; the staff member responding to the report shall be required to follow the listed procedure.

PROCEDURE:

- 1) Separate the alleged victim and abuser; call 911 (Police), and the PREA Coordinator;
- 2) Preserve and protect the crime scene until appropriate steps can be taken to collect any evidence;
- 3) If the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and
- 4) If the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.
- 5) The responder shall be required to request that the alleged victim not take any actions that could destroy physical evidence and then notify Program Manager/staff.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Coordinated response	Department: Fresh Start (FS)
Policy #: PREA-1504	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.265	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program require all staff to coordinate actions taken in response to an incident of sexual abuse, among first responders, staff, medical and mental health practitioners, investigators, and facility leadership.

PROCEDURE:

- 1) Community Renewal Team, Inc. and the Fresh Start program staff will obtain the Fresh Start programs Sexual Abuse Coordinated Response Plan form located in the Coordinated Response Plan folder located in the intake office, or on CRT's "Shared Drive" in the PREA folder.
- 2) Staff will complete the Fresh Start programs Sexual Abuse Coordinated Response Plan form and submit it to the PREA Coordinator, Human Resources Dept. and the Program Manager.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Preservation of ability to protect residents from contact with abusers	Department: Fresh Start (FS)
Policy #: PREA-1505	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility:
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.266	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

The Fresh Start Program administered by Community Renewal Team, Inc. has not entered into any collective bargaining agreement or other agreement that limits the agency's ability to protect residents from contact with abusers pending the outcome of an investigation or of a determination of whether and to what extent discipline is warranted. In the event that it may the following procedure shall be followed.

PROCEDURE:

Nothing in this standard shall restrict the entering into or renewal of agreements that govern:

- 1) The conduct of the disciplinary process, as long as such agreements are not inconsistent with the provisions of §§ 115.272 and 115.276; or
- 2) Whether a no-contact assignment that is imposed pending the outcome of an investigation shall be expunged from or retained in the staff member's personnel file following a determination that the allegation of sexual abuse is not substantiated.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Agency protection against retaliation	Department: Fresh Start (FS)
Policy #: PREA-1506	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.267	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program will protect all residents, staff, volunteers, contractors, interns, or individuals who report sexual abuse or sexual harassment or cooperates with sexual abuse or sexual harassment investigations from retaliation by other residents or staff. Any complaint of retaliation by a resident, staff, volunteer, contractor, intern, or individual will be reported and investigated in accordance with the procedures provided in this policy.

PROCEDURE:

- 1) Community Renewal Team, Inc. and the Fresh Start Program shall protect all residents and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation. The PREA Coordinator and Program Manager in conjunction with the Human Resources Dept. will monitor the conduct and treatment of those employees and residents in the program and will promptly remedy any discovered retaliation.
- 2) The Program will take protective measures, such as room/housing changes or transfers for resident victims, removal of alleged staff or resident abusers from contact with victims, and emotional support services for residents or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.
- 3) For at least 90 days following a report of sexual abuse the Fresh Start program 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 see if there are changes that may suggest possible retaliation by residents or staff, and shall act promptly to remedy any such retaliation. The Fresh Start program and Human Resources Dept. will monitor any resident disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. The agency shall continue such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

- 4) In the case of residents, such monitoring shall also include periodic status checks.
- 5) If any other individual who cooperates with an investigation expresses a fear of retaliation, the agency shall take appropriate measures to protect that individual against retaliation.
- 6) The PREA Coordinator and Program Manager in conjunction with Human Resources Dept. will monitor the conduct and treatment of those individuals in the program and will promptly remedy any discovered retaliation.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Criminal and administrative agency investigations	Department: Fresh Start (FS)
Policy #: PREA-1600	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.271	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start program require that all sexual abuse and sexual harassment be investigated by specialized personnel. All administrative investigations will be conducted promptly, thoroughly and objectively for all allegations, including third-party and anonymous reports.

PROCEDURE:

- 1) Investigations into allegations of sexual abuse and sexual harassment, shall be prompt, thorough, and objective for all allegations, including third-party and anonymous reports.
- 2) The Fresh Start program does not employ specialized trained personnel to conduct criminal investigation where sexual abuse is alleged. The Hartford Police Dept. shall serve as the investigating authority for all allegations of sexual abuse that occur within the Fresh Start facility. All allegations of sexual abuse that occur within facility either between residents or by staff, volunteers, contractors, intern, and visitors will be reported immediately to the Hartford Police Dept., CRT's Executive Director, the Judicial Branch, the agency's Human Resources Dept. and PREA Coordinator in accordance with the reporting procedures. Sexual abuse investigations by the Hartford Police Dept. may occur concurrently with an administrative investigation by CRT and Fresh Start program personnel.
- 3) The Community Renewal Team, Inc. and the Fresh Start Program will assist the investigating authority (The Hartford Police Dept.) preserve any circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; shall interview alleged victims, suspected perpetrators, and witnesses; and shall review prior complaints and reports of sexual abuse involving the suspected perpetrator.
- 4) When the quality of evidence appears to support criminal prosecution, Community Renewal Team, Inc. and the Fresh Start Program may conduct compelled interviews

only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

- 5) The credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis and shall not be determined by the person's status as resident or staff. Community Renewal Team, Inc. and the Fresh Start Program shall not require a resident who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.
- 6) Administrative investigations:
 - a) Community Renewal Team, Inc. and the Fresh Start Program will make a concerted effort to determine whether staff actions or failures to act contributed to the abuse; and
 - b) Shall be documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings;
 - c) Investigating authority (the Hartford Police Dept.) criminal investigations shall be documented when possible. A written report will contain a thorough description of physical, testimonial, and documentary evidence and copies of all documentary evidence where feasible;
 - d) Substantiated allegations of conduct that appears to be criminal shall be referred for prosecution through the Hartford Police Dept.;
 - e) Community Renewal Team, Inc. and the Fresh Start Program shall retain all written reports referenced in paragraphs (b) and (c) of this section for as long as the alleged abuser is incarcerated or employed by the agency, plus five years;
 - f) The departure of the alleged abuser or victim from the employment or control of the facility or agency shall not provide a basis for terminating an investigation;
 - g) Any State entity or Department of Justice component that conducts such investigations shall do so pursuant to the above requirements.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Evidentiary standards for administrative investigations	Department: Fresh Start (FS)
Policy #: PREA-1601	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.272	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program impose a standard of a preponderance of evidence or a lower standard of proof when determining whether allegations of sexual abuse or sexual harassment can be substantiated.

Community Renewal Team, Inc. and the Fresh Start Program require all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency. As well as any retaliation against residents or staff who reported such an incident, and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

PROCEDURE:

- 1) Reporting Duties: All staff will immediately report to the PREA Coordinator, the Program Manager/supervisory designee, the Human Resources Director, or any supervisor or manager or senior management staff any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of the agency.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Reporting to residents	Department: Fresh Start (FS)
Policy #: PREA-1602	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.273	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program will inform any resident of the status of the allegation following an investigation.

PROCEDURE:

- 1) Following an investigation into a resident's allegation of sexual abuse the Community Renewal Team, Inc. and Fresh Start program shall inform the resident as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.
- 2) Community Renewal Team, Inc. and the Fresh Start Program do not conduct investigations; however it shall request the relevant information from the investigative agency (Hartford Police Dept.) in order to inform the resident.
- 3) Following a resident's allegation that a staff member has committed sexual abuse against the resident, the Community Renewal Team, Inc. and the Fresh Start Program shall subsequently inform the resident (unless it has determined that the allegation is unfounded) whenever:
 - a) The staff member is no longer posted on the resident's floor;
 - b) The staff member is no longer employed by Community Renewal Team, Inc. and the Fresh Start Program;
 - c) The Community Renewal Team, Inc. and the Fresh Start Program learns that the staff member has been indicted on a charge related to sexual abuse within the facility; or
 - d) The Community Renewal Team, Inc. and the Fresh Start Program learns that the staff member has been convicted on a charge related to sexual abuse within the facility.

- 4) Following a resident's allegation that she has been sexually abused by another resident, the Community Renewal Team, Inc. and the Fresh Start Program shall subsequently inform the alleged victim whenever:
- a) The Community Renewal Team, Inc. and the Fresh Start Program learns that the alleged abuser has been indicted on a charge related to sexual abuse within the facility; or
 - b) The Community Renewal Team, Inc. and the Fresh Start Program learns that the alleged abuser has been convicted on a charge related to sexual abuse within the facility.
 - c) All notifications or attempted notifications shall be documented.
 - d) Community Renewal Team, Inc. and the Fresh Start Program's obligation to report under this standard shall terminate if the resident is released from the community confinement facility.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Disciplinary sanction for staff	Department: Fresh Start (FS)
Policy #: PREA-1700	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.276	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program will adhere to the disciplinary action for violation of sexual abuse or sexual harassment policies and procedures listed below.

PROCEDURE:

- 1) Staff shall be subject to progressive disciplinary actions up to and including termination for violating agency sexual abuse or sexual harassment policies.
- 2) Termination shall be the presumptive disciplinary action for staff who has engaged in sexual abuse.
- 3) Disciplinary actions for violations of policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) shall be 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.
- 4) 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.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Corrective action for contractors and volunteers	Department: Fresh Start (FS)
Policy #: PREA-1701	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.277	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program will report to law enforcement agencies any contractor or volunteer that engages in sexual abuse or sexual harassment.

PROCEDURE:

- 1) 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.
- 2) The Community Renewal Team, Inc. and the Fresh Start Program will 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.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Disciplinary sanctions for residents	Department: Fresh Start (FS)
Policy #: PREA-1702	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.278	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program will enforce disciplinary sanctions of residents for violations of sexual abuse or sexual harassment.

PROCEDURE:

- 1) Residents shall be subjected to disciplinary sanctions only 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.
- 2) Sanctions shall be commensurate with the nature and circumstances of the abuse committed, the resident's disciplinary history, and the sanctions imposed for comparable offenses by other residents with similar histories.
- 3) The disciplinary process shall consider whether a resident's mental disabilities or mental illness contributed to her behavior when determining what type of sanction, if any, should be imposed.
- 4) If the facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for the abuse, the facility shall consider whether to require the offending resident to participate in such interventions as a condition of access to programming or other benefits.
- 5) Community Renewal Team, Inc. and the Fresh Start Program may discipline a resident for sexual contact with staff only upon a finding that the staff member did not consent to such contact.
- 6) 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 an investigation does not establish evidence sufficient to substantiate the allegation.

- 7) Community Renewal Team, Inc. and the Fresh Start Program may, in its discretion, prohibit all sexual activity between residents and may discipline residents for such activity. Community Renewal Team, Inc. and the Fresh Start Program may not, however, deem such activity to constitute sexual abuse if it determines that the activity is not coerced.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Access to emergency and mental health services	Department: Fresh Start (FS)
Policy #: PREA-1800	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.282	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program will ensure victims of sexual abuse receive access to emergency medical and mental health crises services without cost.

PROCEDURE:

- 1) Resident victims of sexual abuse shall receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which will be determined by medical and mental health practitioners according to their professional judgment.
- 2) Community Renewal Team, Inc. and the Fresh Start Program do not employ qualified medical staff. Clinicians or the 1st responders at the time a report of recent abuse is made, shall take preliminary steps to protect the victim pursuant to § 115.262 and shall immediately notify the appropriate medical and mental health practitioners.
- 3) Resident victims of sexual abuse while in confinement facility shall be offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically appropriate.
- 4) Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Ongoing medical and mental health for sexual abuse victims and abusers	Department: Fresh Start (FS)
Policy #: PREA-1801	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.283	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program will ensure victims and abusers of sexual abuse receive medical and mental health care services.

PROCEDURE:

- 1) Community Renewal Team, Inc. and the Fresh Start program shall offer medical and mental health evaluation and, as appropriate, treatment to all residents who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility.
- 2) The evaluation and treatment of such victims shall include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody.
- 3) Community Renewal Team, Inc. and the Fresh Start Program shall provide such victims with medical and mental health services consistent with the community level of care.
- 4) Resident victims of sexually abusive vaginal penetration while in confinement shall be offered pregnancy tests.
- 5) If pregnancy results from conduct specified in section (4) of this section, such victims shall receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.
- 6) Resident victims of sexual abuse while in confinement shall be offered tests for sexually transmitted infections as medically appropriate.
- 7) Treatment services shall be provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

- 8) Community Renewal Team, Inc. and the Fresh Start Program shall attempt to conduct a mental health evaluation of all known resident-on-resident abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Sexual abuse incident reviews	Department: Fresh Start (FS)
Policy #: PREA-1900	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.286	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program will conduct sexual abuse incident reviews at the conclusion of every administrative sexual abuse investigation, unless the allegation has been determined to be unfounded.

PROCEDURE:

- 1) The facility conducts a sexual abuse incident review at the conclusion of every administrative sexual abuse investigation, unless the allegation has been determined to be unfounded. The Fresh Start program does not conduct criminal investigation where sexual abuse is alleged. Local authorities (i.e. Hartford Police Dept.) will be contacted and shall serve as the investigating authority for all allegations of sexual abuse that occur within the Fresh Start facility.
- 2) The Fresh Start program will ordinarily conduct a sexual abuse incident review within 30 days of the conclusion of the administrative sexual abuse investigation.
- 3) The sexual abuse incident review team will include upper-level management officials (PREA Coordinator, Director of Human Resources, CEO, etc.) and allows for input from line supervisors, investigators, and medical or mental health practitioners.
- 4) The Fresh Start program will prepare reports of its findings from sexual abuse incident reviews, including but not necessarily limited to determinations made pursuant to paragraphs (d)(1)-(d)(5) of this section and any recommendations for improvement, and submits such report to the Program Manager and PREA Coordinator.
- 5) The Fresh Start program will implement the recommendations for improvement or document reasons for not doing so.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Data collection	Department: Fresh Start (FS)
Policy #: PREA-1901	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.287	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program will collect accurate, uniform data for every allegation of sexual abuse at its facility under its direct control using a standardized instrument and set of definitions.

PROCEDURE:

- 1) Community Renewal Team, Inc. and the Fresh Start Program will collect accurate, uniform data for every allegation of sexual abuse at its facility under its direct control using a standardized instrument and set of definitions.
- 2) The standardized instrument the Fresh Start Program uses includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice.
- 3) Community Renewal Team, Inc. and Fresh Start Program will aggregate the incident-based sexual abuse data at least annually.
- 4) Community Renewal Team, Inc. and Fresh Start Program will maintain, review, and collect data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

Date Reviewed: _____ Changes made to P & P: YES NO
 Date Reviewed: _____ Changes made to P & P: YES NO
 Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Data review for corrective action	Department: Fresh Start (FS)
Policy #: PREA-1902	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.288	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program will review data collected and aggregated pursuant to §115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training.

PROCEDURE:

- 1) Community Renewal Team, Inc. and the Fresh Start Program will review data collected and aggregated pursuant to §115.287 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including:
 - a) Identifying problem areas;
 - b) Taking corrective action on an ongoing basis; and
 - c) Preparing an annual report of its findings from its data review and any corrective actions for each facility, as well as the agency as a whole.
- 2) The Community Renewal Team, Inc. annual PREA report will include a comparison of the current year's data and corrective actions with those from prior years.
- 3) The annual PREA report will also provide an assessment of the agency's progress in addressing sexual abuse.
- 4) Community Renewal Team, Inc. will make its annual PREA report readily available to the public at least annually through its corporate website.
- 5) The annual reports will be approved by the CEO.
- 6) If Community Renewal Team, Inc. redacts material from an annual report for publication, the redactions will be limited to specific materials where publication would present a clear and specific threat to the safety and security of the Fresh Start facility.
- 7) Community Renewal Team, Inc. will indicate the nature of material redacted.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO



Community Renewal Team, Inc.
555 Windsor Street
Hartford, CT 06120

Title: Data storage, publication, and destruction	Department: Fresh Start (FS)
Policy #: PREA-1903	Primary Responsibility: Fresh Start
Original Policy Date:	Coordinating Responsibility: Fresh Start
Revision Number:	Form(s):
Effective Date (revised as of):	Manager Initials:
Reference(s): PREA Standard: 115.289	Director Initials:
Policy Council Approval Date:	CRT Board of Trustee's Approval Date:

POLICY:

Community Renewal Team, Inc. and the Fresh Start Program ensure that incident-based and aggregate data are securely retained.

PROCEDURE:

- 1) Community Renewal Team, Inc. and the Fresh Start Program will ensure that incident-based and aggregate data are securely retained.
- 2) Community Renewal Team, Inc. and the Fresh Start Program policy will require aggregated sexual abuse data from its facility under its direct control are made readily available to the public at least annually through its website.
- 3) Before making aggregated sexual abuse data publicly available, the Community Renewal Team, Inc. will remove all personal identifiers.
- 4) Community Renewal Team, Inc. and the Fresh Start Program will maintain sexual abuse data collected pursuant to §115.287 for at least 10 years after the date of initial collection, unless federal, state, or local law requires otherwise.

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO

Date Reviewed: _____ Changes made to P & P: YES NO