

The Neighborhood Center, Inc.

Standards of Conduct

Purpose

The Neighborhood Center promotes integrity, compassion, and respect to diverse populations while empowering individuals and ensuring safety.

The Neighborhood Center is committed to conducting its business ethically and in conformance with all Federal and State laws, regulations, interpretations thereof, and its Standards of Conduct. To support this commitment, The Neighborhood Center will maintain and update as appropriate written Standards of Conduct to provide guidance on employee and organizational responsibilities related to compliance. The Standards of Conduct document serves as a foundational document that describes the Organization's fundamental principles, values, and commitment to conduct its business in an ethical manner.

For purposes of this Policy, the term "Affected Individuals" includes all employees, contractors, subcontractors, vendors, interns and volunteers providing services on behalf of The Neighborhood Center.

Policy

It is the Policy of the Neighborhood Center to develop, maintain, and update as appropriate written Standards of Conduct to provide Affected Individuals with guidance on requirements for conduct related to employment, contract, association, or appointment by The Neighborhood Center.

Procedure

1. Employee Responsibility

The first obligation of employees is to the Agency, consumers, and the community. Employees must recognize that this means both continuous quality of service and flexibility within the accepted work schedule as needed. Employees are obligated to make the fullest use of their professional skill and knowledge to further the achievement of the Agency's mission. Employees should make clear distinctions between statements made and actions engaged in as a private individual and as a representative of The Neighborhood Center, Inc. Employees shall accurately represent the official and authorized positions of The Neighborhood Center, Inc. when speaking on behalf of the Agency.

2. Introductory Period

New employees are subject to a four (4) month introductory period. This period of time will be for learning the new position and getting acquainted with one's supervisor and The Neighborhood Center, Inc. During this period, the Agency will evaluate the individual's suitability for employment in the position of hire. Completion of the Introductory Period does not guarantee continued employment, as employment is always at-will.

3. Performance Appraisals

Performance management is an on-going process designed to assist employees in enhancing their performance and thereby improving the quality of service at The Neighborhood Center, Inc. Regular evaluation improves collaboration between the supervisor and employee and reinforces mutual awareness with respect to performance expectations, job requirements, priorities, and future goals.

Communication between employees and their supervisor is very important. Discussions regarding performance expectations and job requirements may be formal and informal. Employees should initiate

conversations with their supervisor if they feel additional ongoing feedback is needed. Generally, new employees will have a formal performance appraisal conducted at the end of four (4) months and twelve months of employment. Thereafter, performance appraisals will be conducted annually on an anniversary-based system. The performance appraisal shall be reviewed with the employee. A copy of the performance appraisal shall be provided to the employee and a copy shall be placed in the employee's personnel record. An employee who accepts a different position within the Agency, for the purpose of the performance appraisal process, shall be considered a new employee.

The Agency has policies and procedures, and rules of conduct which apply to all employees. These are necessary for safe, efficient operations, to ensure compliance with the law, and to protect the well-being and rights of all employees and to support our values. Unacceptable behavior will result in an employee being subject to disciplinary action, up to and including termination.

4. Professional Development

Subject to prior approval by the employee's immediate supervisor and the Executive Director, employees shall be allowed paid time off to attend conferences, seminars, professional meetings, and other educational opportunities. Such conferences, seminars, professional meetings, and other educational opportunities shall be directly related to the employee's profession or job responsibilities. Such approval shall be based on the determination by the employee's immediate supervisor and Executive Director: the activity to be undertaken will directly benefit the Agency and the absence will not interfere with the provision of services. As per policy, expenses for attendance at conferences, seminars and related training and all training requests must be submitted using the Agency procedure. All expenses must be approved by the designated personnel prior to registration.

5. Training

Education and training opportunities are designed to benefit the employee and the Agency; as such it is the Agency's expectation that the employee and the Agency will share the responsibility. Employees will be provided with, or provide the means for, the mandatory training necessary to maintain program quality and facilitate compliance with regulatory guidelines. Employees are encouraged to participate in professional skill development training and continuing education opportunities to enhance the services provided to our clients and the talents of our employees. Employees may be required to participate in In-Service Training. Training may be held at a time that requires a change in the employee's work schedule.

6. Attendance & Absenteeism

The Neighborhood Center, Inc. expects employees to report to work on a reliable and punctual basis. Regular attendance and punctuality are essential to maintaining a productive work environment.

Scheduled Absences – Requests for scheduled time off should be made in advance and are subject to approval by your immediate supervisor. Leaves of absence protected by law will be approved in accordance with applicable law.

Call-In Procedure for Unscheduled Absences – If you cannot avoid being late to work or are unable to work as scheduled, you must contact your immediate supervisor as soon as possible before your scheduled start time, and no less than one hour, except where illness or emergency prevent such, in which case you must notify HR as soon as possible. If you are absent from work for more than one workday, you must follow this call-in procedure each day or provide advance notice for your absence unless a physician's note has been provided to the Agency of your anticipated return to work date.

Leaving Early – If you need to leave work before the scheduled end of your workday, the early departure must be approved by your immediate supervisor before your departure.

Unscheduled Absence of Three Consecutive Days or More – If you are absent due to illness for three (3) consecutive days, you may need to provide a physician’s note covering the days out and indicating whether you can return to work with or without work restrictions. Employees who do not report to work after being cleared by their physician to do so may be terminated for job abandonment. An employee who has frequent or repeated absences may be required, at the Agency’s discretion, to provide satisfactory medical documentation substantiating that the employee is unable to work, even if the employee has been absent for less than three (3) consecutive days. Excessive Absenteeism or Tardiness – Unscheduled, unauthorized, or excessive absences, including late arrivals and/or early departures, may result in corrective action, up to and including termination of employment. The Agency provides adequate paid time off to cover absences for personal reasons or due to illness or injury. Once you have exhausted your paid time off, any further absences that are not protected by law will be considered excessive and may result in corrective action, if applicable. Other continuing patterns of absences, including early departures and tardiness, may also constitute excessive absenteeism regardless of the exact number of days or whether you have accrued paid time off available to cover the absence.

Accommodations of Individuals with Disabilities and Pregnancy-Related Conditions - Individuals with disabilities or pregnancy-related conditions may be granted reasonable accommodation in complying with this policy if undue hardship does not result to the Agency’s operations. *Please refer to the Accommodation of Individuals with Disabilities and Pregnancy-Related Conditions policy for the procedure for requesting reasonable accommodations.*

7. Dress Code

The Neighborhood Center, Inc. provides a casual yet professional work environment for its employees. Even though the dress code is casual, it is important to project a professional image of the Agency. All employees are expected to dress in a manner consistent with good hygiene, safety, neat, clean, and appropriate for your expected workday.

Casual does not include:

- Ripped jeans or jeans with holes;
- Low cut or cropped tops;
- Leggings or yoga pants made of thin, sheer, or transparent fabric;
- Flip-flops;
- T-shirts with offensive graphics or language;
- Gym clothes;
- Strapless, halter, or spaghetti strap dresses or tops;
- Clothes that are too revealing, too tight, or too short.

8. Confidentiality

As a condition of employment, The Neighborhood Center, Inc. employees are required to protect the confidentiality of trade secrets, proprietary information, and confidential commercially sensitive information (i.e., financial or sales records/reports, marketing or business strategies/plans, product development, customer lists, patents, trademarks, etc.) related to the Agency. Access to this information should be limited to a “need to know” basis and should not be used for personal benefit, disclosed, or released without prior authorization from the Agency. If any employee has information that leads them to suspect employees or competitors are obtaining such information, they are required to inform the Executive Director.

Technology activities are ultimately related to highly sensitive client information. All information regarding clients must be handled with the highest regard for confidentiality. Client information may only be accessed, used, and disclosed in accordance with federal and state confidentiality laws, and only to the extent necessary for the performance of an employee’s assigned duties. The Agency prohibits the use of Agency-issued or personal handheld devices to transmit Protected Health Information (PHI) or Personal

Identifying Information (PII). PHI is any individually identifiable information contained in an electronic or paper medical record. PHI includes a client's mental or physical health condition as well as a client's billing and demographic information. PII is any information that can be used to identify, contact, or locate an individual, either alone or combined with other easily accessible sources. All PHI/PII must be used, transmitted, and maintained in a secure fashion in accordance with policy.

All employees are required to report any suspected or actual security incidents, breach or compromise of protected data or information security to the Executive Director.

Compliance with these conditions and terms are a condition of your employment. Violations will result in disciplinary action, up to and including termination of employment.

9. Conflict of Interest

The Neighborhood Center, Inc. including its officers and employees, have a clear obligation and commitment to conduct all affairs of the Agency in accordance with the highest standards of integrity and ethics, and in compliance with applicable federal and state laws. All employees of the Agency must avoid conflicts of interest or any appearance of conflicts of interest between their own personal interests and the interests of the Agency and those we serve. All employees are obligated to avoid any situation in which an actual or potential conflict of interest could arise. Any situation or activity involving a potential conflict of interest must be disclosed in advance in accordance with policy and procedures.

10. Use of Equipment

All Agency property – including desks, storage areas, work areas, file cabinets, computer systems, mobile devices, telephones, fax machines, copy machines and any other property – must be used properly and maintained in good working order. Employees who lose, misappropriate, or misuse this property may be found to be in violation of this policy. The Agency reserves the right, at all times and without prior notice, to inspect and search any and all of its property to determine whether any policy has been violated, or when necessary for purposes of promoting safety in the workplace or compliance with applicable law. The Agency may also require employees while on the job or on Agency premises to agree to reasonable inspection of their personal property and/or persons. Refusal to cooperate in such a search may result in discipline, up to and including termination of employment.

11. Use of Technology

The Neighborhood Center, Inc.'s Information Technology ("IT") resources include its computer systems, telecommunications equipment, fax machines, voicemail, electronic mail, Internet access, removable media, mobile devices, servers, storage devices and other electronic equipment or media. IT resources are provided to employees in order to conduct business on behalf of The Neighborhood Center, Inc. All IT resources and the data and communications created and/or stored thereon are the property of The Neighborhood Center, Inc. As a result, they are to be used for job-related purposes only. Equipment used by employees may be monitored, and employees should not expect privacy when using this equipment. Furthermore, any and all telephone conversations or transmissions, electronic mail or transmissions, or internet access or usage by an employee by any electronic device or system, including but not limited to the use of a computer, telephone, wire, radio or electromagnetic, photo electronic, or photo-optical systems may be subject to monitoring at any and all times and by any lawful means. This may cover personal devices being used while conducting business on behalf of The Neighborhood Center, Inc., and whenever utilizing The Neighborhood Center, Inc. servers, internet systems, or the like.

Use of The Neighborhood Center, Inc.'s IT resources constitutes consent by the user to all of the terms and conditions of this policy, as well consent to The Neighborhood Center, Inc. accessing, intercepting, and monitoring and disclosing use of The Neighborhood Center, Inc.'s IT Resources in accordance with this policy. The Neighborhood Center, Inc. prohibits employees from accessing or attempting to access or use libraries, files, data, program, and directories unrelated to their work duties unless authorized by management to do so. Unauthorized access, review, duplication, dissemination, removal, installation, damage or alteration of

files, passwords, computer systems or programs or other unauthorized access of The Neighborhood Center, Inc.'s IT resources and the information they contain, or improper use of information obtained by authorized or unauthorized means, is prohibited. Any form of tampering, including snooping or hacking to gain access to Agency property is a serious violation of this policy, carries severe consequences and may be reported to the local authorities.

Employee use of The Neighborhood Center, Inc.'s IT resources is for job-related or approved activities. Inappropriate use includes, but is not limited to:

- Use of Agency computers to send or receive messages, pictures, or computer files which are illegal, pornographic, discriminatory, harassing, or retaliatory. EEO and Prohibited Discrimination, Harassment (Sexual & Other Forms) and Retaliation policies apply to the Agency's IT resources. If you receive such material, notify the Executive Director.
- Loading software that is not approved in advance by the Health Information Technology Director.
- Making illegal copies of licensed software.
- Duplicating, copying, or giving software to any outsiders including clients, contractors, customers, and others.
- Using software which provides unauthorized access to Agency computers or would disrupt The Neighborhood Center, Inc. equipment in any way.
- Using IT resources for personal or non- Agency related use, unless authorized in advance by the Health Information Technology Director.
- Downloading any information that is not authorized for Agency use.
- Use that violates any other Agency policy or procedure.

Software programs purchased and provided by The Neighborhood Center, Inc. are to be used only for creating, researching, and processing materials for Agency use. All software acquired for or on behalf of The Neighborhood Center, Inc. or developed by The Neighborhood Center, Inc. or contractors on behalf of The Neighborhood Center, Inc., is and will be deemed The Neighborhood Center, Inc.'s property. It is The Neighborhood Center, Inc.'s policy, and all employees are required to respect all computer software rights and adhere to the terms of all software licenses to which The Neighborhood Center, Inc. is a party.

12. Work Ownership

Employees generate work products, intellectual property, during their employment with the Agency. Although employees generate work products, the employee does not acquire any rights in or to this property. All employees waive any and all right, claim or interest to such work product, including without limitation documents, designs, training material, structures, grants, grant awards, reports, and other materials generated by each employee during employment.

13. Social Media and Networking

The Neighborhood Center, Inc. recognizes the importance and value of participating in social media to promote its products and services and is committed to doing so the right way. In order to ensure appropriate use of social media, both when participating personally, as well as when acting on behalf of the Agency, it is

important to adhere to the following guidelines. Nothing in this policy is intended to interfere with employees' rights under the National Labor Relations Act or other applicable law.

Business Use of Social Media – We respect the right of employees to use social media not only as a form of self-expression, but also as a means to build our brand. It is important to understand the implications of engaging in forms of social media that reference the Agency and recognize when the Agency might be held responsible for your online behavior. Should an employee discuss the Agency's products and/or services on a social networking site, they must disclose they are an Agency employee within the online posting.

Appropriate use of social media to build our brand includes:

- Announcing new products and services.
- Inviting friends to connect with the Agency on social media outlets.
- Contributing material for posting on the Agency's social media sites.

Inappropriate use of social media includes:

- Public discussions about the Agency's clients, suppliers, or vendors, whether confidential or not, outside Agency-authorized communications.
- Disclosure of confidential matters or any other proprietary and nonpublic information to which employees have access. Such information includes but is not limited to client information, trade secrets, financial information, and strategic business plans. Consult the Confidentiality policy for guidance regarding what constitutes confidential matters. You may also speak with the Executive Director for clarification.
- Disparaging comments about the Agency products or services, a competitor or a competitor's product or services.

"Inappropriate information, content or material" does not include postings or discussions regarding your or your co-workers' wages, benefits or other terms and conditions of employment protected by Section 7 of the National Labor Relations Act ("NLRA").

Personal Use of Social Media – Employees may use social media and networking sites during non-working time, provided such activities do not conflict with their role as an Agency employee. Employees must limit personal use of social media and networking sites to non-working time such as breaks or lunches.

Endorsements and Recommendations – Employees in a supervisory capacity must refrain from endorsing or recommending current or former employees regarding current or past performance on social networking sites. It is not recommended that employees who are not in a supervisory role endorse or recommend current or past employees on social networking sites, but employees who do so must state unequivocally that they are made as a personal reference and that they do not, in any way, represent the Agency or the position of the Agency.

14. Use of Handheld Devices

Disruptions during working time can lead to errors and delays. Therefore, we ask that personal use of cell phones and other handheld devices, text messaging, instant messaging, use of the Internet, use of applications or any other personal use during work hours only be made or received during lunch or break time. If you have a device that has a camera and/or audio/video recording capability, you are restricted from using those functions on Agency property or while engaged in business unless authorized by management or when they are used in a manner consistent with your right to engage in concerted activity under Section 7 of the National Labor Relations Act (NLRA).

The Neighborhood Center may issue an Agency-provided cell phone and/or plan to certain employees who have a legitimate business need and when approved by the Executive Director. Personal devices may be used for work purposes when approved by the Executive Director. Employees may not connect their personal device to the Agency network or to Agency equipment (computers, printers, etc.) without advance approval from the Executive Director. When employees connect their personal device to the Agency's network or using it for business, they expressly agree to authorize and permit the Agency to access the device and securely remove its data at any time deemed necessary, either during the employment relationship, or after. Employees also acknowledge and agree that if they do not make the device available within a certain period of time after demand, they authorize the Agency to remotely wipe the entire device and restore it to its factory settings in order to ensure that its data was securely removed from the device.

Employees are expected to protect personal devices used for work-related purposes from loss, damage, or theft.

The Agency will not be responsible for the loss or damage of personal applications or data resulting from the use of Agency applications or the wiping of Agency information. Employees must immediately notify management in the event their personal device is lost, stolen or damaged. If IT is unable to repair the device, the employee will be responsible for the cost of replacement.

15. Smoking, Tobacco, & Other Related Product Use

The use of tobacco or other smoking products is not permitted on The Neighborhood Center, Inc's premises. The use of tobacco on a client's premises must follow the client's policies. For the purposes of this policy, prohibited tobacco use includes smoking, chewing, vaping, electronic cigarette, other artificial tobacco alternative or marijuana or synthetic alternatives. Complaints from co-workers and/or clients about an employee's tobacco and other related products as described in this policy may result in disciplinary action, up to and including termination of employment. Designated areas depending upon the building. Employees are prohibited from smoking anything near any area where flammable or combustible materials, such as solvents, are used or stored. If an employee has a question, they should contact Human Resources.

16. Alcohol and Drug-Free Workplace

The Neighborhood Center, Inc. is committed to providing a safe and productive workplace. In keeping with this commitment, the following rules regarding alcohol and substance abuse have been established for all employees. The rules apply during working hours to all employees of the Agency while they are on Agency premises or Agency business and can extend outside the normal business hours if an employee is working. Violations of this policy are subject to disciplinary action up to and including termination of employment.

In an effort to minimize the effects of alcohol and drugs in the workplace, the Agency has adopted the following policy:

- Employees must obey state and federal laws on drug and alcohol usage.
- It is a violation of policy for employees to possess, sell, trade, or offer for sale drugs or otherwise engage in the use of drugs or alcohol during working hours, on Agency or client premises or while conducting Agency business. This also includes possession of any drug paraphernalia, including, but not limited to, any tools, equipment, supplies, or materials used, designed, or intended for the use of any drug. Employees will be subject to criminal, civil and disciplinary penalties if the employee violates the law in attempting to manufacture, distribute, sell, attempt to sell, possess, or purchase drugs while at the workplace or while performing in a work-related capacity. Such acts, even if engaged in off duty, may result in disciplinary action.

- Employees are prohibited from on-the-job use of, or impairment from drugs or alcohol. This includes the use, possession, or impairment from recreational marijuana during work hours, on the Agency's premises and while using Agency equipment or other property.
- Employees are prohibited from reporting to work or working when an employee uses any controlled substance, except when the use is pursuant to a doctor's orders and the doctor advises the employee the substance does not adversely affect their ability to perform the essential functions of the job duties safely.
- If an employee takes prescribed medication or ingests alcohol or other substances to an extent which could affect job performance, or jeopardize safety, or the safety of others, the employee must report this to the Executive Director before starting work.

As a condition of employment, an employee must abide by the terms of this policy and must notify the Executive Director or their designee of any arrest or violation of a drug statute as soon as practicable after such an incident, and no later than the beginning of the next workday.

If an employee wants rehabilitation or counseling for drug or alcohol abuse, the employee may ask the Executive Director. Depending on the employee's job, the employee may be temporarily transferred or placed on a leave of absence if there is a safety concern. A request for rehabilitation referral may not influence disciplinary action once the employee is under investigation for violation of this policy.

Where consistent with applicable state law, the Agency will not discipline an employee certified to use medical cannabis or to otherwise unlawfully discriminate against any employee certified by a doctor to use medical cannabis. Employees who are certified to use medical cannabis who require a reasonable accommodation may request one under the Accommodating Individuals with Disabilities & Pregnancy-Related Conditions policy. Please note, however, the use of controlled substances, including medical cannabis, is prohibited during work hours and disciplinary action may be taken against anyone who violates this policy.

Violation of any part of this policy, including any arrest or conviction related to this policy, may result in disciplinary action, up to and including termination of employment.

17. Solicitation and Distribution

Approaching fellow employees in the workplace regarding outside activities, organizations or causes, regardless of how worthwhile, important, or benevolent, can create unnecessary apprehension and pressures for fellow employees. Therefore, you should avoid soliciting another employee or promoting support for any cause or organization during your working time or the working time of the employee or employees at whom the activity is directed. Similarly, you should not distribute or circulate any written or printed material in work areas at any time, during your working time or during the working time of the employee or employees at whom the activity is directed. Under no circumstances will any non-employees be permitted on Agency property to solicit or distribute written material to employees for any purpose.

For the purposes of this policy, "working time" includes all time for which an employee is paid and/or is scheduled to be performing services for the Agency; it does not include meal periods, break periods or periods in which an employee is not, and is not scheduled to be, performing services or work for the Agency.

18. Other Prohibited Conduct

The Neighborhood Center, Inc. has established policies and practices, including those outlined in this handbook, to help guide employees' conduct and ensure the best possible work environment. The Agency expects employees to conduct themselves in a way that will protect the interests and safety of the Agency, its employees and the individuals and entities with which it does business.

In addition to violating any of the policies or procedures specifically mentioned in this handbook or otherwise established by the Agency, the following are examples of prohibited conduct:

- Falsification of employment records, employment information, or other records;
- Falsification of time records;
- Theft or damage to any business property or the property of any employee or client;
- Unauthorized use of equipment, time, materials, or facilities, including use of such property for personal gain;
- Possessing, distributing, selling, transferring, using or being under the influence of alcohol or illegal drugs in the workplace, during work hours, or while on business;
- Insubordination, including but not limited to failure or refusal to obey the reasonable and lawful orders or instructions of your supervisor, or the use of abusive or threatening language toward any member of management;
- Using uncivil, insulting, contemptuous, vicious, or malicious language toward or treating any employee, client, visitor, or vendor rudely or with indifference;
- Threatening, bullying, intimidating, provoking a fight, or fighting (physical or verbal) during working hours or on premises owned or occupied by the Agency;
- Failing to follow the call-in procedure;
- Failing to observe working schedules;
- Committing a fraudulent act or a breach of trust in any circumstances;
- Engaging in illegal or unethical behavior;
- Improper performance of job duties or failure to perform assigned duties (including required training) and responsibilities;
- Negligence or careless acts that endanger the life or safety of another person;
- Unauthorized expenditure of Agency funds or improper handling of expense accounts;
- Excessive personal calls or use of personal handheld devices for non-business-related matters;
- Unauthorized possession of dangerous or illegal firearms, weapons, or explosives on Agency property or while on duty; or
- Any other acts or conduct that is deemed unacceptable by the Agency.

The Agency has a progressive discipline policy, however, in some cases immediate termination may be appropriate depending on the facts. This statement of prohibited conduct does not alter or limit the policy of employment at will. Nothing in this policy is intended to limit your rights under the National Labor Relations Act (NLRA).

19. Professional Boundaries

The Agency is committed to protecting the safety and well-being of all stakeholders including clients and employees. All employees must maintain appropriate boundaries and demonstrate professional behavior regardless of whether a client agrees to, or initiates conduct that is inappropriate. To develop healthy and therapeutic relationships with clients, it is imperative employees gain awareness and sensitivity to behaviors, interactions and verbal and non-verbal cues that overtly or covertly have or might be perceived as being overly personal or having romantic and/ or sexual implications or create situations of favoritism.

This policy applies to all employees, interns, volunteers, contract providers, guests, and vendors.

Employees are expected to demonstrate professional conduct with clients and coworkers. Employees are expressly prohibited from engaging in sexual contact or encouraging sexual relationships with clients and/or client's families. This includes but is not limited to the following: using sexually explicit or suggestive

language, sharing sexually explicit material, sharing details of one's personal sexual experiences and/or making sexual gestures.

Employees are also prohibited from engaging in or establishing any type of relationships with clients and/or client's family members that might be perceived as showing favoritism or encouraging overfamiliarity beyond the scope of the client services and/or therapeutic relationship. This includes, but is not limited to, the following: bringing clients or client's family members to their homes, accepting friend requests (social media/networking sites) from clients or a client's family members, sharing personal information (home address or e-mail address, cell phone number) with clients or client's members, and offering personal loans, gifts, money, or property, renting a room to clients or client's family member, or babysitting without permission.

As the Agency is strongly committed to appropriate boundaries between employees and clients and client's family members, it is expected that the clients and the client's family members will maintain appropriate boundaries with employees as well. Therefore, employees must also be aware of clients or client's family member's behaviors (see above) that might overstep appropriate interpersonal boundaries and must take appropriate action to address the violation. The following actions should be taken:

1. Address the behavior with the client or client family member directly and ask that they stop the behavior;
2. Report the issue to your immediate supervisor;
3. Document the issue and the way in which it was addressed
4. Complete a behavior report or critical report as appropriate; and
5. Ask co-workers to assess for future occurrences of the behavior.

If the behavior continues, the employee must take additional action as appropriate. Such action could include one or more of the following:

1. Informing the clinician / administrator / supervisor
2. Reviewing and revising the treatment plan.
3. Conducting a functional behavioral assessment.
4. Developing a behavior improvement plan.

Employees that become aware of violations of this policy are required to report them to their supervisor immediately. In addition, employees are mandated to report actual or suspected incidents of sexual conduct between employees and clients to the Vulnerable Persons Central Register (VPCR). Violations of this policy can result in discipline, up to and including termination and could result in criminal prosecution.

Sanction Statement:

Non-compliance with this policy may result in disciplinary action, up to and including termination.

Compliance Statement

As part of its ongoing auditing and monitoring process in its Compliance Program, The Neighborhood Center will review this policy based on changes in the law or regulations, as The Neighborhood Center's practices change, and, at minimum, on an annual basis. Additionally, this policy will be tested for effectiveness on an annual basis or more frequently as identified in accordance with The Neighborhood Center's Compliance Program. Testing will include but is not limited to ensuring that the policy is appropriately followed; the policy is effective; the policy has been disseminated to all Affected Individuals, as well as notified of any updates or changes,

Tracking of the criteria above and results of this testing will be completed by the Compliance Officer, or designee. Additionally, results will be reported to the Compliance Committee and Governing Body on a regular basis.

Record Retention Statement:

The Neighborhood Center will retain this policy and all subsequent revisions, and any related documentation will be retained for a period of, at minimum, six years.

***Failure to comply with policies and procedures adopted by the Neighborhood Center may result in disciplinary action including and up to possible termination based on severity.**