

COMMUNITY LIVING MANITOULIN
Policies and Procedures

Category: Administration	Article: AD-02
Subject: Abuse and Harassment Prevention	Page: 1 of 15
Effective Date: April 12, 2008	Forms: AD-02-A
Revised: September 2015, Jan. 2017	Reviewed: Sept. 2016
Approved by: <i>Jammie Molenaar</i>	Title: <i>Executive Director</i>

POLICY STATEMENT:

Community Living Manitoulin has zero tolerance towards all forms of abuse and harassment. Any employee, who abuses an individual being supported by CLM or fails to report abuse, will face disciplinary action up to and including dismissal. This policy protects the rights of all individuals supported, employees, Board of Director members, students, volunteers, family and visitors.

It is the policy of Community Living Manitoulin that all individuals supported by CLM can expect to share, live, and participate in safe places where all people are treated with respect and dignity. All individuals will be empowered to make complaints without fear of consequences. The agency will provide staff who support without control and policies that place “freedom from harm” as the first goal of support.

In keeping with Quality Assurance Measures the agency will conduct an annual mandatory review of this policy and procedure, on the prevention, identification and reporting of abuse and update the policy as determined by the review. This review may also assess whether changes to this policy and procedure may be necessary to prevent occurrences of abuse. If changes are necessary the agency will promptly implement the changes as a result of the review. The agency will also prepare a written record and keep it on file as proof that they have reviewed this policy yearly.

PROCEDURES:

CLM says “NO” to discrimination and harassment based on:

- Race (your skin colour)
- National or ethnic origin (if you came from another country);
- Religion (your religious beliefs or set of opinions or rules you live by)
- Age (how old you are)
- Gender (whether you are a man or a woman)
- Sexual orientation (whether you are straight, gay or bi-sexual)
- Marital and family status (if you are married or not, have children or not).
- Disability (physical, cognitive, mental, developmental, or some combination of these)
- A conviction for which a pardon has been granted or a record suspended
- Citizenship (if you are a citizen of Canada or not);

Nothing in this policy violates anyone’s rights or responsibilities under the law.

COMMUNITY LIVING MANITOULIN
Policies and Procedures

Category: Administration	Article: AD-02
Subject: Abuse and Harassment Prevention	Page: 2 of 15
Effective Date: April 12, 2008	Forms: AD-02-A
Revised: September 2015, Jan 2017	Reviewed: Sept 2016

CLM says “NO” to harassment and abuse. Any employee who abuses an individual support will be dismissed.

CLM says “NO” to unfriendly, angry attitudes in places where individuals supported live, work, and spend time. These attitudes may create an atmosphere that affect people in a negative way. Treating people in a way that makes them feel powerless or uncomfortable is also not acceptable. It is hard for people to work towards, and reach their personal goals in this type of atmosphere.

CLM will act quickly on any report of harassment and/or abuse brought to CLM’s attention, resolving the situation fairly and preventing it from happening again.

CLM will ensure through education that all persons supported, employees, board members, volunteers, and students are aware of their responsibilities as outlined in this policy.

DEFINITIONS:

Note: All definitions and descriptive terms may not describe every possible scenario that can be defined as abuse.

Harassment: Conduct or comments that are degrading to an individual

When the words a person or group of people use, the way they act or make signs

- Insults or negatively mimicking
- Makes the person afraid or unsure of him/herself
- Makes the person feel he/she has to do what is said and not make his/her own decision
- Makes the person feel bad about who he/she is
- Is nasty and hurtful to the person
- Makes the person feel powerless

Sexual Harassment: comments or actions of a sexual nature that offend, humiliate, or worry someone about sex. This could be because the person is a woman or a man, or is gay or lesbian. Or, when people talk or joke about sex, use signs or act in a sexual way meaning to:

- Hurt the person’s dignity or self-respect
- Cause feelings of disgust or unwillingness to be part of what is going on
- Cause feelings of discomfort or powerlessness
- Cause feelings of fear or being unsure of him/herself

COMMUNITY LIVING MANITOULIN
Policies and Procedures

Category: Administration	Article: AD-02
Subject: Abuse and Harassment Prevention	Page: 3 of 15
Effective Date: April 12, 2008	Forms: AD-02-A
Revised: September 2015, Jan 2017	Reviewed: Sept 2016

Abuse: Any action or behaviour that causes, or is likely to cause physical injury or psychological harm to a person, or is likely to result in significant loss or destruction of their property and includes neglect. Abuse can be physical, verbal, sexual psychological, or emotional in nature that demeans, harms or infringes on the rights of individuals.

Abuse may include:

- The infliction of physical harm upon an individual
- The sexual molestation or sexual exploitation of an individual
- The failure to provide a person receiving services and supports with the required medical treatment
- The infliction of emotion harm upon an individual
- Civil and human rights abuse
- Betraying the trust, misusing, violating, perverting, or dishonouring people.

Physical Force: using strength or power against the person's body, usually to make him/her do something.

Psychological: causing harm to the person's mind or harmful mental energy affecting how the person feels.

Emotion Abuse: a chronic attack on an individual's self-esteem that is psychologically destructive.

Sexual Abuse: having sexual intercourse or touching sexual body parts of an individual supported. There can be no consent when someone is in a trust relationship (staff, directors, volunteers, and/or family) with an individual supported.

Neglect: the failure to provide what an individual supported needs for their health, safety, and/or well-being. This includes inactions that jeopardize the health/safety of the individual and denies them the opportunity to live a meaningful life, and meet their goals.

TYPES OF ABUSE:

Physical Abuse:

- Grabbing, forcefully hugging, holding, pulling hair, forcefully moving, stopping freedom of movement not identified in a Behavioural Plan.
- Striking, hitting, slapping, punching, kicking, scratching, burning, biting, tickling, and/or pinching.
- Medical: misuse of medication, over-sedation (too many pills), under-medication)not giving the medication the individual needs
- Forced medicating (giving the person medicine he/she doesn't want).

COMMUNITY LIVING MANITOULIN
Policies and Procedures

Category: Administration	Article: AD-02
Subject: Abuse and Harassment Prevention	Page: 4 of 15
Effective Date: April 12, 2008	Forms: AD-02-A
Revised: September 2015, Jan. 2017	Reviewed: Sept 2016

- Constraints: forced confinement or making a prisoner of the person for a time, forced feeding, (making the person eat when or what he/she does not want to). Refusing access to telephones, washrooms, mail, people, etc.
- Refusing access to washrooms, mail, people, and/or unreasonable access to telephone.
- Isolating: controlling what someone does, who he/she sees or who he/she talks to or where he/she goes.

Sexual Abuse: Unwanted sexual intercourse, unwanted sexual contact or touching, rubbing, being too close to the person's sexual body parts. **The lack of consent is the key. The hierarchy of the agency makes it impossible for there to be consent between a person with an intellectual disability and a care provider (defined as a power relationship).**

- Forced sexual contact/rape
- Unwanted or wanted sexual touching (power relationships)
- Verbal sexual harassment
- Sexual conversations or coercion in connection with sexual activity
- Showing sexual body parts
- Sexual conversation/referencing (that is not used for teaching, explaining things)

In any case where sexual abuse of an individual supported is disclosed, the police will be contacted immediately.

Mistreatment: actions that cause a serious risk of harm, intended or not, to a person by staff or other persons who are in a trust relationship with that person. Lack of respect is a defining feature of mistreatment.

- Actions that result in director or indirect harm
- Misuses of position/authority (power relationships)
- Coercion: forcing or intimidating someone into doing something against their will.
- Manipulation/Blackmail: staff need to encourage each individual receiving supports to make health wise choices. However, staff must not, for their own convenience, make someone do something they do not want to do by influencing them, or make promises or threats of things that will happen or not happen if they do or do not do it.
- Imposing rights restrictions that are unjustifiable or have not been addressed to the "Rights Committee".

Neglect: failing to provide the things people need to live (food, shelter, clothing, care, and supervision). Refusing to provide care, or causing a serious risk of harm, whether intended or not by staff or other persons whom are in a trust relationship with that person. This can mean:

- Withholding food/drinks

COMMUNITY LIVING MANITOULIN
Policies and Procedures

Category: Administration	Article: AD-02
Subject: Abuse and Harassment Prevention	Page: 5 of 15
Effective Date: April 12, 2008	Forms: AD-02-A
Revised: September 2015, Jan. 2017	Reviewed: Sept 2016

- Inadequate hygiene/personal care.
- Inappropriate clothes, bedding for the season (too hot in summer, too cold in winter)
- Not replacing torn or ill-fitting clothes
- Lack of safety precautions (*Safety of Individual IS-11*).
- Not taking individuals for medical, dental, or therapeutic treatments when needed
- Abandonment – leaving people alone (at home or in vehicle) without needed supervision.
- Not providing assistive devices such as hearing aids, glasses, or other aids when needed.
- Not keeping living, working, and recreational environments clean, maintained, and safe in a manner determined by people’s specific needs.

Verbal Abuse: using words, language pace, tone, loudness to affect people supported in a negative way. It may mean:

- Threatening, shouting at someone
- Humiliating, degrading, embarrassing someone
- Using inappropriate language, jokes, nicknames
- Making someone feel guilty
- Name calling, belittling someone

Psychological/Emotional Abuse: constant criticism, degrading, terrorizing, and/or anything that can make a person afraid, feel bad, and/or lower self-esteem and self-worth. This type of abuse is usually motivated by urges for “power and control”. This includes causing fear by intimidation, threatening physical harm, destruction or personal property, and/or forced isolation. Bullying, threatening and intimidation also fall under this section. Stalking or following someone are other examples of psychological abuse. It may mean:

- Not treating people in age appropriate manner
- Taking away a person’s ability to make decisions
- Forced inclusion or exclusion in personal life, such as seeing friends, family, religious events, going to social family events

Financial/Economic Abuse: theft, including deceiving an individual to sign away their possession or the misuse of money or matters that affect a person’s money such as:

- Theft, stealing (taking someone’s money) including Misuse of person’s money, property, or investments (borrowing money from someone supported)
- Fraud (deceiving someone about their money)
- Forgery (falsifying financial papers, personal expense forms or signings someone else’s name)
- Keeping someone from getting or keeping a job
- Abuse of Power of Attorney

COMMUNITY LIVING MANITOULIN
Policies and Procedures

Category: Administration	Article: AD-02
Subject: Abuse and Harassment Prevention	Page: 6 of 15
Effective Date: April 12, 2008	Forms: AD-02-A
Revised: September 2015, Jan. 2017	Reviewed: Sept 2016

Exploitation: taking advantage of an individual's disability.

- Taking unfair advantage of a person or situation for personal gain
- Being the beneficiary (receiving money or credit in some way when it should be the person supported)
- Using someone's abilities or work without acknowledging them or paying them
- Talking someone into doing things that are not in his/her best interest

INDICATORS:

Indicators of Physical Abuse:

- Unexplained and/or unusual burns, cuts, blisters, bruises
- Usual imprints on the skin
- Injuries, marks that do not match what is said to have caused the injury
- Signs of new injuries when old injuries have not yet healed.
- Fearfulness on part of person supported
- Changes in the person's behavior

Indicators of Psychological/Emotional Abuse:

- Extreme, unusual behaviours (anger, aggression, submitting to everything or withdrawal)
- High levels of anxiety/fear of returning to a particular place or situation
- Suicidal thoughts, words
- Delayed emotional or physical development
- Lack of attachment to parents, family, and friends

Indicators of Sexual Abuse:

- Physically observable changes
- Behaviourally observable changes
- Changes in relationships with others; changes at work
- Psychological changes - may express unusual feelings or change how he/she expresses their emotional feelings; their personal characteristics may change (from happy go lucky to quiet and/or withdrawn)
- Changes in sexual behaviours
- Bleeding from vagina or anal orifices
- Sudden desire to wear several layers of clothing
- Refusal to bathe or shower
- An increased fear or wariness of physical contact

COMMUNITY LIVING MANITOULIN
Policies and Procedures

Category: Administration	Article: AD-02
Subject: Abuse and Harassment Prevention	Page: 7 of 15
Effective Date: April 12, 2008	Forms: AD-02-A
Revised: September 2015, Jan. 2017	Reviewed: Sept 2016

Indicators or Neglect/Mistreatment:

- Dirty, torn clothes worn every day
- Insufficient clothing
- Bug infestation on the individual's clothes or body
- Unattended medical or dental needs
- Underweight or overweight (when not associated with primary disability)

Change is the key word in most cases. The fact that there is a change in a person, either physically or mentally, or the way they behave. In most cases the change will increase and become worse if the abuse continues, therefore, having the changes well documented will make it easier to determine the cause.

TRAINING:

All Board members, staff and individuals supported must review CLM's Abuse and Harassment Prevention Policy annually and sign that they have read and fully understand the policy. Training will be documented on the form (form AD-02-A) and sent to the personnel file of the Board member or employee. Supported Individuals' training record form will be kept with their Person Directed Plans. The annual training can include: A review of the Abuse & Harassment Prevention Policy B-1 and/or a review of the QAM video section 7 and/ or a test. For everyone, the training form will be signed and kept on file.

Board Members:

Within (3) months of beginning to work with the Board of Directors, the Board members will meet with the Executive Director and receive training on the Abuse & Harassment Prevention Policy. Annually thereafter, all Board members will receive training. The Executive Director is responsible to train all Board members.

Management:

In addition to the above training, the management team will be trained in their first week, on the process of dealing with an abuse report on a Serious Occurrence Report. Management will review this policy on a yearly basis.

Staff:

Within the 50 hours of orientation, all new staff will be trained on this policy and how to respond to a complaint of abuse.

The Operations Manager will be responsible for training all staff on CLM's Abuse and Harassment Policy during orientation and annually thereafter. Staff will be encouraged to ask questions. Staff who do not complete the annual review can be put off work until it is completed.

COMMUNITY LIVING MANITOULIN
Policies and Procedures

Category: Administration	Article: AD-02
Subject: Abuse and Harassment Prevention	Page: 8 of 15
Effective Date: April 12, 2008	Forms: AD-02-A
Revised: September 2015, Jan. 2017	Reviewed: Sept 2016

Individuals Supported/Participants:

People's disabilities can make them vulnerable. This vulnerability can be mitigated by the meaningful involvement of family and friends. This training will be made available to family members.

The training for participants will take place in a language and manner that is appropriate to the capacity of the person. The training on abuse prevention will be implemented within one month of their admission to any service of CLM.

Upon admission to services at CLM, all individuals with disabilities in care will:

- Receive a full explanation of CLM's abuse and harassment prevention policy. The policy will also be shared with and explained to his/her family and/or guardian
- Each individual will receive some form of abuse prevention training annually while in care. The training given will be at each individual's level of understanding.
- Each individual will be offered the opportunity to take sex education/relationship training classes through the agency.
- Each individual will be offered the opportunity to attend and/or belong to CLM's Self-Advocacy Group.

PROCEDURES for INVESTIGATION:

If you suspect abuse of an Individual supported:

- Treat allegations (reports) or suspicions of abuse seriously
- If the person is not speaking about it, **do not** prompt or ask leading questions
- While supporting the individual, ask general questions such as "How are things going?"
- Let the person know that you are there to talk and support him/her.
- The best way to support individuals who are unable to speak clearly is to become vigilant. Document your concerns and report any suspicions to your manager.
- Use an incident report. Mark "Confidential" on top. Use black ink and put only the facts and observations down. Suspicions and opinions are not evidence.
- Give the report directly to your Manager, who will forward the information to the Executive Director or designate immediately.
- This incident report will not be circulated but will be kept in confidence by the Executive Director.
- Over time, if there is a pattern, it will emerge.
- If you feel a pattern has emerged, and you are suspicious of abuse, call the police.
- **There must be some kind of notable evidence beside suspicion to call the police.**

COMMUNITY LIVING MANITOULIN
Policies and Procedures

Category: Administration	Article: AD-02
Subject: Abuse and Harassment Prevention	Page: 9 of 15
Effective Date: April 12, 2008	Forms: AD-02-A
Revised: September 2015, Jan 2017	Reviewed: Sept 2016

If you witness abuse:

- Intervene immediately and stop it
- Report the crime to the OPP
- Document what you saw
- Ensure the individual is safe

If there is evidence of abuse:

- Call the police immediately and document
- Staff will not ask or continue to ask questions
- CLM will not initiate an internal investigation before the police have completed their investigation

It is very important to keep open lines of communication with all care providers, by communication books, phone and email, incident reports (with injuries marked on body sketches), to prevent false allegations of abuse.

Person to Person Abuse:

- CLM staff will follow the same guidelines as listed in this policy.
- You must know the difference between behaviour and abuse.
- We do not call the police over behaviour.
- Individuals who have behavioural issues must have behavioural support plan/strategies.
- The alleged abuser will be removed from any contact with the victim.

Handling a Report: Staff

If a person tells you of abuse (whether it is happening now or in the past):

- Make sure it is a clear allegation of abuse
- If it isn't clear, ask only open-ended questions like, "What do you mean when you say a staff hurt you?" or "What happened?"
- Once it is a clear allegation, **stop** all questioning.
- It is important to not use leading questions as this will taint the investigation.
- Staff receiving the report or witnessing the abuse will give the abused individual the option of calling the police him/herself before notifying the police immediately.
- If the staff believes that the person is in imminent risk, he/she will immediately inform the police of possible danger.
- Police will give guidance to staff on how they want you to proceed.
- Staff will notify their Manager only after contacting the police.
- Staff will not discuss the allegation with Manager (beyond the basics of the report) or with other staff.

COMMUNITY LIVING MANITOULIN
Policies and Procedures

Category: Administration	Article: AD-02
Subject: Abuse and Harassment Prevention	Page: 10 of 15
Effective Date: April 12, 2008	Forms: AD-02-A
Revised: September 2015, Jan 2017	Reviewed: Sept 2016

- Staff will ask for guidance from the Manager regarding the safety of the individual making the allegation.
- Staff will follow through to ensure that the individual is not placed at risk. CLM will support the staff in staying later after the end of their shift if they staff feels it is necessary to ensure the safety of the individual being supported, and or to do his/her report.
- If the person can give consent, get it before phoning the closest family member or guardian.
- If the person cannot give consent, call the family advocate or guardian to notify them of the allegations and need for cooperation with the police. If the person asks that the family not be contact, document the request and the Manager will talk to the person and decide if the request can be honoured.
- If it is a family member who is accused, do not phone the family until the police have interviewed and advised you.
- If the alleged abuser is in the management group, contact the management's direct Manager going up to and including the President of the Board of Directors.

Documentation:

- Staff will fully document the allegation once the phone call has been made.
- It must be completed at work before going home the same day.
- Use an incident report and black pen.
- Staff will document both the person's allegation and their own questions.
- Use the same words the individual used.
- Write down any questions you asked.
- Do not alter the statement once it is written.
- If you make a mistake, strike it out, initial and continue. Do not use white out
- Mark the incident report "Confidential"
- The original goes directly to your Manager with a copy to the Executive Director.
- This incident report will **not** be circulated, but will be kept pending the police investigation.

Handling a Report: Management

- Assume leadership of the situation once contacted and determine the need for immediate action.
- If the suspected abuse was of a criminal nature and reported to the police, **no** internal investigation can be undertaken until the police have completed their investigation.
- The Executive Director will immediately suspend the alleged abuser, without pay, for the period of the police investigation.

COMMUNITY LIVING MANITOULIN
Policies and Procedures

Category: Administration	Article: AD-02
Subject: Abuse and Harassment Prevention	Page: 11 of 15
Effective Date: April 12, 2008	Forms: AD-02-A
Revised: September 2015, Jan 2017	Reviewed: Sept. 2016

- The police may immediately determine that abuse has not occurred.
- There may be a recommendation that the accused not work with the individual supported or staff making the report.
- Should the police not charge the alleged abuser; the Executive Director will determine whether or not the Agency needs to do an internal investigation.
- Should the Executive Director determine that an internal investigation is required; the alleged abuser will remain on a suspension until such time as the internal investigation is completed, or be transferred to another work arrangement.
- The Executive Director will ensure the incident is reported as a serious occurrence according to the Ministry guidelines.
- Manager will meet with the individual supported and ensure that the person is feeling safe and has counselling (internally or using external agencies) as needed.
- Manager will meet with the staff member who took the initial report to ensure that the staff is feeling supported and offered counseling services if necessary.

The Manager will ensure the reporting staff is not subject to:

- Workplace harassment
- Ostracism
- Threats and or Intimidation

A false or malicious report of abuse by one staff member against another will be dealt with as harassment and may lead to disciplinary action up to and including dismissal.

Handling a Report: Agency

- The Executive Director or designate will **immediately** submit to the Ministry a *Serious Occurrence*, notifying the Ministry of known details following established Ministry's guidelines for reporting abuse.
- Upon completion of the OPP investigation, CLM will do a follow up report to MCSS giving full details of the police investigation.
- The Agency will communicate, through training and orientation, that CLM has a zero tolerance for abuse and all abuse will be reported.
- The Agency will support staff through the process of reporting abuse by:
 - a) Ensuring that training on abuse happens yearly
 - b) Ensuring that abuse policies and reporting protocols are reviewed annually
- The agency will review the abuse reporting procedure at a board level annually
- The agency will develop a relationship with the local police force to discuss any issues of concerns or support.

COMMUNITY LIVING MANITOULIN
Policies and Procedures

Category: Administration	Article: AD-02
Subject: Abuse and Harassment Prevention	Page: 12 of 15
Effective Date: April 12, 2008	Forms: AD-02-A
Revised: September 2015, Jan. 2017	Reviewed: Sept 2016

Confidentiality:

- It is of the utmost importance that everyone involved maintain a silence on the charge of abuse once it has been made.
- If the individual supported needs counseling or help in keeping information only for the police, Managers will arrange for it.
- The accused person's reputation is intact if only those involved know about the charge
- The staff making the report will feel more secure knowing people won't approach them with questions.
- Any staff violating confidentiality on abuse or harassment charges will be disciplined. This means not talking to anyone other than a professional counselor or their Manager and/or Executive Director, during and after the investigation is completed by the police.
- Once the police investigation has been completed you may be asked by the Executive Director to direct some information to the internal investigation committee or to attend in person.
- All other discussion is forbidden.

Support to Police Investigations:

- If requested by the police, the agency will provide a place for interviewing the individual(s) and staff that is neutral and safe, and is not a room where the abuse is alleged to have occurred.
- The Executive Director or his/her delegate will make available to the police all such records and documents (daily logs, medical records, staff assignments, etc.) which may be required for the investigation and a private space in which to examine them.
- The Executive Director and/or his/her designate will also provide any information necessary to help the police understand the intellectual disability the alleged victim and/or perpetrator may have.
- Following their investigation protocol, the police may carry out detailed interviews with:
 - a) The person who reported the abuse
 - b) The person who initially suspected the abuse (if different from the person who reported)
 - c) The alleged victims(s)
 - d) Any witnesses to the alleged abuse
 - e) Any other person(s) who may be of assistance in the investigation
- Interviewing as part of the investigation process is the responsibility of the police. If a CLM staff is asked by the police to act in an interpreter/communication support capacity, the staff is limited solely to interpreting what is asked and the individual's response to the question.
- If an individual requires aids to facilitate communications, these will be made available.

COMMUNITY LIVING MANITOULIN
Policies and Procedures

Category: Administration	Article: AD-02
Subject: Abuse and Harassment Prevention	Page: 13 of 15
Effective Date: April 12, 2008	Forms: AD-02-A
Revised: September 2015, Jan 2017	Reviewed: Sept 2016

- A person whom the victim trusts will, where necessary or requested by the individual, be assigned to support the individual through the investigation process. Under no circumstances will this person conduct the interview, unless directed by the police. The person assisting must ensure that they do not coach or lead the individual during the interview process.
- If a medical examination is required as part of the investigation, this will be carried out by a physician knowledgeable about abuse and in such a manner that does not cause undue addition stress for the individual. Any information about the individual's special needs will be made available to the physician.
- The Executive Director or designate will request regular updates on the progress of the investigation and make information available as permitted for the purpose of supporting individuals and staff.
- At the conclusion of the investigation, the police will be asked if any charges are being laid and if they have any recommendations concerning further action to be taken.

Media Strategy:

The Executive Director or designate, will be the designated media contact. No information will be given "off the record".

Allegations of abuse are a Serious Occurrence and, if the media or community attention is involved, the incident will be deemed as an Enhanced Serious Occurrence.

PROCEDURES FOR APPROPRIATE RESPONSE/DISCIPLINARY ACTION:

The police will determine if criminal actions/abuse has taken place or not. If they determine "yes" an employee will be dismissed. A board member or volunteer will be removed from CLM property and forbidden access to all CLM individuals supported. If there is no abuse, but there is misconduct or mistreatment, the agency will investigate.

If the police report mistreatment or misconduct by an employee, the Executive Director and/or designate will determine the degree of discipline to be applied, which can include dismissal.

If the agency needs to investigate further:

- An impartial management employee will be selected by the Executive Director as the investigator
- A team including the investigator, one other management staff and possibly, one board member, will conduct and review all documentation.
- The interview team will interview the alleged abuser with any union steward of his/her choice.

COMMUNITY LIVING MANITOULIN
Policies and Procedures

Category: Administration	Article: AD-02
Subject: Abuse and Harassment Prevention	Page: 14 of 15
Effective Date: April 12, 2008	Forms: AD-02-A
Revised: September 2015, Jan 2017	Reviewed: Sept 2016

- If the allegation is denied, the team will meet with the alleged victim and/or staff filing the abuse allegations and any witnesses.
- Team members will provide detailed written responses as provided by those interviewed
- Any modifications to questions used for individuals supported will be documented.
- All information will be reviewed by the team
- A report including recommendations will be formulated by the team and provided to the Executive Director
- Legal opinions on information will be sought by the Executive Director or delegate.
- Management will meet with both parties (victim, alleged abuser) separately and explain the findings of the investigation as well as notifying them in writing
- Need for counseling for the victim may be determined
- The accused will either be found guilty or not guilty based on the evidence or not sufficient evidence to make a decision.

If guilty, CLM will determine the appropriate actions to be taken which may range from counseling, relocation, or termination of employment.

If during the investigation it is determined that abuse or misconduct has not occurred all documentation of evidence shall be given to the Executive Director and will be placed in the employee's personnel file.

Debriefing will be arranged for all involved to provide closure on all outstanding issues.

Recommendations may be made to the Executive Director for additional preventative measure to be considered.

PREVENTING ABUSE:

The most important thing staff can do to prevent abuse is – Don't Be an Abuser.

- Give the individual an opportunity to say "No" and practice being assertive.
- Make sure each individual has five to ten minutes of undisturbed free time every day just to talk.
- Work on self-advocacy skills and encourage them to join CLM's Advocacy Group.
- Do not speak for the individual, but encourage the individual to speak for themselves.
- Ask for the individual's input and opinions

COMMUNITY LIVING MANITOULIN
Policies and Procedures

Category: Administration	Article: AD-02
Subject: Abuse and Harassment Prevention	Page: 15 of 15
Effective Date: April 12, 2008	Forms: AD-02-A
Revised: September 2015, Jan 2017	Reviewed: Sept 2016

- For those who use non-traditional communication strategies that take a little more time, take time to listen.

Strategies for Staff in Trying Circumstances:

- Practice good boundaries
- Keep your relationship with the individual you support clear
- Avoid relationship terms for professional services, do not use terms of familiarity (i.e. Friend, sweetie, love, dear, honey, etc.)
- Ensure that you have strategies to deal with your own temper.
- Ensure that you have strategies to deal with frustration.
- Seek out supervision and support during times of high stress.
- Take training in understanding behaviours.
- Learn about and respect the disability experience.
- Use relaxation procedures liberally at work.
- Monitor your use of power.
- Encourage those in your care to express themselves and then listen when they talk.
- Being each day with a simple pledge: "I will respect constantly, reflect regularly, and in every situation stay calm and carry on." – *David Hingburger*

Abuse and Harassment Prevention Training
Form AD-02A

Please Print

Name: _____

Position: _____

Date of Training or Review: _____

- Upon orientation, I have received training on this policy AD-02 Abuse and Harassment Prevention. I have viewed Segment 7 of the Quality Assurance Measures on Abuse as part of this training.

- I have annually reviewed this policy and been given the opportunity to clarify any sections that I did not fully understand.

Signature

Date

Management Signature

Date

All employees, volunteers and board members must read and sign this form annually.

Revised Jan 2017