

PREA AUDIT: Auditor's Final Report

JUVENILE FACILITIES



Name of Facility: ORANGE COUNTY YOUTH ACADEMY/ ORLANDO INTENSIVE			
Physical Address: 3150 39 TH STREET, ORLANDO, FLORIDA 32839			
Date report submitted			
Auditor information: Mr. Tracy S. Maxwell			
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Telephone number: 904-349-0045			
Date of facility visit July 9-11			
Facility Information			
Facility Mailing Address: (if different from above)			
Telephone Number: 407-835-0111			
The Facility is:	<input type="checkbox"/> Military	<input type="checkbox"/> County	<input type="checkbox"/> Federal
	<input type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input checked="" type="checkbox"/> Private not for profit		
Facility Type:	<input type="checkbox"/> Detention	<input type="checkbox"/> Correction	<input type="checkbox"/> Other:
Name of PREA Compliance Manager: Todd Johnson		Title: Facility Administrator	
Email Address: ToddJohnson@usG4s.com		Telephone Number:	407-835-0111
Agency Information			
Name of Agency: G4S YOUTH SERVICES, LLC			
Governing Authority or Parent Agency: (if applicable)			
Physical Address: 6302 Benjamin Road, Suite 400, Tampa Florida 33634			
Mailing Address: (if different from above)			
Telephone Number:			
Agency Chief Executive Officer			
Name: Jim Hill		Title: President	
Email Address: Jim.Hill@us.G4s.com		Telephone Number: 813-514-6275 ext. 202	
Agency Wide PREA Coordinator:			
Name: Bobbi.Pohlman-Rodgers		Title: PREA Coordinator	
Email Address: Bobbi.Pohlman@us.G4S.com		Telephone	

AUDIT FINDINGS

NARRATIVE:

The Orange Youth Academy is a 48-bed hardware-and staff-secure high-risk program for males between the ages of 14–21. The program provides Mental Health Overlay Services (MHOS) and evidence-based practices which incorporate the principles of restorative justice.

DESCRIPTION OF FACILITY CHARACTERISTICS:

The goal of the program is to provide an environment that offers vast opportunities for personal growth and fosters feelings of safety and well-being. Youth participate in daily psychotherapeutic services, seven days per week, including group and individual counseling and cognitive skills training sessions, as well as educational and recreational services. Family involvement is an integral component and is achieved through family counseling, visitation, and Family Day events. Clothing and uniforms are provided by the program. The anticipated average length of stay for each youth is between 9–12 months. Orange Youth Academy (school number 488009) is a Type 2 program offering English, Math, Science, Social Studies, Reading and one elective course. Education services are provided by the Orange County School District.

Orlando Intensive Youth Academy is a 16-bed, staff-secure moderate-risk program for males between the ages of 12-18. The program provides intensive mental health services, special needs mental health services, social and life skills, vocational training, and on-site educational classes. The program model is based on a cognitive behavioral approach incorporating evidence-based treatment practices and restorative justice principles. Youth receive weekly individual therapy and monthly family therapy sessions. A licensed psychologist completes assessments and provides monthly follow-ups. Clothing and uniforms are provided by the program. The anticipated average length of stay is between 9–12 months.

SUMMARY OF AUDIT FINDINGS:

The notification of the on-site audit was posted on May 28, 2014, six weeks prior to the first date of the on-site audit. The posting of the notices was verified by photographs received electronically from the PREA Coordinators. The photographs indicated notices were posted in various locations throughout the facility including the housing unit and administrative areas. The Pre-Audit Questionnaire, policies and supporting documentation were received on May 28, 2014. The documents were uploaded to a UBS flash drive.

The on-site audit was conducted July 9-10, 2014. An in-brief was conducted with the Facility Administrator and Assistant Facility Administrator. At the conclusion of the in-brief a complete tour of the facility was conducted including the resident sleeping, showering areas and areas where residents primarily spend their time.

My initial assessment of the facility was the youth were under direct supervision of the staff while engaged in various activities. The sanitation was acceptable throughout the facility. The average daily population during the past 12 months was 62 residents. The average age of the residents was 13-19 years. Staff acknowledged where the blind spots were located in the facility but noted that residents are never left without supervision. There were 23 surveillance cameras located throughout the facility. There was only one camera located in the kitchen area which limits the viewing of the washing area. Additionally, there was also a blind spot noted outside of the administration area leading into one of the housing dorms. It is recommended that additional cameras be placed in these areas. The surveillance system does not capture youth in showers or in their rooms.

During the two-day on-site visit, ten staff including those from all three shifts were interviewed. All interviews validated staff knowledge of PREA standards and their responsibilities as first responders. Fourteen residents were also interviewed. Residents were well informed of their right to be free from sexual abuse and harassment, how to report sexual abuse and harassment, and the services that the community based victims advocate provides.

The victims' advocacy Memorandum of Understanding (MOU) service was established; however, the contract has not been signed during the audit.

Secondary documentation to include two PREA related complaints and one report to law enforcement concerning an incident which allegedly took place at another facility were thoroughly reviewed.

Number of standards exceeded: **0**

Number of standards met: **38**

Number of standards not met: **0**

Number of standards Not Applicable: **3**

Standard 115.311- Zero Tolerance of Sexual Abuse and Sexual Harassment; PREA Coordinator

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

The initial review of Orange County Youth Academy/ Orlando Intensive facility policy (10-25 page #3) met the intent of the PREA Standard. The policy sufficiently met the zero-tolerance standard prohibiting all forms of sexual abuse and harassment. My interview with the Facility Administrator who also serves as the PREA Compliance Manager was fully involved and inculcated a zero-tolerance environment towards all forms of sexual abuse and harassment with the facility. The policy outlined in the facility's approach to preventing, detecting and responding to sexual abuse and harassment, including definitions of prohibited behaviors and sanctions for prohibited behaviors.

The agency has one dedicated PREA Coordinator. Interviews with the PREA Coordinator and PREA Manager/Facility Administrator both validated their responsibilities and both conveyed sufficient time to oversee the facility's PREA compliance efforts and to perform their other duties.

Standard 115.312- Contracting with Other Entities for the Confinement of Residents

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)
- Non- Applicable Standard

Auditor comments:

G4S Orange County Youth Academy/ Orlando Intensive is a stand-alone facility contracted and govern by The Florida Department of Juvenile Justice and does not contract for confinement of its residents.

Standard 115.313- Supervision and Monitoring

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

In reviewing the facility's documentation and submitted staffing plan assessment, considerations were documented and validated for staffing ratios of 1.8 staff to resident during waking hours. It is important to note that this ratio was also maintained during the evening and midnight shifts. An assessment was conducted on the physical plant layout and facility blind-spots.

Documented unannounced higher-level supervisor rounds as required in the standard to monitor, deter sexual harassment and sexual abuse was validated compliant through corrective action documentation submitted.

Standard 115.315- Limits to Cross-Gender Viewing and Searches

- Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

Orange County Youth Academy/ Orlando Intensive Policy 10-25 prohibits cross-gender searches only in exigent circumstances and must document reasoning for the opposite gender search. The policy additionally prohibited staff from examining a transgender or intersex youth for the sole purpose of determining the resident's genital status. Body cavity searches require the Director's authorization and must be conducted by licensed medical personnel in a medical establishment. The Search Log indicated there were no cross-gender strip searches or body cavity searches of residents in the past 12 months. This standard was validated compliant during resident and staff interviews.

The policy limits pat-down searches to male staff absent exigent circumstances. This was validated during interviews with both residents and staff.

Policy requires female staff, volunteers and contractors entering the housing unit to announce themselves upon entering the areas where the likelihood of residents performing bodily functions occur and shower except in exigent circumstances or when viewing is incidental to routine room checks. Staff and Contractor training records along with staff interviews validated 100% compliance training on cross-gender pat searches, searches of transgender and intersex residents and Zero tolerance policy concerning sexual harassment and sexual abuse of Residents and Staff.

Standard 115.316- Residents with Disabilities and Residents Who are Limited English Proficient

- Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

G4S Orange County Youth Academy/ Orlando Intensive has identified selected staff who shall provide interpreter assistance to residents. The Florida Department of Juvenile Justice provides interpreter services, a hearing impaired specialist, a vision impaired specialist, an audiologist, an English as a second language specialist, equipment and technology for residents, as needed. Orange County Youth Academy/ Orlando Intensive Policy 10-25 and FOP 9-2 requires the PREA Facility Compliance Manager to take steps to ensure residents with disabilities or who are limited English proficient are provided meaningful access to all aspects of the facility's efforts to prevent, protect and respond to sexual abuse and harassment.

This policy also states the facility will not rely on resident interpreters, resident readers or any kind of resident assistants except when a delay in obtaining interpreters services could jeopardize residents' safety. Resident interviews validates compliance the facility does not use resident assistants and there were no instances of resident interpreter or readers being used in the past 12 months.

Standard 115.317- Hiring and Promotion Decisions

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

G4S Orange County Youth Academy/ Orlando Intensive Policy 3-16 specifically addresses all elements as required by this standard. A review of full-time employees and contractors files interviewed revealed that all eleven hired during the past 12 months had documented criminal background checks. Questions regarding past conduct were asked during the interview process. Additionally, signed acknowledgement forms concerning zero-tolerance of sexual harassment and sexual abuse were present in the files.

The policy also validated compliance based on the requirement to conduct background checks every five years.

Standard 115.318- Upgrades to Facilities and Technology

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

G4S Orange County Youth Academy/ Orlando Intensive has not acquired any new facilities since August 20, 2012. Additionally, the facility has identified the need for the additional cameras and video monitoring system upgrades.

Standard 115.321- Evidence Protocol and Forensic Medical Examinations

- Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

Orange County Youth Academy/ Orlando Intensive Policy 10-25 requires the Facility Director contact local law enforcement, Office of Inspector General and the Department of Children and Families who will conduct administrative investigations of abuse allegations. All criminal investigations are conducted by the Orange County Sheriff's Office. The Office of the Inspector General will conduct an administrative investigation apart from any criminal investigation to identify staff misconduct.

G4S Orange County Youth Academy/ Orlando Intensive has submitted a Memorandum of Understanding with the Arnold Palmer Hospital and is currently waiting for the agreement signing to conduct sexual assault forensic examinations. Orange County Sheriff's Office verbally acknowledged that uniform evidence protocol would be followed to maximize the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions.

Standard 115.322- Policies to Ensure Referrals of Allegations for Investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

G4S Orange County Youth Academy/ Orlando Intensive Policy 10-25 requires referrals of sexual abuse allegations to be submitted to the Orange County Sheriff's Office, Florida Department of Children and Families and the Office of the Inspector General. In the past 12 months, Orange County Youth Academy/ Orlando Intensive had one allegation of sexual abuse, which occurred at the facility involving one resident making an allegation on another resident. The allegation was reported by the resident accuser to a staff member of the facility. Orange County Youth Academy/ Orlando Intensive referred the allegation to Orange County Sheriff's Office. Both residents; the alleged victim and the abuser were housed at Orange County Youth Academy/ Orlando Intensive and documentation validates both were kept separated. The facility followed all protocols and documentation of the allegation and follow-up procedures were reviewed and found to be in compliance with this standard. The Florida Department of Juvenile Justice (FDJJ) Division of Youth Services' website describes the investigative responsibilities for conducting investigations for the facilities it operates and funds. FDJJ's website also includes its PREA policy which describes how investigative responsibilities are handled for allegations of sexual abuse.

Standard 115.331- Employees Training

- Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

Orange County Youth Academy/ Orlando Intensive Policy 10-25 and Florida Department of Juvenile Justice Policy 1919 documents training requirements for PREA. The training curriculums, documented staff training records and staff interviews validates compliance. The PREA training covered requirements for direct care, workers, medical personnel and contractors during initial training and annual refresher training. Specific topics covered during PREA training are consistent with this standard's requirements and is tailored to the facility's male resident population. All employees are trained as new hires regardless of their previous experience. Employees sign training rosters and are required to score 70% on a final exam verifying comprehension of PREA training. This standard was verified compliant through my review of the documentation.

Standard 115.332- Volunteer and Contractor Training

- Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

G4S Orange County Youth Academy/ Orlando Intensive Policy 10-25 and The Florida Department of Juvenile Justice Policy 1919 requires volunteers and contractors who have contact with residents to receive PREA training. This training is provided online. Employees sign training rosters and are required to score 70% on a final exam verifying comprehension of PREA training. Acknowledge completion certificates were reviewed for volunteers and contractors. Interviews with volunteers and contractors revealed they are knowledgeable concerning their responsibilities relative to PREA and the agency's zero tolerance policy regarding sexual abuse and harassment.

Standard 115.333- Resident Education

- Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

Orange County Youth Academy/ Orlando Intensive Policy 10-25 requires residents to receive information during intake within 24-hours regarding the facility's zero tolerance policy and how

to report sexual abuse and harassment. Additionally, The Florida Department of Juvenile Justice requires all residents participate in comprehensive training that is conducted within 10-days of arrival. Residents are provided a handout entitled "What You Should Know about Sexual Abuse/Assault/Harassment" which includes information on prevention/intervention, self-protection, reporting and treatment/counseling. Intake staff or case management staff reviews the handout with the residents and residents sign verifying receipt of the information. Documentation of residents' signatures were reviewed and confirmed during resident interviews. All residents interviewed stated they received this information the same day they arrived at the facility and periodically thereafter. Case management staff presents the PREA information in a manner that is accessible to all residents. During the facility tour PREA posters and reporting instructions were posted throughout the facility. If needed, the facility has staff available to provide translation services. Additionally, The Florida Department of Juvenile Justice shall provide services for hearing and visual impairment services for residents with disabilities or who may be limited English deficient.

Standard 115.334- Specialized Training: Investigation

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)
- Non-Applicable Standard

Auditor comments:

There are no facility investigators. All criminal and administrative investigations are referred to outside agencies.

Standard 115.335- Specialized Training: Medical and Mental Health Care

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

The Florida Department of Juvenile Justice Policy# 1919 requires that all G4S Orange County Youth Academy/ Orlando Intensive full-time, part-time medical and mental health care practitioners receive specialized training. The training documentation reviewed validated that all staff received this training from the National Institution of Corrections. While conducting interviews with the Health Services Administrator and two registered nurses, it was validated that medical staff do-not conduct forensic examinations.

Standard 115.341- Obtaining information from Residents

- Exceeds Standard (substantially exceeds requirement of standard)

Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Auditor comments:

G4S Orange County Youth Academy/ Orlando Intensive Policy 9-1 addresses the screening process for vulnerability to victimization and sexual aggressive behavior by using the Florida Department of Juvenile Justice Form RC 8050-2. All facility residents are screened within twenty-four hours upon arrival at the facility. Those residents who score vulnerable to victim or sexually aggressive are included into the alert system, as well as receiving further assessments, as identified. Residents who are identified or report as prior sexual victims are referred to the medical and mental health professionals within 14 days. The screening documentation instrument met the tenets of the standard. Validation of compliance was conducted through a review of random resident's intake.

Standard 115.342- Placement of Residents in housing, bed, program, education and work

Assignments.

Exceeds Standard (substantially exceeds requirement of standard)

Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Auditor comments:

G4S Orange County Youth Academy/ Orlando Intensive Academy has single occupancy rooms for residents. Victimization screening information may be used to determine a resident's room assignment and its proximity to direct care staff in the housing unit to ensure resident's safety.

G4S Orange County Youth Academy/ Orlando Intensive Policy 8-14, Policy 9-1 and Florida Department of Juvenile Justice Policy 1919 precludes gay, bi-sexual, transgender and intersex residents being placed in a particular housing unit. Isolation rooms are prohibited by the Florida Department of Juvenile Justice. Facility staff and residents interviews validated compliance.

Standard 115. 351- Resident Reporting

Exceeds Standard (substantially exceeds requirement of standard)

Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Auditor comments:

G4S Orange County Youth Academy/ Orlando Intensive Academy Policy 8.3 provides a plethora of ways for residents to report sexual abuse and harassment including; a pre-programmed telephone line to an outside agency; the facility provides the addresses in resident's handbooks

and posters throughout the facility. Instructions for reporting are provided to all residents during the intake process. Instructions include the Victims Assistance Program so they or their family member can write to an outside agency; and they may report to any staff member or family member. The facility also has reporting mechanisms in place for staff to privately report. Resident and staff interviews validated compliance with this standard.

Standard 115. 352- Exhaustion of Administrative Remedies

■ Exceeds Standard (substantially exceeds requirement of standard)

☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

■ Does Not Meet Standard (requires corrective action)

Auditor comments:

G4S Orange County Youth Academy/ Orlando Intensive Policy 8-4 outline procedures for the administrative resident's grievances regarding sexual abuse or sexual harassment. The elements of this policy address and comports with the intent of the standard. There have been no grievances relating to sexual abuse filed in the past 12 months. Staff and resident interviews validate their knowledge of how the grievance process is used to report sexual abuse or harassment.

Standard 115. 353- Resident Access to Outside Support Services and Legal Representation

■ Exceeds Standard (substantially exceeds requirement of standard)

☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

■ Does Not Meet Standard (requires corrective action)

Auditor comments:

The facility has established a sign MOU agreement with Victim Service Center of Central Florida Inc. This organization provides emotional services to victims and coordination for victim SANE exams.

Orange County Youth Academy/ Orlando Intensive Academy staff are mandated reporters and are required by Orange County Youth Academy/ Orlando Intensive Policy 10-25 and Florida Department of Juvenile Justice Policy 1919 to immediately report any knowledge, suspicion or information they receive regarding sexual abuse and harassment, retaliation against residents or staff who report any incidents or any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Random staff and resident interviews validated the facility's compliance with this standard.

Interviews with the case management staff and health service professional validated their responsibility to inform residents 18 years old of their duty to report and limitations of confidentiality.

Standard 115. 354- Third Party Reporting

■ Exceeds Standard (substantially exceeds requirement of standard)

☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

■ Does Not Meet Standard (requires corrective action)

Auditor comments:

G4S Orange County Youth Academy/ Orlando Intensive through The Florida Department of Juvenile website informs the public with information regarding third-party reporting of sexual abuse or sexual harassment on behalf of any facility resident. Also, parents receive information regarding-party reporting. Resident interviews revealed their awareness of reporting sexual abuse or harassment to others outside of the facility.

Standard 115. 361- Staff and Agency Reporting Duties

■ Exceeds Standard (substantially exceeds requirement of standard)

☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

■ Does Not Meet Standard (requires corrective action)

Auditor comments:

Under Florida Department of Juvenile Justice Policy 1919 and G4S Orange County Youth Academy/ Orlando Intensive Policy 10-25, all facility staff are mandated reporters. Staff is required to immediately report any knowledge, suspicion or information they receive regarding sexual abuse and harassment, retaliation against residents or staff who report any incidents or any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation. Random staff and health professional interviews validated their technical knowledge and compliance with this standard.

Standard 115. 362- Agency Protection Duties

■ Exceeds Standard (substantially exceeds requirement of standard)

☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

■ Does Not Meet Standard (requires corrective action)

Auditor comments:

G4S Orange County Youth Academy/ Orlando Intensive Policy 10-25 requires residents identified as being at risk for sexual victimization to be monitored and to receive ongoing counseling from mental health or other qualified staff. Residents are provided services consistent with the community of care. There were no residents identified as being at risk for sexual abuse in the past 12 months, as indicated on a log maintained by the facility and as revealed in interviews with the Facility Director and other random staff.

Standard 115. 363- Reporting to other Confinement Facilities

■ Exceeds Standard (substantially exceeds requirement of standard)

Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Auditor comments:

G4S Orange County Youth Academy/ Orlando Intensive Academy received no allegations of sexual abuse from other facilities during the past 12 months. Upon receiving an allegation that a resident was sexually abused while confined at another facility, Orange County Youth Academy/ Orlando Intensive Academy Policy 10-25 and Florida Department of Juvenile (FDJJ) Justice Policy 1919 requires facility leadership immediately notify the Florida Department of Juvenile Justice Central Communications Center. The FDJJ will in turn notify the facility, and the facility management overseeing the facility where the alleged abuse occurred.

Standard 115. 364- Staff First Responder Duties

Exceeds Standard (substantially exceeds requirement of standard)

Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Auditor comments:

During the initial audit, random staff interviews, staff could not consistently articulate the required actions upon learning of an allegation that a resident was sexually abused and steps to protect usable physical evidence. A review of the corrective action documentation submitted validates that all staff have received refresher training on their duties as first responders.

There was one allegation of sexual abuse during the past 12 months which is currently ongoing. G4S Orange County Youth Academy/ Orlando Intensive Policy 10-25 and The Florida Department of Juvenile Justice Policy 1919 requires staff to take specific steps to respond to a report of sexual abuse including; separating the alleged victim from the abuser; preserving any crime scene within a period that still allows for the collection of physical evidence; request that the alleged victim not take any action that could destroy physical evidence; and ensure that the alleged abuser does not take any action to destroy physical evidence, if the abuse took place within a time period that still allows for the collection of physical evidence.

Standard 115. 365- Coordinated Response

Exceeds Standard (substantially exceeds requirement of standard)

Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)

Does Not Meet Standard (requires corrective action)

Auditor comments:

Interviews with the Facility Administrator, Assistant Facility Administrator and other professional staff validated their technical knowledgeable of their duties in response to a sexual assault. G4S Orange County Youth Academy/ Orlando Intensive Policy 10-25, Policy 7-30 and The Florida Department of Juvenile Justice Policy 1919 gives technical directions concerning coordinated

actions taken in response to an incident of sexual assault among staff first responders, medical, and facility leadership.

Standard 115. 366- Preservation of Ability to Protect Residents from Contact with Abusers

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)
- Non-Applicable Standard

Auditor comments:

Orange County Youth Academy/ Orlando Intensive are not in a Collective bargaining Agreement.

Standard 115. 367- Agency Protection against Retaliation

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

All G4S Orange County Youth Academy/ Orlando Intensive staff are charged with monitoring for possible retaliation. There were no incidents of retaliation in the past 12 months reported. This was validated during my interview with the PREA Manager/ Facility Administrator. G4S Orange County Youth Academy/ Orlando Intensive Policy 10-25, Policy 8-3 and The Florida Department of Juvenile Justice Policy 1919 all require the monitoring of residents and staff who have reported sexual abuse or harassment or who have cooperated in a sexual abuse or harassment investigation. The monitoring will take place for a period of 90 days or longer, as needed.

Standard 115. 368- Post-Allegation Protective Custody

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

G4S Orange County Youth Academy/ Orlando Intensive are prohibited from having isolation rooms or segregation housing. G4S Orange County Youth Academy/ Orlando Intensive use single occupancy rooms to protect residents who alleged to have suffered sexual abuse. Random staff interviewed validated residents are monitored constantly by staff. G4S Orlando Youth Academy/

Orlando Intensive Policy 10-25 and The Florida Department of Juvenile Justice Policy 1919 provide guidelines for the use of room restriction as a last measure to keep residents who alleged sexual abuse safe only until an alternative means for keeping the resident safe can be arranged.

Standard 115. 371- Criminal and Administrative Agency Investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

There was one reported investigation of alleged resident sexual abuse in the facility in the past 12 months. The investigation is currently ongoing. G4S Orange County Youth Academy/ Orlando Intensive Policy 1-5, Policy 10-25 and The Department of Juvenile Justice Policy 1919 establishes investigation guidelines for reporting allegations of sexual abuse to the Orange County Sheriff's Office, The Office of The Inspector General and The Florida Department of Children Services for investigations.

Standard 115. 372- Evidentiary Standards for Administrative Investigations

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

The Florida Department of Juvenile Justice Policy 1919 states the outside investigative entities, the Orange County Sheriff's office and the Florida Department of Children Services, shall impose a standard of preponderance of evidence or lower standards of proof for determining if allegations are substantiated.

Standard 115. 373- Reporting to Residents

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

There has been one criminal and administrative investigation during the past 12 months. There has been no notice sent to the residents because the case is still ongoing. G4S Orange County

Youth Academy/ Orlando Intensive Policy 10-25 and The Florida Department of Juvenile

Justice Policy 1919 establishes processes to notify residents should the need arise and an allegation proves substantiated, unsubstantiated or unfounded. The Agencies PREA Coordinators and facility PREA Compliance Manager validated their technical knowledge of the process during their interviews.

Standard 115. 376- Disciplinary for Staff

- Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

There were no employees terminated or disciplined in the past 12 months for violation of the facility's sexual abuse or harassment policies. G4s Employee Handbook, G4S Orange County Youth Academy/ Orlando Intensive Policy 3-3 and Policy 3-5 requires staff disciplinary sanctions up to and including termination for violating facility's sexual abuse or harassment policies. The policy also mandates that the violation be reported to law enforcement.

Standard 115. 377- Corrective Action for Contractors and volunteers

- Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

The Florida Department of Juvenile Justice Policy 1919 requires volunteers and contractors in violation of the facility's policies and procedures regarding sexual abuse and harassment of residents will be reported to local law enforcement and relevant licensing bodies unless the activity was clearly not criminal. During the interview with the Facility Administrator/PREA Compliance Manager, it was reported that there have been no volunteers or contractors reported in the past 12 months.

The policy also requires the facility staff to take remedial measures and prohibit future contact with residents in the case of any violation of the facility's sexual abuse and harassment policies by contractors or volunteers.

Standard 115. 378- Disciplinary sanctions for Residents

- Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

There has been one reported case of resident-on-resident sexual abuse in the past 12 months case that is still an active case. There have been no administrative or criminal findings or rulings on this case.

Standard 115. 381- Medical and Mental screening; History of Sexual Abuse

- Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

There were no residents who disclosed prior victimization during their initial screening process. The Florida Department of Juvenile Justice Policy 1919 requires mental health and medical staff to monitor and provide counseling on an on-going basis for residents who disclose a history of sexual abuse or who disclose previously perpetrating sexual abuse.

Standard 115. 382- Access to Emergency Medical and Mental Health Services

- Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

There has been one reported case of sexual abuse in the past 12 months that is currently ongoing. The Health Services Administrator interview validated through documentation the resident's access to medical and mental care of the alleged incident. The Florida Department of Juvenile Justice Policy 1919 mandates residents receive timely, unimpeded care on-site and off-site emergency care and crisis intervention services.

Standard 115. 383- Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers

- Exceeds Standard (substantially exceeds requirement of standard)
- ☒ Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

There has been one alleged sexual assault victim in the past 12 months. The investigation is still ongoing. The Facility Administrator/ PREA Compliance Manager's interview revealed that both the alleged victim and accuser receive ongoing counseling during individual and group counseling sessions as needed.

Standard 115. 386- Sexual Abuse Incident Reviews

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

The Florida Department of Juvenile Justice Policy 1919 and G4S Orange County Youth Academy/ Intensive Policy 10-25 require an incident review team of every sexual abuse allegation at the conclusion of the investigation within 30 days. The review team includes the PREA Compliance Manager, Department program staff mental and medical health providers and upper-level management with input from line supervisors. The facility has a specific review form to capture all aspects of the incident. There has been one reported case of sexual abuse during the past 12 months. Documentation reviewed during the audit validated an initial assessment completed.

Standard 115. 387- Data Collection

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

The Florida Department of Juvenile Justice Policy 1919 Definitions, requires the collection of accurate, uniform data for every allegation of sexual assault. The facility's PREA Coordinators collect all data relating to PREA.

Standard 115. 388- Data Review for Corrective Action

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

There has been one alleged sexual abuse allegation within the past 12 months. The case is still an active case; however, The Florida Department of Juvenile Justice Policy 1919 requires the review of data for corrective action to improve the effectiveness of its prevention, protection and response policies, practices and training.

Standard 115. 389- Data Storage, Publication, and Destruction

- Exceeds Standard (substantially exceeds requirement of standard)
- Meets Standard (substantial compliance; complies in all material ways with the standard for the relevant review period)
- Does Not Meet Standard (requires corrective action)

Auditor comments:

The Florida Department of Juvenile Justice Policy 1919 directs that data from every allegation of sexual misconduct at its facilities shall be collected at Central Communications Center. The PREA Coordinator will review data collected in order to assess and improving the effectiveness of the Department’s sexual misconduct prevention, detection and response polices, practices and training. The policy established that aggregated sexual abuse data be reviewed annually and placed on the facility’s website after all personal identifiers are removed. All data collected will be maintained for at least 10 years after the date of the initial collection.

AUDITOR CERTIFICATION:

The auditor certifies that the contents of the report are accurate to the best of his/her knowledge and no conflict of interest exists with respect to his or her ability to conduct an audit of the agency under review.



Auditor’s Signature

Date: November 26, 2014