

**PREA AUDIT REPORT Interim Final
ADULT PRISONS & JAILS**

Date of report: March 15, 2016

Auditor Information			
Auditor name: Shaun Klucznik			
Address: 16425 Spring Hill Drive Brooksville Florida 34604			
Email: sklucznik@hernandosheriff.org			
Telephone number: 352-797-3403			
Date of facility visit: March 9-10 2016			
Facility Information			
Facility name: Glades County Sheriff's Office Detention Center			
Facility physical address: 1297 East State Road 78 Moore Haven Florida 33471			
Facility mailing address: <i>(if different from above)</i> P.O. Box 39 Moore Haven Florida 33471			
Facility telephone number: 863-946-1600			
The facility is:	<input type="checkbox"/> Federal	<input type="checkbox"/> State	<input checked="" type="checkbox"/> County
	<input type="checkbox"/> Military	<input type="checkbox"/> Municipal	<input type="checkbox"/> Private for profit
	<input type="checkbox"/> Private not for profit		
Facility type:	<input type="checkbox"/> Prison	<input checked="" type="checkbox"/> Jail	
Name of facility's Chief Executive Officer: Robert DeMann, Chief			
Number of staff assigned to the facility in the last 12 months: 62			
Designed facility capacity: 546			
Current population of facility: 177			
Facility security levels/inmate custody levels: Medium/Maximum			
Age range of the population: 19-68			
Name of PREA Compliance Manager: Lavoyea Henry		Title: Captain	
Email address: lhenry@gladessheriff.org		Telephone number: 863-946-1600 ext 2107	
Agency Information			
Name of agency: Glades County Sheriff's Office			
Governing authority or parent agency: <i>(if applicable)</i> N/A			
Physical address: 1297 East State Road 78 Moore Haven Florida 33471			
Mailing address: <i>(if different from above)</i> P.O. Box 39 Moore Haven Florida 33471			
Telephone number: 863-946-1600			
Agency Chief Executive Officer			
Name: Stuart Whiddon		Title: Sheriff	
Email address: swhiddon@gladessheriff.org		Telephone number: 863-946-1600 ext 2101	
Agency-Wide PREA Coordinator			
Name: Keith Henson		Title: Major	
Email address: khenson@gladessheriff.org		Telephone number: 863-946-1600 ext 2104	

AUDIT FINDINGS

NARRATIVE

Shaun Klucznik with the assistance of Grace White, both certified Prison Rape Elimination Act Auditors, conducted the onsite PREA audit of the Glades County Sheriff's Office (GCSO) Detention Center March 9th and 10th, 2016. Leading up to the onsite inspection, Glades County's PREA Coordinator Major Keith Henson provided us with all pertinent policies, procedures, and support documentation to establish compliance with the PREA Standards. Leading up to and during the onsite audit, there was a tremendous level of open verbal and written communication between Major Henson and the audit team.

On the first day of the audit, the audit team met with Chief Robert DeMann, Major Henson, Captain Lavoyea, and Lieutenant Gadson. We discussed the goals for the audit and a plan of action while onsite. To begin the audit, we toured the facility and conducted informal staff and inmate interviews. After the initial tour we conducted all specialized staff interviews and formal random staff interviews

On the second day of the audit we conducted inmate interviews. We were provided with a list of inmates that were currently detained within the Glades County Detention Center. I randomly selected fifteen general population inmates to be interviewed. The random general population inmates consisted of Glades County inmates, United States Marshal Service Detainees, and Immigration and Customs Enforcement Detainees. We also interviewed the following; one inmate from segregation, one inmate that reported sexual harassment, one self-identified lesbian, one self-identified bi-sexual male inmate, and two limited English proficient inmates.

During the past twelve months there have been two allegations of inmate on inmate sexual harassment or abuse that resulted in administrative investigation. One was an allegation of inmate on inmate sexual harassment. This event was deemed an event of sexual harassment by an administrative investigation. This event was investigated fully and reviewed by the (GCSO) PREA Review Committee. The second was an allegation of staff misconduct with female inmates. This allegation was unsubstantiated by administrative investigation and reviewed by the GCSO PREA Review Committee.

DESCRIPTION OF FACILITY CHARACTERISTICS

The Glades County Sheriff's Office (GCSO) opened its Detention Center in June of 2007. The 544 bed facility provides the physical plant for management of a unique multi-jurisdictional incarcerated population. The GCSO Detention Center is an 88,000 square foot multi-jurisdictional county jail facility. The facility provides space for booking, administrative areas, Immigration and Customs Enforcement (ICE) Court, foodservice, laundering, medical services, indoor and outdoor recreational activities and two secured general population housing units.

The Glades County Detention Center consists of two housing areas. Housing Unit One has four pods with capacities consisting of 95, 92, 96, and 95. Housing Unit Two has five pods with capacities of 46, 48, 48, 20, and 24. The pod with 20 is considered the segregation unit. With the exception of the Segregation Pod, Housing Unit Two is unoccupied. The Medical Observation Area consists of four observation cells.

The Glades County Detention Center has 63 video cameras monitoring the detention facility environment. All cameras feed into a central matrix which output analog video to three control rooms and a Digital Video Recorder (DVR) system.

The three control rooms are as follows: Central Control, Dorm 1 Control and Dorm 2 Control. Central Control can view up to 7 cameras at once with the ability to access any of the 63 cameras throughout the facility. Interfacing via keypad, touch screen or with a mouse, the officer can select which camera they choose to monitor at any given time. This functionality is handled by a centrally controlled security system that manages door controls, intercoms, and camera views throughout the facility. Central Control has the ability to open doors throughout the facility, view any facility camera, and use two way intercoms at key locations. If needed, Central Control may grant each Dormitory security control over their respective location. Once granted permission, Dorm 1 Control has security control over the door mechanisms in Dorm 1 and may view up to three cameras at once with the ability to view any camera within Dorm 1. The same is true for Dorm 2 Control.

The 63 video cameras feed into a central matrix which output video to three control rooms and a DVR. This DVR system is contained on their operating network and can be accessed by officers at their workstations. This access allows for both live video monitoring and recorded video playback. Their DVR system retains at least 14 days of video surveillance. Access to this system is controlled by user credentials. Only certain staff have access to the DVR system for live or playback viewing. Incident reviews are managed by facility Internal Affairs personnel, as incidents and shall be logged and reported.

SUMMARY OF AUDIT FINDINGS

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Number of standards exceeded: 6

Number of standards met: 34

Number of standards not met: 0

Number of standards not applicable: 3

Standard 115.11 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff’s Office (GCSO) has a written policy (720.13) that mandates zero tolerance towards all forms of sexual abuse and sexual harassment. This policy also describes the GCSO’s approach to preventing, detecting, and responding to sexual abuse or sexual harassment allegations. The staff at the GCSO Detention Center is required to carry a PREA response card that spells out individual roles when responding to sexual abuse or sexual harassment events. The GCSO has assigned the Major as their PREA Coordinator. The PREA Coordinator has the time and authority to ensure their agency’s compliance with the Prison Rape Elimination Act. It was evident after staff and inmate interviews that the GCSO does an excellent job practicing zero tolerance of sexual abuse and sexual harassment.

Standard 115.12 Contracting with other entities for the confinement of inmates

- 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)

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The Glades County Sheriff’s Office does not contract with other entities for the confinement of inmates.

Standard 115.13 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office has developed, documented, and made every effort to comply with their staffing plan. The staffing plan provides for adequate staffing levels and considers video monitoring to protect inmates from sexual abuse and sexual harassment. It was reported that the Glades County staffing plan has not been deviated from. Shift supervisors have the authority to utilize overtime to ensure staffing levels comply with the staffing plan. The Glades County Sheriff's Office completes an annual review of the staffing plan. Through provided documentation and staff interviews, it is clear the Glades County Sheriff's Office Detention Supervisors complete unannounced rounds on a regular yet random basis.

Standard 115.14 Youthful inmates

- 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)

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The Glades County Sheriff's Office does not house youthful inmates in their facility.

Standard 115.15 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office ensures cross-gender staff announces their presence each time they enter a housing unit of the opposite gender. Inmates are allowed to shower, perform bodily functions, and change clothing without non-medical staff of the opposite gender viewing these functions. It is the Glades County Sheriff's Office policy that only certified same sex detention staff will perform searches of detainees. Interviewed female inmates advised they have not been denied programs or out of cell opportunities due to a lack of female staff.

Standard 115.16 Inmates with disabilities and inmates 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office has established a policy to provide disabled and limited English proficient inmates the opportunity to participate in and benefit from all aspects of the agency's efforts to prevent, detect, and respond to sexual abuse and sexual harassment. The Glades County Sheriff's Office provides a TDY phone to inmates with hearing disabilities, reads necessary information to inmates that are blind and have other disabilities, and they provide interpreter services for non-English speaking inmates. The Glades County Sheriff's Office compensates their bi-lingual staff \$1200 annually for their language abilities. The Glades County Sheriff's Office has a large percentage of Spanish only inmates due to their Immigration Contract. It is clear to me, after inmate interviews that the non-English speaking population is well versed in PREA and they have a sense of safety at the Glades County Detention Center.

Standard 115.17 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office prohibits hiring, promoting, or enlisting the services of anyone who may have contact with inmates that have engaged in sexual abuse in a confinement setting, that have been convicted of engaging or attempting to engage in forced sexual activity in the community, or have been civilly or administratively adjudicated to have engaged in activities previously described. The GCSO also has a policy that they will consider sexual harassment incidents when hiring, promoting, or enlisting the services of a contractor. The GCSO conducts thorough pre-employment background investigations. The GCSO exceeds PREA Standard 115.17 in that they conduct criminal records checks on their employees every year instead of every five years.

Standard 115.18 Upgrades to facilities and technologies

- 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office has not upgraded their facilities or the technology since they opened the facility in 2007.

Standard 115.21 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office is responsible for conducting administrative or criminal sexual abuse investigations within the Glades County Detention Center. The agency follows a uniform evidence protocol that is based on the most recent edition of the United States Department of Justice's Office on Violence Against Women. According to the GCSO policy, all victims of sexual abuse will be offered access to forensic medical examinations at no cost to the victim. According to GCSO policy and a memorandum of agreement between ACT and the GCSO, forensic examinations will be conducted at a local hospital of by appropriately trained clinicians at the Abuse Counseling & Treatment Center (ACT) in Ft. Myers, Florida. In the agreement, ACT agrees to provide SANE/SAFE forensic services. Also in the agreement ACT agrees to provide victim services for inmate reporting sexual abuse and/or harassment alleged to have occurred at the Glades County Detention Center to include counseling and treatment. All of this information was verified during a telephone conversation with ACT Director, Jennifer Benton on January 6, 2016.

Standard 115.22 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office has a policy that ensures an administrative or criminal investigation is completed for all allegations of sexual abuse and sexual harassment.

Standard 115.31 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office trains all employees who have contact with inmates on;

- Zero-tolerance policy for sexual abuse and sexual harassment.
- How to fulfill their responsibilities under agency sexual abuse and sexual harassment prevention detection, reporting, and procedures.
- Rights of inmates to be free from sexual abuse and sexual harassment.
- Dynamics of sexual abuse and sexual harassment in confinement.
- Common reactions of sexual abuse and sexual harassment victims.
- How to detect and respond to signs of threatened and actual sexual abuse.
- How to avoid inappropriate relationships with inmates.
- How to communicate effectively and professionally with LGBTI or gender non-conforming inmates.
- How to comply with relevant laws related to mandatory reporting of sexual abuse to outside authorities.

The training provided was tailored to address both genders of inmate at the Glades County Detention Center.

The Glades County Sheriff's Office provided their training curriculum and training rosters. Staff interviews revealed the above listed training was effective.

Standard 115.32 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office has a policy that ensures all volunteers and contractors that have contact with inmates are trained on their responsibilities under the agency's Prison Rape Elimination Act policy. The Glades County Sheriff's Office provided volunteer training rosters and their volunteer program training curriculum that complies with this standard.

Standard 115.33 Inmate 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

At intake, the Glades County Sheriff’s Office conducts an orientation explaining the facility’s zero-tolerance policy regarding sexual abuse and sexual harassment. The intake orientation also includes information on how to report incidents or suspicions of sexual abuse or sexual harassment. A sexual assault awareness pamphlet is provided to each inmate during intake containing information on self-protection and prevention techniques, treatment and counseling, and reporting methods. All detainees at the Glades County Detention Center receive an orientation within 30 days of intake which provides comprehensive education regarding their rights to be free from sexual abuse and sexual harassment and to be free from retaliation for reporting such incidents. All detainees are required to sign a receipt for their copy of the inmate handbook and the orientation program that contains the sexual assault awareness information brochure. The referenced handbook and orientation is available in three languages English, Spanish, and Creole. The Glades County Sheriff’s Office ensures that PREA education is available in formats to aid the limited English proficient population, the deaf, visually impaired, otherwise disabled, or limited in their reading skills. Inmates that spoke both English and Spanish were interviewed and were very aware of how to report a PREA incident.

Standard 115.34 Specialized training: 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff’s Office has a policy that ensures all investigators that investigate allegations of sexual abuse are trained in conducting sexual abuse investigations in confinement settings. The policy ensures the training includes techniques for interviewing sexual abuse victims, proper use of Miranda and Garrity warnings, sexual abuse evidence collection in a confinement setting, and the criteria and evidence required to substantiate a case or administrative action or prosecution referral. The policy also ensures the agency maintains documentation showing that investigators have completed the required training. The Glades County Sheriff’s Office provided documentation proving their investigators attended an eight hour block of instruction titled “Conducting Investigations in Confinement Settings (PREA) that was hosted by the Collier County Sheriff’s Office. Staff interviews verified the completion of this training by current Glades County Sheriff’s Office Investigators.

Standard 115.35 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office does not conduct forensic examinations. Forensic examinations are conducted at the local hospital or at the Abuse Counseling & Treatment Center in Ft. Myers, Florida. The Glades County Sheriff's Office ensures that all full time and part time medical and mental health care practitioners who work regularly in facilities have been trained on 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 harassment, and how to report allegations or suspicions of sexual abuse and sexual harassment. Training rosters have been provided by the Glades County Sheriff's Office.

Standard 115.41 Screening for risk of victimization and abusiveness

- 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office completes an objective risk of sexual victimization/abusiveness screening on all detainees during intake. The screening tool complies with PREA standard 115.41 (d). The information collected during the initial screening is used to determine the detainee's risk of victimization or abusiveness and to ensure the safety of each detainee in the Glades County Detention Center. Inmates are not disciplined for refusing to answer screening questions. By policy, additional assessment is completed by Classification or the PREA Compliance Manager within 30 days of confinement and any time additional relevant information is gathered. The Glades County Sheriff's Office has implemented controls on the dissemination of the information gathered during PREA screenings.

Standard 115.42 Use of screening information

- 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)

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The Glades County Sheriff's Office uses risk screening information to determine housing, bed, work, education, and program assignments to prevent inmates from being sexually victimized from those at the risk of being abusive. The Glades County Sheriff's Office makes individualized determinations about how to ensure the safety of each inmate. The GCSO ensures by policy that housing and program assignments of transgender or intersex inmates handled on a case by case basis and these assignments shall be re-evaluated at least twice per year. The GCSO ensures by policy that transgender and intersex inmate's own views with respect to their identity are given serious consideration by staff. Transgender and intersex inmates are given the opportunity to shower separately from other inmates. LGBTI inmates are not placed in dedicated housing units solely on the basis of their self-identification or status. This was verified through staff interviews and inmate interviews.

Standard 115.43 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office has a policy preventing detainees at high risk of victimization being placed in involuntary segregated housing units unless all available alternatives have been exhausted. The GCSO ensures that inmates placed in segregation for purposes of PREA shall have access to programs, privileges, education, or work opportunities. If any of these are restricted the facility will document the opportunities that were limited, the duration of the limitation, and the reasoning behind the limitation. It was reported before the on-site audit and during the on-site audit that there have been zero instances where any detainees have been segregated due to their risk of being victimized.

Standard 115.51 Inmate 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office (GCSO) has a policy that allows for private internal reporting of sexual abuse and sexual harassment to agency officials. Detainees may report verbally, on request forms, on grievances forms, by dialing #9 to call the internal PREA Hotline. Immigration and Customs Enforcement Detainees have the option of calling ICE's Community & Detainee Hotline or ICE's Joint Intake Center. ICE Detainees may also write to the ICE Office of Inspector General. The GCSO has established a Memorandum of Agreement with the Hendry County Sheriff's Office that established an external and confidential PREA Hotline. Glades County Detainees can access the external hotline by dialing 0 then pressing 1. This provides access to a hotline outside the jurisdictional control of the GCSO. The hotline is monitored by designated officials at the Hendry County Sheriff's Office. During the on-site audit I observed both telephonic (internal and third party) reporting methods. GCSO staff are required by policy to accept reports of sexual assault and sexual harassment made verbally, in writing, anonymously, and from third parties. GCSO staff are required to immediately document verbal allegations of sexual abuse and sexual harassment. GCSO staff can privately report sexual abuse and sexual harassment of detainees to their supervisor or any facility supervisor. GCSO staff are informed on reporting procedures during classroom training, supervisory briefings, training bulletins, and by policy. GCSO staff has done an excellent job training their detainee population on the various ways to report sexual abuse or sexual harassment. During inmate interviews, many of the inmates were able to list all of the reporting options. All inmates knew of at least two ways to report sexual abuse and sexual harassment.

Standard 115.52 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)

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The Glades County Sheriff's Office (GCSO) has established an administrative procedure for dealing with inmate grievances regarding sexual abuse and sexual harassment. GCSO policy allows inmates to submit a grievance regarding an allegation of sexual abuse at any time regardless of when the incident is alleged to have occurred. Inmates are not required to use an informal grievance process, or otherwise attempt to resolve with staff, an alleged incident of sexual abuse. Inmates may submit grievances alleging sexual abuse without submitting said grievances to the staff member who is the subject of the complaint. The GCSO Detention Division Administration will issue a final decision on the merits of any portion of a grievance alleging sexual abuse within five days of the initial filing of the grievance. This far exceeds the DOJ PREA standard that allows for 90 days to respond.

Standard 115.53 Inmate 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)

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The Glades County Sheriff's Office (GCSO) has a policy that provides detainees with access to outside confidential support services. The GCSO has entered into a Memorandum of Agreement with the Abuse Counseling & Treatment Center (ACT) of Ft. Myers. ACT has agreed to provide victim services for detainees reporting sexual abuse and/or sexual harassment alleged to have occurred at the Glades County Detention Center. These services include counseling and treatment. The agreement ensures communication between ACT and clients remains privileged and the GCSO agrees to respect the nature of privileged communication between ACT staff and clients. The GCSO has provided their detainees the mailing address to ACT and a toll free hotline that detainees can access for counseling and treatment. During the tour, the address and phone numbers were observed to be posted in all housing areas. GCSO policy ensures that detainees are informed of the extent that counseling and treatment communications will be monitored prior to access. GCSO policy also ensures that detainees are informed of mandatory reporting rules.

Standard 115.54 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)

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The Glades County Sheriff's Office (GCSO) has established a policy that allows for third party reports of inmate sexual abuse or sexual harassment. As described in 115.51, the GCSO has established a Memorandum of Agreement with the Hendry County Sheriff's Office that establishes an external and confidential PREA Hotline. Glades County Detainees can access the external hotline by dialing 0 then pressing 1. This provides access to a hotline outside the jurisdictional control of the GCSO. The hotline is monitored by designated officials at the Hendry County Sheriff's Office. During the on-site audit I observed both telephonic (internal and third party) reporting methods. The GCSO has placed on their agency website information on how third parties can file complaints of sexual abuse or sexual harassment on behalf of an incarcerated detainee. The website explains that individuals may report sexual abuse or sexual harassment in person, by telephone, anonymously, or by mail. The GCSO provides their physical address, mailing address, and telephone number for reporting. The GCSO also provides information allow for an individual to report sexual abuse and sexual harassment of their Federal detainees. The GCSO has placed on their website two addresses and two telephone numbers to the Office of Inspector General. This contact information is also posted in the Glades County Detention Center's lobby and visitation entrance for public viewing. This information was observed during the facility tour.

Standard 115.61 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office has a policy that requires all staff to immediately report any knowledge, suspicion, or information they receive regarding an incident of sexual abuse or sexual harassment that is alleged to have occurred in any detention facility even if it is not the Glades County Detention Center. GCSO policy requires staff to immediately report any form of retaliation against staff or inmates who report incidents of sexual abuse or sexual harassment. Staff are required to report staff that neglect their responsibility to report on retaliation issues. GCSO staff is prohibited by policy from revealing any information related to a sexual abuse report to anyone other than to the extent necessary to make treatment, investigation, and other security and management decisions. GCSO policy requires medical and mental health practitioners to report sexual abuse to the appropriate officials unless precluded by Federal, State, or local law. If an alleged victim is under the age of 18 or is considered a vulnerable adult, the agency shall report an allegation to the designated state or local services agency under applicable mandatory reporting laws. GCSO policy also requires all allegations of sexual abuse and sexual harassment be reported to the facility's designated investigators. During interviews, GCSO staffs were aware of their roles when it comes to staff reporting responsibilities. Staff indicated in their interviews that the agency has zero tolerance for retaliation against individuals that report sexual abuse situations.

Standard 115.62 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office has a policy that requires staff to immediately protect any detainee that is subject to substantial risk of imminent sexual abuse. The Glades County PREA Coordinator reported that there were zero detainees that fit the definition of substantial risk of imminent sexual abuse.

Standard 115.63 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office (GCSO) has a policy that ensures, upon receiving an allegation that an inmate was sexually abused while confined at another facility, the head of the facility must notify the head of the facility or appropriate office of the agency where the sexual abuse is alleged to have occurred. According to the policy the facility head will provide such notification as soon as possible but not later than 72 hours upon receiving the information. The GCSO will fully document that it provided the notification within 72 hours of receiving the allegation. According to policy, the GCSO is required to fully investigate any allegations received from other facilities. The GCSO PREA Coordinator advised that the GCSO received one incident where an ICE detainee alleged sexual abuse at another facility in Florida. The Glades County Sheriff's Office initiated an investigation in reference to this allegation. GCSO reported that the detainee was cooperative with this investigation. The GCSO ensured they reported this information to Immigration and Customs Enforcement.

Standard 115.64 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office (GCSO) has a policy that fully complies with this standard. During staff interviews it became evident that all staff are very aware of their first responder responsibilities in response to a sexual abuse incident. Staff understood to separate the victim from the alleged abuser and appropriate steps to protect evidence both on the victim and within a potential crime scene. Non-security staff members knew to notify a member of security staff immediately and knew to request that the victim not take any actions to destroy physical evidence. All GCSO Detention Staff carry a PREA response card that would assist them in their first responder duties.

Standard 115.65 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office has a policy that includes 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. All interviewed staff are knowledgeable of their roles in how to respond to a sexual abuse situation. The GCSO PREA Response Card is beneficial to staff in complying with their coordinated response plan.

Standard 115.66 Preservation of ability to protect inmates 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)

Auditor discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office does not participate in collective bargaining activities.

Standard 115.67 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office has a policy that ensures the agency protects staff and inmates from retaliation. The GCSO PREA Coordinator is designated to monitor all potential retaliation. The agency employs multiple protection measures to include housing assignment changes or transfers to another facility outside of Glades County jurisdiction, removal of alleged staff or inmate abusers from contact with victims, and they provide emotional support services for inmates or staff that fear retaliation for reporting sexual abuse or sexual harassment incidents or for cooperating with investigations. For at least 90 days following an allegation of sexual abuse, the agency will monitor the conduct and treatment of the staff and inmates that reported the abuse. The agency's policy provides for GCSO staff to promptly remedy any form of retaliation. If necessary the agency will continue to monitor reporters for longer than 90 days. GCSO policy allows for the termination of monitoring if the allegation is unfounded.

Standard 115.68 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office (GCSO) did not have any instances of involuntary segregation of detainees who alleged sexual abuse. The GCSO has a policy that fully complies with this standard. If involuntary segregation becomes necessary these inmates receive all the same rights and privileges as general population.

Standard 115.71 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office (GCSO) has a policy that fully complies with this standard. The GCSO ensures all investigations into allegation of sexual abuse and sexual harassment will be done promptly, thoroughly, and objectively, including third-party and anonymous reports. The GCSO conducts its own investigations into allegations of sexual abuse and sexual harassment. The GCSO policy ensures investigators that investigate sexual abuse have received specialized training pursuant to 115.34. By policy, investigators are charged with gathering and preserving evidence, including any physical, DNA, and any electronic monitoring data. The investigators shall interview alleged victims, suspects, and witnesses. If the evidence supports criminal prosecution, compelled testimony will be completed only after discussion with prosecutors. Credibility of an alleged victim, suspect, or witness shall be assessed on an individual basis. GCSO policy requires that administrative investigations shall include an effort to determine whether staff actions or failures played a role in the abuse. The GCSO retains all written reports pertaining to administrative or criminal investigations of alleged sexual assault or sexual harassment for as long as the alleged abuser is incarcerated or employed by the agency, plus five years. By GCSO policy, the departure of an alleged abuser or victim is not grounds for terminating an investigation.

Standard 115.72 Evidentiary standard 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office ensures by policy that the evidentiary standards for administrative investigations of sexual abuse or sexual harassment do not exceed the level of preponderance of the evidence.

Standard 115.73 Reporting to inmates

- 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office (GCSO) has a policy that fully complies with this standard. The GCSO requires that inmates are informed verbally, or in writing, as to whether the allegation has been determined to be substantiated, unsubstantiated, or unfounded following an investigation. By GCSO policy, if there has been a substantiated or unsubstantiated complaint of sexual abuse committed by staff against an inmate, the agency must inform the inmate whenever the staff member was no longer posted within the inmate's housing unit, the staff member was no longer employed at the facility, the staff member was indicted on a charge related to sexual abuse within the facility, and if the staff member is convicted on a charge related to sexual abuse within the facility. By GCSO policy, following an inmate's allegation of sexual abuse by another inmate within the facility, the agency must inform the victim when the alleged abuser is indicted and when the abuser is convicted on a charge related to sexual abuse within the facility. All notifications under this standard must be documented.

Standard 115.76 Disciplinary sanctions 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office (GCSO) has a policy that fully complies with this standard. GCSO staff would be subject to sanctions up to and including termination for violating agency sexual abuse and sexual harassment policies. Termination is the likely disciplinary sanction for GCSO staff that engage in sexual abuse. Disciplinary sanctions for violations of agency policies relating to sexual abuse or sexual harassment are commensurate with the nature and circumstances of the acts committed, a staff member's disciplinary history, and the sanctions imposed for comparable offenses by other staff with similar histories.

Standard 115.77 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office (GCSO) has a policy that fully complies with this standard. The GCSO requires that any contractor or volunteer who engages in sexual abuse be reported to law enforcement, unless the activity was clearly not criminal, and to relevant licensing bodies. Any contractor or volunteer who engages in sexual abuse is prohibited from contact with inmates. The GCSO will take immediate remedial measures and prohibit further contact with inmates in the case of any other violation of agency sexual abuse or sexual harassment policies by a contractor or volunteer.

Standard 115.78 Disciplinary sanctions for inmates

- 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office (GCSO) has a policy that fully complies with this standard. Inmates are subject to disciplinary sanctions pursuant to a formal disciplinary process following an administrative finding that the inmate engages in inmate-on-inmate sexual abuse. Inmates are subject to disciplinary sanctions pursuant to a formal disciplinary process following a criminal finding of guilt for inmate-on-inmate sexual abuse. Sanctions are proportionate with the nature and circumstance of the abuses committed, the inmate's disciplinary history, and the sanctions imposed for the comparable offenses by other inmates with similar histories. The disciplinary process considers whether an inmate's mental disabilities or mental illness contributed to his or her behavior when determining what type of sanction, if any should be imposed. The facility offers therapy, counseling, or other interventions designed to address and correct underlying reasons or motivations for abuse. Offenders or other subjects are not required to participate in such recommended measures in order to have access to other programming or benefits. The GCSO disciplines inmates for sexual conduct with staff only upon finding that the staff member did not consent. The GCSO prohibits disciplinary action for a report of sexual abuse made in good faith based upon a reasonable belief that the alleged conduct occurred, even if an investigation does not establish evidence sufficient to substantiate the allegation. The Glades County Sheriff's Office Detention Division prohibits all sexual activity between inmates. Although all sexual activity is prohibited between inmates, the GCSO will only deem such activity to constitute sexual abuse if it determines that the activity is coerced.

Standard 115.81 Medical and mental health screenings; 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff’s Office has a policy that fully complies with this standard. All inmates at the Glades County Detention Center that have disclosed any prior sexual victimization during a screening pursuant to 115.41 are offered a follow-up meeting within 14 days with a medical or mental health provider. Immigration and Customs Enforcement (ICE) detainees shall receive this follow-up no later than 72 hours after referral. Medical and Mental Health staff are charged with maintaining secondary documentation ensuring compliance with this standard. Information related to sexual victimization or abusiveness that occurred in an institutional setting is not limited to medical and mental health staff. Information shared is strictly limited to informing security and management decisions, including treatment plans, housing assignments, work, education, and program assignments. By policy medical and mental health staff are required to obtain informed consent from inmates before reporting information about prior victimization that did not occur in an institutional setting, unless the inmate is under the age of 18.

Standard 115.82 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor’s analysis and reasoning, and the auditor’s conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff’s Office (GCSO) has a policy that fully complies with this standard. GCSO policy ensures inmate victims of sexual abuse receive timely and unimpeded access to emergency medical treatment and crisis intervention services. Inmate victims of sexual abuse while incarcerated, shall be offered information about and timely access to emergency contraception and sexually transmitted infections prophylaxis, in accordance with professionally accepted standards of care, where medically necessary appropriate. Treatment services are provided to every victim without financial cost and regardless of whether the victim names the abuser or cooperates with any investigation arising out of the incident.

Standard 115.83 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office (GCSO) and Armor Correctional Health Service have policies that fully comply with this standard. The facility offers medical and mental health evaluation and, as appropriate, treatment to all inmates who have been victimized by sexual abuse in any prison, jail, lockup, or juvenile facility. The evaluation and treatment of such victims shall 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. The facility shall provide such victims with medical and mental health services consistent with the community level of care. Female victims of sexual abuse while incarcerated are offered pregnancy tests. If pregnancy results from sexual abuse while incarcerated, victims receive timely and comprehensive information and timely access to, all lawful pregnancy-related medical services. Inmate 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. The facility will maintain that a mental health evaluation is conducted of all inmate-on-inmate abusers within 60 days of learning of such abuse history and offers treatment when deemed appropriate by mental health practitioners. Interviews of the PREA Coordinator and the Armor HSA verified these services are available to the inmates at the Glades County Detention Center.

Standard 115.86 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office (GCSO) has a policy that fully complies with this standard. The facility conducts a sexual abuse incident review at the conclusion of every sexual abuse investigation, including whether the allegation has not been substantiated, unless the allegation has been determined to be unfounded. Sexual abuse incident reviews will be conducted within 30 days of concluding the investigation. The sexual abuse incident review team will include upper-level management officials and allows for input from line supervisors, investigators, and medical or mental health staff. The review team shall consider whether the allegation or investigation indicates a need to change policy or practice to better prevent, detect or respond to sexual abuse, Consider 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 the facility, examine the area in the facility 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, prepare a report of its findings and any recommendations for improvement and submit such report to the facility head and PREA Coordinator. GCSO policy ensures the facility will implement the recommendations or will document the reason for not doing so. The facility shall conduct an annual review of all sexual abuse investigations and resulting incident reviews to assess and improve sexual abuse intervention, prevention and response efforts. If the facility has not had any reports of sexual abuse during the annual reporting period, then the facility shall prepare a negative report. The results and findings of the annual review shall be provided to the facility administrator, ICE Field Office Director and the agency PREA Coordinator. Staff interviews and copies of incident reviews verified compliance with this standard.

Standard 115.87 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office (GCSO) has a policy that fully complies with this standard. The agency collects accurate, uniform data for every allegation of sexual abuse using a standardized instrument and set of definitions. The standardized instrument includes, at a minimum, the data necessary to answer all questions from the most recent version of the Survey of Sexual Violence (SSV) conducted by the Department of Justice. The agency aggregates the incident-based data at least annually. The agency maintains reviews and collects data as needed from all available incident-based documents, including reports, investigation files, and sexual abuse incident reviews. Upon request, the agency will provide all such data from the previous calendar year to the Department of Justice no later than June 30. The GCSO provided a copy of their most recent Immigration and Customs Enforcement Sexual Abuse and Assault Prevention and Intervention Incident Log and their most recent Survey of Sexual Victimization summary that was submitted to the Department of Justice.

Standard 115.88 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office (GCSO) has a policy that fully complies with this standard. The agency reviews data collected and aggregated pursuant to 115.87 in order to assess and improve the effectiveness of its sexual abuse prevention, detection, response policies, and training, including: identifying problem areas, taking corrective action in an ongoing basis, preparing an annual report of its findings from its data review and any corrective actions. The annual report will include a comparison of the current year's data and corrective actions with those from prior years. The annual report will provide an assessment of the agency's progress in addressing sexual abuse. The agency will make its annual report readily available to the public at least annually through its website. The annual reports are approved by the agency head. When the agency redacts material from an annual report for publication, the redactions are limited to specific materials where publication would present a clear and specific threat to the safety and security of the facility. The agency will indicate the nature of the redaction. The GCSO provided a copy of their 2015 PREA Data Annual Review and their most recent report is posted on the GCSO website.

Standard 115.89 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 discussion, including the evidence relied upon in making the compliance or non-compliance determination, the auditor's analysis and reasoning, and the auditor's conclusions. This discussion must also include corrective action recommendations where the facility does not meet standard. These recommendations must be included in the Final Report, accompanied by information on specific corrective actions taken by the facility.

The Glades County Sheriff's Office (GCSO) has a policy that fully complies with this standard. The agency ensures that the incident-based and aggregated data are securely retained. Aggregated sexual abuse data from facilities under its direct control and private facilities with which it contracts be made readily available to the public at least annually through its website. Before making aggregated sexual abuse data publicly available, the agency removes all personal identifiers. The agency maintains sexual abuse data collected pursuant to 115.87 for at least 10 years after the date of initial collection, unless federal, state, or local law requires otherwise. This information is currently available on the GCSO website.

AUDITOR CERTIFICATION

I certify that:

- The contents of this report are accurate to the best of my knowledge.
- No conflict of interest exists with respect to my ability to conduct an audit of the agency under review, and
- I have not included in the final report any personally identifiable information (PII) about any inmate or staff member, except where the names of administrative personnel are specifically requested in the report template.

Shaun Klucznik

[Click here to enter text.](#)

Auditor Signature

Date