



American Young Leader Exchange Sexual Harassment and Abuse Prevention Policy

The American Young Leader Exchange (“AYLX”) prohibits sexual abuse or sexual harassment of any student (“Student”) within the program. No employees, contractors, volunteers, family members nor host family members, no matter their title or position, will be permitted to commit or allow sexual abuse or sexual harassment in violation of this Sexual Harassment and Abuse Prevention Policy (“Policy”). Any violation of this Policy will result in termination of the offending individual’s relationship with AYLX, and criminal prosecution may ensue.

Identifying Sexual Abuse

For the purposes of this Policy, sexual abuse is defined as inappropriate sexual contact or interaction with a Student, whether initiated or received, by any individual functioning as a caregiver or otherwise exercising responsibility, for any aspect of the Student’s care. Sexual abuse includes sexual assault, exploitation, molestation, or injury. It does not include sexual harassment, which is addressed below.

Signs of Potential Sexual Abuse

There are a number of “red flags” that suggest someone is being sexually abused. They take the form of physical or behavioral evidence.

Physical evidence of sexual abuse includes, but is not limited to:

- Sexually transmitted diseases;
- Difficulty walking or moving normally;
- Stained, bloody or torn undergarments;
- Genital pain or itching; and
- Physical injuries involving the external genitalia.

Behavioral signals suggestive of sexual abuse include, but are not limited to:

- Fear or reluctance about being left in the care of a particular person;
- An aversion to being touched;
- Wearing excessive clothing, especially nightclothes;
- Discomfort or apprehension when sex is referred to or discussed; and
- Nightmares or fear of night and/or darkness.

Identifying Sexual Harassment

Examples of prohibited behavior that could be defined as sexual harassment include:

- unwelcome sexual advances;
- requests for sexual favors;
- obscene gestures;
- displaying sexually graphic magazines, photos, calendars, or posters;
- sending sexually explicit emails or text messages;
- other verbal or physical conduct of a sexual nature, such as uninvited touching of a sexual nature or sexually related comments;
- sexual joking, vulgar or offensive conversation or jokes;
- commenting about a Student's or an AYLX community member's physical appearance;
- conversation about your own or someone else's sex life; and
- teasing or other conduct directed toward a person because of his or her gender which is perceived to create an unprofessional and hostile environment.

Mandatory Reporting Procedure

To ensure enforcement of, and compliance with, this Policy, we have adopted mandatory reporting procedures for the student, fellow students, employees, contractors, volunteers, family members, and host family members to follow if they suspect, witness, or otherwise learn of any

potential instance of sexual abuse or sexual harassment of a Student under the care or supervision a host family.

Anyone subject to this Policy who suspects, witnesses, or otherwise learns of any potential instance of sexual abuse or sexual harassment must immediately report it to the appropriate party:

- Host families must report to their Regional Coordinator.
- The Regional Coordinator must report to the Operations Manager. The Operations Manager must report to the AYLX Human Resource Department and Executive Director.
- The AYLX Regional Coordinator must report harassment or abuse to the Student's education provider and law enforcement as required by state law. Details can be found on the U.S. Department of Health & Human Services Child Welfare Information Gateway at <https://www.childwelfare.gov/topics/systemwide/laws-policies/statutes/manda/>. If the Student is 18 years or older, then the AYLX Regional Coordinator must assist the Student with police contact if requested and/or deemed necessary.

If you are unable, for any reason, to report a Policy violation to the appropriate individual, or if you have not received a satisfactory response within three (3) days after reporting any incident of what you perceive to be sexual abuse or sexual harassment or if the person toward whom the complaint is directed is one of the individuals indicated above, you should contact any higher-level manager within AYLX. Urgent matters shall be reported to local authorities and then reported directly to the AYLX Human Resources Department. These reporting procedures do not change or supplant an individual's existing reporting requirements under state or federal law.

If the alleged victim is legally an adult, then the matter will be reported to the local or state Adult Protective Services (APS) Agency. If the alleged victim is a minor, then the matter will be reported to the local or state Child Abuse Agency. Further steps will be taken to promptly notify family members of the alleged victim, as appropriate.

AYLX will also take appropriate steps to report the alleged sexual abuse or sexual harassment incident to its insurance company and make all further notifications deemed reasonably necessary to protect the alleged victim and AYLX.

Investigation & Follow Up

We take all allegations of sexual harassment or abuse extremely seriously. Every report will be investigated as per the AYLX Critical Incident Policy and corrective action will be taken where appropriate. All complaints will be kept confidential to the extent possible, but confidentiality cannot be guaranteed.

Once the allegation is reported, we will promptly, thoroughly, and impartially conduct an investigation to determine whether there is a reasonable basis to believe that sexual harassment or abuse has been committed. Our investigation may be undertaken by either an internal team or we may hire an independent third party. We will cooperate fully with any investigation conducted by law enforcement or regulatory agencies and we may refer the complaint and the result of our investigation to those agencies.

If the alleged perpetrator is a member of the host family, the Student will be immediately removed from the home and placed with another host family or alternate housing as required. AYLX will take all reasonable measures to prevent the alleged perpetrator from engaging in verbal or physical contact with the Student.

If the alleged perpetrator is an AYLX staff member, we reserve the right to place the staff member on an involuntary leave of absence or otherwise re-assign that person to responsibilities that do not involve personal contact with the alleged victim or other Students, during the course of an investigation.

If the investigation substantiates the allegation, the perpetrator's relationship with AYLX will be terminated.

We will arrange medical attention and counseling services as required, monitor the need for counseling, and maintain contact with those who may need ongoing support.

To the fullest extent possible, but consistent with our need to complete a thorough investigation and our legal obligation to report suspected sexual harassment or abuse to appropriate authorities, we will endeavor to keep the identities of the alleged victims and investigation subject confidential.

Retaliation Prohibited

We prohibit any retaliation against anyone, including employees, contractors, volunteers, family members, host family members, students, or other individuals associated with AYLX, who in good faith reports a potential violation of this Policy or who participates in any related investigation.

Anyone who takes any action to retaliate against an individual who has made a good-faith report of a potential violation of this Policy or who has participated in a related investigation will be subject to discipline, up to and including termination of the individual's relationship with AYLX. Intentionally false or malicious accusations of sexual abuse or sexual harassment, or intentionally providing false information in a related investigation is also prohibited and will subject the offending individual to discipline, up to and including termination of the individual's relationship with AYLX.