

PATHWAY, Inc.

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Pathway School – T: 334-894-5405 F: 334-894-5408

Pathway Group Home T-334-443-0479

Pathway of Baldwin County - T: 251-405-3107 F: 251-450-8315

Joe Peeples
Chief Executive Officer

Pathway Programs Annual PREA Report Pathway of Baldwin County

Brad WoodChief Administrative Officer

In compliance with the Prison Rape Elimination Act, Pathway has adopted a PREA Policy that aims to provide guidelines and procedures that reduce the risk of sexual abuse and sexual harassment at all Pathway owned and operated facilities. It is a written plan to coordinate actions taken in response to an incident of sexual abuse among staff, clients/residents, volunteers, contractors, and facility leadership. Pathway is committed to a zero-tolerance standard for sexual abuse and sexual harassment either by staff or by another client/resident.

Karen Brabham Compliance Officer

The purpose of this report is to gather data that will assist in reducing the risk that sexual abuse and/or sexual harassment would occur within Pathway's facilities.

Summary of 2020 reporting data:

Client on Client Incident Type	Number of incidents	Number Substantiated	Number Unsubstantiated	Number Unfounded
Non- Consensual Sexual Act	1	0	1	0
Abusive Sexual Contact	6	2	3	1
Sexual Harassment	2	2	0	0
Consensual Sexual Contact	0	0	0	0

Staff on Client	Number of	Number	Number	Number Unfounded
Incident Type	Incidents	Substantiated	Unsubstantiated	
Staff Sexual	0	0	0	0
Misconduct				
Staff Sexual	1	0	0	1
Harassment				

Frequency and Severity of sexual abuse/sexual harassment and trends:

Review of the 2019 data indicates a decrease this reporting period in the overall number of PREA related allegations by 17%. There were 10 reported incidents during the reporting period, as opposed to 12 in 2019. The most serious of these allegations was an incident of client-on-client non-consensual sexual act, which was unsubstantiated; however, it was referred to the Department of Human Resources for further investigation. There were six allegations of abusive sexual contact, of these, two were substantiated and clients received consequences for their actions in line with the client handbook. The remaining four could not be proven based on staff and client reports and review of video footage. There were two allegations of sexual harassment that were substantiated, on of

which appears to be the result of horseplay, the other allegation led to the client's removal from the program. The allegation of staff sexual harassment was unfounded after a thorough investigation involving speaking with all clients on campus as well as review of video footage and interviews with other staff.

Deficiencies identified:

There were no physical barriers identified that allowed abuse to occur. No recommendations were made for changes to the physical plant or addition of security cameras or staffing.

Corrective Action Plan:

One staff member did receive disciplinary action based on not providing adequate supervision on clients and not ensuring proper boundaries were enforced.

Reviewed by

1/20/2021

1-20-2021 Date