

# PREA AUDIT: AUDITOR'S SUMMARY REPORT

## JUVENILE FACILITIES

<b>Name of facility:</b> Seminole Sheriff's Office Juvenile Detention Center			
<b>Physical address:</b> 200 Bush Blvd. Sanford, Florida			
<b>Date report submitted:</b> April 27, 2016			
<b>Auditor Information</b>		<b>Katherine Brown</b>	
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<b>Date of facility visit:</b> April 26, 2016			
<b>Facility Information</b>			
<b>Facility mailing address:</b>		SAA	
<b>Telephone number:</b>			
<b>Seminole Juvenile Detention Center is:</b>	<input type="checkbox"/> Military	<input checked="" type="checkbox"/> County	<input type="checkbox"/> Federal
	<input type="checkbox"/> Private for profit	<input type="checkbox"/> Municipal	<input type="checkbox"/> State
	<input type="checkbox"/> Private not for profit		
<b>Facility Type:</b>	<input checked="" type="checkbox"/> Detention	<input type="checkbox"/> Correction	<input type="checkbox"/> Other
<b>Name of PREA Compliance Manager:</b>		Joseph Klinger	<b>Title:</b> Manager
<b>Email address:</b>		<a href="mailto:JKlinger@seminolesheriff.org">JKlinger@seminolesheriff.org</a>	<b>Telephone number:</b> 407-665-2428
<b>Agency Information</b>			
<b>Name of agency:</b>		Seminole Sheriff Office	
<b>Governing authority or parent agency: (if applicable)</b>		N/A	
<b>Physical address:</b>		200 Bush Blvd, Sanford Florida	
<b>Mailing address: (if different from above)</b>		SAA	
<b>Telephone number:</b>		407-665-6600	
<b>Agency Chief Executive Officer</b>			
<b>Name:</b>	Donald Erslinger	<b>Title:</b>	Sheriff
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# AUDIT FINDINGS

## **NARRATIVE:**

The audit of Seminole Juvenile Detention Center was conducted on April 26, 2016 Katherine Brown, Certified PREA auditor. The areas toured were a total of two housing units. There are 5 confinement cells located on the male pod and 2 confinement cells located on the female pod. I toured both general population pods plus the kitchen, laundry and programs area.

In preparation of the audit I received the requested documentation on March 31, 2016 and began the review of the documentation. I asked for additional documentation and received it on April 10, 2016. At that point I was able to complete the documentation review portion of the audit process and was ready for the on-site.

An entrance meeting was held with facility staff. The following people were in attendance: Bernard Johns, Manager Juvenile Detention Center; Valerie Johnson, Juvenile Detention Officer; Cubit Malone, Juvenile Detention Officer; Joseph Klingler, Accreditation Manager John E. Polk Correctional Facility; Anthony Pastor, Sergeant; Pamela Kaiserm Secretary.

Following the entrance meeting I toured the Seminole Juvenile Detention Center from 08:30-0900. On the tour with me was, Bernard Johns, Manager Juvenile Detention Center; Joseph Klingler, Accreditation Manager and Anthony Pastor, Sergeant.

During the tour all facility notices were posted in all detainees living areas; program areas and public areas announcing the audit. As I entered all detainees living area cross gender announcements were made, this practice was also confirmed during random staff and detainee interviews.

I asked for an alpha listing of all Detainees housed at Seminole Juvenile Detention Center and all Detainee to interview except for the ones that were out to court or were identified as combative (14). There were no limited English speaking; hearing/vision impaired or transgender/intersex detainees to interview. I also interviewed all security staff on duty at time of the audit (3) . I also conducted 19 specialized interviews.

There were 3 sexual assault/harassment allegation cases, all relatively recent (within the past year) that had all been unfounded.

## **DESCRIPTION OF FACILITY CHARACTERISTICS:**

The Sheriff's Office operates the Seminole County Juvenile Detention Center, a 56-bed, secure facility that serves pre-adjudicated youth detained in Seminole County. The Center was previously operated by the Florida Department of Juvenile Justice until being closed in 2011 for budgetary reasons. The Center provides mental health, religious support and health care services. The youth in custody there are provided educational services by Seminole County Public Schools. It is composed of two housing units located on opposite sides of the facility. The west side housing unit houses the female detainees. It contains 18 beds, 2 shower rooms, 2 restrooms, 2 one person confinement cells, a 6 person closed cell, and 3 direct supervision cells without doors. The cells line 3 sides of the housing unit. There is a small dayroom in the middle with an officers station. The east side housing unit houses the male detainees. It contains 5 two person confinement cells, 9 direct supervision cells without doors, and 1 shower

room/restroom. The cells line the walls on 3 sides of the housing unit. There is a large, open day room in the middle and an officers station along one wall in the housing unit. Separating the housing units is a large dayroom that is bordered on the north by a computer lab, intake area, and cafeteria. Medical, Master Control, 2 confinement cells, staff lounge, release office and interview room.

Only male staff work the male dorms and only female staff work the female dorm. All food is prepared at the jail across the street and transported to the detention center where it is served in a dining hall. Laundry services are also provided by the jail. There are several multi purpose areas where detainees are provided programs services and educational classes. There is also a computer lab designed to keep the detainees current with their school classes on the outside.

### **SUMMARY OF AUDIT FINDINGS:**

Number of standards exceeded: 6

Number of standards met: 32

Number of standards not met:

Number of standards not applicable: 2

**Standard number here**      **§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, including corrective actions needed if does not meet standard**

Based on review of General Order 25. V. Employee Harassment Policy; SCSO JDC 36- Youth Sexual Abuse & PREA. H.; Organizational Chart and based on interviews with PREA Compliance Manager I find they meet this standard.

Seminole County Sheriff's Office has a written policy mandating zero tolerance toward all forms of sexual abuse and sexual harassment and outlines Seminole County Sheriff's Office approach to preventing, detecting, and responding to such conduct.

Seminole County Sheriff's Office employs or designates an upper-level, agency-wide PREA coordinator with sufficient time and authority to develop, implement, and oversee agency efforts to comply with the PREA standards. The PREA Coordinator reports directly to the Superintendent.

**Standard number here**      115.312 Contracting with other agencies for confinement of Detainees

- 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)
- X Not applicable

**Auditor comments, including corrective actions needed if does not meet standard**

Seminole County does not contract for confinement of their detainees.

**Standard number here**      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, including corrective actions needed if does not meet standard**

Reviewed SCSO JDC 36 IV.; JDC Daily Operational Schedule; Reassignment memo; Unannounced PREA Review Form; Population Count; Shift Rosters and based on interview with Superintendent and PREA Compliance Manager.

Seminole County Sheriff's Office has developed, implemented, documented, a staffing plan that provides for adequate levels of staffing and uses video monitoring, to protect Detainees against sexual abuse.

Seminole County Sheriff's Office complies with the staffing plan except during limited and discrete exigent circumstances, and fully documents deviations from the plan during such circumstances. All deviations are recorded on the Shift Rosters.

Seminole Juvenile Detention Center maintains staff ratios at a minimum of 1:8 during Detainee waking hours and 1:16 during Detainee sleeping hours, except during limited and discrete exigent circumstances, which is fully documented. Only security staff are included in these ratios. Day Shift has 11 officers assigned to supervise the youth and night shift have 10 officers assigned.

Seminole County Sheriff's Office completes an annual review, in consultation with the PREA coordinator required by § 115.311, to assess, determine, and document whether adjustments are needed. The Superintendent reviews the staffing plan annually with the PREA Compliance Manager.

Seminole Juvenile Detention Center implemented a policy and practice of having intermediate-level or high level supervisors conduct and document unannounced rounds to identify and deter staff sexual abuse and sexual harassment. There is a policy in place that prohibits staff from alerting other staff members that these supervisory rounds are occurring, unless such announcement is related to the legitimate operational functions of Seminole Juvenile Detention Center.

**Standard number here**

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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC. 36 V.; Course Completion History Searches; Sign In Sheets; Unannounced PREA review form; PREA round videos and interview with random staff I find they meet this standard.

Seminole Juvenile Detention Center does not conduct cross-gender pat-down searches except in exigent circumstances. No cross gender searches have been conducted.

Seminole Juvenile Detention Center shall document and justify all cross gender strip searches, cross gender visual body cavity searches, and cross gender pat-down searches.

Seminole Juvenile Detention Center has policies and procedures that enable Detainees to shower, perform bodily functions, and change clothing without nonmedical staff of the opposite gender viewing their breasts, buttocks, or genitalia, except in exigent circumstances or when such viewing is incidental to routine cell checks. Such policies and procedures require staff of the opposite gender to announce their presence when entering a Detainee housing unit. This practice was confirmed during the tour and random staff and detainees interviews. Detainees are given personal shrouds they can use when using the restroom to provide sight ability for the cameras in the isolation cells. I viewed the cameras in the control room and found that the isolation cells have visibility of the toilets, however detainees are given these personal shrouds they can use to block visibility. While in the control room a detainee was using the restroom and observed no visibility issues.

There have been no transgender detainees at the center however, there are policies in place that address the following:

Seminole Juvenile Detention Center does not search or physically examine a transgender or intersex Detainee for the sole purpose of determining the Detainee's genital status. If the Detainee's genital status is unknown, it is determined during conversations with the Detainee, by reviewing medical records, or, if necessary, by learning that information as part of a broader medical examination conducted in private by a medical practitioner.

Seminole County Sheriff's Office trains security staff in how to conduct cross-gender pat-down searches, and searches of transgender and intersex Detainees, in a professional and respectful manner, and in the least intrusive manner possible, consistent with security needs.

**Standard  
number here**

115.316 Detainees with disabilities and limited English speaking

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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 VI; SCSO General Order G-58 Communicating with Hearing Impaired & Limited English IV. A.B. ; V; VI;VII;VIII-11Detainee Right; XVIII; JDC-42 Detainee Orientation III.H.2; JDC Bi-Lingual employee list; Language Line Contract and random Detainee and staff interviews I find they meet this standard.

Seminole County Sheriff's Office takes appropriate steps to ensure Detainees with disabilities (including, for example, Detainees who are deaf or hard of hearing, those who are blind or have low vision, or those who have intellectual, psychiatric, or speech disabilities), have an equal opportunity to participate in or benefit from all aspects of Seminole County Sheriff's Office 's efforts to prevent, detect, and respond to sexual abuse and sexual harassment, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using any necessary specialized vocabulary.

Seminole County Sheriff's Office shall take reasonable steps to ensure meaningful access to all aspects of Seminole County Sheriff's Office 's efforts to prevent, detect and respond to sexual

abuse and sexual harassment to Detainees who are limited English speaking, including steps to provide interpreters who can interpret effectively, accurately, and impartially, both receptively and expressively, using necessary specialized vocabulary.

Seminole County Sheriff's Office does not rely on Detainee interpreters, Detainee readers, or other types of Detainee assistants except in limited circumstances where an extended delay in obtaining an effective interpreter could compromise the Detainee's safety.

<b>Standard number here</b> 115.317 Hiring and promotion decisions
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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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 VII Hiring & Promotion; SCSO G.O. G23 Recruitment & Decision Selection; VII Elements of Pre-Employment Screening; VIII. A,C,F,G & H.; Employees New Hire List; Employment application with PREA questions; Contract Employees List and interview with Human Resource Director and review of personnel files I find they meet this standard.

Seminole County Sheriff's Office does not hire or promote anyone who may have contact with Detainees, and does not enlist the services of any contractor who may have contact with Detainees, who has engaged in sexual abuse in any criminal justice facility, has been convicted of engaging or attempting to engage in sexual activity in the community facilitated by force, overt or implied threats of force, or coercion, or if the victim did not consent or was unable to consent or refuse; or has been civilly or administratively adjudicated to have engaged in the activity described above.

Seminole County Sheriff's Office considers any incidents of sexual harassment in determining whether to hire or promote anyone, or to enlist the services of any contractor, who may have contact with Detainees.

Seminole County Sheriff's Office performs a criminal background records check and consults applicable child abuse registries, before enlisting the services of any contractor who may have contact with Detainees. Seminole County Sheriff's Office performs a records check at least every five years of current employees and contractors who may have contact with Detainees. The current practice is Seminole County Sheriff Office tracks these criminal histories on an excel spreadsheet and monthly they have to manually check for who is due to be run. I made the suggestion to create an automated monthly report that leaves the guess work out of who requires a criminal history run.

Florida has the Sunshine Law that allows Seminole County Sheriff's Office to provide information on substantiated allegations of sexual abuse or sexual harassment involving a former employee upon receiving a request from an institutional employer for whom such employee has applied to work.

<b>Standard</b> 115.318 Upgrades to facilities and technology
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number here

- 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC-36 VIII. Upgrades to facilities and technology and based on interview with Superintendent I find they meet this standard.

When installing or updating a video monitoring system, electronic surveillance system, or other monitoring technology, Seminole County Sheriff's Office considers how such technology may enhance Seminole County Sheriff's Office's ability to protect Detainees from sexual abuse. There have been no substantial or modifications to existing facilities. The Superintendent has asked for 5 additional cameras in this years budget to increase visability and to protect some of the blind spots.

Standard number here

115.321 Evidence protocol and forensic medical exams

- 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC-36 IX. Evidence protocol and forensic medical exams and based on interview with Director of Kids House; Investigator at Kids House and PREA compliance manager; and based on this collaboration of services and the structure of this program I find they exceed in this standard.

Seminole County Sheriff's Office Child Protection Services is responsible for investigating allegations of sexual abuse; they follow a uniform evidence protocol that maximizes the potential for obtaining usable physical evidence for administrative proceedings and criminal prosecutions. The protocol is developmentally appropriate for youth and as appropriate is adopted from or otherwise based on the most recent edition of the US Department of Justice's Office on Violence against Women publication.

Seminole County is very fortunate to have a place for children who are victims of sexual abuse. In collaboration with all agencies of law enforcement, the state attorney's office, medical personnel, child protection professionals, social workers, and licensed mental health counsellors, they work to break the cycle of violence so often seen with incidents of child abuse and neglect.

Kids House's team approach in dealing with child abuse allows for all involved agencies and victims to come together at one single facility, working together on a thorough investigation.



This includes case history, sharing information and ideas, carrying through to assist with prosecution and ultimately determining the best course to provide emotional and psychological well-being for the child and family. This unique approach reduces further trauma and distress for the child. Agencies work collaboratively and efficiently at a single-site location which ultimately reduces the need for a child to repeat their story over and over again.

Seminole County Sheriff's Office offers all Detainees of sexual abuse access to forensic medical examinations, at the Kids House, without financial cost, where evidentiary or medically appropriate. Such examinations are performed by Sexual Assault Nurse Examiners (SANEs) from Kids House of Seminole. All services are performed on site at this facility which is designed for children.

Seminole County Sheriff's Office actually assigns two victim advocates to all detainees of sexual abuse. One victim advocate is from the Kids House who walks them through the medical and therapeutic side and another victim advocate from the State Attorney office who walks them through the judicial side of the case. During the interview with both of these individuals I find them to work very well together and it is a very cohesive environment all with the victim in mind.

**Standard number here**

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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36-X Policies to Ensure Referrals of Allegations for Investigations; JDC 36 I. Investigations; reviewed Police Reports and based on interview with Superintendent and investigative staff I find they meet this standard.

Seminole County Sheriff's Office ensures that an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

Seminole County Sheriff's Office has a policy that ensures allegations of sexual abuse or sexual harassment are referred for investigation to an agency with the legal authority to conduct criminal investigations, unless the allegation does not involve potentially criminal behavior. Seminole County Sheriff's Office publishes such policy on its website [www.seminolesheriff.org](http://www.seminolesheriff.org). Seminole County Sheriff's Office documents all such referrals.

**Standard number here**

115.331 Employee 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36. XI Employee Training; Video PREA What You Need to Know; Staff acknowledgement from Lesson plans and sign in sheets; annual training course completion History; staff Course sign in sheet and PowerPoint and interview with random staff I find they exceed in this standard based on the level of knowledge of all staff interviewed.

Seminole County Sheriff’s Office trains all employees who have contact with Detainees on:

- (1) Its zero-tolerance policy for sexual abuse and sexual harassment;
- (2) How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention, detection, reporting, and response policies and procedures;
- (3) Detainees’ right to be free from sexual abuse and sexual harassment;
- (4) The right of Detainees and employees to be free from retaliation for reporting sexual abuse and sexual harassment;
- (5) The dynamics of sexual abuse and sexual harassment in confinement;
- (6) The common reactions of sexual abuse and sexual harassment victims;
- (7) How to detect and respond to signs of threatened and actual sexual abuse and how to distinguish between consensual sexual contact and sexual abuse between Detainees;
- (8) How to avoid inappropriate relationships with Detainees;
- (9) How to communicate effectively and professionally with Detainees, including lesbian, gay, bisexual, transgender, intersex, or gender nonconforming Detainees; and
- (10) How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities;
- (11) Relevant laws regarding the applicable age of consent.

The training is tailored to the gender of the Detainees at Seminole Juvenile Detention Center. The employees receive additional training if the employee is reassigned from a facility that houses only male Detainees to a facility that houses only female Detainees, or vice versa.

Seminole County Sheriff’s Office documents, through employee electronic verification in Relias, which is their training program, those employees understand the training they have received.

<b>Standard number here</b>	115.332 Volunteer and contractors training
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- 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XII Volunteer/Contractor Training; power point; Annual Training PowerPoint; Volunteer/Contractor signature page; Sexual Abuse/Sexual Assault Awareness Test; Training Schedule; and Contract Employee List and interview with volunteer and contractors I find they meet this standard.

Seminole County Sheriff’s Office ensures all volunteers and contractors who have contact with Detainees have been trained on their responsibilities under Seminole County Sheriff’s Office’s sexual abuse and sexual harassment prevention, detection, and response policies and procedures.

The level and type of training provided to volunteers and contractors is based on the services they provide and level of contact they have with Detainees, but all volunteers and contractors who have contact with Detainees are notified of Seminole County Sheriff's Office 's zero-tolerance policy regarding sexual abuse and sexual harassment and informed how to report such incidents.

Seminole County Sheriff's Office has documentation confirming that volunteers and contractors understand the training they have received.

<b>Standard number here</b> 115.333 Detainee education
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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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36- XIII. Detainee Education; logbook; brochure English/Spanish; Sexual Assault/Sexual Abuse awareness test English/Spanish; Detainee Orientation/Handout sign in sheet and intake log showing video being shown and interview with random Detainees and intake staff I find they exceed in this standard.

During the intake process, Detainees receive information explaining Seminole County Sheriff's Office's zero-tolerance policy regarding sexual abuse and sexual harassment and how to report incidents or suspicions of sexual abuse or sexual harassment.

Seminole County Sheriff's Office provides a comprehensive education to Detainees immediately upon arrival in person and shows the video regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents, and regarding agency policies and procedures for responding to such incidents. At the conclusion they are given a test to ensure they understand the information provided to them. Also the video is showed every Friday as was confirmed during the detainee interviews.

Seminole County Sheriff's Office provides Detainee education in formats accessible to all Detainees, including those who are limited English proficient, deaf, visually impaired, or otherwise disabled, as well as to Detainees who have limited reading skills. There is documentation of Detainee participation in these education sessions.

<b>Standard number here</b> 115.334 Specialized training: Investigators
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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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XIV Specialized Training Investigators and interview with Seminole County Sheriff Office investigative staff I find they exceed in this standard.

In addition to the general training provided to all employees Seminole County Sheriff's Office the investigators have received training in conducting investigations in confinement settings. Seminole County Juvenile Detention staff does not perform any investigations they immediately contact the Crimes Against Children unit who respond and conduct all investigations in conjunction with Kids House if warranted. These are all trained professionals who conduct all investigations.

Specialized training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in confinement settings, and the criteria and evidence required to substantiate a case for administrative action or prosecution referral. Seminole County Sheriff's Office maintains documentation that agency investigators have completed the required specialized training in conducting sexual abuse investigations.

Based on the level of expertise the Crimes against Children investigators have in dealing with sexual assault I find they exceed in this standard.

<b>Standard number here</b> 115.335 Specialized training: Medical and mental health care
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- 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36. XV. Specialized training: Medical and mental health care and XI. Employee Training.

Seminole County Sheriff's Office ensures that all full and part-time medical and mental health care practitioners who work regularly in its facilities have been trained in how to: detect and assess signs of sexual abuse and sexual harassment; preserve physical evidence of sexual abuse; respond effectively and professionally to victims of sexual abuse and sexual harassment; and how and to whom to report allegations or suspicions of sexual abuse and sexual harassment.

Seminole County Sheriff's Office maintains documentation that medical practitioners have received the training. Mental Health services provided are limited at the facility, however if a detainee requires further mental health care they can use the services of Kids House.

Medical and mental health care practitioners also receive the training mandated for employees, contractors and volunteers.

<b>Standard number here</b> 115.341 Obtaining information from Detainees
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- 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XVI Obtaining Information from Detainees; Intake Screening form and interview with random Detainees and intake staff responsible for screening I find they exceed this standard.

Detainees are immediately upon arrival at Seminole Juvenile Detention Center and periodically throughout a Detainees confinement, Seminole County Sheriff’s Office maintains and use information information about each Detainee’s personal history and behavior to reduce the risk of sexual abuse by or upon a Detainee.

Seminole Juvenile Detention Center uses an Intake Screening Form which is an objective screening instrument.

The intake screening considers, at a minimum, the following criteria to assess Detainees for risk of sexual victimization:

- (1) Prior sexual victimization or abusiveness
- (2) Gender nonconforming appearance or manner or identification as lesbian, gay, bisexual, transgender or intersex, and whether the Detainee may be vulnerable to sexual abuse
- (3) Current charges and offense history
- (4) The age of the Detainee;
- (5) Level of emotional and cognitive development
- (6) The physical size and stature of the Detainee;
- (7) Mental illness or mental disabilities
- (8) Intellectual or developmental
- (9) Physical disabilities
- (10)The Detainees own perception of vulnerability
- (11) Any other specific information about individual Detainees that may indicate heightened needs to supervision, additional safety precautions, or separation from certain Detainees.

This information is ascertained through conversations with the Detainees during the intake process and medical and mental health screenings; during classification assessments; and documentation from the Detainees files.

Seminole County Sheriff’s Office implements appropriate controls on the dissemination within Seminole Juvenile Detention Center of responses to questions asked pursuant to this standard in order to ensure that sensitive information is not exploited to the Detainees detriment by staff or other Detainees. Only limited staff has access to the intake screening form only Medical, Mental Health and Superintendent has access to the risk screening.

<b>Standard number here</b>	115.342 Placement of Detainees in housing, bed, program, education, and work assignments
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- Exceeds Standard (substantially exceeds requirement of standard)

X 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC -36 Placement of Detainees in housing, bed, program, education, and work assignments and interview with PREA compliance manager and staff responsible for risk screening I find they meet this standard.

Seminole County Sheriff's Office uses all information obtained to make housing, bed, program, and education and work assignments for Detainees with the goal of keeping all Detainees safe and free from sexual abuse.

Detainees are isolated from others only as a last resort when less restrictive measures are inadequate to keep them and other Detainees safe, and then only until an alternative means of keeping all Detainees safe can be arranged. During this period of isolation Seminole County Sheriff's Office ensures the Detainee receive daily large muscle exercise and any legally required educational programming or special education services. Detainees in isolation receive daily visits from a medical or mental health care clinician. Detainees also have access to other programs and work opportunities to the extent possible.

There have been no transgender/intersex detainees at the facility however; there are policies in place that address the following:

Placement and programming assignments for each transgender or intersex Detainee is reassessed at least twice each year to review any threats to safety experienced by the Detainee.

A transgender or intersex Detainee's own views with respect to his or her own safety are be given serious consideration.

Transgender and intersex Detainees are be given the opportunity to shower separately from other Detainees.

Seminole County Sheriff's Office does not place lesbian, gay, bisexual, transgender, or intersex Detainees in particular housing, bed or other assignments solely on the basis of such identification or status, nor shall agencies consider lesbian, gay, bisexual, transgender, or intersex identification or status as an indicator of likelihood of being sexually abusive.

In deciding whether or assign a transgender or intersex Detainees to a facility for male or female Detainees and in making other housing and programming assignments, Seminole County Sheriff's Office considers on a case by case basis whether a placement would ensure the Detainee's health and safety, and whether the placement would present management or security problems.

If a Detainee is isolated pursuant to this standard Seminole Juvenile Detention Center clearly documents the basis for Seminole Juvenile Detention Center's concern for the Detainees safety and the reason why no alternative means of separation can be arranged. This isolation is reviewed every 30 days to determine if continued separation from general population is necessary.

**Standard number here** 115.351 Detainee reporting

- Exceeds Standard (substantially exceeds requirement of standard)
- X 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC-36 XVIII Detainee Reporting; Orientation brochure; poster and JDC Reporting Brochure and based on interviews with random staff and Detainees I find they meet this standard.

Seminole County Sheriff's Office provides multiple internal ways for Detainees to privately report sexual abuse and sexual harassment, retaliation by other Detainees or staff for reporting sexual abuse and sexual harassment, and staff neglect or violation of responsibilities that may have contributed to such incidents. Detainees can report to the Sheriff Office Telecommunications Center; Internal PREA hotline; staff and by filing a grievance.

Seminole County Sheriff's Office provides at least one way for Detainees to report abuse or harassment to a public or private entity or office that is not part of Seminole County Sheriff's Office, and that is able to receive and immediately forward Detainee reports of sexual abuse and sexual harassment to agency officials, allowing the Detainee to remain anonymous upon request. Detainees are given contact information for the Florida Child Abuse Hotline. Calls to this hotline are immediately forwarded to the Sheriff Office Child Protective Services Division.

Staff accepts reports made verbally, in writing, anonymously, and from third parties and promptly document any verbal reports.

Seminole Juvenile Detention Center provides Detainees with access to tools necessary to make a written report.

Seminole County Sheriff's Office provides a method for staff to privately report sexual abuse and sexual harassment of Detainees.

**Standard number here** 115.352 exhaustion of administrative remedies

- Exceeds Standard (substantially exceeds requirement of standard)
- X 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XIX. Exhaustion of Administrative Remedies and request for Administrative Remedy.

Seminole County Sheriff Office has a policy on Administrative Remedies however detainees are not required to file a grievance and if they do file one it is not treated as a normal grievance it is handled as a priority.

Seminole County Sheriff's Office does not impose a time limit on when a Detainee may submit a grievance regarding an allegation of sexual abuse.

Seminole County Sheriff's Office does not require a Detainee to use any informal grievance process, or to otherwise attempt to resolve with staff, an alleged incident of sexual abuse.

Seminole County Sheriff's Office ensures that a Detainee who alleges sexual abuse may submit a grievance without submitting it to a staff member who is the subject of the complaint, and such grievance is not referred to a staff member who is the subject of the complaint.

Seminole County Sheriff's Office issues a final agency decision on the merits of any portion of a grievance alleging sexual abuse within 90 days of the initial filing of the grievance.

Third parties, including fellow Detainees, staff members, family members, attorneys, and outside advocates, are permitted to assist Detainees in filing requests for administrative remedies relating to allegations of sexual abuse, and are also be permitted to file such requests on behalf of Detainees. If a third party, other than a parent or legal guardian, files such a request on behalf of a Detainee, Seminole Juvenile Detention Center may require as a condition of processing the request that the alleged victim agree to have the request files on his or her behalf, and may also require the alleged victim to personally pursue any subsequent steps in the administrative process. If the Detainee declines to have the request processed on his or her behalf Seminole County Sheriff's Office documents the Detainee's decision.

A parent or legal guardian of a juvenile shall be allowed to file a grievance regarding allegations of sexual abuse, including appeals, on behalf of such juvenile.

Seminole County Sheriff's Office has established procedures for the filing of an emergency grievance when the Detainee is subject to a substantial risk of imminent sexual abuse.

After receiving an emergency grievance alleging a substantial risk of imminent sexual abuse, Seminole County Sheriff's Office immediately forwards the grievance (or any portion thereof that alleges the substantial risk of imminent sexual abuse) to a level of review at which immediate corrective action is taken, and provides an initial response within 48 hours, and issues a final agency decision within 5 calendar days. The initial response and final agency decision documents Seminole County Sheriff's Office 's determination whether the Detainee is in substantial risk of imminent sexual abuse and the action taken in response to the emergency grievance.

Seminole County Sheriff's Office may discipline a Detainee for filing a grievance related to alleged sexual abuse only where Seminole County Sheriff's Office demonstrates that the Detainee filed the grievance in bad faith.

**Standard  
number here**

115.353 Detainee access to outside confidential support 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XX. Detainee access to outside confidential support services and interview with random Detainees and interview with Director at Kids House and State Attorney Office Victim Advocate I find they exceed in this standard.

Seminole Juvenile Detention Center provides Detainees with access to outside victim advocates for emotional support services related to sexual abuse by giving Detainees mailing addresses and telephone numbers, including toll-free hotline numbers to the Kids House of Seminole. Seminole Juvenile Detention Center enables reasonable communication between Detainees and these organizations and agencies, in as confidential a manner as possible.

Seminole Juvenile Detention Center informs Detainees, prior to giving them access, of the extent to which such communications will be monitored and the extent to which reports of abuse will be forwarded to authorities in accordance with mandatory reporting laws.

Seminole County Sheriff's Office maintains memoranda of understanding with Kids House.

Seminole County Sheriff's Office also provides the Detainees with reasonable and confidential access to their attorneys or other legal representation and reasonable access to parents or legal guardians.

<b>Standard number here</b> 115.354 Third party reporting
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Exceeds Standard (substantially exceeds requirement of standard)

X 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, including corrective actions needed if does not meet standard**

Based on SCSO JDC 36 XXI Third Party Reporting.

Seminole County Sheriff's Office has a method to receive third-party reports of sexual abuse/harassment and distributes publicly, information on how to report sexual abuse and sexual harassment on behalf of a Detainee. Detainees can report sexual abuse/harassment to the Florida Child Abuse Hotline; Child Protective Services or the States Attorney Office.

<b>Standard number here</b> 115.361 Staff and agency reporting duties
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Exceeds Standard (substantially exceeds requirement of standard)

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

Does Not Meet Standard (requires corrective action)

Based on review of SCSO JDC 36 XXII Staff and Agency Reporting Duties and interviews with random staff; Superintendent and medical/mental health staff I find they meet this standard.

Seminole County Sheriff's Office requires all staff to report immediately and according to agency policy any knowledge, suspicion, or information regarding an incident of sexual abuse or sexual harassment that occurred in a facility, whether or not it is part of Seminole County Sheriff's Office; retaliation against Detainees or staff who reported such an incident; and any staff neglect or violation of responsibilities that may have contributed to an incident or retaliation.

Seminole County Sheriff's Office shall also require all staff to comply with any applicable mandatory child abuse reporting laws.

Apart from reporting to designated supervisors or officials and designated State or local service agencies, staff are prohibited from revealing any information related to a sexual abuse report to anyone other than to the extent necessary, as specified in agency policy, to make treatment, investigation, and other security and management decisions.

Medical and mental health practitioners are required to report sexual abuse to designated supervisors and officials as well as to the designated State or local service agencies where required by mandatory reporting laws. Such practitioners are required to inform the Detainees at the initiation of services of their duty to report and the limitation of confidentiality.

Upon receiving any allegation of sexual abuse, Seminole Juvenile Detention Center head or designee promptly reports the allegation to the appropriate agency office and to the alleged victim's parents or legal guardian, unless Seminole Juvenile Detention Center has official documentation showing the parents or legal guardian should not be notified.

If the alleged victim is under the guardianship of a child welfare system, the report is made to the alleged victim's caseworker.

If a juvenile court retains jurisdiction over the alleged victim, Seminole Juvenile Detention Center head or designee also reports the allegation to the juvenile's attorney or other legal representative of record with 14 days of receiving the allegation.

Seminole Juvenile Detention Center reports all allegations of sexual abuse and sexual harassment, including third-party and anonymous reports, to Seminole Juvenile Detention Center's designated investigators.

<b>Standard number here</b> 115.362 Agency protection duties
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- 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, including corrective actions needed if does not meet standard**

Based on SCSO JDC 36 XXIII Agency Protecting Duties and interviews with random staff, and Superintendent I find they meet this standard.

Immediate action is taken to protect Detainees when Seminole County Sheriff's Office learns that a Detainee is subject to a substantial risk of imminent sexual abuse.

<b>Standard number here</b> 115.363 Reporting to other confinement facilities
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- 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XXIII. Agency Protection Duties and interview with Superintendent and Major I find they meet this standard.

Upon receiving an allegation that a Detainee was sexually abused while confined at another facility, the head of Seminole Juvenile Detention Center that received the allegation notifies the head of the facility or appropriate office where the alleged abuse occurred. Such notification is provided as soon as possible, but no later than 72 hours after receiving the allegation, and all actions are thoroughly documented.

<b>Standard number here</b> 115.364 Staff first responder duties
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- 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XXIV First Responder Duties and interview with security staff who are first responders and random staff I find they meet this standard.

Upon learning of an allegation that an Detainee was sexually abused, the first security staff member to respond separates the alleged victim and abuser; preserves and protects any crime scene until appropriate steps can be taken to collect any evidence; and if the abuse occurred within a time period that still allows for the collection of physical evidence, request that the alleged victim not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating; and if the abuse occurred within a time period that still allows for the collection of physical evidence, ensure that the alleged abuser does not take any actions that could destroy physical evidence, including, as appropriate, washing, brushing teeth, changing clothes, urinating, defecating, smoking, drinking, or eating.

If the first staff responder is not a security staff member, the responder request that the alleged victim not take any actions that could destroy physical evidence, and then notify security staff.

**Standard number here** 115.365 Coordinated response

Exceeds Standard (substantially exceeds requirement of standard)

X 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, including corrective actions needed if does not meet standard**

Based on SCSO JDC 36 XXV Coordinated Response and Coordinated Response Plan and on interview with Superintendent I find they meet this standard.

Seminole Juvenile Detention Center has a written institutional plan to coordinate actions taken in response to an incident of sexual abuse, among staff first responders, medical and mental health practitioners, investigators, and facility leadership.

**Standard number here** 115.366 Preservation of ability to protect Detainees 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)

X Not Applicable

**Auditor comments, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC XXVI. Preservation of ability to protect Detainees from contact with abusers based on interview with Superintendent I find this standard is not applicable. The Seminole County Sheriff's Office does not participate in Collective Bargaining.

**Standard number here** 115.367 Agency protection against retaliation

Exceeds Standard (substantially exceeds requirement of standard)

X 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XXVII. Agency Protection against Retaliation and on interview with Superintendent, designated staff member with monitoring retaliation I find they meet this standard.

Seminole County Sheriff's Office has a policy to protect all Detainees and staff who report sexual abuse or sexual harassment or cooperate with sexual abuse or sexual harassment investigations from retaliation by other Detainees or staff, and are designate which staff members or departments are charged with monitoring retaliation.

Seminole County Sheriff's Office has multiple protection measures, such as housing changes or transfers for Detainee victims or abusers, removal of alleged staff or Detainee abusers from contact with victims, and emotional support services for Detainees or staff that fear retaliation for reporting sexual abuse or sexual harassment or for cooperating with investigations.

For at least 90 days following a report of sexual abuse, Seminole County Sheriff's Office monitors the conduct and treatment of Detainees or staff who reported the sexual abuse and of Detainees who were reported to have suffered sexual abuse to see if there are changes that may suggest possible retaliation by Detainees or staff, and are act promptly to remedy any such retaliation. There are periodic status checks performed. Items Seminole County Sheriff's Office should monitor include any Detainee disciplinary reports, housing, or program changes, or negative performance reviews or reassignments of staff. Seminole County Sheriff's Office continues such monitoring beyond 90 days if the initial monitoring indicates a continuing need.

In the case of Detainees, such monitoring also includes periodic status checks.

If any other individual who cooperates with an investigation expresses a fear of retaliation, Seminole County Sheriff's Office takes appropriate measures to protect that individual against retaliation.

<b>Standard number here</b> 115.368 Post allegation protective custody
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- 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XXVIII Post Allegation Protective Custody and interview with Superintendent I find they meet this standard.

Any use of segregated housing to protect a Detainee who is alleged to have suffered sexual abuse receives all the same rights and privileges as general population Detainees.

<b>Standard number here</b> 115.371 Criminal and administrative agency investigation
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- 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XXIX Criminal and Administrative Investigations and Sexual Assault/Sexual Harassment Incident report and interview with investigative staff I find they meet this standard.

Seminole County Sheriff’s Office conducts its own investigations into allegations of sexual abuse and sexual harassment, it does so promptly, thoroughly, and objectively for all allegations, including third-party and anonymous reports. All sexual abuse/sexual assault cases are handled by the Child Protective Services Division.

Where sexual abuse is alleged, Seminole County Sheriff’s Office uses investigators who are specially trained in sexual abuse investigations.

Investigators gather and preserve direct and circumstantial evidence, including any available physical and DNA evidence and any available electronic monitoring data; are interview alleged victims, suspected perpetrators, and witnesses; and are review prior complaints and reports of sexual abuse involving the suspected perpetrator.

Seminole County Sheriff’s Office does not terminate an investigation solely because the source of the allegation recants the allegation.

When the quality of evidence appears to support criminal prosecution, Seminole County Sheriff’s Office conducts compelled interviews only after consulting with prosecutors as to whether compelled interviews may be an obstacle for subsequent criminal prosecution.

The credibility of an alleged victim, suspect, or witness is assessed on an individual basis and is not determined by the person’s status as Detainee or staff. No agency requires a Detainee who alleges sexual abuse to submit to a polygraph examination or other truth-telling device as a condition for proceeding with the investigation of such an allegation.

All Administrative investigations are conducted by Professional Standards and includes efforts to determine whether staff actions or failures to act contributed to the abuse; and are documented in written reports that include a description of the physical and testimonial evidence, the reasoning behind credibility assessments, and investigative facts and findings.

Criminal investigations are documented in a written report that contains a thorough description of physical, testimonial, and documentary evidence and attaches copies of all documentary evidence where feasible.

Substantiated allegations of conduct that appears to be criminal are referred for prosecution.

Seminole County Sheriff’s Office retains all written reports for as long as the alleged abuser is incarcerated or employed by Seminole County Sheriff’s Office, plus five years.

The departure of the alleged abuser or victim from the employment or control of Seminole Juvenile Detention Center or agency does not provide a basis for terminating an investigation.

<b>Standard number here</b>	115.372 Evidentiary standard for administrative investigation
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Exceeds Standard (substantially exceeds requirement of standard)

X 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XXX Evidentiary Standards for Administrative Investigations and interview with investigative staff I find they exceed this standard.

Seminole County Sheriff's Office imposes no standard higher than a preponderance of the evidence in determining whether allegations of sexual abuse or sexual harassment are substantiated.

<b>Standard number here</b> 115.373 Reporting to Detainees
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Exceeds Standard (substantially exceeds requirement of standard)

X 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XXXI Reporting to Detainees and interview with Superintendent and investigative staff I find they exceed in this standard.

Following an investigation into a Detainee's allegation that they suffered sexual abuse in an agency facility, Seminole County Sheriff's Office informs the Detainee as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded.

If Seminole County Sheriff's Office did not conduct the investigation, it requests the relevant information from the investigative agency in order to inform the Detainee.

Following an Detainee's allegation that a staff member has committed sexual abuse against the Detainee, Seminole County Sheriff's Office subsequently informs the Detainee (unless Seminole County Sheriff's Office has determined that the allegation is unfounded) whenever the staff member is no longer posted within the Detainee's unit; the staff member is no longer employed at Seminole Juvenile Detention Center; Seminole County Sheriff's Office learns that the staff member has been indicted on a charge related to sexual abuse within Seminole Juvenile Detention Center; or Seminole County Sheriff's Office learns that the staff member has been convicted on a charge related to sexual abuse within Seminole Juvenile Detention Center.

Following an Detainee's allegation that they had been sexually abused by another Detainee, Seminole County Sheriff's Office subsequently informs the alleged victim whenever Seminole County Sheriff's Office learns that the alleged abuser has been indicted on a charge related to sexual abuse within Seminole Juvenile Detention Center; or Seminole County Sheriff's Office learns that the alleged abuser has been convicted on a charge related to sexual abuse within Seminole Juvenile Detention Center.

All such notifications or attempted notifications are documented.

An agency's obligation to report under this standard are terminate if the Detainee is released from Seminole County Sheriff's Office's custody.

<b>Standard number here</b> 115.376 Disciplinary sanctions for staff
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- Exceeds Standard (substantially exceeds requirement of standard)
- X 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XXXII Disciplinary Sanctions for Staff.

Staff are subject to disciplinary sanctions up to and including termination for violating agency sexual abuse or sexual harassment policies. Termination is the presumptive disciplinary sanction for staff who have engaged in sexual abuse.

Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment (other than actually engaging in sexual abuse) are commensurate with the nature and circumstances of the acts committed, the staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.

All terminations for violations of agency sexual abuse or sexual harassment policies, or resignations by staff who would have been terminated if not for their resignation, are reported to law enforcement agencies, unless the activity was clearly not criminal, and to any relevant licensing bodies.

<b>Standard number here</b> 115.377 Corrective action for contractors and volunteers
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- Exceeds Standard (substantially exceeds requirement of standard)
- X 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, including corrective actions needed if does not meet standard**

Based on SCSO JDC 36 XXXIII Corrective Action for Contractors and Volunteers and interview with Superintendent I find they meet this standard.

Any contractor or volunteer who engages in sexual abuse is prohibited from contact with Detainees and are reported to Child Protective Services and Florida Child Abuse Hotline, unless the activity was clearly not criminal, and to relevant licensing bodies.

Seminole Juvenile Detention Center takes appropriate remedial measures, and considers whether to prohibit further contact with Detainees, in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.



**Standard  
number here**

115.378 Interventions and disciplinary sanctions for Detainees

Exceeds Standard (substantially exceeds requirement of standard)

X 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XXXIV Disciplinary Sanctions' for Detainees and interview with medical/mental health staff I find they meet this standard.

No detainee has been disciplined for this type of behavior.

Detainees are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the Detainee engaged in Detainee-on-Detainee sexual abuse or following a criminal finding of guilt for Detainee-on-Detainee sexual abuse.

Sanctions are commensurate with the nature and circumstances of the abuse committed, the Detainee's disciplinary history, and the sanctions imposed for comparable offenses by other Detainees with similar histories.

The disciplinary process considers whether a Detainee's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any, should be imposed.

Seminole Juvenile Detention Center disciplines a Detainee for sexual contact with staff only upon a finding that the staff member did not consent to such contact.

A report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred are not constitute falsely reporting an incident or lying, even if an investigation does not establish evidence sufficient to substantiate the allegation.

Seminole Juvenile Detention Center prohibits all sexual activity between Detainees and may discipline Detainees for such activity.

**Standard  
number here**

115.381 Medical and Mental care

Exceeds Standard (substantially exceeds requirement of standard)

X 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XXXV Medical and Mental Health Screenings; Initial Intake Screening; Initial Mental Health Evaluation form and interview with staff responsible for risk screening and medical/mental health staff I find they meet this standard.

If the screening indicates that an Detainee has experienced prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the Detainee is offered a follow-up meeting with a medical or mental health practitioner within 14 days of the intake screening.

If the screening indicates that an Detainee has previously perpetrated sexual abuse/prior sexual victimization, whether it occurred in an institutional setting or in the community, staff ensure that the Detainee is offered a follow-up meeting with a mental health practitioner within 14 days of the intake screening.

Any information related to sexual victimization or abusiveness that occurred in an institutional setting is strictly limited to medical and mental health practitioners and other staff, as necessary, to inform treatment plans and security and management decisions, including housing, bed, work, education, and program assignments, or as otherwise required by Federal, State, or local law.

Medical and mental health practitioners obtain informed consent from Detainees before reporting information about prior sexual victimization that did not occur in an institutional setting, unless the Detainee is under the age of 18.

**Standard number here**

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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XXXVI Access to Emergency Medical and Mental Health Services and interview with medical and mental health staff I find they meet this standard.

Detainee victims of sexual abuse receive timely, unimpeded access to emergency medical treatment and crisis intervention services, the nature and scope of which are determined the victim and are immediately notify the appropriate medical and mental health practitioners.

Detainee victims of sexual abuse while incarcerated are offered timely information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of by medical and mental health practitioners according to their professional judgment. All medical and mental health care for a victim of sexual abuse is provided through the Kids House.

If no qualified medical or mental health practitioners are on duty at the time a report of recent abuse is made, security staff first responders take preliminary steps to protect care, where medically appropriate. A nurse will be called from John E. Polk Correctional Facility, which is across the street from the facility.

Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

<b>Standard number here</b> 115.383 ongoing medical and mental health care for sexual abuse victims
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- 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XXXVII. Ongoing Medical and Mental Health Care for Sexual Abuse Victims and Abusers and interview with medical/mental health staff I find they meet this standard.

Seminole Juvenile Detention Center offers medical and mental health evaluation and, as appropriate, treatment to all Detainees who have been victimized by sexual abuse in any juvenile facility through the Kids House.

The Kids House provides all the following services:

The evaluation and treatment of such victims include, as appropriate, follow-up services, treatment plans, and, when necessary, referrals for continued care following their transfer to, or placement in, other facilities, or their release from custody.

Seminole Juvenile Detention Center provides such victims with medical and mental health services consistent with the community level of care.

Detainee victims of sexually abusive vaginal penetration while incarcerated are offered pregnancy tests. If pregnancy results victims receive timely and comprehensive information about and timely access to all lawful pregnancy-related medical services.

Detainee victims of sexual abuse while incarcerated are offered tests for sexually transmitted infections as medically appropriate.

Treatment services are provided to the victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Seminole Juvenile Detention Center attempts to conduct a mental health evaluation of all known Detainee-on-Detainee abusers within 60 days of learning of such abuse history and offer treatment when deemed appropriate by mental health practitioners.

<b>Standard number here</b> 115.386 Sexual abuse incident reviews
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- Exceeds Standard (substantially exceeds requirement of standard)

X 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XXXVIII Sexual Abuse Incident Review and interview with Superintendent, PREA compliance manager and incident review team I find they meet this standard.

Seminole Juvenile Detention Center conducts a sexual abuse incident review at the conclusion of every sexual abuse investigation, including where the allegation has not been substantiated, unless the allegation has been determined to be unfounded. This review occurs within 30 days of the conclusion of the investigation. The review team includes upper-level management officials, with input from line supervisors, investigators, and medical or mental health practitioners.

The review team considers whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect, or respond to sexual abuse; whether the incident or allegation was motivated by race; ethnicity; gender identity; lesbian, gay, bisexual, transgender, or intersex identification, status, or perceived status; or gang affiliation; or was motivated or otherwise caused by other group dynamics at Seminole Juvenile Detention Center; and they examine the area in Seminole Juvenile Detention Center where the incident allegedly occurred to assess whether physical barriers in the area may enable abuse; assess the adequacy of staffing levels in that area during different shifts; assess whether monitoring technology should be deployed or augmented to supplement supervision by staff.

A report is prepared of its findings, including but not limited to determination made and any recommendations for improvement and submit such reports to Seminole Juvenile Detention Center head and PREA compliance manager. Seminole Juvenile Detention Center implements the recommendations for improvement or documents its reasons for not doing so.

<b>Standard number here</b> 115.387 Data collection
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Exceeds Standard (substantially exceeds requirement of standard)

X 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XXXIX Data Collection.

Seminole County Sheriff's Office collects accurate, uniform data for every allegation of sexual abuse at facilities under its direct control using a standardized instrument and set of definitions, and aggregates the incident-based sexual abuse data at least annually.

The incident-based data collected is based on the most recent version of the Survey of Sexual Violence conducted by the Department of Justice.

Seminole County Sheriff's Office maintains, reviews, and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews.

Seminole County Sheriff's Office obtains incident-based and aggregated data from every private facility with which it contracts for the confinement of its Detainees.

Upon request, Seminole County Sheriff's Office provides all such data from the previous calendar year to the Department of Justice no later than June 30.

<b>Standard number here</b> 115.388 Data review for corrective action
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- 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XL. Data Review for Corrective Action and review of annual report on the website and interview with PREA coordinator I find they meet this standard.

Seminole County Sheriff's Office reviews data collected to assess and improve the effectiveness of its sexual abuse prevention, detection, and response policies, practices, and training, including identifying problem areas; taking corrective action on an ongoing basis; and preparing an annual report of its findings and corrective actions for each facility, as well as Seminole County Sheriff's Office as a whole.

Such reports includes a comparison of the current year's data and corrective actions with those from prior years and are provide an assessment of Seminole County Sheriff's Office 's progress in addressing sexual abuse.

Seminole County Sheriff's Office's report is approved by Seminole County Sheriff's Office head and made readily available to the public through its website [www.seminolesheriff.org](http://www.seminolesheriff.org).

<b>Standard number here</b> 115.389 Data storage, publication and destruction
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- 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, including corrective actions needed if does not meet standard**

Based on review of SCSO JDC 36 XLI Data Storage, Publication and Destruction.

Seminole County Sheriff's Office makes all aggregated sexual abuse data, from facilities under its direct control and private facilities with which it contracts, readily available to the public at least annually through its website [www.seminolesheriff.org](http://www.seminolesheriff.org) .

All reports are securely retained and maintained for at least 10 years after the date of the initial collection unless Federal, State, or local law requires.

**AUDITOR CERTIFICATION:**

The auditor certifies that the contents of the report are accurate to the best of her knowledge and no conflict of interest exists with respect to her ability to conduct an audit of Seminole County Sheriff's Office under review.

*Katherine Brown* \_\_\_\_\_

April 27, 2016 \_\_\_\_\_

Auditor Signature

Date