



Procedure # 7: Customer Code of Conduct Enforcement & Violation Intervention Guidance

Governed by: Administration

Refer to policy: #7 Code of Conduct

Effective: February 1, 2013

Last Updated: October 16, 2015

Purpose: To provide the agency with a tool to:

- Proactively encourage and enforce desired behavior expectations
- Most positively enforce and intervene during a violation
- Respond to and address repeated code violations
- Respond to and address extreme code violations

Procedure:

Proactive approaches to encourage Customer Code of Conduct

They are in no particular order and should be relied upon to individualize your response in accordance with various unique situations.

- Encourage adherence to the code
 - Be a role model
 - Be sure the sign is visible throughout the building especially high traffic customer areas.
- Remind customer of the code as discreetly as possible when undesirable behavior occurs.
 - If necessary invite customer into the most confidential appropriate space as possible to further encourage the ceasing of the undesirable behavior.
 - When possible and/or appropriate try to shift the customers focus to their need and serve if redirection was successful in ceasing the undesirable behavior.
- Contact immediate supervisor, designee or Department Director for support and assistance when unsure or concerned.

Code of Conduct Enforcement

When all else fails and a customer is completely inappropriate and unable or unwilling to stop their undesirable behavior



- Seek an appropriate team member for support and assistance, ideally your immediate supervisor, designee or Department Director.
- Customers should be clearly told when they are in violation of the Code of Conduct
- When a customer is escalated and in violation of the Code of Conduct they either need to agree to relocate to a private space to talk/de-escalate or be instructed to leave the premises.
- If customer is unwilling or unable to de-escalate ask them to leave and return when willing and able to adhere to behavior expectations.
- When on the phone a customer violating the Code of Conduct should be strongly encouraged to call back when they are calm and prepared to speak in a way someone can hear and help.
- Notify direct supervisor and complete incident report immediately upon evacuation /disconnect of customer.
- When a customer has been asked to leave they must agree and participate in a follow-up one-on-one session with the Program Manager or designee before they are eligible to re-engage in program opportunities.
- During one-on-one sessions, Manager or designee will review and explain the purpose of the Code of Conduct with the customer and explain that further violations could result in suspension from program activities.

Responding to and addressing repeated violations of the Code of Conduct

- Moving forward any repeated violations of the Code of Conduct may result in suspension from the building/program activities for a specified period of time, as determined by program service regularity, up to days depending upon the severity of the violation, to be determined by the Early Childhood Services Director or the Operations Department. Customer must once again agree and participate in a follow-up one-on-one session with the Program Manager or designee before they are eligible to re-engage in program opportunities.
- If a customer violates the Code of Conduct more than three times CEO reserves the right to exclude the customer from services until further notice. Program Managers will seek guidance from their Department supervisor if or when this should occur.



- Department supervisors will seek guidance from the Chief Compliance & QA Officer who will conduct an investigation and engage an incident review committee (IRC) meeting upon request or in accordance with incident “RED FLAG” criteria (See IAC policy for details) for further analysis.
- Next steps will reflect IRC agreed upon action steps and timelines.

Responding to and addressing extreme violations of the Code of Conduct

*Extreme violations are as follows and constitute **immediate suspension** for further investigation:*

- Threats or Physical violence against any persons on CEO premises
- Evidence to support criminal activity on CEO premises or in the company of CEO staff
 - Illegal drug activity (sale or consumption)
 - Theft
 - Endangering the welfare of others
- Customer should be immediately notified they are suspended from all CEO services/programs, pending investigation until further notice.
- If person is removed with police intervention, police should notify customer upon removal from the building and program should follow-up notifying customer in writing via the mail when possible.
- Department will notify Chief Compliance & QA Officer who will conduct an investigation and engage an IRC meeting within 48 hours of violator suspension.
- Next steps will reflect IRC agreed upon action steps and timelines.
- Customer may be terminated from services/agency for a specified period of time associated with severity of violation.
- Any customer terminated from services will need to meet with the Chief Compliance or Chief Administrative Officer to re-apply for re-engagement opportunities no less than 6 months after the incident.
- The President or designee has final authority in approving a termination of a customer from a program, service and/or the agency.
- Program is responsible to officially notify customer of termination and opportunity to re-apply for services, in the future if applicable, in writing via the mail.