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| Policy Number | VQ.NATL.HR.4 | Rev. No. 00 |
| Policy Name | Zero Tolerance Policy | |
| Operations | National | |
| Department | Human Resources | |
| Effective Date | 10/10/2024 | |

1. Policy Statement

- 1.1. At VisionQuest, we are committed to providing a safe and nurturing environment for all children, youth, families, and staff under our care. Our Zero Tolerance Policy reflects our unwavering commitment to safeguarding the physical, emotional, and psychological well-being of every child, family, youth, family, and staff entrusted to our care.

2. Scope

- 2.1. This policy applies to all VisionQuest employees, contractors and volunteers that provide services at any VisionQuest program.

3. Definitions

- 3.1. **Abuse** is defined as the infliction or allowing of physical injury, impairment of bodily function or disfigurement or the infliction of or allowing another person to cause serious emotional damage as evidenced by severe anxiety, depression, withdrawal or untoward aggressive behavior and which emotional damage is diagnosed by a medical doctor or psychologist and which is caused by the acts or omissions of an individual having care, custody, or control of a child. Abuse includes physical injury to a child that results from abuse.
- 3.2. **Neglect** is defined as the inability or unwillingness of a parent, guardian, or custodian of a child to provide that child with supervision, food, clothing, shelter, or medical care if that inability or unwillingness causes substantial risk of harm to the child's health or welfare.
- 3.3. **Sexual abuse of a child by another child includes the following acts if the victim does not consent:**
 - 3.3.1. The employment, use, persuasion, inducement, enticement, or coercion of a child to engage in, or assist another person to engage in, (2) or (3) below or the rape, molestation, prostitution, or other form of sexual exploitation of children, or incest with children.
 - 3.3.2. Actual or simulated sexual intercourse, including sexual contact in the manner of genital-genital, oral-genital, anal-genital, or oral-anal contact, whether between persons of the same or opposite sex
 - 3.3.3. 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
 - 3.3.4. Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument
 - 3.3.5. Bestiality
 - 3.3.6. Masturbation
 - 3.3.7. Lascivious exhibition of the genitals or pubic area of a person or animal
 - 3.3.8. Sadistic or masochistic abuse
 - 3.3.9. Child pornography or child prostitution
- 3.4. **Sexual abuse of a child by an adult includes the following acts:**

- 3.4.1. The employment, use, persuasion, inducement, enticement, or coercion of a child to engage in, or assist another person to engage in, (2) or (3) below or the rape, molestation, prostitution, or other form of sexual exploitation of children, or incest with children.
- 3.4.2. Actual or simulated sexual intercourse, including sexual contact in the manner of genital-genital, oral-genital, anal-genital, or oral-anal contact, whether between persons of the same or opposite sex
- 3.4.3. Intentional touching, either directly or through the clothing, of the genitalia, anus, groin, breast, inner thigh, or the buttocks that is unrelated to official duties or where the staff member, grantee, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire.
- 3.4.4. Contact between the mouth and any body part where the staff member, grantee, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire.
- 3.4.5. Penetration of the anal or genital opening of another person, however slight, by a hand, finger, object, or other instrument that is unrelated to official duties or where the staff member, grantee, contractor, or volunteer has the intent to abuse, arouse, or gratify sexual desire.
- 3.4.6. Any attempt, threat, or request by a staff member, grantee, contractor, or volunteer to engage in activities (3.4.1.) through (3.4.5.) above.
- 3.4.7. Any display by a staff member, grantee, contractor, or volunteer of his or her uncovered buttocks or breast in the presence of a child
- 3.4.8. Bestiality
- 3.4.9. Masturbation
- 3.4.10. Lascivious exhibition of the genitals or pubic area of a person or animal
- 3.4.11. Sadistic or masochistic abuse
- 3.4.12. Child pornography or child prostitution; or
- 3.4.13. Voyeurism by a staff member, grantee, contractor, or volunteer
- 3.5. **Voyeurism** is an invasion of privacy of a child by a staff member, grantee, contractor, or volunteer for reasons unrelated to official duties. Examples include inappropriately viewing a child performing bodily functions or bathing; or requiring a child to expose his or her buttocks, genitals, or breasts; or recording images of all or part of a child's naked body or part of a child performing bodily functions.
- 3.6. **Sexual Harassment of a child by another child includes:** repeated and unwelcome sexual advances, requests for sexual favors, or verbal comments, gestures, phone calls, emails, texts, social media messages, pictures sent or shown, other electronic communication, or actions of a derogatory or offensive sexual nature.
- 3.7. **Sexual harassment of a child by an adult includes:** repeated verbal comments, gestures, phone calls, emails, texts social media messages, pictures sent or shown, or other electronic communication of a sexual nature to a child by a staff member, grantee, contractor, or volunteer, including demeaning references to gender, sexually suggestive or derogatory comments about body or clothing, or obscene language or gestures.
- 3.8. **Inappropriate Sexual Behavior** includes singular instances of inappropriate, sexual, derogatory, or offensive conduct that (1) are not serious enough to rise to the level of sexual abuse, and (2) have not occurred repeatedly so as to constitute sexual harassment.

4. Policy

- 4.1. Zero Tolerance
 - 4.1.1. VisionQuest has a zero-tolerance policy for all forms of abuse, neglect, sexual abuse, sexual harassment, and inappropriate sexual behavior at all programs, and will make every effort to prevent, detect, and respond to such conduct.

- 4.1.2. VisionQuest has policies, procedures and services that enforce prevention, detection, and response for all forms of abuse, neglect, sexual abuse, sexual harassment, and inappropriate sexual behavior. These policies, procedures, and services:
 - 4.1.2.1. Are culturally sensitive and knowledgeable of child welfare best practices for preventing, detecting, and responding to sexual abuse, sexual harassment, and inappropriate sexual behavior.
 - 4.1.2.2. Are age appropriate
 - 4.1.2.3. Are tailored for a diverse population of children, including children who are LGBTQI (lesbian, gay, bisexual, transgender, questioning, and intersex);
 - 4.1.2.4. Ensure that children with disabilities, including but not limited to children who are deaf, hard of hearing, blind, or have low vision and children with intellectual, psychiatric, or speech disabilities, have an equal opportunity to participate in or benefit from all care provider facility policies and procedures.
 - 4.1.2.5. Ensure that children with limited reading ability or who are limited English proficient (LEP) have an equal opportunity to participate in or benefit from all care provider facility policies and procedures.
 - 4.1.2.6. Provide for effective communication with children with disabilities or who are LEP, including access to in-person, telephonic, or video interpretive services that enable effective, accurate, and impartial interpretation, both receptively and expressively, using any necessary specialized vocabulary
 - 4.1.2.7. Require quality in-person or telephonic interpretation services that enable effective, accurate, and impartial interpretation services.
 - 4.1.2.8. Ensure that any written materials, including but not limited to notifications, orientation materials, and instruction, are translated either verbally or in written form in the child's preferred language.
- 4.1.3. VisionQuest strives to create a warm and caring environment for all youth, and there may be times that a child is upset or seeks comfort from a staff member, in these instances, VisionQuest expects all employees, contractors, and volunteers to use maximum prudence, caution, and child welfare standards in preventing all forms of abuse, neglect, sexual abuse, sexual harassment, and inappropriate sexual behavior.
 - 4.1.3.1. VisionQuest employees who have completed and passed all background check requirements are permitted to give a side hug to children at the child's request. Employees must ensure there is another staff member present as a witness.
- 4.1.4. Any VisionQuest employees found to have violated this policy and/or suspicions of a violation of this policy will be suspended pending an investigation which may lead to disciplinary action up to termination.

4.2. Prevention, Detection and Response to Sexual Abuse and Sexual Harassment

4.2.1. Prevention/Detection

- 4.2.1.1. Employee Screening and Background Checks:
 - 4.2.1.1.1. VisionQuest makes every effort to prevent sexual abuse and sexual harassment by following the below practices:
 - 4.2.1.1.2. Prior to being onboarded each applicant undergoes criminal history and child protective services background checks according to program specific state licensing and contractual requirements.
 - 4.2.1.1.2.1. Background investigations are updated according to state licensing and contractual requirements.
 - 4.2.1.1.3. Each applicant is asked for a minimum of 1 personal reference and their previous employers.
 - 4.2.1.1.4. Each applicant (new or existing employees) completes a written application which includes a question regarding any

prior misconduct. This misconduct may include but is not limited to:

- 4.2.1.1.4.1. Any civil or criminal convictions, charges, arrests, investigations, or adjudications
- 4.2.1.1.4.2. Having engaged in or attempted to engage in sexual abuse, sexual harassment, or inappropriate sexual behavior, a crime involving a minor, or any violent crime.

4.2.2. **Conditions for Employment**

- 4.2.2.1. VisionQuest will not hire or contract an individual or volunteer who:
 - 4.2.2.1.1. Has engaged in, or attempted to engage in, sexual abuse, sexual harassment, domestic violence, or any other inappropriate type of sexual behavior.
 - 4.2.2.1.2. 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.
 - 4.2.2.1.3. Has been civilly or administratively adjudicated to have engaged in the activity described in this policy.
 - 4.2.2.1.4. Has perpetrated any crime involving a child, regardless of how long ago the incident occurred, or a violent crime within the past 10 years.
- 4.2.2.2. All offers of employment for any position are contingent upon receipt of an acceptable background screening.
- 4.2.2.3. Any employee who provides erroneous, misleading or willfully deceptive information on an application or part of the employment screening process (I-9, resume, etc.) will be immediately terminated from employment or eliminated from the screening process.

4.2.3. **Employee Training:**

- 4.2.3.1. New hires will receive training prior to being allowed to work with children, youth, and their families.
 - 4.2.3.1.1. New hires shall not have either supervised or unsupervised contact with minors prior to completing the training.
- 4.2.3.2. All VisionQuest employees will receive upon hire a copy of Zero Tolerance for Sexual Misconduct of a Minor and Code of Conduct documents during their new hire and orientation process.
 - 4.2.3.2.1. Employees will be required to sign a form to be kept in the HR file to ensure the safety and security of the minors of VisionQuest.
- 4.2.3.3. VisionQuest employees will be trained in the following:
 - 4.2.3.3.1. The right of children and staff to be free from sexual abuse, sexual harassment, and inappropriate sexual behavior
 - 4.2.3.3.2. Definitions and examples of prohibited and illegal sexual behavior
 - 4.2.3.3.3. Recognition of situations where sexual abuse, sexual harassment, and inappropriate sexual behavior may occur
 - 4.2.3.3.4. Recognition of physical, behavioral, and emotional signs of sexual abuse and methods of preventing and responding to such occurrences
 - 4.2.3.3.5. How to avoid inappropriate relationships with children

- 4.2.3.3.6. How to communicate effectively and professionally with children, including children who are lesbian, gay, bisexual, transgender, questioning, or intersex
- 4.2.3.3.7. Procedures for reporting knowledge or suspicion of sexual abuse, sexual harassment, or inappropriate behavior as well as how to comply with relevant laws related to mandatory reporting
- 4.2.3.3.8. The requirement to limit disclosing of sexual abuse, sexual harassment, and inappropriate sexual behavior to staff on a need-to-know basis, in order to make decisions concerning the victim's welfare and for law enforcement, investigative, or prosecutorial purpose.
- 4.2.3.3.9. Cultural sensitivity toward diverse understanding of acceptable and unacceptable sexual behavior and appropriate terms and concepts to use when discussing sex, sexual abuse, sexual harassment, and inappropriate sexual behavior with a culturally diverse population.
- 4.2.3.3.10. Sensitivity regarding trauma commonly experienced by children
- 4.2.3.3.11. Knowledge of existing resources for children inside and outside the care provider facility, such as trauma-informed treatment, counseling, and legal advocacy for victims.
- 4.2.3.3.12. General cultural competency and sensitivity to the culture and age of children.

4.2.4. Contractor and Volunteer Training

- 4.2.4.1. Contractors and volunteers will receive a copy of the Zero Tolerance Policy and Code of Conduct documents before having access to children, youth, and families.
 - 4.2.4.1.1. Contractors and Volunteers must always follow this policy and will receive training that will be documented and filed.
- 4.2.4.2. Contractors and Volunteers will be required to sign a form to be kept in the HR file to ensure the safety and security of the minors of VisionQuest.

4.2.5. Child, Youth, and Family Education

- 4.2.5.1. VisionQuest will provide each minor entering the program with a comprehensive orientation explaining the program's zero tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.
- 4.2.5.2. VisionQuest will ensure that all communication and services provided and related to the programs' policies and procedures for the prevention, detection and response to sexual abuse and sexual harassment are available, understood and accessible to all minors, regardless of disabilities or language barriers.
- 4.2.5.3. VisionQuest acknowledges that LGBTQI children and youth have the right to be free from discrimination and harassment based on actual or perceived sexual orientation or gender identity.
 - 4.2.5.3.1. VisionQuest may not label a child or youth as a likely abuser or punish a child or youth for his or her sexual orientation, gender identity, or gender expression.

- 4.2.5.3.2. All children and youth must be treated fairly and equally and provided with inclusive, safe, and nondiscriminatory services.
- 4.2.6. **Response**
 - 4.2.6.1. Reporting
 - 4.2.6.1.1. Each employee, contractor, and volunteers are aware that they are mandated reporters.
 - 4.2.6.1.2. VisionQuest follows "See Something, Say Something" and employees, contractors, and volunteers are trained to report any suspicions of sexual abuse, sexual harassment, and inappropriate sexual behavior as well as potential boundary crossings and/or any concerns related to the safety and well-being of all children in care.
 - 4.2.6.1.3. If there is a sexual abuse, sexual harassment or inappropriate sexual behavior allegation, designated staff will contact the local Police Department and other pertinent entities as stated in the program's internal procedure.
 - 4.2.6.1.4. Employees are expected to keep the alleged victim and alleged perpetrator separate to ensure safety.
 - 4.2.6.1.5. Each VisionQuest program will have procedures tailored to their specific demographic and governing body to address allegations of sexual abuse and sexual harassment.
 - 4.2.6.2. Employee Allegations of Sexual Abuse or Sexual Harassment
 - 4.2.6.2.1. If an employee, contractor or volunteer feels that they have experienced sexual abuse, sexual harassment, or inappropriate sexual behavior on behalf of another employee or child, youth, or family in our program, the employee should promptly contact their Human Resources Representative or Program director. If any of these individuals are involved in the allegation, the complaint should be directed to the other named position.
- 4.2.7. Disciplinary Actions
 - 4.2.7.1. VisionQuest has Zero Tolerance for Sexual Misconduct, Abuse or Harassment of any minor in care, regardless of age. All allegations will be investigated and reported to external authorities as required by law.
 - 4.2.7.1.1. The results of an investigation of potential sexual abuse or sexual harassment or inappropriate sexual behavior will determine the level of discipline or consequence.
 - 4.2.7.2. Anyone who has been found to have sexually harassed another person under the terms of this policy is liable to any of the following sanctions:
 - 4.2.7.2.1. Verbal and/or Written Warning
 - 4.2.7.2.2. Write-Up
 - 4.2.7.2.3. Note-to-File (NTF)
 - 4.2.7.2.4. Suspension
 - 4.2.7.2.5. Termination
 - 4.2.7.2.6. Prosecution
 - 4.2.7.2.6.1. Criminal prosecution may come as a result of law enforcement involvement.
 - 4.2.7.3. Retaliation against individuals who in good faith report allegations of sexual misconduct, abuse or harassment is prohibited and may be subject to disciplinary action.

5. Related Policies

5.1. N/A

6. Attachments

6.1. N/A

7. Legal/Contract Reference

7.1. N/A

8. Review/Revision History (This is to document any revisions made since the last policy review or the creation date, to keep track of changes made, who made them, etc)

| Revision/Version # | Summary of Changes | Date | Signed |
|--------------------|--------------------|------------|---|
| 00 | Creation | 8/2/2024 | Juan Alvarez-National Director of Compliance and Operations |
| 00 | Approved | 9/4/2024 | Kara Gouveia- Chief Operating Officer |
| 00 | Approved | 09/05/2024 | Lindsey Lake, VP of Human Resources |
| 00 | Approved | 09/05/2024 | Yousef Awwad, CEO |