

**CANADIAN FOUNDATION FOR HEALTHCARE IMPROVEMENT
GOVERNANCE POLICIES**

Subject: Code of Conduct Policy	Policy No.: GP-C7
Category: Human Resources	Approved: September 2005
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Reviewed by: President	Next Review: January 2014

Preamble

In accordance with by-law number 4 of the corporation, the board of trustees has appointed a President who has general charge of the business affairs of the Canadian Foundation for Healthcare Improvement (CFHI), is responsible for the overall day to day management of CHSRF, and has such authority as prescribed by the board at the time of said appointment.

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

1. Policy

CFHI believes that all employees have the right to feel respected and safe in the workplace, free from harassment or prejudice. 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, or a face to face meeting, or sponsored conference an employee represents CFHI to the person with whom he or she is conducting business. This same courteous attitude is expected of an employee in dealing with his or her 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.

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 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.
- 3.3 In all cases, guidance will be provided by the Vice-President, Corporate Services.
- 3.4 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 is not to be released. When an employee or contractor is in doubt as to whether certain information is confidential, he or she should:
 - 4.1.1 refer to CFHI's *Conflict of Interest Policy* located on the website at <http://www.cfhi-fcass.ca/Libraries/Documents/Conflict-of-Interest-E.sflb.ashx>
 - 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, Section 15 for more information on Disciplinary Measures.

5. Communication

- 5.1 When employees are communicating on behalf of CFHI with anyone outside the organization, he or she 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 <http://incubator/Docs/Communications/Branding/Style-Guides> . The authorized version of 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), electronic systems (printers, copiers), computer systems (including electronic files), emails (including all messages sent or received), and the Internet.
- 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 (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 e-mail and Internet 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 his or her personal number. Employees are asked to be considerate of their colleagues working in open work

spaces and refrain from engaging in loud conversation or conducting informal meetings 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's primary value to CFHI is the ability to collect and use data 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 CHSRF'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. This should be done on stand-alone, non-production machines;
- e) not contribute to pirate software bulletin boards and similar activities, and
- f) indicate their affiliation with CFHI in Internet newsgroups, bulletin board discussions, chat sessions and other offerings when the message is sent for CFHI business purposes.

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 chain email;
- g) forges or misleads the sender's identity;
- h) divulges private and/or confidential information related to CFHI's

- i) business, its clients and/or its employees;
violates CFHI's policies including policies related to attitude and conduct or workplace harassment.

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, he or she 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 viruses. 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, Section 15 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 reasonable 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 his or her 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 senior management team member 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 take supplementary employment, including self-employment,

unless it:

- 7.2.1 interferes with his or her 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 Canvassing and soliciting for political or personal support or any such form of activity will not be permitted.

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 Committee funding of the staff holiday party or summer BBQ, for example;
 - Assistant appreciation day;
 - Employee service awards;
 - Gifts for a departing employee;
 - Flowers for a volunteer 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 Senior Management Team. 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 Senior Management Team 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 Trustees 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 Senior Management Team 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 CHSRF 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 his or her immediate branch 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 his or her job duties and responsibilities, the employee shall resign from his or her 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 his or her branch lead to ensure that it will not interfere with his/her 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 To ensure consistent communications, any public appearances, including speaking at a meeting, conference or seminar, or to the media, on any topic that involves CFHI, are subject to prior approval of the employee's branch lead and prior notification to the Vice-President, Corporate Services.
- 12.2 All contacts with the media and requests for interview are to be approved prior to the event by the employee's branch lead and prior notification to the Vice-President, Corporate Services.

13. Dress Code

- 13.1 To project a positive, professional image, employees are expected to dress business casual at all times 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 All CFHI employees who require a laptop computer for business travel are required to sign one out with the IT Help Desk representative.
- 14.3 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 Introduction

- 15.1.1 CFHI's "*Statement of Institutional Purpose*" clearly identifies transparency as one of its key operating principles. CFHI is therefore 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.
- 15.1.2 Employees can be the first to realize that there may be something seriously wrong within their organization's operations. However, they may decide not to express their concerns as they feel that speaking up would be disloyal to their colleagues or to the organization. They may also fear possible repercussions of harassment or victimization. In these circumstances, they may feel it would be easier to ignore the issue rather than report what may be a suspicion of malpractice or observed malpractice.
- 15.1.3 Employees can raise their concerns without fear of victimization, subsequent discrimination or disadvantage. This Whistleblowing Policy is intended to encourage and enable employees to raise these sorts of concerns within CFHI rather than simply overlooking a problem.
- 15.1.4 The Whistleblowing Policy is intended, as a clear statement, that if any wrong doing by CFHI or any of its employees or contractors is identified and reported to CFHI, it will be thoroughly investigated and remedied expediently. CFHI will further examine the means of ensuring that such

wrong doing can be prevented in future. A whistleblowing mechanism enables all employees and contractors to act responsibly to uphold the reputation of CFHI and maintain both internal and external confidence.

15.1.5 Wrong doing involves any unlawful or illegal behaviour and can include:

- a) any unlawful civil or criminal act,
- b) breach of or failure to implement or comply with any approved CFHI policy,
- c) knowingly breaching federal or provincial laws or regulations,
- d) unprofessional conduct or conduct below recognized, established standards of practice,
- e) questionable accounting or auditing practices,
- f) dangerous practice likely to cause physical harm / damage to any person / property,
- g) failure to rectify or take reasonable steps to report a matter likely to give rise to a significant and avoidable cost or loss to CFHI,
- h) abuse of power or authority for any unauthorized or ulterior purpose,
- i) unfair discrimination in the course of the employment or provision of services, and
- j) breach of CFHI's *Code of Conduct Policy*.

This list is not comprehensive, but is intended to give an indication of the kind of conduct which may constitute "wrong doing".

15.2 Whistleblowing Protection

15.2.1 Any employee who makes a disclosure or raises a concern under this Policy will be protected if the employee:

- a) discloses the information in good faith through the specified process outlined in section 15.4 below,
- b) believes it to be substantially true,
- c) does not act maliciously or make false allegations, and
- d) does not seek any personal or financial gain.

15.3 Complaint Process – Contacts

15.3.1 Anyone with a complaint or concern about CFHI's activities should contact his or her immediate supervisor.

15.3.2 If the person has concerns with his or her immediate supervisor, they should contact the (i) Human Resources Officer, (ii) Vice-President,

Corporate Services, (iii) President, (iv) Chair, Board of Trustees, or (v) Vice-President, Organizational Health, Shepell-fgi, our employee assistance program (EAP) care provider at 1-800-268-5211 who would act as an independent ombudsman. (This ombudsman will contact the Chair, Board of Trustees to remedy the concern.).

15.3.3 All initial contacts are to be followed up in writing by the complainant.

15.4 Complaint Process – Response

15.4.1 CFHI will respond in writing to all complaints raised. Depending on the seriousness of the concern, the complaints may:

- a) be investigated by an individual listed in section 15.3.2 above and/or
- b) be referred to the police.

15.4.2 In order to protect individuals and those accused of misdeeds or possible malpractice, initial inquiries will be made to decide whether an investigation is appropriate and, if so, what form it should take.

15.4.3 Some concerns may be resolved by agreed action without the need for investigation. If urgent action is required, this will be taken before any investigation is conducted.

15.4.4 Within **ten (10)** business days of a concern being raised, the responsible CFHI representative will:

- a) acknowledge that the concern has been received;
- b) indicate how he/she proposes to deal with the matter;
- c) give an estimate of how long it will take to provide a final response;
- d) inform the complainant whether any initial inquiries have been made; and
- e) inform the complainant whether further investigation(s) will take place and, if not, the reasoning behind their decision for not investigating further.

15.4.5 The amount of contact between CFHI representative reviewing the concern(s) and the complainant will depend on the nature of the matters raised, the potential difficulties involved and the clarity of the information provided. If necessary, CFHI will seek further information from the complainant.

15.4.6 CFHI will take steps to minimize any difficulties which the complainant may experience as a result of raising a concern. For instance, if the complainant is required to give evidence in criminal or disciplinary proceedings, CFHI will arrange for him/her to receive advice about the

process.

15.4.7 CFHI will ensure that the matter has been properly addressed. Thus, subject to legal or organizational constraints, CFHI will inform the complainant of the outcomes of any investigation.

15.5 Complaint Process – Time Frame

15.5.1 Concerns will be investigated as quickly as possible. It may be necessary to refer a matter to an external agency and this may result in an extension of the investigative process. Both the seriousness and complexity of any concern may have an impact upon the time taken to investigate a matter. The designated person will indicate at the outset the anticipated time scale for investigating the concern.

15.5.2 If the complainant is not satisfied with the results of the investigation, he/she may submit their concerns in writing to the President or a designate identified by the President to handle such appeals. The President will immediately undertake a review of the file. If the President is involved in the presumed wrong doing, the file will be escalated to the Chair, Board of Trustees for further review.

15.6 Prevention of Recriminations, Victimization or Harassment

15.6.1 CFHI will not discharge, threaten, harass, discipline, withhold or suspend payment of salary and/or benefits, demote, transfer or otherwise take any disciplinary or retaliation action against any employee or consultant of CFHI who in good faith raises a concern, reports any suspected wrong doing, or who discloses or provides information or assistance in connection with any internal investigation of legal inquiry.

15.7 Confidentiality and Anonymity

15.7.1 CFHI will respect the confidentiality of all whistleblowing concerns received to the extent that it is feasible.

15.7.2 All individuals involved with a whistleblowing investigation will be informed that it may be necessary at certain points of the investigation to release details including names and confidential information to verify information and thereby remedy the concern.

15.8 False and Malicious Allegations

15.8.1 Any allegations which prove to be unsubstantiated and have been made maliciously or knowing them to be false will be regarded by CFHI as a serious disciplinary offence which will result in disciplinary action, up to

and including dismissal without notice or pay in lieu thereof.

15.9 Whistleblowing File Maintenance

15.9.1 The President's office will maintain all whistleblowing files received. Each concern will be separately documented by the investigative parties and will be placed in a sealed envelope, clearly marked "*Confidential*" at the conclusion of the investigation. The status of the file will be clearly marked (pending or closed, and if closed, an executive summary describing the final disposition of the case will be outlined on the front of the file, prior to the envelope being sealed).

15.9.2 These files will remain sealed within the President's office until the expiration of the time allotted under the predetermined records retention schedule of seven (7) years.