

## The Connection's Community Justice Service Area PREA Annual Report 2023

#### Background

The Prison Rape Elimination Act (PREA) was unanimously passed in 2003 by the United States Congress, creating the National Prison Rape Elimination Commission and charging the Commission with researching and drafting standards for eliminating prison rape. The draft standards were published in 2009 and delivered to the Department of Justice, forming the basis for proposed final rules for PREA compliance. The final PREA standards for implementation became effective on August 20, 2012. The purpose of the PREA and its implementing rules is to provide a set of standards to prevent, detect, and eliminate sexual assault and sexual harassment of individuals residing in covered facilities. These standards apply to The Connection's community confinement facilities. In response to these standards, The Connection developed core policy establishing zero-tolerance for sexual abuse and sexual harassment and additional policies addressing the reporting of, and response to, all such allegations. These policies apply to the following programs: Sierra Center Pre-Trial, Sierra Center Work Release, Roger Sherman House, Cochegan House, Connection House, Eddy Center, The January Center, and Women's RISE.

The PREA Coordinator works closely with the Department of Corrections, Community Supervision Support Services, and the Connecticut State Police to respond to all allegations involving potential client sexual abuse, client sexual harassment, staff sexual misconduct, and staff sexual harassment in the above listed community confinement facilities. Staff and clients are educated on the agency's zero tolerance policy, the multiple avenues for reporting allegations, the appropriate response to allegations, and the agency's zero tolerance policy on retaliation. Any visitor entering the program receives information pertaining to sexual harassment and sexual abuse and their role in the program to report. Additionally, these programs, with the exception of The January Center, have a Memorandum of Understanding with the Connecticut Alliance to End Sexual Violence to provide services, support, advocacy, and counseling for clients who report that they have experienced sexual harassment or sexual abuse regardless of the outcome of any investigation. The services provided by the Alliance are free of charge to the client.

As an annual requirement, the PREA Coordinator reports all allegations and findings to the Department of Justice. Below you will find the definitions for the results of allegations. Additionally, the following pages include the Department of Justice's definitions of the allegation category with tables including totals of reported allegations by category.

#### Year in Review: 2023

In 2023, there were four (4) PREA Audits completed. The Sierra Center Work Release, Connection House, Women's RISE, and Roger Sherman House programs were found compliant with the PREA standards and successfully passed the audit.

In 2023, there were a total of eight (8) PREA allegations in the Community Justice Residential programs listed above. Of the eight, three (3) were at Sierra Center Work Release, one (1) was at The January Center, three

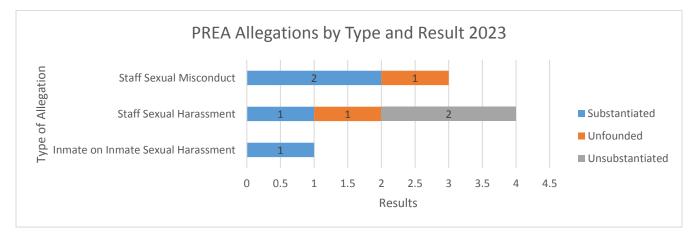
# The Connection's Community Justice Service Area PREA Annual Report 2023

(3) were at Cochegan House, and one (1) was at the Eddy Center. Three additional incidents occurred that did not meet the definitions of sexual abuse or sexual harassment per the PREA standards, but which were reviewed and reported to the funder. No PREA allegations arose at the Roger Sherman House, Connection House, Women's RISE, or Sierra Center Pre-Trial program. The nature of the allegations and findings are summarized in the tables below.



#### **Outcome Definitions**

- **Substantiated allegation:** The allegation was determined to have occurred by a preponderance of evidence.
- **Unsubstantiated allegation:** The evidence was insufficient to make a final determination whether the allegation was true or false.
- **Unfounded allegation:** The allegation was determined not to have occurred.



The 2023 allegations included one (1) client-on-client allegations and seven (7) staff-on-client allegations. Three additional allegations did not meet the legal definition of sexual abuse or sexual harassment per the PREA standards but were reviewed and reported to the funder (2 involving a staff-on-client and 1 involving a client-on-client).

## The Connection The Connection's Community Justice Service Area PREA Annual Report 2023

#### **Category Definitions**

#### • Client on Client Nonconsensual Sexual Acts

Sexual contact with any person without his or her consent, or with a person who is unable to consent AND contact between the penis and the vulva or penis and the anus including penetration, however slight OR contact between the mouth and penis, vulva, or anus OR penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument.

	Client on Client Nonconsensual Sexual Acts								
Finding 2019 2020 2021 2022 2023 Total									
Substantiated	1	0	0	0	0	1			
Unsubstantiated	0	0	0	1	0	1			
Unfounded	0	0	0	0	0	0			
Total	1	0	0	1	0	2			

#### • Client on Client Abusive Sexual Contact

Sexual contact with any person without his or her consent, or with a person who is unable to consent AND intentional touching, either directly or through clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks of any person. Does not include any incident in which the sexual contact was incidental to a physical altercation.

	Client on Client Abusive Sexual Contact								
Finding 2019 2020 2021 2022 2023 Total									
Substantiated	0	0	0	1	0	1			
Unsubstantiated	0	1	0	1	0	2			
Unfounded	0	1	0	1	0	2			
Total	0	2	0	3	0	5			

#### • Client on Client Sexual Harassment

Repeated and unwelcome sexual advances, request for sexual favors, or verbal comments, gestures, or actions of a derogatory or offensive sexual nature by one client directed toward another.

Client on Client Sexual Harassment								
Finding 2019 2020 2021 2022 2023 Total								
Substantiated	3	0	1	4	1	9		
Unsubstantiated	2	2	3	6	0	13		
Unfounded	2	1	0	0	0	3		
Total	7	3	4	10	1	25		

## The Connection The Connection's Community Justice Service Area PREA Annual Report 2023

#### • Staff on Client Sexual Misconduct

Any behavior or act of a sexual nature directed toward a client by an employee, volunteer, contractor, official visitor, or other agency representative (exclude family, friend, or other visitors). Consensual and nonconsensual sexual acts include - Intentional touching, either directly or through clothing, of the genitalia, anus, groin, breast, inner thigh, or buttocks that is unrelated to official duties or with the intent to abuse, arouse, or gratify sexual desire OR completed, attempted, threatened, or requested sexual acts OR occurrences of indecent exposure, invasion of privacy, or staff voyeurism for reasons unrelated to official duties or for sexual gratification.

Staff on Client Sexual Misconduct									
Finding 2019 2020 2021 2022 2023 Total									
Substantiated	1	1	1	2	2	7			
Unsubstantiated	0	1	1	4	0	6			
Unfounded	2	0	1	2	1	6			
Total	3	2	3	8	3	19			

#### • Staff on Client Sexual Harassment

Repeated verbal statements, comments, or gestures of a sexual nature to a client by an employee, volunteer, contractor, official visitor, or other agency representative (exclude family, friends, or other visitors) Include - Demeaning references to gender; or sexually suggestive or derogatory comments about body of clothing OR repeated profane or obscene language or gestures.

	Staff on Client Sexual Harassment								
Finding	2019	2020	2021	2022	2023	Total			
Substantiated	0	0	0	2	1	3			
Unsubstantiated	0	0	0	0	2	2			
Unfounded	4	0	0	1	1	6			
Total	4	0	0	3	4	11			

#### Total Allegations by Program 2019-2023

The Ja	The January Center		2020	2021	2022	2023
	Client on Client Nonconsensual Sexual Abuse	0	0	0	0	0
<b>V</b>	Client on Client Abusive Sexual Contact	0	1	0	0	0
Category	Client on Client Sexual Harassment	6	2	0	2	0
Cat	Staff on Client Sexual Misconduct	1	0	1	0	0
	Staff on Client Sexual Harassment	1	0	0	1	1
브	Substantiated	4	0	0	1	0
<u>Result</u>	Unsubstantiated	2	2	1	2	1
ž	Unfounded	2	1	0	0	0
Total		8	3	1	3	1

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## The Connection's Community Justice Service Area PREA Annual Report 2023

Eddy	Center	2019	2020	2021	2022	2023
	Client on Client Nonconsensual Sexual Abuse	0	0	0	1	0
Vic	Client on Client Abusive Sexual Contact	0	0	0	1	0
Category	Client on Client Sexual Harassment	0	0	1	1	0
Cat	Staff on Client Sexual Misconduct	2	0	0	3	1
	Staff on Client Sexual Harassment	0	0	0	0	0
Ц	Substantiated	0	0	0	1	1
<u>Result</u>	Unsubstantiated	0	0	1	2	0
Å	Unfounded	2	0	0	3	0
Tota		2	0	1	6	1

Cochegan House	2019	2020	2021	2022	2023
Client on Client Nonconsensual Sexual Abuse	0	0	0	0	0
Client on Client Abusive Sexual Contact	0	0	0	0	0
Client on Client Sexual Harassment	0	0	0	0	0
Staff on Client Sexual Misconduct	0	1	1	0	2
Staff on Client Sexual Harassment	0	0	0	1	1
Substantiated	0	1	0	0	1
Unsubstantiated	0	0	0	0	0
Unfounded	0	0	1	1	2
Total	0	1	1	1	3

Roger	Sherman House	2019	2020	2021	2022	2023
	Client on Client Nonconsensual Sexual Abuse	0	0	0	0	0
Vic	Client on Client Abusive Sexual Contact	0	0	0	0	0
Category	Client on Client Sexual Harassment	1	0	0	1	0
Cat	Staff on Client Sexual Misconduct	1	1	0	2	0
	Staff on Client Sexual Harassment	1	0	0	0	0
비	Substantiated	0	0	0	0	0
Result	Unsubstantiated	0	1	0	3	0
Re	Unfounded	3	0	0	0	0
Total		3	1	0	3	0

Sierra	Sierra Center Pre - Trial		2020	2021	2022	2023
	Client on Client Nonconsensual Sexual Abuse	0	0	0	0	0
orv	Client on Client Abusive Sexual Contact	0	0	0	2	0
Category	Client on Client Sexual Harassment	0	0	2	5	0
Cat	Staff on Client Sexual Misconduct	0	0	0	0	0
	Staff on Client Sexual Harassment	0	0	0	0	0
비	Substantiated	0	0	0	4	0
<u>Result</u>	Unsubstantiated	0	0	2	3	0
<u>R</u>	Unfounded	0	0	0	0	0
Total		0	0	2	7	0



## The Connection's Community Justice Service Area PREA Annual Report 2023

Sierra	Center Work Release	2019	2020	2021	2022	2023
	Client on Client Nonconsensual Sexual Abuse	1	0	0	0	0
	Client on Client Abusive Sexual Contact	0	1	0	0	0
Category	Client on Client Sexual Harassment	0	1	1	0	1
Cat	Staff on Client Sexual Misconduct	1	0	1	3	0
	Staff on Client Sexual Harassment	0	0	0	1	2
비	Substantiated	1	0	2	2	2
Result	Unsubstantiated	0	1	0	2	1
<u>x</u>	Unfounded	1	1	0	0	0
Total		2	2	2	4	3
Connection House						
Conne	ection House	2019	2020	2021	2022	2023
Conne	ection House Client on Client Nonconsensual Sexual Abuse	2019 0	2020 0	2021 0	2022 0	2023 0
	Client on Client Nonconsensual Sexual Abuse	0	0	0	0	0
Category	Client on Client Nonconsensual Sexual Abuse Client on Client Abusive Sexual Contact	0	0	0	0	0
	Client on Client Nonconsensual Sexual Abuse Client on Client Abusive Sexual Contact Client on Client Sexual Harassment	0 0 0	0 0 0	0 0 0	0 0 0	0 0 0
<u>Category</u>	Client on Client Nonconsensual Sexual Abuse Client on Client Abusive Sexual Contact Client on Client Sexual Harassment Staff on Client Sexual Misconduct	0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0	0 0 0 0
<u>Category</u>	Client on Client Nonconsensual Sexual Abuse Client on Client Abusive Sexual Contact Client on Client Sexual Harassment Staff on Client Sexual Misconduct Staff on Client Sexual Harassment	0 0 0 0 0	0 0 0 0 0	0 0 0 0 0	0 0 0 0 0	0 0 0 0 0
	Client on Client Nonconsensual Sexual Abuse Client on Client Abusive Sexual Contact Client on Client Sexual Harassment Staff on Client Sexual Misconduct Staff on Client Sexual Harassment Substantiated	0 0 0 0 0 0	0 0 0 0 0 0 0	0 0 0 0 0 0 0	0 0 0 0 0 0 0	0 0 0 0 0 0

Wome	en's RISE - Program opened on 7/1/2021.	2021	2022	2023
	Client on Client Nonconsensual Sexual Abuse	0	0	0
ory	Client on Client Abusive Sexual Contact	0	0	0
Category	Client on Client Sexual Harassment	0	1	0
Cat	Staff on Client Sexual Misconduct	0	0	0
	Staff on Client Sexual Harassment	0	0	0
비	Substantiated	0	0	0
Result	Unsubstantiated	0	1	0
<u>R</u>	Unfounded	0	0	0
Total		0	1	0

#### **Identified Problem Areas and Corrective Actions**

The PREA standards require a "Sexual Abuse Incident Review" to be conducted within 30 days of the determination of the outcome of all substantiated and unsubstantiated allegations. Of the eight (8) allegations in 2023, two (2) were unfounded, two (2) were unsubstantiated and four (4) were substantiated. Reviews of the six (6) unsubstantiated and substantiated incidents resulted in one (1) corrective action plan and multiple recommendations. Recommendations included:

• Any chairs where clients habitually sit to wait for staff to address their needs or concerns should immediately be removed. Another location in the program, outside the staff office, should be located where clients can wait for staff attention.

# The Connection's Community Justice Service Area

#### PREA Annual Report 2023

- The staff office and surrounding area should be reviewed, and locations identified for the placement of white noise generating machines to minimize the opportunities for staff conversations to be overheard by program clients.
- The treatment program's Resident Handbook will be updated to clarify that clients should only discuss any sexual ideas, fantasies, thoughts, etc. with clinical staff and these topics as well as any inappropriate sexual talks should not occur with non-clinical staff.
- Staff will be reminded of the need to distribute the Visitors' Guide to PREA to all program visitors, especially client's friends and family members.
- Program Leadership will be directed to implement a camera footage review protocol so that the operations of the program and conduct of each staff is reviewed for random intervals, particularly during times when any staff has been the only who was working during a particular shift.

There were also recommendations related to staff training and supervision:

- More management presence until a program manager is hired;
- Enhancement of boundary training for all community confinement program staff;
- For program leadership to regularly review boundaries and ethical behaviors in one-on-one supervisions and staff meetings; and
- To revise the current annual PREA training content to include more information on boundaries between staff and clients, ethical behavior generally, and various ways in which clients might attempt groom staff for purposes of the client being able to exploit staff for the client's personal advantage and implement training to all community confinement staff.

#### **Assessment of Progress**

Starting in of January 2023, the PREA Coordinator made significant updates to the yearly refresher training for all staff working in this agency's community confinement facilities and provided the training to all community confinement staff by May, 2023. The PREA Coordinator will continue to periodically update both the yearly refresher training and the training at orientation for new staff. The PREA Coordinator will create a one-page resource for management to provide an overview of requirements to be provided to new management and as a refresher. All community confinement program staff will continue to adhere to the agency's PREA Policies and Procedures and remain compliant with the PREA standards. The following programs successfully passed their PREA Audits in 2023: Sierra Center Work Release, Connection House, Women's RISE, and Roger Sherman House. The following programs have been scheduled for an audit in 2024: January Center, Cochegan House, and Sierra Center Pre-Trial.

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Elissa Viglione, PREA Coordinator

DocuSigned by

Lisa DeMatteis, Chief Executive Officer

1/18/2024

Date

1/18/2024

Date