



COMCOR, Inc.

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POLICY AND PROCEDURE MANUAL

Section: PREA

Title: Zero Tolerance

Number: PREA-010

POLICY INFORMATION

Original Effective Date: 02-28-14

Revision Dates: 04-14-14

Annual Review Required:

Responsible Staff: PREA Coordinator
Residential Senior Program Manager

Form:

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STANDARD REFERENCES

ACA

BOP

DBH

DCJ

3-171

DOC

DYC

PREA

115.211(a)

Source:

Policy ComCor will maintain a zero tolerance policy in that it does not tolerate sexual conduct of any type among offenders or between offenders and staff members, regardless of whether such conduct is consensual. To adequately prevent, detect and respond to occurrences of sexual assault or sexual harassment, ComCor will adhere to the following practices.

- A. Screening – All potential employees and volunteers must undergo a comprehensive background check before being allowed to work. ComCor will conduct background checks on existing employees, contractors and volunteers at least every five years.
- B. Employment - ComCor will not hire anyone who may have contact with residents, and shall not enlist the services of any contractor or volunteer 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
 - 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 (B)(2) of this section

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- C. Training – All employees, contractors and volunteers will be trained annually on what constitutes sexual abuse and sexual harassment, how to respond to allegations and reporting procedures and acknowledge their understanding.
- D. Prevention – This organization has a detailed listing of ways to minimize occurrences and reviews the listing annually:
1. Consistency in Leadership and Vision: ComCor has cultivated and maintained a culture in which the safety and wellbeing of our clients and our community is of paramount importance. Because we value our clients, we have created an organization that has zero tolerance for sexual assault, sexual misconduct and sexual harassment. Our management team communicates with staff regularly about the importance of adhering to PREA standards and why they are important.
 2. Employee Hiring and Training: ComCor screens all potential employees before the interview process to weed out those people that do not meet the minimum standards, including people that have a criminal record and those that have been involved in PREA incidents in the past. All employees participate in training designed to inform them of the PREA standards and their responsibilities under those standards. Staffs are provided with refresher information annually.
 3. Staff Diversity: ComCor seeks to create a labor pool that is as diverse as the population of Colorado Springs. We believe this practice will help create an environment in which clients are more comfortable communicating with staff members about sensitive issues.
 4. Objective Classification System: ComCor assesses each residential client upon entry to determine their level of risk and vulnerability. This information is used to help make housing assignments. Every effort is made to ensure that our clients feel comfortable in their rooms with their roommates.
 5. Independent Investigations: ComCor responds to all alleged sexual assault, sexual harassment and sexual misconduct reported. We have created an internal investigation team that is not part of the facility hierarchy that is responsible for initial investigations. If at any time it is suspected that an incident involves potentially criminal behavior, it is immediately turned over to local law enforcement for investigation.

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- E. Reporting – ComCor will take all allegations of sexual abuse seriously and will promptly and thoroughly investigate whether sexual abuse has taken place. All clients will be given information regarding multiple ways to report sexual assault or sexual harassment.
- F. Investigation – It is ComCor’s objective to conduct fair and impartial investigations of any allegation of sexual assault or sexual harassment. Every reasonable effort will be made to keep the matters involved in the allegation as confidential as possible, while still allowing for a prompt and thorough investigation. ComCor will cooperate fully with any investigation conducted by law enforcement or other regulatory agencies as needed.
- G. Protection – All victims will be protected from harm during the investigation period. Victims will be monitored after the conclusion of the investigation to ensure they do not suffer any type of retaliation and to ensure their needs for medical and mental health services are met.
- H. Response – Analysis of the occurrences will be conducted to determine what changes to policies and procedures are needed, if any, to prevent further occurrences.
- I. Review – ComCor’s sexual abuse policy will be reviewed periodically. A documented annual review for staff and volunteers will be provided on the following:
 - 1. Organization’s sexual abuse policy
 - 2. Preventing sexual abuse
 - 3. Detecting sexual abuse, and
 - 4. Responding to sexual abuse