

POLICY AND PROCEDURE

REACH for Tomorrow

RRRights - 115 Freedom from Financial or Other Exploitation and Humiliation

TITLE: Freedom from Financial or Other Exploitation and Humiliation

EFFECTIVE DATE: 8/1/2025

AUTHORIZED BY: Board of Trustees

Purpose

To affirm and protect the inherent dignity, rights, and well-being of all clients by ensuring that they are free from any form of exploitation, abuse, neglect, or humiliation in the course of receiving services. This policy supports the organization's commitment to ethical conduct, trauma-informed care, and compliance with CARF standards on client rights and safety.

Scope

This policy applies to all employees, contractors, interns, volunteers, and any individual representing the organization who interacts with clients in any capacity. It also applies to organizational activities, both on-site and virtual, that involve client participation or information.

Policy Statement

The organization strictly prohibits any behavior, action, or practice that exploits or humiliates clients in any form. Clients have the right to receive services in an environment free from:

Financial exploitation – including but not limited to borrowing money from clients, accepting gifts or gratuities beyond nominal value, coercing or influencing clients to make financial decisions, or misusing client funds or property.

Other exploitation – including sexual, emotional, psychological, social, or professional exploitation for personal gain or gratification.

Humiliation or degradation – including verbal, nonverbal, or written communication that shames, threatens, intimidates, or demeans clients.

All staff are expected to treat clients with respect, courtesy, and cultural sensitivity, and to uphold professional boundaries at all times. Any form of retaliation against a client for asserting their rights or filing a grievance is strictly prohibited.

Procedures

Education and Training

All staff receive orientation and annual training on client rights, boundaries, professional ethics, and procedures for preventing and reporting exploitation or humiliation.

Supervisors reinforce these standards in ongoing supervision and performance evaluations.

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Prevention

Staff must maintain professional boundaries and avoid dual relationships that may create conflicts of interest or power imbalances.

Staff are prohibited from entering into financial, business, or personal arrangements with clients outside the scope of their professional role.

Gifts of more than nominal value (e.g., over \$10) must be reported to and approved by a supervisor.

Reporting

Any staff member, volunteer, or client who suspects or witnesses exploitation, humiliation, or abuse must report it immediately to their supervisor, the Compliance Officer, or through the organization's confidential incident reporting process.

Reports may be made verbally or in writing and will be documented promptly using the organization's Incident Report Form.

Investigation and Response

The Compliance Officer or designated investigator will initiate an inquiry within 24 hours of receiving a report.

All investigations will be conducted confidentially, with respect for all parties involved.

Substantiated violations will result in corrective action, which may include retraining, disciplinary measures, termination, and/or reporting to licensing or legal authorities as required.

Client Support

Clients affected by exploitation or humiliation will be offered support services, including counseling, advocacy, and assistance with filing formal grievances or external complaints.

The organization ensures that no client experiences retaliation for reporting misconduct.

Documentation

All reports, investigations, and corrective actions are documented and securely maintained in accordance with confidentiality and record retention policies.

Data from these reports are reviewed as part of the organization's Quality Improvement and Risk Management programs.

Responsibilities

All Staff: Maintain awareness of and comply with this policy; report concerns immediately.

Supervisors/Managers: Ensure staff adherence, monitor for warning signs, and address violations promptly.

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Compliance Officer / Privacy Officer: Receive, investigate, and track incidents; coordinate corrective action and compliance reporting.

Executive Leadership: Provide oversight, resources, and ensure policy enforcement and staff accountability.

References

CARF Behavioral Health Standards, Section 1.I – Rights of Persons Served

CARF 2023–2024 Behavioral Health Manual, Client Rights and Confidentiality standards

HIPAA Privacy Rule, 45 CFR 164.530

State laws governing client rights, protection from abuse and exploitation