President’s Message

St. Mary’s General Hospital’s reputation is shaped by our everyday actions, choices and decisions. For almost 90 years, our dedicated staff, physicians and volunteers have cared for patients, discovered new and innovative therapies and trained generations of health care professionals – all with the single focus on improving the quality of human life.

Throughout our history, we have served our patients and our community as part of our commitment to continue the healing ministry of Christ, consistent with our Catholic traditions. We have worked hard to earn a reputation of honour and integrity and remain rooted in the values demonstrated by our Founders, the Sisters of St. Joseph of Hamilton – to serve those in need with compassion, dignity, and respect. Our success is dependent on our commitment to St. Mary’s mission, vision and values; it is measured by the health outcomes and satisfaction of our patients and their families, and by the feedback from and satisfaction of our staff, physicians and volunteers.

In each of our roles, we are part of a team with a common vision, “to be the safest, most effective hospital in Canada, characterized by innovation, compassion and respect.” The privilege of supporting this noble vision carries with it significant responsibilities.

I’m pleased to share with you this St. Mary’s General Hospital Code of Conduct (Code) which was developed to help guide us through rules, behaviours, and responsible decision making in the workplace. This Code was developed with our staff, physicians, volunteers and patients in mind and is in large part a result of your feedback which indicated a desire for organizational wide accountability and behavioural guidelines. It is my hope that the Code clearly outlines expectations of how we treat each other, and identifies and helps to answer legal or ethical questions that you may encounter in your work.

All of St. Mary’s employees, volunteers, physicians, Board members and others who provide care for our patients will be asked to sign a certification stating that we understand the Code and are individually committed to compliance. If you have questions regarding this Code or encounter any situation that you believe violates the Code, you should immediately advise your supervisor, contact the Human Resources Office at ext. 6556, call our Ethics Hotline at 1-855-484-CARE (2773) or access the web-based reporting option at www.grantthorntincare.ca. Each of us has the responsibility to report any concerns that we may have, and to be free from retaliation or retribution for asking questions, or raising concerns in good faith about improper conduct.

Together, we must:
• Work in the best interests of our patients
• Respect and care for each other
• Act fairly and objectively
• Recognize and address conflicts of interest
• Think about how our actions may impact our patients, co-workers, clients and community partners
• Exercise our best judgment
• Protect the confidentiality of information trusted to us
• Come forward if we are aware of something that we think is not in the best interest of our patients or our organization
• Have the courage to stand up for what is right

St. Mary’s is part of St. Joseph’s Health System, and as such, our Code of Conduct stems from their values of Responsibility, Service, Justice, Enquiry, Respect and Dignity. We are committed to demonstrating in all that we undertake, the values that inspired the Sisters of St. Joseph.

I am confident that you will find this Code to be useful to your role and responsibilities at St. Mary’s. I am proud to say I work for St. Mary’s and hope you are too.

Don Shilton
President, St. Mary’s General Hospital
Mission, Vision & Values

St. Joseph’s Health System
Founded in the healing mission of the Sisters of St. Joseph of Hamilton, St. Joseph’s Health System was established in 1991 to meet the challenges of the changing environment for delivery of health and social services and takes pride in a system-wide commitment to caring for the whole person: body, mind and spirit. St. Mary’s is a proud member of the St. Joseph’s Health System.

Mission
Living the Legacy – Compassionate Care. Faith. Discovery.

Vision
On behalf of the individuals and families we are privileged to serve, we will:
- Deliver an integrated high quality care experience,
- Pursue and share knowledge,
- Respect our rich diversity, always remaining faithful to our Roman Catholic values and traditions.

Values
We commit ourselves to demonstrate in all that we undertake, the vision and values that inspired our Founders, the Sisters of St. Joseph.
These are:
- Dignity
- Service
- Responsibility
- Respect
- Justice
- Enquiry

St. Mary’s General Hospital
In the tradition of the Sisters of St. Joseph, Leading our Community in Health Care.
We believe in the sacredness of life and dignity of all people.

Our Mission
To continue the healing Ministry of Christ, consistent with our Catholic traditions and values.

Our Vision
St. Mary’s will be the safest, most effective hospital in Canada, characterized by innovation, compassion and respect.

We are Committed to:
- Heal, comfort, teach and promote health
- Care for the whole person – body, mind and spirit
- Encourage independence and self-responsibility
- Serve those in need, especially the poor and vulnerable
- Be a responsible corporate citizen and neighbour
- Use our resources wisely
- Be excellent, innovative and compassionate in all we do
- Promote an organizational spirit by encouraging participation, responsibility, continued learning and mutual respect
St. Mary’s Code of Conduct

What is a Code of Conduct?
A Code of Conduct is a tool to help create and maintain a culture of integrity and accountability, which is vital to achieving our mission and vision. It is a set of rules that clearly outlines the types of behaviours and responsibilities that are expected in the workplace.

The Code helps unite us all by communicating the same expectations and behavioural standards across the organization. This fosters a safe, secure and healthy work environment in which people are respected and valued as equal team members in the delivery of care.

As an organization we define ourselves by six core principles – Transparency, Integrity, Accountability, Innovation, Patient Centric and Compassion – which stem from the overarching values of the St. Joseph’s Health System.

To whom does the Code of Conduct apply?
The Code of Conduct applies equally to all Board members, executives and employees of St. Mary’s including medical (physicians), professional, and contract staff; volunteers, students, and researchers. We also expect our community partners to know and honour this Code.

In order to create a positive work environment, all members of St. Mary’s are accountable to themselves and each other for upholding this Code, which will be posted on our Intranet site and www.smgh.ca.

Note: Specific provisions in collective agreements that do not align with this policy will prevail.

What is the purpose of the Code of Conduct?
The Code of Conduct supports St. Mary’s commitment to maintaining the highest professional and ethical standards in how we conduct our business. The Code informs us about what we must do (compliance) and what we should do (ethics).

As an organization that is guided by ethics, we must follow St. Mary’s mission, vision and values. As a result, the Code will influence a positive workplace aimed at fostering development and performance, as it is in the best interest of our staff, physicians, volunteers and patients.

Our ethics set us apart from other organizations, which is why we each must do our part to achieve and sustain these standards. All individuals must maintain integrity in workplace conduct and avoid any activities that could harm the reputation of St. Mary’s, its Board members, employees, physicians, volunteers, patients or a patient’s family members.

The standards described in this Code are covered in more detail in our hospital policies, available on St. Mary’s Intranet. As members of the St. Mary’s team, we all must follow and support this Code and the mandatory standards it sets forth. Therefore, please keep this Code for future reference.

Non-compliance with the Code will result in appropriate disciplinary actions, up to and including termination of employment with St. Mary’s.

In addition, if an individual of St. Mary’s fails to comply with such requirements and policies, they may also be subject to criminal penalties and possible exclusion from licensing or regulatory bodies. If you have any questions or uncertainty regarding these standards, it is your responsibility and obligation to seek guidance from a member of management or Human Resources representative.

The Code is a critical component of our Compliance & Ethics Program. The standards apply to all of us. This means you will:

• Read the Code and understand how it applies to you
• Refer to the Code and St. Mary’s policies to guide your daily work activities
• Ask questions or report issues
• Complete training by established guidelines

*Note: This Code is subject to change and may be updated periodically to respond to shifting conditions and reflect changes in the law.
# St. Mary’s Core Principles, Essential Behaviours & LEGACY

## Core Principles

<table>
<thead>
<tr>
<th>Principle</th>
<th>Description</th>
</tr>
</thead>
<tbody>
<tr>
<td>Transparency</td>
<td>We communicate with each other and the public in an open and honest manner. Our decisions must stand up to scrutiny and be understood by others.</td>
</tr>
<tr>
<td>Integrity</td>
<td>Being ethically unyielding and honest, and inspiring trust by saying what we mean, matching our behaviours to our words, and taking responsibility for our actions.</td>
</tr>
<tr>
<td>Accountability</td>
<td>We take responsibility for our own actions and expect the same of others. We are accountable to our patients, each other, ourselves, St. Mary’s as an organization and the public.</td>
</tr>
<tr>
<td>Innovation</td>
<td>We are continuously driven to pursue excellence in everything we do with constant improvements in quality, service and cost effectiveness.</td>
</tr>
<tr>
<td>Patient Centric</td>
<td>We prioritize safety, quality and the patient experience in everything we do, with a focus on healing, comforting and health promotion for the whole person – body, mind and spirit.</td>
</tr>
<tr>
<td>Compassion</td>
<td>We have genuine concern for each other, our patients, and those within our community and we treat them with respect and empathy.</td>
</tr>
</tbody>
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## Essential Behaviours

### How we will succeed.

- **We will have a talented and inspired workforce.**
  We must attract, develop, engage and empower the right people who are motivated to fulfill their potential and the St. Mary’s vision.

- **We will be accountable.**
  Each individual employee will have a responsibility to achieve our organizational and financial goals so that we accomplish our vision.

- **We will pursue continuous improvement.**
  Superior results will be achieved by improving our processes, eliminating barriers to success and measuring our progress.

- **We will be receptive of each other.**
  We respect and value diversity and the unique contributions that foster a trusting, open and inclusive environment.

## LEGACY

**Leadership Competency Model**

LEGACY is an acronym for the competencies of Leader, Engagement, Goals, Analytical, Customer Focused and You-Self Aware. Each of these competencies outlines a set of behaviours that guide us in our performance.

The word LEGACY was chosen specifically for its strategic relevance to the St. Joseph’s Health System mission, “Living the Legacy” and as a testament to the healing mission of the Sisters of St. Joseph’s of Hamilton. LEGACY is an emotional word that reminds us on an individual level of the importance of the work that we do, why we do it, and that it is a privilege to serve the needs of the ill.

Our leadership competency model, LEGACY, will drive the highest standards of professionalism, respect and excellence in our workplace (see St. Mary’s General Hospital Values, Principles & Competency Map on p.28).
Pledge of Commitment

We are committed to delivering the highest quality health care and superior clinical outcomes in accordance with this Code. We are guided by and will uphold the following commitments:

To Our Patients
We treat our patients with respect and dignity and provide the highest quality health care services in a professional, compassionate, respectful, courteous and cost effective manner, compliant with applicable laws and regulations.

To Our Employees
We provide a safe work environment that is characterized by open and honest communication, respect, fairness, pride, friendship, professional ethics, integrity and ample opportunities for professional growth and development.

To Our Volunteers
We recognize the time and talent provided by our volunteers as a vital component of our mission in assisting and attending to the non-medical needs of patients and their families. We ensure our volunteers feel a sense of meaningfulness from their work and receive recognition for their efforts.

To Our Medical Staff Members
We provide a work environment that offers outstanding professional support and an atmosphere that advances high quality patient care.

To Our Board of Directors
We follow high standards of professional and ethical management by providing strong leadership to pursue strategies that meet the mission and vision of the organization.

To the Communities We Serve
We understand the particular needs of the communities that we serve and provide them with high quality, cost effective health care. As a charitable organization, we recognize our responsibility to assist those in need. In addition, we support international outreach programs through the St. Mary’s General Hospital Foundation and the St. Joseph’s Health System.

To Our Suppliers
We support fair competition among prospective suppliers and act in an ethical manner in selecting and maintaining our business relationships.
Leadership Responsibilities

While all St. Mary’s employees follow this Code, our management team sets the example and acts as a role model in every regard. Our managers help their team members understand what is expected of them under the Code and other applicable laws, regulations and policies. Managers create an environment that promotes the highest standard of ethics and compliance. Managers maintain an open-door policy and encourage employees to raise concerns, while ensuring that no one who reports a suspected violation of law or St. Mary’s policy in good faith is subject to retaliation. Managers must take prompt, appropriate action when a potential violation of law or St. Mary’s policy arises. Managers should seek assistance from their Human Resources representative in addressing questions or concerns.

Your Rights & Responsibilities

Every person subject to this policy deserves to be treated fairly and equitably.

You have the right to:

- Work in a safe and respectful environment
- Be free from discrimination and harassment
- Lodge complaints without fear of reprisal

You have a responsibility to:

- Treat everyone in the hospital community with respect and work together
- Provide the same high quality of care and treatment to all patients
- Report to a Supervisor, Manager or Human Resources any discriminatory or harassing conduct in the hospital community that you become aware of or witness
- Fully and truthfully cooperate with investigations under this Code

Patient & Family Rights & Responsibilities

It is expected that all individuals subject to this policy honour the rights and responsibilities of patients and their families. For further information, please refer to the link Patient Declaration of Values on-line at: www.smgh.ca/about-us/who-we-are/mission-values-and-history/

Patients & Families have the right to:

- Be provided with high quality care and services that focus on the whole being - mind, body and spirit
- Be treated with respect, compassion and understanding of their unique needs
- Be an active partner in their health care and be given reliable and current information to make informed decisions
- Express their appreciation or concerns about their health care experience knowing that their health care providers are listening

Patients & Families have the responsibility to:

- Treat everyone in the hospital community, including staff, volunteers and other patients, with respect. Special consideration will be taken when a patient is cognitively impaired.

Transparency is an important aspect of St. Mary’s culture. We communicate with each other and the public in an open and honest manner. Our decisions must stand up to scrutiny and be understood by others. We support our principles by promoting a culture of transparency.

Dignity, Respect & Communication

Tips for Everyday

Sometimes it’s the smallest things that have the biggest impact.

Dignity & Respect

- Smile — it’s contagious
- Be considerate - your words affect others
- Say “Hello,” say “Thank you”
- Respect everyone’s need for privacy
- Knock or indicate your presence before entering a patient’s room or examining area
- Avoid conversing with patients and family members within earshot of other patients or visitors
- Exit elevators to give right of way for patients
- Listen to what others have to say before expressing your viewpoint. Never speak over, butt in or cut off another person.

Communication

- Acknowledge patients and visitors
- Introduce yourself and your function
- Listen with empathy, provide reassurance and support
- Refrain from discussing your personal life with colleagues in front of patients
- Respond quickly and non-defensively to frustrations or concerns of others
- Take concerns seriously, not personally
- Respect cultural or religious needs, seek an interpreter or spiritual guidance when needed
- Remember, we all make mistakes
Commitment to Quality Care

Patient Care
Our primary mission is to provide quality health care services to all of our patients in a safe, healing environment. We treat patients with respect and dignity and provide necessary and appropriate care. We do not discriminate based on prohibited grounds (e.g., race, sex, sexual orientation, gender identity, same sex partner status, colour, ancestry, place of origin, ethnic origin, marital status, age, disability, citizenship, family status or religion, etc.) as noted within the Ontario Human Rights Code.

St. Mary’s has a comprehensive program to measure and improve its quality of care. Quality is measured in numerous ways, including review of patient outcomes, implementing provincial initiatives related to patient safety and quality, and through patient satisfaction surveys. St. Mary’s also compares the quality of its services against provincial standards and benchmarks in an effort to identify ways to continually improve the quality of care we provide and to establish standards of care that reflect best practices.

St. Mary’s maintains a patient safety program to identify and mitigate risks to our patients, and to promote the prevention, reporting and reduction of health care errors. All St. Mary’s caregivers must make patient safety a priority and ask for help or report issues if needed to ensure that we will fulfill our commitment to the highest quality standards.

In 2011, St. Mary’s introduced a Patient Declaration of Values in line with the Excellent Care for All Act, 2010 to ensure that we work collaboratively with patients and families to deliver the best possible experience.

We recognize and respect the diverse backgrounds and cultures of our patients and make every effort to equip our caregivers with the knowledge and resources to respect each patient’s cultural heritage and needs.

St. Mary’s has comprehensive Diversity, Human Rights and Accessibility policies that are consistent with the aims and objectives of the Canadian Charter of Rights and Freedoms, the Ontario Human Rights Code and the mission and values of St. Mary’s.

These policies are designed to accomplish the following outcomes:
• Outline the steps required to implement St. Mary’s plan to achieve equity, fairness, and due process;
• Foster a positive work/learning environment through proactive measures, barrier free systems analysis and enforcement;
• Require all members of the hospital community to be treated equitably and with dignity and respect;
• Address breaches of the policy and settle disputes quickly, fairly and as close to the source as possible; and
• Encourage all members of the hospital community to be aware of their rights and responsibilities under the policy.

All individuals subject to this Code are expected to review and actively support the principles of the policies located on the Intranet.

Safety Reporting, Disclosure & Transparency
Transparency and disclosure of unexpected outcomes in health care is an important process in ensuring a safe environment where patients and families feel secure and informed. Errors arise more often due to system issues as opposed to simple individual errors, making it necessary to promote a culture of transparency where errors are appropriately reported. All employees are encouraged to report errors. Disclosure of adverse events and critical incidents, and non-employee incident reporting policies were developed in collaboration with St. Mary’s Risk Management team to foster a transparent environment in which errors are acknowledged regardless of the outcomes severity. Familiarization with department-specific policies may also be required.

Confidentiality of Patient Information
Under the Personal Health Information Protection Act (PHIPA) and guided by the Freedom of Information & Protection of Privacy Act (FIPPA), St. Mary’s upholds all standards for maintaining the privacy and security of patient’s protected health information. Consistent with PHIPA, we only use, disclose or discuss patient-specific information with others when it is necessary for treatment, or when such disclosure is authorized by the patient or is required or authorized by law.

We protect the confidentiality of patients, whether that information exists in oral, written or electronic form. St. Mary’s maintains and safeguards both paper and electronic medical records to ensure that information is not shared with anyone except the patient, the patient’s substitute decision maker or executor, other third parties who represent a valid written authorization signed by the patient, or as required or authorized by law.

St. Mary’s employees and affiliated physicians access patient information only as necessary to perform their St. Mary’s roles. Unless authorized by law or by the patient, only individuals requiring patient information to provide care, perform quality control activities, bill or collect payment for services, or perform other administrative services are permitted access to confidential patient information.

In compliance with the Health Care Consent Act, 1996, we provide a treatment environment where patients and their families understand their individual illnesses and make informed decisions concerning their medical care. Each patient or patient representative receives a clear explanation of the benefits, risks and alternatives to the transfer. We inform patients of their right to make advance directives regarding treatment decisions and the designation of a substitute decision maker for health care. We honour patient directives or preferences to hospice care or palliative care. Patients receive care from appropriately licensed and credentialed professionals. In addition, patients have the right to request transfers to other facilities. In such cases, we provide the patient with an explanation of the benefits, risks and alternatives to the transfer. We inform patients of their right to make advance directives regarding treatment decisions and the designation of a substitute decision maker for health care. We honour patient directives or wishes regarding resuscitation within the limits of the law and the organization’s capabilities.

Patients and their representatives will benefit from confidentiality, privacy, opportunity for complaint resolution and spiritual care. Any restrictions on a patient’s visitors, mail, telephone or other communications must be evaluated for therapeutic effectiveness or necessity to protect the patient, other patients or St. Mary’s staff. Restrictions must be fully explained to the patient or their representative. We provide health education, health promotion and rehabilitation programs as part of our efforts to improve our patient’s quality of life.
Our patients trust us with their confidential medical information. All of St. Mary’s personnel have a role to play in following confidentiality, privacy and information security policies.

This means:

- Only accessing information needed to do your job
- Keeping passwords confidential and not sharing them with others
- Not posting patient information on social media forums
- Securing and encrypting mobile devices, such as laptops, flash drives, external hard drives and personal devices (cell phones and tablets) that contain St. Mary’s or confidential information
- Reporting any security breach of St. Mary’s electronic systems to the Chief Information Officer at ext. 4108

Security of Patient & Business Information

Because so much of St. Mary’s clinical and business information is stored electronically, it is essential that each St. Mary’s associate review and follow our information security policies and standards as required by the Personal Health Information Protection Act (PHIPA) and the Personal Information Protection & Electronic Documents Act (PIPEDA).

St. Mary’s has significant safeguards to maintain the confidentiality, integrity and availability of patient information. Our information security standards are designed to protect electronic systems, and the patient and business information contained therein. These standards apply to all St. Mary’s electronic systems containing patient and business information including: workstations, devices and terminals; networks, servers and their supporting infrastructure; software and applications (e.g., e-mail); and, databases and storage devices. St. Mary’s also has information security standards for associate’s personal devices that contain St. Mary’s information for a legitimate business purpose (e.g., personal smart phone containing an associate’s St. Mary’s e-mail address).

Any St. Mary’s associate who knows or suspects confidential information to have been compromised must report the potential security breach to St. Mary’s Privacy Officer at ext. 1209, or Chief Information Officer, ext. 4108.

Associates shall never use tools or techniques to break or exploit St. Mary’s information security measures or those used by other companies or individuals.

We take steps to prevent identity theft by protecting Social Insurance Numbers and other personal patient and employee data. We maintain and update our numerous security measures to prevent unauthorized access to St. Mary’s systems.

Research & Education

St. Mary’s mission includes the continued discovery and pursuit of innovative medical excellence within legal and ethical standards. We are committed to conducting responsible research and to proactively invest in educational programs that prepare researchers, students and staff for the challenges of the future.

We are committed to research integrity in disseminating appropriate, valid scientific results in accordance with applicable regulations and guidelines of the Tri-Hospital Research Ethics Board. All patients who are asked to participate in a research project are given a full explanation of alternative treatment services that might prove beneficial to them, along with their risks and benefits. Patients have the right to refuse to participate in a research study without compromising his or her access to health care services. All human subject research proposals must be approved by the appropriate research ethics board (e.g., Health Canada’s Research Ethics Board).

Any employee or physician engaging in human subject research must do so in conjunction with appropriate approval and consistent with applicable St. Mary’s policies and procedures.
Workplace Conduct & Employment Practices

Diversity & Equal Employment Opportunity
St. Mary’s recognizes people as our greatest asset. Our organization’s ability to deliver quality patient care is directly related to the skills, competencies and abilities of our employees, physicians and volunteers. A diverse workforce enables us to meet the needs of our diverse patient population.

St. Mary’s will not tolerate acts of discrimination. This policy applies to all facets of the employment relationship including: recruitment, placement, promotions, transfers, retention, compensation, benefits, training, reduction in workforce, attendance, discipline, discharge, retirement, pension policies, human resources programs, policies and conditions of employment, and the granting or renewal of clinical privileges, save for legislated exemptions.

St. Mary’s leaders and associates are responsible for ensuring that this policy is followed at all times and that all employees know about and understand this policy.

Harassment & Workplace Violence
St. Mary’s maintains a positive work environment that supports our mission, vision and policies. We will not tolerate disrespectful, intimidating, threatening, discriminating, or harassing behaviour such as:

- Verbal, physical or sexual conduct that interferes with a person’s work performance or creates an intimidating, hostile or poisoned work environment as per the Occupational Health & Safety Act.
- Workplace violence, including physical assault, threat of violence, stalking, robbery or other hate crimes.

Discrimination is behaviour that excludes individuals or treats them differently because they are members of specific groups. According to the Ontario Human Rights Code, individuals cannot be discriminated against in employment based on a series of prohibited grounds (e.g., race, sex, sexual orientation, gender identity, same sex partner status, colour, ancestry, place of origin, ethnic origin, marital status, age, disability, citizenship, family status or religion, etc.).

Harassment — According to the Ontario Human Rights Code and the Occupational Health & Safety Act, harassment is “engaging in a course of vexatious comment or conduct that is known or ought reasonably to be known to be unwelcome.” The various types of harassment are noted in our Violence & Harassment Prevention policy and procedure.

Each of us has the right to work in an environment free of harassment, intimidation, and violence. Accordingly, we prohibit any behaviour that creates an intimidating, hostile or poisoned work environment. If you observe or experience any form of harassment, discrimination or violence, you should report the incident to your Supervisor/Manager immediately.

If you have concerns that you or a fellow employee may be the potential target of violence by a third party (e.g., spouse, former spouse, family member, boyfriend, girlfriend, etc.), or a patient or visitor may act violently, you must report these concerns to your Supervisor/Manager immediately. If you have obtained a restraining order against a third party, you must provide a copy of that order to your Manager and Human Resources.

Inappropriate Behaviour
Inappropriate behaviour is conducting oneself in a way that is undesirable, unsuitable or improper. St. Mary’s has the exclusive right and function to manage the hospital and direct the workforce to maintain order, discipline and efficiency within the organization. St. Mary’s establishes and enforces rules and regulations to be observed to carry out obligations to its patients, members and the community.

Examples of inappropriate behaviour include:

- Comments that are insulting, hurtful, disrespectful or rude
- Discussing workplace conduct, concerns and conflict in front of others inclusive of social media (e.g., Facebook, Twitter, etc.)
- Verbal abuse, including swearing, insults, condescending remarks, sarcastic language and malicious gossip
- Bullying, belittling, undermining, coercion and professional humiliation
- Wilful damage to St. Mary’s property including banging, kicking or throwing equipment
- Use or sale of illegal drugs on St. Mary’s property
- Sabotage or theft
- Violations of clinical practice
- Sexual abuse/harassment

If you observe examples of inappropriate behaviour or violations of our Violence, Harassment & Prevention policy, report your observation to your Supervisor/Manager, or Human Resources representative. Managers are obliged to follow up and investigate all reports.

Authority Relationships
Dealing with rude or disrespectful behaviour from someone who has ‘authority’, such as a Manager/Physician, etc., may feel challenging. If you are uncomfortable speaking directly to a person of more ‘authority’ about how his or her behaviour has affected you, or you have done so and have not reached a resolution, then you should contact a Human Resources representative.

You will receive notification where action has been taken to address your concern. There will be no reprisal against any individual for making a complaint in good faith; however, malicious reporting (making a false claim) will not be tolerated.

Creating an environment of dignity and respect starts with each and every one of us. Positive and respectful behaviour is contagious and by maintaining an outlook that is consistent with the principles of this Code, we engage and empower our colleagues to do the same.

Tips for managing difficult situations:
- Approach a person when you are feeling calm
- Stay focused on the problem behaviour, not the person
- Be respectful in your approach, avoid confrontation
- Use an “I” message. Let the person know how the behaviour has affected you
- Clarify your understanding of the person’s position
- Stay focused on the facts
- Take responsibility for any contributions you have made to the problem
- Manage your own emotional response, stay calm
- Ask for a “time out” if the situation escalates, respect “time out” requests
- If you cannot resolve the problem, seek assistance from Human Resources staff as they have specialized training in conflict resolution.

What to say when addressing rude or disrespectful behaviour:
- “It sounds like you are having a bad day. Can I help you in any way?”
- “You may not be aware of it, but you sounded a bit abrupt when you spoke to that patient.”
- “I am uncomfortable with how you said that to me.”
- “I would rather not talk about our co-workers behind their backs. Can we change the subject?”
- “Can we agree to disagree on this?”
- “When you speak to me in that tone of voice, I feel you don’t respect my opinion.”
- “It sounds like you have a serious concern. It might be helpful to speak to your Supervisor, Manager or Union Rep about it.”
- “I think we may need to get someone to help us with this issue.”

We provide an inclusive work environment where everyone is treated with fairness, dignity and respect. We embrace the diversity of our patients, co-workers, physicians, volunteers and vendors. St. Mary’s is an equal opportunity workforce and does not permit harassment or discrimination against any individual with regard to any status protected by law.
Commitment to Co-Workers
Co-worker is defined broadly to include St. Mary’s staff, managers, volunteers, physicians, students, and contract employees.

Demonstrate your commitment to co-workers:
• Be friendly, courteous and respectful to all members of the health care team
• Arrive at work and return from your breaks on time
• Manage your attendance; your absenteeism results in difficulty for the rest of your team
• Take responsibility for your share of the work
• Be willing to pitch in and provide assistance to co-workers when needed
• Maintain confidentiality as appropriate, do not speak ill of others; this includes the use of social media (e.g., Facebook, Twitter, LinkedIn, etc.)
• Learn to manage your stress; stress is never an excuse for rude or disrespectful behaviour
• Use your energy to suggest solutions rather than to complain about things
• Be welcoming and supportive of new staff; being a mentor is a great way to pass on your knowledge and experience to others

Drug, Alcohol & Smoke Free Environment
We are committed to the Smoke-Free Ontario Act. The health and safety of our employees, patients, volunteers and physicians is our primary concern. This includes an alcohol-drug-and-smoke free work environment. St. Mary’s facilities and property, including the island created by Queen Street’s route around the hospital, are entirely smoke free.

General Standards
Licensure and Certification
Credentials communicate to our patients that we are qualified to do our jobs. Employees and independent contractors requiring professional licenses, certification or other credentials to perform their duties must maintain current status of their credentials and provide a current copy to Human Resources. St. Mary’s requires independent contractors to maintain all required credentials. Caregivers with lapsed or revoked credentials will not be allowed to provide care to patients.

Appearance
• Visibly wear your identification badge at all times
• Do not wear scented products to work
• Keep your work area tidy and clean
• Dress professionally, follow the St. Mary’s dress code

Way-finding
• Give directions to anyone who appears lost or asks for assistance
• If the route is not easy, when possible take the person to their destination

Maintain Standards of Practice/Service
• Ensure that you fully understand your role and responsibilities
• Stay current and up-to-date in your area of service
• Take advantage of educational opportunities
• Attend your required annual training
• Ask for feedback on your performance and participate in the St. Mary’s Performance Management Program
• Maintain St. Mary’s standards of safety

We have a safe and drug-free workplace
• Report for work free from the influence of alcohol and illegal drugs
• Immediate termination may result if you: report to work under the influence of any illegal drug or alcohol; have an illegal drug in your system; use, possess or sell illegal drugs while on St. Mary’s property or during St. Mary’s work time; St. Mary’s recognizes its obligation towards employees as outlined in the Ontario Human Rights Code.

Controlled Substances
Some employees have access to prescription drugs, controlled substances and other medical supplies. We access and handle these substances only as authorized and administer them only by physician order. If you become aware of inadequate security of drugs, theft of drugs from the organization or diversion of drugs from their intended purpose, you must report this immediately to your Manager or Human Resources.

Health & Safety
St. Mary’s complies with all regulations through its policies that promote the protection of workplace health and safety.

• Know how St. Mary’s health and safety policies apply to your specific job responsibilities;
• Seek advice from your Manager or Occupational Health & Safety Department (if applicable) whenever you have a question or concern; and
• Notify your Manager about a safety hazard, broken piece of equipment, any workplace injury or any situation presenting a danger of injury so that timely corrective action can be taken.

You are responsible to ensure that you complete annual mandatory safety training and comply with all St. Mary’s Health & Safety policies.

Our Human Resources or Occupational Health & Safety Departments are the most appropriate contacts if you have concerns about your specific work situation.

You should make every effort to resolve workplace conduct and employment practices through your Manager and Human Resources.
Responsible Use of St. Mary’s Assets
We all have a responsibility to use our resources wisely and only for St. Mary’s business purposes. These assets include, but are not limited to, employee’s time, materials, supplies, equipment, information, reports, records, computer software and data, trademarks and service marks, other intellectual property and St. Mary’s provider services. Any community or charitable use of organizational resources must be approved in advance by your Manager. We do not allow any use of organizational resources for personal financial gain for any individual or entity.

Non-Employment or Retention of Sanctioned Individuals
St. Mary’s does not hire, contract with or bill for services rendered by an individual or entity that:

- Has been convicted of a criminal offense related to health care for which a pardon has not been granted;
- Has been convicted of a criminal offense that disqualifies an individual from employment for which a pardon has not been granted.

St. Mary’s will conduct the necessary background checks and take appropriate action if an individual or entity is found to be in violation of the above.

Cooperation in Government Investigations
St. Mary’s cooperates fully with government inquiries. If any employee receives an inquiry, subpoena or other legal document regarding St. Mary’s business, whether at home or in the workplace, the employee must notify his or her Manager immediately.

We are always clear and truthful in responding to authorized inquiries. We will not conceal, destroy or alter any documents, lie or make misleading statements to any investigative representative.

Environmental Compliance
St. Mary’s promotes sound environmental practices that prevent damage to the environment, enhance human and community resources, and reduces or avoids exposure to environmental liabilities. We comply with applicable laws and operate our facilities with the necessary permits, approvals and controls. We properly handle and dispose of hazardous and bio-hazardous waste.

Immediately tell your Supervisor or Manager about any situation regarding contamination by a hazardous substance, improper disposal of medical waste or any situation that may be potentially damaging to the environment or create a hazard to associates or patients. If you are uncertain of the correct procedures for handling or disposing of any such material, you must consult your supervisor for assistance.

Communication Systems & Electronic Media
All communication systems are the property of St. Mary’s and are to be used for business purposes. These systems include, but are not limited to, computers, electronic mail (e-mail), smartphones, Intranet/Internet access, fax machines, telephones and voicemail. St. Mary’s permits reasonable and extremely limited personal use of St. Mary’s communication systems during designated break times; however, such communication is not private. St. Mary’s reserves the right to access, monitor and disclose the contents of the Internet, e-mail and voicemail messages or other communications made through our systems. Use of clinical area computers for personal purposes, such as online banking, booking trips, shopping etc., is inappropriate and will not be tolerated. There are designated break times and break rooms for associates to complete such tasks.

Employees may not use St. Mary’s communication systems for a purpose that would constitute or encourage a criminal offense, give rise to civil liability or otherwise violate any laws. Users who abuse St. Mary’s communications systems or use them for unauthorized, non-business purposes may lose these privileges and will not be tolerated. There are designated break times and break rooms for associates to complete such tasks.

Employees may not use St. Mary’s communication systems or use them for unauthorized, non-business purposes may lose these privileges and be subject to disciplinary action, up to and including termination. Employees are prohibited from using personal computers to make illegal copies of software licenses or from using unlicensed software.

Failure to observe this policy may result in consequences to the employee, such as termination of employment or legal action by the software licensing company. Any questions regarding this policy should be directed to the Chief Information Officer.

Standard Communication Etiquette

Telephone
- Identify yourself and your department/function when making or answering a call
- Be friendly and courteous
- Give your full attention to the caller
- Know how to transfer a call and put someone on hold; ask permission before putting someone on hold and thank the caller for waiting
- Be willing and able to take calls and take messages
- Assist the caller in whatever way you can

E-mail
- Use the telephone, rather than e-mail, to discuss complex or sensitive problems if you cannot have a meeting
- Do not send an e-mail when you are upset or frustrated
- Use the spelling and grammar check function on your computer
- Use the subject heading to identify the topic of your e-mail
- Limit your use of the “CC” function
- Do not allow the use of your BlackBerry or other smart phone to interfere with your participation in a meeting
- Respond to e-mails in a timely manner

Confidential Business Information
Although you may use confidential information to perform your job, you must protect it from unauthorized use. Confidential information covers anything related to St. Mary’s operations that is not publicly known, such as: personnel lists and data; patient lists and clinical information; passwords or identifiers; financial and research data; marketing strategies; supplier and subcontractor information; and proprietary computer software, etc.
Employees may not use internal communication channels or access the Internet at work to post, store, transmit, download or distribute any material that is:

- Threatening
- Discriminatory
- Obscene
- Knowingly, recklessly or maliciously false

These channels of communication may not be used to:

- Send chain letters
- Broadcast personal messages
- Forward copyrighted documents that are not authorized for reproduction
- Conduct a job search
- Open misaddressed mail

Computer passwords and other means of identification that may be used by St. Mary’s are confidential and personal to the user. Such passwords or identifiers allow authorized users access to specific applications related to their responsibilities with St. Mary’s. Sharing or failing to protect your unique passwords or identification is a breach of internal security and is subject to disciplinary action, up to and including termination of employment.

If an individual’s employment or relationship with St. Mary’s ends for any reason, the individual is still bound to maintain the confidentiality of information viewed, received or used during the course of his or her relationship with St. Mary’s. Such individuals will not be permitted access to confidential information after termination, and copies of any confidential information in the individual’s possession must be returned at the end of the individual’s employment or relationship with St. Mary’s.

We are all required to:

- Use St. Mary’s e-mail for all electronic communication
- Protect St. Mary’s confidential information
- Use St. Mary’s electronic systems (e.g., Meditech) in accordance with our policies

Marketing, Advertising & Communications

St. Mary’s engages in communications, marketing and advertising activities to educate the public, provide information to the community, increase awareness of our services and to recruit employees. We share only truthful information in these communications. We comply with applicable legislation, professional ethical guidelines related to marketing, advertising and communication activity. Third parties (e.g., vendors) may not use or associate St. Mary’s name, symbols, logos or trademarks in an advertisement, press release or marketing material without prior consent from the St. Mary’s Communications Department. Any media inquiries should be referred to the Communications Department.

Copyrights

St. Mary’s personnel will obtain the express permission of the copyright holder before making copies of copyrighted materials, unless St. Mary’s is licensed under an agreement to do so. Producing replications of copyrighted works, even for internal distribution, can lead to substantial organizational and personal liability for copyright infringement.

Copyrighted works include, but are not limited to, printed or digital articles from publications, magazines, books, television and radio programs, videotapes, musical performances, photographs, training materials, manuals, documentation, surveys, software programs and databases. In general, the laws that apply to printed materials are also applicable to all other media, including visual and electronic media such as diskettes, CD-ROMs, DVDs and Internet pages.

Conflicts of Interest & Business Relationships

Conflicts of Interest

In our work, we have the duty to put the interests of St. Mary’s before our own. The term ‘conflict of interest’ refers to situations in which financial or other personal considerations may compromise, or have the appearance of compromising, an individual’s ability to make objective decisions in the course of their job. We avoid conflicts of interest where someone might question whether we are acting for St. Mary’s benefit or for personal gain. Because reports of conflicts based on appearances may undermine public trust which is difficult to restore, even the appearance of a conflict may be as serious and potentially damaging as an actual conflict. For that reason, employees should avoid even the appearance of a conflict of interest.

Employees must disclose all possible conflicts of interest involving themselves or their immediate family members (e.g., spouse, parent, brother, sister, child, etc.). If you believe a conflict of interest exists or if you have a question about whether an outside activity might constitute a conflict of interest, you must consult with your Human Resources Department.

Business Courtesies

The business courtesies policies set forth in the following sections of the Code governs activities with those outside of St. Mary’s, such as vendors, subcontractors, suppliers, independent consultants and others. These sections do not apply to actions between the organization and its employees or actions among St. Mary’s employees. Nothing in these sections of the Code should be considered in any way as an encouragement to make, solicit or receive entertainment or gifts.

We must disclose potential conflicts of interest and seek approval before pursuing any activity. Potential conflicts include, but are not limited to:

- Employment with a company that competes, contracts with or is a supplier of St. Mary’s
- A financial or ownership interest in an entity that competes with St. Mary’s
- Using St. Mary’s property, information or resources for non St. Mary’s purposes
- Outside jobs or positions that conflict with or distract you from your work at St. Mary’s
- Making business decisions that involve or could benefit family and friends
- Having a supervisory or reporting relationship with a family member or someone with whom you are close

Receiving Business Courtesies

Meals and Business Entertainment

We recognize that there will be times when you receive an invitation to attend an event with representatives of a current or potential business partner (e.g., local theatre or sporting event). Business partners include contractors, customers, suppliers or anyone with whom you do business with on behalf of St. Mary’s.

A St. Mary’s employee may accept such invitations so long as the requirements described in this section are followed. These requirements do not apply to business meetings at which food may be provided. Certain exceptions to these requirements may be made with the prior written approval of a St. Mary’s Vice President. Any approval must be forwarded to the Human Resources Department.
Meals and business entertainment offered by a St. Mary’s vendor or business partner may be accepted if:

- The cost associated with the event is reasonable and appropriate which, generally, means the cost is less than $150 per person
- No expense is incurred for travel costs or overnight lodging
- Such invitations from the business partner are no more frequent than quarterly
- There are no business transactions or renewals of an existing relationship currently under negotiation

Gifts
St. Mary’s employees may accept a personal gift from any individual or organization with a potential relationship with St. Mary’s as long as all gifts from such business partners in a calendar year are $150 or less. A business partner may not extend a gift more than quarterly to a St. Mary’s employee.

You may not accept a gift if there is a business transaction, or renewal or expansion of an existing relationship under negotiation. Perishable or consumable gifts to a department or group are not subject to any specific limitation, but the benefit per recipient should be minimal. Neither you nor any member of your family may accept cash or cash equivalents, such as gift certificates, from any individual or organization with a current or potential relationship with St. Mary’s. Under no circumstances may a St. Mary’s employee solicit a gift. Prior to accepting a gift over $150, you should seek appropriate approval from the Chief Financial Officer.

Training & Education
Business partners may extend training and educational opportunities that include travel and overnight accommodation at no cost to you or St. Mary’s. Similarly, there may be circumstances where you are invited to an event at a vendor’s expense to receive information about new products or services. Prior to accepting such invitations, you must receive approval by a St. Mary’s Vice President in your chain of command. Any approval should be forwarded to the Human Resources Department.

Relationships with Subcontractors & Suppliers
We manage our consulting, subcontractor, supplier and vendor relationships in a fair and reasonable manner, free from conflicts of interest and consistent with all applicable laws and good business practices. We promote good competitive procurement to the maximum extent practical.

We always employ the highest ethical standards in business practices and source selection, negotiation, determination of contract awards and the administration of all purchasing activities.

Program Structure
The St. Mary’s Compliance & Organizational Ethics Program demonstrates our commitment to the organization’s highest standards of ethics and legal compliance. Human Resources, along with the Audit Committee, provide direction, guidance and oversight in creating the standards set forth in this Code. In line with that commitment, we maintain a Workplace Ethics policy that reflects our values and beliefs as individuals and as an organization. We are committed to ethical and legal conduct that is compliant with all relevant laws and regulations. We correct wrongdoing wherever it may occur in the organization. Each employee has an individual responsibility to report any activity that appears to violate applicable laws, regulations, this Code or St. Mary’s policies. We are committed to providing an environment that allows reporting in good faith without fear of retaliation.

Personal Responsibility to Report Without Fear of Retaliation
We are committed to ethical and legal conduct that is compliant with all relevant laws and regulations. We correct wrongdoing wherever it may occur in the organization. Each employee has an individual responsibility to report any activity that appears to violate applicable laws, regulations, this Code or St. Mary’s policies. We are committed to providing an environment that allows reporting in good faith without fear of retaliation.

Reporting
In most situations, your immediate Supervisor or Manager may be in the best position to address your ethical dilemmas. They are responsible to address your concerns and guide your access to further assistance, if required. In situations where you may be uncomfortable talking to your Supervisor or Manager, or they are unable to help, you are encouraged to speak with the next level manager or seek assistance from Human Resources Management, a professional practice lead, related regulated college, or in case of a physician, you may contact the Head of Service or Chief of Department.

If the above options have not resolved your issue and you still believe it is a serious violation of the Workplace Ethics policy (refer to the policy for a definition of serious violations), you may make an on-line report through the Workplace Ethics Reporting Line.

- Your Human Resources Department is the most appropriate resource to contact if you have concerns about your specific work situation.
- You should make every effort to resolve workplace conduct and employment practice issues through your supervisor, labour representative and the Human Resources Department.

Retaliation occurs when an individual experiences adverse action for acting upon their legal rights. We do not tolerate retaliation. Reports of retaliation are taken very seriously. If you feel that you have experienced retaliation, immediately report it to your Manager or to the Human Resources Department.

St. Mary’s has retained Grant Thornton, an independent reporting firm, to provide an ethics reporting service. For more information please visit the website at www.grantthorntong.ca or call 1-855-484-CARE (2273) and speak directly with an independent CARE representative. Your identity is protected should you choose not to divulge it. You are making this report without any personal consequences to yourself.
We have coding and billing policies to ensure our bills are accurate and comply with all applicable laws. This means:

- We bill for only those services actually provided. We provide medically necessary services that are ordered by a physician or other appropriately licensed individual;
- The medical record contains proper, timely, appropriate and legible documentation of all physician and other professional services prior to billing; and
- We correct billing errors prior to submitting a bill, or if already submitted, we correct the underlying problem and make appropriate refunds.

Resources for Guidance & Reporting Concerns

Individuals may obtain guidance on a compliance or ethics issue or report a concern using several resources. We encourage resolution of issues at a local level. Employees should contact the Human Resources Department to resolve Human Resources-related issues (e.g., payroll, fair treatment, disciplinary, etc.).

We encourage you to raise compliance concerns first with your Manager. If this is uncomfortable or inappropriate, you may discuss the situation with a Human Resources representative. You may always contact the compliance hotline where you may make an anonymous report. If you believe that your compliance report was given insufficient attention you should report the matter to senior management. If you observe criminal or illegal activity presenting an immediate risk to the safety of any person, you should first report it to the local police.

Accurate Billing & Coding of Services

St. Mary’s assures that all billings to the government, third-party payors and patients are accurate and conform to all applicable laws and regulations. We prohibit any employee or agent of St. Mary’s from knowingly presenting or causing to be presented claims for payment or approval that are false, fictitious or fraudulent.

Strict regulations govern third-party billing of our insured patients. St. Mary’s is committed to full compliance with federal health care program requirements, including preparing and submitting accurate claims consistent with such requirements. We monitor and verify that claims are submitted accurately and appropriately. For hospital or physician billing or coding questions, contact the Finance Department at ext. 6660.

Accuracy of Records & Reports

Each St. Mary’s employee is responsible for the integrity and accuracy of documents and records to ensure that records are available to support our business practices and actions. No one may falsify information on any record or document or make alterations to such information except in accordance with St. Mary’s policy.

Medical records must be as accurate and complete as possible. Personnel may correct errors in medical records only according to the appropriate procedures. Any changes or entries made out of time sequence should be clearly dated and initialed. All of St. Mary’s supporting documentation (e.g., medical records) related to our coding and billing of patient care services to third-party payors must be accurate, timely, reliable and properly maintained in accordance with St. Mary’s Management of Records policy.

Financial Reporting & Records

We maintain a high standard of accuracy and completeness in the documentation and reporting of all financial records. These records serve as a basis for managing our business and are important in meeting our obligations to patients, employees, suppliers and others. These records also are necessary for compliance with tax and financial reporting requirements.

Business & Financial Records
All financial information must fairly represent actual business transactions and conform to generally accepted accounting principles or other applicable rules and regulations. St. Mary’s maintains a system of internal controls to provide reasonable assurances that all transactions are executed in accordance with management’s authorization and are recorded in a proper manner so as to maintain accountability of the organization’s assets.

Anyone with knowledge of inaccurate or false financial records must promptly report them to their Supervisor, the Chief Financial Officer or the Compliance & Ethics Hotline (1-855-484-2773). All issues related to the preparation, submission and settlement of cost reports must be addressed by or coordinated with the Finance Department.

Retention, Disposal of Documents & Records
Medical and business documents and records are retained or destroyed in accordance with the law and our Corporate Management of Records policy. Medical and business documents include paper documents such as letters and memos, computer-based information such as e-mail or computer files on the St. Mary’s network or stored in a portable format (disk, tape, DVD, USB drive, etc.) and any other medium that contains information about the organization or its business activities.

Records of any type must never be destroyed, altered or concealed in an effort to deny governmental authorities or appropriate persons information that may be relevant to an investigation, inquiry or litigation.

Billing Inquiries
St. Mary’s responds timely and truthfully to any billing inquiries. We answer billing requests with complete, factual and accurate information. We cooperate with and are courteous to all government inspectors, their agents as well as other third parties, and we will provide them with the information to which they are entitled during an inspection or inquiry.

St. Mary’s maintains documentation in support of patient care services billed to government and third party payors in accordance with our Management of Records Policy.
For additional information on our Code of Conduct please contact our Human Resources Department at:
519.749.6578 x6556