

their immediate supervisor or Human Resources (HR) within one business day of identifying the relationship or relationship history. A determination shall be made, in consultation with HR and the employees supervisor, regarding the need for intervention or corrective action.

- D. **Required Reporting:** Any observed or suspected misconduct in an employee relationship with a current client shall be reported to the employee’s supervisor and or HR in accordance with approved procedures, [Reporting Abuse, Neglect and Exploitation](#). Staff are also required to document their observations or the conduct/behavior that has led to suspicions in accordance with HHs’ [Unusual and Critical Incidents](#) policy and its related procedure, [Universal Incident Reporting](#).
- E. **Policy Compliance:** Failure to comply with this policy, including providing prompt notice of current or prior personal relationships with a client, is grounds for discipline.

Communication and Training:

The Board shall receive a copy of the policy at the time of periodic review and will have an opportunity to ask clarifying questions during the approval process. Employees and volunteers shall receive notice of the Board’s policy review and approval including notice of any substantive changes. The notice will provide a link to the policy located on the HH website.

Definitions:

NA

Other Related Materials:

Progressive Discipline Procedure

References/Legal Authority:

Preventing Abuse Together, Model Policies for Selective Insureds, Praesidium, 2023

Change Log:

Date of Change	Description of Change	Responsible Party
09.2023	Updates to the new template; expanded scope to all services, staff and volunteers; Added communication and training and other related materials.	N. Miller, Prog. Eval Consultant, R. Lucovich, HR Specialist
07.2024	Updates the policy to achieve compliance with requirements identified in an insurance audit, added appropriate physical and verbal contact/interaction guidelines and conduct expectations for 1-on-1 interactions.	N. Miller, Prog. Eval Consultant



Defining Appropriate and Inappropriate Physical Contact

Hopeful Horizons' Staff Relationship with Clients policy promotes a positive, professional, and nurturing environment while protecting current clients, employees and volunteers. Our organization encourages appropriate physical contact with current and former clients and prohibits inappropriate displays of physical contact. Any inappropriate physical contact by employees or volunteers toward a current client shall be reported and shall result in disciplinary action, up to and including termination. The organization's standards for appropriate and inappropriate physical interactions include but are not limited to¹:

Appropriate Physical Contact	Inappropriate Physical Contact
<ul style="list-style-type: none"> ▪ Contact initiated by the client such as: ▪ Side hugs ▪ Shoulder-to-shoulder or “temple” hugs ▪ Pats on the shoulder or back ▪ Handshakes ▪ High-fives and hand slapping ▪ Pats on the head when culturally appropriate touching hands, shoulders, and arms ▪ Arms around shoulders ▪ Holding hands (with young children in escorting situations) 	<ul style="list-style-type: none"> ▪ Full-frontal hugs ▪ Kisses ▪ Showing affection in isolated areas or while one-on-one ▪ Wrestling ▪ Piggyback rides ▪ Tickling ▪ Allowing a client to cling to an employee's or volunteer's leg ▪ Allowing clients, older than kindergarten, to sit on an employee or volunteer's lap ▪ Any type of massage given by or to a client ▪ Any form of affection that is unwanted by the client or the employee or volunteer ▪ Touching bottom, chest, or genital areas

¹ Source: Preventing Abuse Together, Model Policies for Selective Insureds, Praesidium, 2023



Defining Appropriate and Inappropriate Verbal Interactions

Hopeful Horizons' employees and volunteers are prohibited from speaking to clients in a way that is, or could be construed by any observer, as harsh, coercive, threatening, intimidating, shaming, derogatory, demeaning, or humiliating. Employees and volunteers must not initiate sexually oriented conversations with current clients. Employees and volunteers are not permitted to discuss their own sexual activities with current clients. Organization guidelines for appropriate and inappropriate verbal interactions include but are not limited to:

Appropriate Verbal Interactions	Inappropriate Verbal Interactions
<ul style="list-style-type: none">▪ Positive reinforcement▪ Appropriate jokes▪ Encouragement▪ Praise▪ Strength-based conversations▪ Self-disclosure as a supervised therapeutic tool by licensed clinicians, medical professionals, and pastoral counseling	<ul style="list-style-type: none">▪ Name-calling▪ Discussing sexual encounters or in any way involving current clients in the personal problems or issues of employees and volunteers▪ Secrets▪ Cursing▪ Off-color or sexual jokes▪ Shaming, belittling▪ Oversharing personal history▪ Derogatory remarks▪ Harsh language that may frighten, threaten or humiliate clients▪ Derogatory remarks about the client or their family▪ Compliments relating to physique or body development

Managing One-on-One Interactions Between Employees, Volunteers, and Clients

One-on-one interactions (inclusive of virtual interactions) with current clients should only occur during programming under normal service/treatment activities. This guideline is to ensure Hopeful Horizons clearly communicates expectations for employees and volunteers and gives examples of appropriate behavior when authorized one-on-one interactions occur. In those situations where one-on-one interactions occur and are appropriate, employees and volunteers shall observe the following guidelines to limit the risk of misconduct or allegations of abuse, neglect or exploitation:

- ✓ When possible, meet current clients in a public place where you are in full view of others.
- ✓ Avoid physical contact and/or affection during one-on-one interactions.
- ✓ If physical contact occurs, ensure appropriate physical and verbal interactions align with this organization's established guidelines and are limited to the related service/treatment activities. Immediately share the nature and extent of physical contact that occurred during the one-on-one interaction with your supervisor after the interaction has ended.
- ✓ When possible, if meeting in a room or office, leave the door open or move to an area that can be easily observed by others passing by.
- ✓ When appropriate, inform other employees and volunteers that you are alone with a current client and encourage them to randomly drop in or pass by the interaction.
- ✓ To the extent possible, ensure one-on-one interactions occurring behind closed doors are scheduled in advance, occurring in a room with windows or glass in the door, and/or are known to your supervisor.
- ✓ Ensure one-on-one interactions are documented, especially if behind closed doors. Keep documentation of these meetings (such as in shared calendar, case notes, etc.).
- ✓ In accordance with Hopeful Horizons policies, document and immediately report any unusual incidents, including physical interactions, disclosures of abuse or maltreatment, behavior problems and how they were handled, injuries, or any interactions that might be misinterpreted or that made you uncomfortable.