



CONNECTICUT DEPARTMENT OF LABOR
CUSTOMER CONDUCT POLICY

Effective Date: February 7, 2018

To: All DOL Staff

From: Scott D. Jackson, Commissioner

Subject: Customer Conduct

To assure the safety of the public, partners and state employees, *Executive Order 16* and the *State of Connecticut Violence in the Workplace Prevention Policy* establish a statewide zero tolerance policy for workplace violence, which prohibit all conduct, either verbal or physical, that is abusive, threatening, intimidating or demeaning. The Department of Labor (DOL) fully supports this policy and recognizes the right of its employees to work in a safe and secure environment that is characterized by respect and professionalism.

An essential component of our Agency's mission is to provide in-person services to customers within the American Job Centers (AJCs). Again, to assure safety within each AJC, any customer that exhibits behavior that is abusive or disruptive and, in some cases, may even threaten the safety of the AJC, is subject to sanctions which may include suspension from accessing services, either on a temporary or long-term basis.

Customer violations of AJC rules and/or the State of Connecticut Violence in the Workplace Prevention Policy shall be reported by DOL employees through the submission of a **Workplace Incident Report** in BMC Footprints on the DOL Intranet homepage. The Workplace Incident Report is completed by the employee, supervisor, or manager. The report serves as a record that an incident occurred. All situations require that the **Workplace Incident Report** be filed within twenty-four (24) hours or next business day.

The report will be reviewed by DOL's Threat Assessment Team, which consists of the Directors of Enterprise Risk Management, Human Resources, and Facilities. This team will guide the investigation and intervention process as it deems appropriate with input from the reporting AJC. This may entail planning a response and mitigating further damage, coordinating responses with law enforcement and the community, and ensuring that any decision to deny services is both in accordance with state and federal laws and regulations and reflects consistency.

In order to promote coordination among all AJCs and partner agencies, the affected DOL AJC Director will communicate via email all issues of customer misconduct and any decisions to warn or suspend customers with AJCs and partner agencies across the state. AJC Directors must also notify all AJCs when partner agencies have done the same regarding their customers.



**CONNECTICUT DEPARTMENT OF LABOR
CUSTOMER CONDUCT PROCEDURE**

February 7, 2018

This policy addresses how the Department of Labor (DOL) responds to circumstances in which customers availing themselves of services provided at the American Job Centers (AJCs) engage in either non-violent or violent behavior in violation of Job Center rules.

NON-VIOLENT BEHAVIOR

All AJCs should insure that customers are notified of Job Center rules, including prohibited conduct. AJC staff shall explain the rules and prohibited conduct to customers during the orientation process. AJCs shall also post a copy of rules and prohibited conduct in a conspicuous location.

Response to non-violent behavior

Violations of Job Center rules may also result in recommendations for short-term or long-term denial of services. There is an expectation that staff will respond to violations of Job Center rules in a progressive manner. Generally, this means:

- **First Level:**
 - **Verbal warning** – for those customers that initially violate Job Center rules such as using the computer for personal reasons, etc., but typically respond to staff's direction to cease conduct. A staff member shall speak to the offending customer and inform him/her of the specific policy violation and the potential for formal sanctioning should the offensive activity continue. Minor violations such as personal use of computer, talking on cell phone, etc. which the customer immediately corrects when asked, if necessary, should be noted by staff in writing for internal files, but do not need to be followed up by a Workplace Incident Report. Staff must submit a **Workplace Incident Report** if the violation is more egregious, such as viewing pornography, etc., or the customer repeatedly violates Job Center rules. In these situations it may also be appropriate to direct the customer to leave the Job Center.
- **Second Level:**
 - **Written warning** – for customers that have been given verbal warning(s) but either continue to violate Job Center rules or refuse to change their conduct when directed to by staff may be directed to leave the Job Center. Staff must submit a **Workplace Incident Report** to be reviewed by the Threat Assessment Team and the Office of Program Policy, who will then draft the written warning. Written warnings will be signed by the AJC Director and mailed to the customer by certified and regular mail, as well as email if available.

- **Third Level:**
 - **Short-term or long-term suspension** – for customers who have been given verbal and written warning(s) but continue to violate Job Center rules it is appropriate to direct the customer to leave the AJC. Staff must submit a **Workplace Incident Report** to be reviewed by the Threat Assessment Team and the Office of Program Policy, who will then draft the suspension letter. Suspension letters will be signed by the Director of Labor Operations and mailed to the customer by certified and regular mail, as well as email if available. All DOL and partner staff in the AJCs shall be notified when a customer is suspended from in-person services. When a customer is suspended from in-person services, DOL and partner staff shall attempt to continue to provide services via a designated point person by e-mail, online, phone or fax to the greatest extent possible. Prior to being able to access in-person services, the suspended customer must meet with the AJC Director to discuss the expected Job Center standards of conduct and rules, as well as sign an acknowledgement form.

VIOLENT/INAPPROPRIATE BEHAVIOR

The following types of customer behavior are strictly prohibited within the AJCs and will result in immediate suspension of services:

- (1) Any behavior that jeopardizes or threatens the health, safety or welfare of staff or public.
- (2) Possessing a weapon or threatening with a weapon.
- (3) Obscene or abusive language, threats or intimidating behavior.
- (4) Behavior which is emotionally, physically or sexually abusive toward staff or the public.
- (5) Verbally abusive or belligerent behavior which disrupts Job Center operations.
- (6) Behavior which clearly demonstrates that a customer is intoxicated or impaired by the influence of drugs and/or alcohol. (An assessment of intoxication or impairment should be confirmed by a supervisor or manager based on observation of the customer, in their absence, another employee may confirm).

Response to violent/inappropriate behavior

Emergency Situations. Any employee who believes that there is a serious threat to his/her safety or the safety of others that requires immediate attention should contact **911**. (Please note that when 911 is called from a hard line, the local police authority will respond. When calling from a cell phone, 911 will connect you directly to the nearest State Police Troop). Staff shall then contact Human Resources to let them know that the police have been called to their AJC.

Non-Emergency Situations. In general, the first response to any prohibited inappropriate behavior (with the exception of intoxication or impairment) should be a direct advisement to the customer to stop the offensive conduct. Where such advisement is disregarded, the Director (or highest level staff person present) should determine the most responsible course

of action with an eye toward a safe and expedient resolution. Please note that while the usual response to intoxication or impairment is to deny services for that visit, repeated occurrences may warrant a stronger response.

After responding to the immediate situation, staff must follow the procedures outlined in the 'Non-Violent Behavior' **Third Level** response and submit a **Workplace Incident Report**. Please also see *State of Connecticut Violence in the Workplace Prevention Policy*: <http://intranet/HR/Policies/viole-policy.htm>.

Non-Discrimination

Any decision to deny or limit services to a customer may not be based upon any customer characteristic(s), which are protected by law. The delivery of services to a customer, the assessment of a customer's behavior, and/or the decision to impose a subsequent penalty for that behavior must not be based upon the customer's gender, race, national origin, ancestry, religion, age, disability, marital status, sexual orientation, political affiliation or belief.

Links to relevant documents:

Preventing Violence in the Workplace webpage
<http://intranet/HR/Policies/violen-home.htm>

State of Connecticut Violence in the Workplace Prevention Policy
<http://intranet/HR/Policies/viole-policy.htm>

Executive Order No. 16
<http://www.ct.gov/opp/lib/opp/olr/wpv/exc16.pdf>