



**PECKHAM**

*Potential. Purpose. Results.*

# CODE OF ETHICS & CONDUCT

Peckham’s mission is based on a strong set of committable core values; “We Believe” principles that lead and guide us toward a welcoming and inclusive culture where each individual succeeds, feels respected and is engaged and empowered in their work.

The intangible feeling that everyone identifies with when walking through our buildings, spending time talking with staff, and hearing the success stories of team members; has created a thriving culture that makes us a great place to work.

It is a culture of respect and dignity, of humility and flexibility; a culture that practices listening to the needs of each other, makes everyone feel safe and remains open-minded to believe in each individual’s incredible potential.

This a culture that is not happenstance, but is built with intentionality. This culture exists because of what we believe. At Peckham, we believe in the amazing ability of people with disabilities and other barriers. We believe in the power of work. We believe that when you focus on the individual, good things happen. We believe in our most important core value, “People Matter to Us. A Whole Lot.”

It is because of these core values, this belief system, that Peckham remains a rich, vibrant and thriving organization—committed to people, believing in ability, and intentionally creating more opportunities for people with disabilities and other barriers to maximize their potential.

These core values not only drive our internal culture and the way we treat each other, but also guide how we conduct ourselves with our customers, our external community and maintain an organizational reputation of high credibility, ethics and public trust.

The Peckham Code of Ethics and Conduct is additional instruction that helps inform the way we should lead and steward our talents and resources. Thank you for your commitment, your engagement and your ownership in using this tool as a supportive guide to creating a respectful culture where each individual can thrive.

Sincerely,

Jo Sinha  
President & CEO

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## › MISSION STATEMENT

Peckham, a community rehabilitation organization, is a unique business and human services agency, which values quality, diversity and performance. Our mission is to provide a wide range of opportunities to maximize human potential for persons striving for independence and self-sufficiency. We embrace collaboration, effective resource management and innovative approaches to achieve world-class excellence.

## › CORE VALUES

Peckham has established a Code of Ethics to guide the actions of staff, board members, and volunteers. Each new staff and board member will be required to review and sign the Code of Ethics, indicating acceptance. Any staff member who violates the agency's Code of Ethics may face corrective action. Board action may be taken with any board member who violates the Code of Ethics.

The core values that serve as roots for our Code of Ethics are:

**BALANCE**

EMBRACE THE "AND"

**DIVERSITY**

DIFFERENT IS AWESOME

**COMPASSION**

PEOPLE MATTER TO US. A WHOLE LOT

**PRIDE**

BE PROUD OF IT

**EXCELLENCE**

DO GREAT WORK

**COMMUNITY**

"WE" IS THE PASSWORD

**OPPORTUNITY**

FREEDOM TO THRIVE

An effective rehabilitation program requires the services of men and women of integrity, high ideals, and human understanding. To maintain and promote these essentials, all employees of Peckham, Inc. are expected to maintain high standards in their relationships.

The following standards represent Peckham's Code of Ethics.

## TREATMENT OF PERSONS RECEIVING SERVICES

### Intro Paragraph....

- › Persons receiving services must always be treated with respect and dignity, regardless of disability, medical status, economic status, cultural background, race, color, gender identity, age, sex, sexual orientation, pregnancy or pregnancy related condition, citizenship, national origin, marital status, parental status, genetic information, membership in any labor organization, political affiliation, religious beliefs, and military status.
- › The input of persons receiving services is valued and critical to achieving successful outcomes. Team member input should always be received in a respectful manner.
- › Persons receiving services retain all their legal rights when participating in Peckham programs and services. An individual's legal rights shall be respected at all times.
- › An atmosphere is to be maintained in which persons receiving services may learn, develop, and maximize their potential.
- › As an agency, Peckham is cognizant of any attitudinal, architectural, and communication barriers that may exist both within Peckham and in the community. Where barriers exist internally, Peckham takes corrective action. When barriers exist in the community, Peckham and Peckham staff advocate with the appropriate entity for corrective action.
- › Peckham will continue to demonstrate a commitment and value for advocating on behalf of persons served.
- › Ensure Peckham meets the needs of persons receiving services, and other internal and external customers.
- › Support an open and non-secretive work atmosphere while protecting the confidentiality of persons receiving services.
- › Refrain from inappropriate relations with team members, including but not limited to sexual activity.
- › Staff, as may be appropriate in their role, shall respect and safeguard the personal property of not only team members, but also all visitors and the organization in general.
- › On behalf of a person served, no fundraising for team members.....

- › On behalf of a person served, No witnessing of documents for team members.....
- › All communications by Peckham Staff with Team Member/Clients through Social Media are subject to the same ethical, disciplinary and overall company policies that govern proper workplace interactions. In line with our general no solicitation policy, social media must not be used to solicit team members for outside business ventures, personal parties, social meetings, charities, membership in any organization, political causes, religious causes, or other matters not connected to the company's business or are not appropriate given Peckham policies and guidelines.

## CANON 1—MORAL AND LEGAL STANDARDS

Peckham staff shall behave in a legal, ethical, and moral manner in the conduct of their profession, maintaining the integrity of the Code and avoid any behavior which would cause harm to others.

### RULES OF PROFESSIONAL CONDUCT

- R1.1** Peckham staff will obey the laws and statutes in the legal jurisdiction in which they practice and are subject to disciplinary action for any violation to the extent that such violation suggests the likelihood of professional misconduct.
- R1.2** Peckham staff will not engage in any act or omission of a dishonest, deceitful, or fraudulent nature in the conduct of their professional activities. They will not allow the pursuit of financial gain or other personal benefit to interfere with the exercise of sound professional judgment and skills, nor will Peckham staff abuse their relationships with team members to promote personal or financial gain of Peckham.
- R1.4** Peckham staff will respect the rights and reputation of any institution, organization, or firm with which they are associated when making oral or written statements. In those instances where they are associated when critical of policies, they attempt to effect change by constructive actions within organizations.
- R1.5** Peckham staff will refuse to participate in employment practices which are inconsistent with the moral or legal standards regarding the treatment of employees or the public. Peckham staff will not condone practices which result in illegal or otherwise unjustifiable discrimination on any basis in hiring, promotions, or training.

# HOW WE TREAT EACH OTHER

## STAFF MEMBERS AND VOLUNTEERS

### Intro Paragraph....

- › Respect the value and dignity of all individuals.
- › Create and maintain a climate of, trust, and mutual respect.
- › Staff, as may be appropriate in their role, shall respect and safeguard the personal property of not only team members, but also all visitors and the organization in general.
- › Support a work atmosphere in which the work of each individual is respected as important.
- › Refrain from swearing, using threats or intimidation, or using vulgar or offensive language.
- › Recognize the work done by other staff members and persons receiving services.
- › Strive to speak to everyone in a friendly, positive, enthusiastic, and courteous way.
- › Support the decisions of management. Staff is encouraged to discuss their views, but ultimately staff must follow management's final decision.
- › Maintain loyalty to the agency and refrain from activities that might bring discredit to the agency.
- › Strive for personal and professional growth to improve effectiveness.
- › Refrain from swearing, using threats or intimidation, or using vulgar or offensive language.
- › Refrain from inappropriate relations with team members, including but not limited to sexual activity.
- › Staff shall not engage in fundraising activities that are not sanctioned and approved by the CEO or their authorized designee as permissible fundraising activities.

All communications by Peckham Staff with Team Member/Clients through Social Media are subject to the same ethical, disciplinary and overall company policies that govern proper workplace interactions. In line with our general no solicitation policy, social media



must not be used to solicit team members for outside business ventures, personal parties, social meetings, charities, membership in any organization, political causes, religious causes, or other matters not connected to the company's business or are not appropriate given Peckham policies and guidelines.

## HOW WE ACT IN THE BEST INTEREST OF PECKHAM INC.

### Intro Paragraph...

- › Support the decisions of management. Staff is encouraged to discuss their views, but ultimately staff must follow management's final decision.
- › Maintain loyalty to the agency and refrain from activities that might bring discredit to the agency.
- › Carefully consider the public perception of personal and professional actions, and the effect those actions could have on Peckham's reputation in the community.
- › Uphold all applicable laws and regulations, going beyond the letter of the law to protect and/or enhance Peckham's ability to meet its mission.
- › Provide responsible stewardship of Peckham's resources.
- › On behalf of Peckham, staff shall not act as a witness to documents such as Power of Attorney, guardianship, and/or agency contracts without the expressed approval of the CEO or their authorized designee.
- › On behalf of Peckham, staff shall not engage in fundraising activities that are not sanctioned and approved by the CEO or their authorized designee as permissible fundraising activities.

## LEADERSHIP, HUMAN RESOURCES AND CASE MANAGEMENT STAFF

- › Strive for personal and professional growth to improve effectiveness.
- › Leadership, HR and case management professionals are responsible for adding value to Peckham and contributing to its ethical success.
- › Strive to meet the highest standards of competence, integrity and honesty and commit to strengthen those competencies on a continuous basis.

- › Exhibit individual leadership as a role model for maintaining the highest standards of ethical conduct and avoid deceitful or secretive behaviors which may create an atmosphere of mistrust.

## CANON 2—STAFF AND TEAM MEMBER RELATIONSHIPS

Peckham staff will respect the integrity and protect the welfare of people and groups with whom they work. The primary obligation of Peckham staff is the safety and welfare of our team members, defined as people who are receiving services from Peckham. Peckham staff shall endeavor at all times to place their team members' interests above their own.

### RULES OF PROFESSIONAL CONDUCT

- R2.1** Peckham staff will align their job functions within their abilities and collaborate with other professionals to meet the needs of team members.
- R2.2** Peckham staff will be continually cognizant of their own needs, values, and of their potentially influential position with team members and co-workers. Peckham staff must avoid exploiting the trust and dependency of such persons. Peckham staff should not become involved in a dual relationship that could impair their professional judgments or increase the risk of exploitation.
- Examples of dual relationships include, but are not limited to: business associations, business transactions of goods, research with and treatment of employees, students, supervisors, close friends, relatives or team members.
- Furthermore, staff is not permitted to date or socialize outside of work with team members. Sexual intimacies with team members are unethical and strictly prohibited.
- Staff may not borrow money from or sell items to team members.
- R2.3** Peckham staff will honor the right of team members to participate in rehabilitation services. Appropriate staff will inform team member or the team members' legal guardians of factors that may affect team members' decision to participate in rehabilitation services. Peckham staff who work with minors or other persons who are unable to give voluntary and informed consent will take special care to protect the best interests of team members.
- R2.4** Peckham staff will recognize that families are usually an important factor in team member's rehabilitation and will strive to enlist family understanding and involvement as a positive resource in promoting rehabilitation. The permission of team members will be secured prior to family involvement.
- R2.5** Peckham staff will work collectively with the team members in devising an integrated, individualized rehabilitation plan, which offers reasonable promise of success and is consistent with the abilities and circumstances of team members. Peckham staff will persistently monitor rehabilitation plans to ensure their continued viability and effectiveness, remembering that team members have the right to make choices.
- R2.6** Peckham staff will work with their team members in considering employment for team members in only jobs and circumstances that are consistent with the team members' overall abilities, vocational limitations, physical restrictions, general temperaments, interests, aptitude patterns, social skills, education, general qualifications and other relevant characteristics and needs.
- Peckham staff will neither place nor participate in placing team members in positions that will result in damaging the interests and welfare of either team members or employers.
- R2.7** Peckham staff shall refrain from giving rides to team members in their personal vehicles unless required for the team member's rehabilitation efforts and approved by supervision.

- › Responsible for promoting and fostering fairness and justice for all employees within Peckham.
- › Maintain a high level of trust and should not engage in activities that create actual, apparent, or potential conflicts of interest.
- › Consider and protect the rights of individuals, especially in the acquisition and dissemination of information while ensuring truthful communications and facilitating informed decision-making.
- › Leadership shall avoid inappropriate relationship with other staff or team members. If in doubt, consult the HR department or the corporate compliance officer. Leadership leads by example.

## BOARD OF DIRECTORS

### Intro paragraph....Members of the Peckham Board of Directors shall:

- › Ensure Peckham is operating in a manner that upholds the agency’s integrity, adhere to its bylaws, and merits the trust and support of the public.
- › Exercise reasonable care when making decisions as a steward of Peckham, Inc.
- › Act in a way that is consistent with the central goals of Peckham.
- › Provide responsible stewardship of Peckham’s resources.
- › Refrain from actions that would benefit personally at the expense of Peckham, avoiding even the appearance of a conflict of interest.

## CANON 3—TEAM MEMBER ADVOCACY

Peckham staff shall serve as advocates for the people we serve.

### RULES OF PROFESSIONAL CONDUCT

- R3.1** Peckham staff will be committed at all times to promote access for people with disabilities in programs, facilities, transportation, and communication, so that team members will not be excluded from opportunities to participate in rehabilitation, education, and society.
- R3.2** Peckham staff will strive to understand accessibility problems of people with cognitive, hearing, language, mobility, visual, and/or other disabilities and demonstrate such understanding in the practice of their jobs.
- R3.3** Peckham staff will strive to eliminate attitudinal barriers, including stereotyping and discrimination, toward people in the workplace and will enhance their own sensitivity and awareness toward all people with all levels of abilities.

- › Disclose outside activities that may create a conflict of interest so that it may be determined if abstention/recusal is necessary on certain issues.
- › Consider the public perception of personal and professional actions, and the effect those actions could have, positively or negatively, on Peckham’s reputation in the community.

## CANON 4—PROFESSIONAL RELATIONSHIPS

Peckham staff shall act with integrity in their relationships with colleagues, other organizations, agencies, customers, institutions, referral sources, and other professionals to facilitate the contributions of all specialists toward achieving optimum benefits for team members.

### RULES OF PROFESSIONAL CONDUCT

- R4.1** Peckham staff will abide by and help to implement "team" decisions in formulating rehabilitation plans and procedures, even when not personally agreeing with such decisions, unless these decisions breach the ethical Rules.
- R4.2** Peckham service staff, as referring counselor, will promptly supply all information necessary and relevant for a cooperating staff to begin serving team members.
- R4.3** Peckham staff will not offer ongoing counseling/case management services to team members receiving such services from other staff without first notifying the other staff.
- R4.4** Peckham staff will not discuss in a disparaging way with team members or other staff (except the staff’s direct supervisor, Human Resource Department, or CEO) the competency of other staff or agencies, or program judgments made, the methods used, or the quality of rehabilitation plans.
- R4.5** Peckham staff will not exploit their professional relationships with supervisors, colleagues, students, team members, or other employees sexually or otherwise.  
  
Peckham staff will not condone or engage in sexual harassment, defined as deliberate or repeated comments, gestures, or physical contacts of a sexual nature unwanted by the recipients.
- R4.6** Peckham staff aware of an ethical violation by another staff will informally attempt to resolve the issue with the staff, when the misconduct is of a minor nature and/or appears to be due to lack of sensitivity, knowledge, or experience.  
  
If the violation does not seem amenable to an informal solution, or is of a more serious nature, Peckham staff will bring it to the attention of the appropriate person (direct supervisor, Human Resource Department, or CEO).
- R4.7** Peckham staff possessing information concerning an alleged violation of this Code, will confidentially, upon request, reveal such information to the Human Resources Department, CEO, or other authority empowered to investigate or act upon the alleged violation, unless the information is protected by law.
- R4.8** Peckham staff that employ or supervise other staff or students will facilitate professional development of such individuals. They provide an appropriate learning environment, working conditions, timely evaluations, constructive consultation, and experience opportunities.
- R4.9** Peckham staff will not enter into business relationships with team members and will follow current Peckham regulations regarding solicitation and sales on Peckham property.

- › Strive for personal and professional growth to improve effectiveness as a Board member.
- › Refrain from unwarranted intrusion into the responsibilities of Peckham's operational management.
- › Commit to full compliance with all federal, state and local statutes, regulations, and guidelines applicable to Peckham.

## BUSINESS PRACTICES AND CONTRACTUAL RELATIONSHIPS

- › All financial practices of Peckham shall be handled in full compliance with applicable federal, state and local laws. This includes full compliance with federal health care programs, including a commitment to prepare and submit accurate billing consistent with such requirements.
- › Staff involved in providing, documenting and billing for services rendered shall be expected to comply with all federal health care program requirements and Peckham's Corporate Compliance Program.
- › Peckham staff shall report any suspected violations, fraud, waste, abuse, mismanagement or misappropriation of funds paid on behalf of persons receiving behavioral health services to the Corporate Compliance Officer.
- › Peckham assures the right of all individuals to use the 'No Reprisals' reporting system and to maintain confidentiality to the greatest extent possible. These rights are not guaranteed in cases of malicious, false or fictitious reporting.
- › All financial matters shall be conducted with the standards of commonly accepted, sound financial management practices or Generally Accepted Accounting Standards (GAAP), as applicable.
- › All financial matters that fall within the purview of the agency's financial management policies shall comply with those policies.
- › All financial matters covered by Peckham's bylaws shall be handled in accordance with those bylaws.
- › All business activities shall be conducted in full compliance with applicable federal, state, and local laws, regulations and guidelines.
- › All business activities shall support, enhance and serve the mission of Peckham, Inc.

- › All business activities will uphold the integrity of Peckham to merit the continued support and trust of the public.
- › All business activities shall be carried out in such a manner as to provide sound stewardship of Peckham resources and assets.
- › Peckham staff who may work with an independent contractor are encouraged to report any suspected abuse, neglect, waste, or wrongdoing by the independent contractor to their supervisor, another Manager, and/or the Corporate Compliance Officer.

It is the responsibility of Purchasers to work on behalf of the interests of Peckham and avoid situations that may result in personal benefit or gain to the Purchaser or others involved in the transaction. Costs incurred by Peckham must be necessary and cost-effective. If not expressly addressed in the Peckham Procurement Manual, ethics concerns shall be addressed on a contract by contract basis as per the provisions and clauses contained within each solicitation and contract.

**Purchasers shall also abide by the following principles:**

- › Give first consideration to the objectives and policies of Peckham;
- › Strive to obtain the Best Value for each dollar of expenditure;
- › Decline personal gifts or gratuities;
- › Grant all competitive suppliers equal consideration insofar as state or federal statute and Peckham policies permit;
- › Conduct business with potential and current suppliers in an atmosphere of good faith, devoid of intentional misrepresentation;

## CANON 5—PUBLIC STATEMENTS/FEEES

Peckham staff shall adhere to company and professional standards in promoting their services and employment positions.

### RULES OF PROFESSIONAL CONDUCT

- R5.1** Peckham staff will not accept a fee or any other form of payment from team members who are entitled to their services and supervision.
- R5.2** Peckham staff will neither give nor receive a commission or rebate or any other form of remuneration for referral of team members for professional services.
- R5.3** Peckham staff will not receive gifts, gratuities, fees, or any other form of remuneration from any team member for any services.

- › Demand honesty in sales representation whether offered through the medium of a verbal or written statement, an advertisement, or a sample of the product;
- › Receive consent of originator of proprietary ideas and designs before using them for purchasing purposes;
- › Make every reasonable effort to negotiate an equitable and mutually agreeable settlement of any controversy or protest with a vendor;
- › Accord a prompt and courteous reception insofar as conditions permit to all who call on legitimate business missions;
- › Cooperate with trade, industrial and professional associations, and with governmental and private agencies for the purposes of promoting and developing sound business methods;
- › Foster fair, ethical and legal trade practices;
- › Ensure proper type of contract selection and prohibit issuance of cost-plus-a percentage-of-cost subcontracts; and
- › Purchasers must maintain compliance with applicable laws and regulations when conducting Peckham business.
- › Marketing activities are part of Peckham's accountability to the public.
- › Marketing activities shall always respect the dignity and privacy rights of those receiving services.
- › Marketing activities will never knowingly mislead or misinform the public or misrepresent Peckham.
- › Marketing activities will uphold the integrity of Peckham to merit the continued support and trust of the public.
- › Donations and contributions given to Peckham will be handled in accordance with the wishes of the donor.

# HOW WE TREAT OUR COMMUNITY AND THE WORLD

Intro Paragraph....

## FREEDOM OF ASSOCIATION AND COLLECTIVE BARGAINING

Peckham shall respect the right of employees to freedom of association and collective bargaining. If freedom of association and/or the right to collective bargaining is restricted by law, employees shall be free to develop parallel means for independent and free association and collective bargaining.

Peckham shall develop and implement effective mechanisms to resolve workplace disputes, including employee grievances, and ensure effective communication with employees and their representatives.

## HEALTH AND SAFETY

Peckham will engage in its best efforts to provide a safe and healthy workplace setting to prevent accidents, illness and injury to health arising out of, linked with, or occurring in the course of work or as a result of the operation of Peckham's facilities.

Peckham will engage in its best efforts to continually adopt and implement systems that prevent, minimize, detect and respond to potential health and safety risks. These include but are not limited to fire protection, proper management and disposal of chemicals and hazardous waste, structural safety, electrical safety, personal protective equipment and adequate lighting, heating, cooling and ventilation systems.

## ENVIRONMENTAL PROTECTION

Peckham will engage in its best efforts to comply with all applicable environmental laws and regulations, including but not limited to air emissions, solid and hazardous waste storage and disposal, energy usage and water consumption and discharge. Peckham will adopt reasonable measures to mitigate negative impacts of operations on the environment. Peckham continuously looks into potential progressive improvements in the environmental performance of its operations, including, but not limited to, responsible use of natural resources, reduction of waste, energy efficiency, and cleaner production methods.



## AUDITS AND IMPROVEMENTS

At any time, but particularly during training sessions, employees are encouraged to make suggestions for improvement to Peckham's Corporate Compliance Plan. All such suggestions received by supervisors and training instructors shall be forwarded to the Corporate Compliance Officer for review and consideration.

### CANON 6—CONFIDENTIALITY

Peckham staff shall respect the confidentiality of information obtained from team members and staff in the course of their work.

#### RULES OF PROFESSIONAL CONDUCT

- R6.1** Peckham staff will inform team members at the beginning of the program of the limits of confidentiality.
- R6.2** Peckham staff may take action, including informing authorities and consulting with other professionals, to protect the person from imminent danger. The team member must resume personal responsibility as quickly as possible.
- R6.3** Peckham staff will not forward to another person, agency, or potential employer, any confidential information without the written permission of team members or their legal guardians. Medical and psychological reports from an outside agency may never be forwarded without a court order or consent of the outside agency.
- R6.4** Peckham staff will communicate policies and practices, which effectively protect the team member's confidentiality.
- R6.5** Peckham staff will safeguard the maintenance, storage, and disposal of the records of team members so that unauthorized persons shall not have access to these records.
- R6.6** Peckham staff, in the preparation of written and oral reports, will present only pertinent data and will make every effort to avoid undue invasion of privacy.
- R6.7** Peckham staff will obtain written permission from team members or their legal guardians prior to taping or otherwise recording team member's actions or comments. Even with the guardians' written consent, rehabilitation counselors will not record sessions against the expressed wishes of the team members.
- R6.8** Peckham service staff will not provide verbal information regarding the involvement of team members in Peckham Programs. Telephone messages and inquiries will be relayed to the Case Manager or Human Resources Manager.
- R6.9** Peckham staff must be present for team members to review their file information. Team members must specifically request what they would like to see and should not include working case notes and forms or information not generated by Peckham staff.

# ENFORCEABLE ACTIONS OF ETHICAL STANDARDS OR RESOLVING ETHICAL ISSUES

## Intro Paragraph

## ENFORCEABLE ACTIONS OF THE CODE OF ETHICS

Any allegation of violation of Peckham's Code of Ethics and Code of Ethical Conduct will be taken seriously and thoroughly investigated by the appropriate supervisor, management staff or governing authority in accordance with Peckham's progressive disciplinary policy. Substantiated violations of the Code of Ethics will result in progressive discipline up to and may include immediate termination for serious infractions.

Allegations of violations of the Code of Ethics by Peckham Board members shall be investigated by the Human Resources Committee of the Board. Substantiated violations by any member of Peckham's Board of Directors may result in suspension or dismissal from the Board. Staff, Board Members, volunteers, persons receiving services and other stakeholders may report allegations verbally to the appropriate management staff, in writing or via e-mail to the appropriate management staff, or [ethicspoint.com](http://ethicspoint.com). The link to [ethicspoint.com](http://ethicspoint.com) is on the Peckham intranet page under "News/Administration" as well as on the Peckham website.

Peckham will acknowledge receipt of a complaint within three to five (3-5) business days of its receipt. The complaint will generally be resolved within thirty (30) days, but this is not a strict requirement and it may take longer to resolve a particular complaint depending upon the severity and circumstances.

## CANON 7—ASSESSMENT AND EVALUATION

Peckham staff shall promote the welfare of team members in the selection, utilization, and interpretation of evaluation measures.

### RULE OF PROFESSIONAL CONDUCT

- R7.1** Peckham staff will make known the purpose of testing and the use of the results to team members prior to the testing. Recognizing the right of team members to have test results, appropriate Peckham staff, will share the test results in a manner or language team members can understand.
- R7.2** Peckham staff will recognize that evaluation and assessment results may become obsolete. They make every effort to avoid and prevent the misuse of obsolete measures.

Peckham staff is committed to facilitating personal, social, and economic independence of individuals with disabilities or barriers to employment. Peckham staff recognizes that both action and lack of action can be facilitating or debilitating. Peckham staff must demonstrate adherence to ethical standards and must ensure that the standards are enforced vigorously. The Code of Ethics (“the Code”) is designed to facilitate the accomplishment of these goals.

The primary responsibility of Peckham staff is to their internal team members, defined in the Code as people with disabilities or who have other barriers to employment who are receiving services from Peckham. Peckham also acknowledges that our external customers and suppliers should be treated with the same standards and ethical practices as our internal team members.

The basic objective of the Code is to promote the public welfare by specifying and enforcing ethical behavior expected of Peckham staff. Accordingly, the Code consists of two kinds of standards, Canons and Rules of professional conduct.

The Canons are general standards of an aspirational and inspirational nature reflecting the fundamental spirit of caring, honesty, and respect which staff share. They are maxims, which serve as models of exemplary professional conduct.

The Canons also express general concepts and principles from which more specific Rules are derived. Unlike the Canons, The Rules are more exacting standards that provide guidance in specific circumstances.

## CANON 8—COMPETENCE

**Peckham staff shall establish and maintain their work relevant competencies at such a level that their team members receive the benefit of the highest level of safety and quality of service the profession is capable of offering.**

### **RULES OF PROFESSIONAL CONDUCT**

- R8.1** Peckham staff will function within the limits of their defined role, training, and technical competency and will accept only those positions for which they are professionally qualified.
- R8.2** Peckham staff will continue to strive through reading, attending meetings, and taking courses of instruction to keep abreast of new developments, concepts, and practices that are essential to providing the highest quality of services to our team members.
- R8.3** Peckham staff recognize that personal values, moral beliefs, or personal and professional relationships may interfere with their work related effectiveness, and will refrain from undertaking any activity in which personal values, moral beliefs, or personal professional relationships are likely to lead to inadequate performance.

The Peckham staff that violate the Code are subject to discipline action. A Rule violation is interpreted as a violation of the applicable Canon and the general principles embodied thereof. Disciplinary penalties are imposed as warranted by the severity of the offense and its attendant circumstances.

All disciplinary actions are undertaken in accordance with published procedures and penalties of the offense designed to assure the proper enforcement of the Code within the framework of due process and equal protection of the laws. When there is reason to question the ethical propriety of specific behaviors, persons are encouraged to refrain from engaging in such behaviors until the matter has been clarified.

The Code is not meant to be a complete listing of all policies and procedures. Peckham staff should refer to their employee handbook and Peckham's Policy and Procedure Documents for a complete listing of company rules and expectations.

## REPORTING OF AND RESPONSE TO VIOLATIONS

**Reporting:** If an employee or stakeholder becomes aware of any wrongdoing under the standards set forth in this Program, whether committed by that employee or by someone else, they must report the wrongdoing to the Corporate Compliance Officer through one of the methods described below;

- › You may submit your report on line. Click on the EthicsPoint link on Peckham's intranet site or external web site and select "make a report".
- › Remember you can report to a third party and may remain anonymous if you wish. If your report concerns our Compliance Officer, the CEO or a board member will investigate your report, if it concerns the CEO, a board member will investigate your report.

**Response:** Upon receiving a report of a wrongdoing under the Corporate Compliance Program, the Corporate Compliance Officer will respond to you through the EthicsPoint site.

You will be issued a password to communicate with. You will check back with the site for questions from the Corporate Compliance Officer or to see the status of your complaint. The Corporate Compliance Officer shall conduct the appropriate investigation into the incident and complete a Summary Report for each complaint received. The Corporate Compliance Officer shall determine whether the alleged wrongdoing is a violation of Peckham's Compliance Program, code of ethics, is a violation of state or federal law, or

otherwise puts Peckham at risk of economic injury or injury to reputation. Thereafter, the Corporate Compliance Officer and CEO, as appropriate, shall take action commensurate with the gravity of the allegation to determine if the allegation has a basis in fact; what internal disciplinary and/or remedial action, if any, is warranted; whether the alleged violation must by law, or should by discretion, be reported to the appropriate governmental authorities, and what modifications in the program might help prevent similar future conduct. You will know the status of the investigation through the EthicsPoint secure site or if reporting in person, the Corporate Compliance Officer will provide you with status updates directly. Peckham will acknowledge receipt of a complaint within three to five (3-5) business days of its receipt.

If the Corporate Compliance Officer, CEO, and legal counsel conclude, reporting to governmental authorities is or may be appropriate, they shall so inform Peckham's Board of Directors immediately. The CEO, in consultation with Peckham's Board of Directors and legal counsel, if appropriate, shall then be responsible for determining whether and how a timely and thorough report should be made to the appropriate governmental authorities on behalf of Peckham. The Corporate Compliance Officer shall make modifications to the Program as needed to help prevent future violations similar to any detected through the reporting system.

**Retribution:** Peckham shall not take disciplinary action against an employee for merely reporting what the employee reasonably believed to be a violation of this Program. However, Peckham may take disciplinary action against an employee on several bases related to reporting. First, an employee knowingly fabricated, distorted, exaggerated, or minimized a report of wrongdoing either to injure someone else or to protect themselves or others. Second, an employee whose report contains admissions of personal wrongdoing will not be guaranteed protection from discipline. Peckham generally will give positive weight to self-confession in determining disciplinary action; but the extent depends on factors such as whether the employee's conduct was previously known to Peckham, whether discovery of the conduct was imminent, and whether the confession was complete and truthful.

## CANON 11—RESEARCH ACTIVITIES

### RULE OF PROFESSIONAL CONDUCT

**R11.1** Any research activities dealing with team members are forbidden without the written approval and documentation from administration.

**Enforcement:** Employees are expected to comply with the Corporate Compliance Program. Peckham uses a progressive discipline policy except where immediate termination is justified due to the seriousness of the violation.

# ACKNOWLEDGMENT

- › The Code was developed with the assistance of a cross functional team of staff from Peckham Vocational Industries, Inc.
  
- › Referenced documents, statements, and sources for the development of this revised Code are as follows:
  - **National Rehabilitation Counseling Association Code of Ethics**
  - **National Academy of Certified Clinical Mental Health Counselors**
  - **The Ethical Standards of the American Association for Counseling and Development**
  - **The American Psychological Association Ethical Principles of Psychologists**
  - **New Balance Code of Conduct**