

Subject: Code of Conduct	Policy No.: GP-C6-3
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Preamble

The Canadian Foundation for Healthcare Improvement (CFHI) is incorporated as a not-for-profit corporation under federal legislation, and its directors are responsible for managing and supervising the activities and affairs of the Corporation. In discharging this mandate, the Board must comply with the Foundation's governing documents¹ as well as the rules established under the common law governing directors' duties. In addition, and in accordance with By-law Number 1 of the Corporation, the Board of Directors has appointed a president who has general charge of CFHI's business affairs, is responsible for the overall day-to-day management of CFHI and has such authority as prescribed by the Board.

Accordingly, a policy has been developed to give direction with regards to the Code of Conduct.

Policy

1. CFHI believes that all employees have the right to feel respected and safe in the workplace, free from harassment or discrimination. As such, CFHI expects all of its employees to maintain a level of personal conduct that will reflect positively on themselves and on the reputation of CFHI.

CFHI expects all of its employees to be courteous at all times, to be respectful of other persons and organizations and to convey a friendly, approachable image to its stakeholders – partners, sponsors and the community within which it works. Whatever the meeting venue, whether it is a telephone call, a face to face meeting or sponsored conference, an employee represents CFHI to the person with whom they are conducting business. This same courteous attitude is expected of an employee in dealing with their fellow employees.

2. Objectives
 - 2.1. To foster an environment of openness and friendliness while still providing professional and courteous service to all CFHI stakeholders and employees.
 - 2.2. To ensure that all CFHI employees are aware of their responsibilities and the consequences of their conduct during their course of employment. Employees are accountable for their personal and professional conduct as per the terms of this policy.

¹ The Foundation's governing documents include the legislation under which CFHI exists and operates, its constating documents (articles of continuance and by-laws), funding/contribution agreements, and internal governance policies.

3. Attitude and Conduct

- 3.1. The reputation of CFHI depends upon the integrity and sense of responsibility of its employees, in whom its partners, sponsors and the community place great trust. As a most valued contributor to CFHI's success, all CFHI employees are expected to demonstrate the highest standards of behaviour.
- 3.2. All employees are expected to arrive at CFHI "fit for work". "Fit for work" means a physical, mental, and, emotional state that enables the employee to safely and acceptably perform the essential tasks of their job, including working in a manner which does not threaten the safety or health of themselves, coworkers, property, or the public at large.
- 3.3. Inappropriate and unacceptable behaviour includes but is not limited to yelling; using obscene or abusive language; spreading malicious gossip or rumours; harassing, threatening, intimidating, coercing any person at any time; excessive personal use of telephones or computer facilities; indecency and fighting. Such behaviour is strictly forbidden in all work-related situations and must be reported to the employee's supervisor immediately for follow-up.
- 3.4. In all cases, guidance will be provided by the Vice-President, Corporate Services.
- 3.5. If the misconduct compromises the integrity of CFHI and it is determined that the employee has engaged in inappropriate behaviour or misconduct, the employee shall be subject to appropriate disciplinary action up to and including termination without notice or pay in lieu thereof.

4. Confidentiality: Duty of Confidence

- 4.1. Confidential information about CFHI, its employees and its stakeholders are not to be released. When an employee or contractor is in doubt as to whether certain information is confidential, they should:
 - 4.1.1. refer to CFHI's *Conflict of Interest Policy* located on the website at cfhi-fcass.ca/sf-docs/default-source/policies/Conflict-of-Interest-E.pdf.
 - 4.1.2. obtain the appropriate approval from the President before disclosing the information.
- 4.2. Confidential information including but not limited to information pertaining to CFHI research, awards, finances, and planning, is the sole and exclusive property of CFHI. Employees shall not disclose confidential information to anyone outside CFHI, whether or not that person could benefit directly or indirectly from having that information or use confidential information for any other purpose than that of CFHI. Use or disclosure of such information for personal advantage or private speculation is strictly forbidden.
- 4.3. Confidential information obtained as a result of employment with CFHI may not be used for furthering any private enterprise, or as a means of making personal gains. Use or disclosure of such information can result in civil or criminal penalties, both for the individuals involved and for CFHI.

- 4.4. In the course of any job, an employee may become aware of personal and confidential information. CFHI depends on the maturity and loyalty of each employee to keep private all such information and to keep confidential any personal matters discussed.
 - 4.5. Breach of the duty of confidence is a serious matter and may result in discipline up to and including dismissal without notice or pay in lieu thereof. See Conditions of Employment Policy for more information on Disciplinary Measures.
5. Communication
 - 5.1. When employees are communicating on behalf of CFHI with anyone outside the organization, they must always be careful to use language and mannerisms that reflect professionalism, respect and a high level of customer service. The content of any and all written and oral communications must not, under any circumstance, amount to harassment or discrimination.
 - 5.2. It is the practice of CFHI that all communications sent out must be professional and in a consistent format. The prescribed format guidelines for both letters and memoranda are to be used at all times (see cfhi-fcass.ca/sf-docs/default-source/policies/english-style-guide.pdf). The authorized version of the CFHI logo is to be used on all letterhead, packaging and promotional material.
6. Electronic Communication Systems
 - 6.1. CFHI's electronic communications systems include telecommunications systems (telephones, voicemail, facsimile, Skype, Instant messaging, video calls), electronic systems (printers, copiers), computer systems (including electronic files), emails (including all messages sent or received), and the Internet (applications). Refer to CFHI's *Social Media Policy* for more information, located on the website at cfhi-fcass.ca/social-media-policy.
 - 6.2. All electronic communication systems are the property of CFHI and primarily for business use. Limited personal use is permitted as long as it is lawful, is not disruptive to work, does not affect the capacity of the system and does not violate any CFHI policy, including accessing or transmitting information containing content inappropriate for the workplace (for example, sites with sexually explicit, and or harassing emails). Although CFHI respects the privacy of its employees, employee privacy does not extend to the employee's use of CFHI's Electronic Communications Systems. No person using such resources should expect privacy of their communications. All email communications and information downloaded from the Internet constitute CFHI property.
 - 6.2.1. Telephone Usage: Employees are encouraged to conduct personal telephone business during their lunch hour or during their breaks. Personal calls should be restricted to local calls, unless the employee charges any long-distance calls to their personal number. Employees are asked to be considerate of their colleagues working in open work spaces and refrain from engaging in loud telephone conversations in open spaces.
 - 6.2.2. Email Usage: Limited personal use of email is permitted. CFHI reserves the right to access, use and disclose without notice all messages sent over

its email system. CFHI's President and Vice-President, Corporate Services or designate shall review the contents of all suspect email messages.

- 6.2.3. Internet Usage: Limited personal use of Internet is permitted. The Internet and Internet access is a core business requirement at CFHI; including accessing hosted services and applications as well as collecting data and information from outside the organization. However, much of the data on the Internet presents risks to CFHI such as viruses, breaches of copyright, and reliance on outdated or inaccurate information. Therefore, the following guidelines apply to all employees using the Internet. Employees must:
- a) use due diligence in all Internet contacts;
 - b) follow all terms and conditions of software licenses and copyright laws when collecting or using information from the Internet;
 - c) conform to CFHI's software standards and refrain from downloading software from the Internet and comply with CFHI's information technology policies;
 - d) have CFHI's information technology staff screen all software downloaded from the Internet with virus detection software prior to use. All software needs to be installed by CFHI's information technology staff after being evaluated and approved; and,
 - e) not contribute to pirate software bulletin boards and similar activities.
- 6.2.4. Users of CFHI's Internet and email systems are strictly prohibited from creating, transmitting, distributing, forwarding, downloading and/or storing anything which:
- a) infringes any copyright, trademark, trade secret, or other intellectual property right;
 - b) is obscene, immoral, unethical or pornographic;
 - c) is libellous, defamatory, hateful, or constitutes a threat of abuse;
 - d) encourages conduct that would constitute a criminal offence or give rise to liability;
 - e) harasses the receiver, whether through language, frequency or size of messages;
 - f) is considered email junk, spam or phishing email;
 - g) forges or misleads the sender's identity;
 - h) divulges private and/or confidential information related to CFHI's business, its clients and/or its employees;
 - i) violates CFHI's policies including policies related to attitude and conduct or workplace harassment.
- 6.2.5 Internet and email use may be monitored from time to time, without notice, to determine how the system is being used. All monitoring of electronic communications systems shall be conducted by CFHI's Director, Information Technology and Knowledge Management who will log and audit usage to ensure compliance with this policy. If the Director, Information Technology and Knowledge Management feels that the

electronic communications systems are being misused or used in an abusive manner, they shall report the abuse directly to the Vice-President, Corporate Services. The President and Vice-President, Corporate Services or designates may review, examine and analyze the personal file directories, Internet access logs, emails and any other information stored on CFHI's computers to determine whether there has been a breach of this policy.

- 6.3. CFHI's firewall security system is set to guard against Internet security threats. As new services and new threats from the Internet are disclosed, new security technology will update and change the specific services offered through the firewall. News feeds are permitted only to designated gateway servers. New Internet services are permitted only with the prior technical approval of CFHI's Director, Information Technology and Knowledge Management.
 - 6.4. Breach of the Electronic Communication Systems policy is a serious matter and may result in discipline up to and including dismissal without notice or pay in lieu thereof. See Conditions of Employment Policy for more information on Disciplinary Measures.
7. Outside Employment/Activities
- 7.1. In some situations, an employee's personal activities, and outside employment interests may be perceived to be in conflict with those of CFHI. A conflict of interest refers to a situation where an employee's personal relationship(s) or financial interest(s) could reasonably be seen as influencing the employee's duty to act in the best interests of CFHI. It is the employee's responsibility to identify and report all actual or perceived conflicts of interest to their direct supervisor, regardless of whether or not the employee derives a financial benefit from the outside activity or interest.
 - 7.1.1. The supervisor will be responsible to inform their respective President's Executive Committee Lead on any perceived conflict of interest activities and consult with them if there are any questions on which activities are deemed to be a conflict of interest.
 - 7.2. An employee may engage in supplementary employment, including self-employment, unless it:
 - 7.2.1. interferes with their ability to carry out their employment with CFHI;
 - 7.2.2. involves the use of CFHI premises, equipment or supplies; or
 - 7.2.3. places the employee in a real or apparent conflict of interest with CFHI. This would include an enterprise that seeks to supply goods or services to CFHI, or an enterprise that competes with CFHI directly or indirectly.
 - 7.3. Employees must complete the Conflict of Interest and Disclosure Forms if they engage in outside employment activities. Forms must be submitted to the Vice-President, Corporate Services. The form is located on the website at cfhi-fcass.ca/sf-docs/default-source/policies/conflict-of-interest-disclosure-agreement-e.pdf. Canvassing and soliciting for political or personal support or any such form of activity will not be permitted on CFHI premises.

8. Gifts and Gratuities

8.1. Employees are expected to make workplace decisions based on impartial and objective assessment, free from the influence of gifts, and potential favours. It is also recognized in our community that the acceptance of expressions of appreciations or gratitude are customary. As such, CFHI employees may accept gifts or entertainment with a value not greater than \$100. These gifts must not be in the form of cash or of a nature that might suggest they are a bribe, incentive or pay-off. All gifts must be registered with the employee's immediate supervisor and the Director, Finance and Administration.

8.1.1. Employees may not offer gifts or entertainment with a value greater than \$100 to anyone.

8.1.2. Employees may not demand or agree to accept payments, services or other incentives from contractors or suppliers of CFHI if intended as a solicitation of business.

9. Honorariums

9.1. An honorarium is any form of cash payment offered to an employee outside of regular expense reimbursement.

9.2. When an employee is participating in an event or activity as a consequence of their official role at CFHI, the honorarium will normally be designated to CFHI. In this case, the payment should be made payable to CFHI.

9.3. When participation is as a consequence of the employee's reputation or skills alone and no CFHI resources are consumed as part of the participation, the payment is considered outside compensation. These payments should not flow through CFHI but directly to the employee. In this case, it is the employee's responsibility to ensure that they comply with Canada Revenue Agency legislation.

9.4. When the honorarium has been designated to CFHI, Finance will ensure that any funds received are deposited in the Honorarium bank account. Funds from this account can be used for, but are not limited to, the items in the following list:

- Social Event funding of the staff holiday party or summer BBQ, for example;
- Professional Administrative Assistant appreciation day;
- Employee service awards;
- Gifts for a departing employee;
- Flowers for an employee experiencing a family event (i.e. birth, death, wedding, for example);
- Miscellaneous supplies related to this account such as a cheques order; and
- Other expenditures as approved by the President.

9.5. The President shall have discretion as to how the honoraria funds are used in consultation with the President's Executive Committee for items not listed in section 9.4. Individuals within the organization who wish to access these funds must provide a written memo to the President explaining what the funds are to be used for, why the expenditures should come from the honoraria account and the amount requested. Based on the information provided, the President will discuss the request

with the President's Executive Committee and provide the appropriate authorization. The President will advise the individual in writing (email acceptable), copy to Finance, if the expenditures are approved. Should the expenditure be directly related to the President, the expenditure will be approved by the Chair, Board of Directors given that no individual within the organization should authorize expenditures from which they will derive personal benefit. Once the expenditure is approved, Finance will prepare a cheque and ensure it is signed by the President and one other individual with the appropriate signing authority.

- 9.6. Decisions as to the use of these funds will be recorded in the minutes of the President's Executive Committee meetings.

10. Political Activities

- 10.1. Employees are free to participate in political activities including belonging to a political party, supporting a candidate for elected office and actively seeking elected office. Employees' political activities, however, must be clearly separated from activities related to their employment.
- 10.2. If engaging in political activities, employees must be able to retain the perception of impartiality in relation to their duties and responsibilities. Employees must not engage in political activities during working hours or use CFHI facilities, equipment or resources in support of these activities.
- 10.3. Partisan politics at the local, provincial or national levels are not to be introduced into the workplace. This does not apply to informal private discussions among co-workers.
- 10.4. Any employee of CFHI seeking a nomination as a candidate in a federal, provincial or municipal election must advise their respective President's Executive Committee Lead or the Vice-President, Corporate Services prior to the announcement of the nomination. If the employee is unable to meet job duties and responsibilities as a result of the requirements of active campaigning, CFHI may grant to the employee a leave of absence without pay. The leave of absence shall begin prior to the employee's declaration of candidacy and end on the day the results of the election are officially declared, or an earlier date as requested by an employee who has ceased to be a candidate. If the employee is elected to a political office and as a result, the employee is unable to carry out their job duties and responsibilities, the employee shall resign from their employment effective the date of the election.

11. Outside Directorships

- 11.1. CFHI encourages its employees to become involved in charitable, civic and community groups. However, before accepting a voluntary position or unpaid directorship with such an organization, an employee must disclose the nature of the position to their respective President's Executive Committee Lead, or in the case of the President, advise the Board Chair, to ensure that it will not interfere with their ability to carry out their employment with CFHI or place the employee in a real or perceived conflict of interest with CFHI. This would include an enterprise that seeks to supply goods or services to CFHI or an enterprise that competes with CFHI directly or indirectly.

12. Public Appearances

- 12.1. For work-related appearances at conferences and seminars, staff, other than the President, must seek approval from their respective Directors or President's Executive Committee Lead, and information will be brought to the Operations Committee to ensure coordination.
- 12.2. All media requests should be sent to the Senior Communications Lead, who consults the Senior Director, Communications for approval. The Senior Director will engage the appropriate PEC lead to identify spokespeople and plan a response.

13. Dress Code

- 13.1. To project a positive, professional image, employees are expected to dress business casual, at a minimum, while at work or representing CFHI. This means presenting themselves to work in clothing suitable for an office environment and does not include shorts, sweatshirts, loose footwear, ripped or torn clothing, or anything else that does not reflect a positive business image.
- 13.2. Employees requiring accommodation for religious, disability or other reasons should discuss their requirements with their direct supervisors.

14. Security of Property and Theft

- 14.1. Preserving and safeguarding CFHI's property is the responsibility of each employee. Equipment, materials and supplies are the property of CFHI and must be used only for organizational business and on organizational premises, and must be protected from theft, misuse and/or damage. No CFHI property may be borrowed without the authorization of an employee's immediate supervisor.
- 14.2. Theft of CFHI's property or of a fellow employee's property while at work will result in disciplinary action, up to and including dismissal and potential criminal charges.

15. Whistleblowing

- 15.1. CFHI is committed to the highest possible standards of openness, honesty and accountability. In line with this commitment, CFHI expects employees, and our stakeholders, who may have serious concerns about any aspect of CFHI's operations, to have a mechanism to take the required steps to raise these concerns. Please refer to CFHI's Whistleblowing Policy for more information.