

Organization or employer when used in this document refers to Hospice Palliative Care Ontario (HPCO).

HPCO's Code of Conduct is grounded in our Mission and Value Statements.

HPCO's Mission Statement:

To provide leadership on behalf of our members by informing policy and promoting awareness, education, knowledge transfer and best practices in the pursuit of quality hospice palliative care in Ontario.

HPCO's Values:

Courage: We make the best decisions not just the popular ones. We dare to go down new roads and challenge accepted wisdom. We place clear expectations on one another and promote change.

Integrity: We are professional and honest in our relationships. We honor our commitments. We hold ourselves accountable.

Respect: We value the diversity of our members and stakeholders, their opinions, experience, and contributions.

CODE OF CONDUCT

This Code applies to all employees (permanent full-time, hourly, fixed term contract, permanent part-time); volunteers (including Board members); and any third party contracted entity (referred to as contractors in this policy) operating or providing service on behalf of HPCO.

This Code covers a wide range of business practices and procedures. It does not cover every issue that may arise, but it sets out basic principles to guide all employees/volunteers of HPCO. All HPCO employees and volunteers must conduct themselves accordingly and seek to avoid even the appearance of improper behavior or conflict of interest.

If a law conflicts with any part of this Code, you must comply with the law. If questions arise pertaining to conflicts between the law and this code, employees/volunteers should consult their supervisor to resolve the situation. Employees and volunteers are responsible for understanding the legal and policy requirements that apply to their jobs and reporting any suspected violations of law, this Code or HPCO policy.

Those who violate the standards in this Code will be subject to disciplinary action, including possible dismissal. Furthermore, violations of this Code may also be violations of the law and may result in civil or criminal penalties for you, your supervisors and/or HPCO. If you are in a situation which you believe may violate or lead to a violation of this Code, please seek clarification from your supervisor and if necessary follow the procedures set out in the HPCO's Complaints Policy.

The Code is organized into categories, as follows:

Service

1. Always act with fairness, honesty, integrity and openness; respect the opinions of others and treat everyone with equality and dignity without regard to gender, race, color, creed, and ancestry, place of origin, political beliefs, religion, marital status, gender identification, disability, age, or sexual orientation.

Accountability

1. Act with honesty and integrity and in accordance with any professional standards and/or governing laws and legislation that have application to the responsibilities you perform for or on behalf of the HPCO.
2. To act in accordance with the values of HPCO being as follows;
Courage: We make the best decisions not just the popular ones, we dare to go down new roads and challenge accepted wisdom, and we place clear expectations on one another and promote change.
Integrity: We are professional and honest in our relationships, we honour our commitments, and we hold ourselves accountable.
Respect: We value the diversity of our members and stakeholders, their opinions, experiences, and contributions.
3. Comply with both the letter and the spirit of any training or orientation provided to you by the HPCO in connection with those responsibilities.
4. Adhere to the policies and procedures of the HPCO and support the decisions and directions of the Board and its delegated authority.
5. Take responsibility for your actions and decisions. Follow reporting lines to facilitate the effective resolution of problems. Ensure that you do not exceed the authority of your position.

Conflict of Interest

A conflict of interest exists when a person's private interest interferes in any way - or even appears to interfere - with the interests of HPCO. A conflict situation can arise when an employee, volunteer, or contractor takes actions or has interests that may make it difficult to perform his or her work on behalf of HPCO objectively and effectively. Conflicts of interest may also arise when an employee, volunteer, or contractor, or a member of his or her family, receives improper personal benefits as a result of his or her position in the organization. Loans to, or guarantees of obligations of, employee, volunteers, or contractors and their family members by the organization may create conflicts of interest and in certain instances are prohibited by law.

Conflicts of interest are prohibited as a matter of organization policy, except as approved by the CEO for situations involving employee, contractor or non-board volunteers, or the Board of Directors for situations involving the CEO or Board Members. It is the duty of employees, volunteers, and contractors to adhere to the Conflict of Interest Policy at all times. In the event that such a matter arises, the person shall formally disclose the interest, recuse themselves from any discussion or voting on the matter and refrain from attempting to persuade or influence other persons participating in the decision.

Conflicts of interest may not always be clearly defined; hence, where potential conflicts arise, employees and volunteers should consult their immediate supervisor. Any employee, volunteer, or contractor who becomes aware of a conflict or potential conflict should bring it to the attention of a supervisor.

Employment Opportunities

Employees are prohibited from taking for themselves opportunities that are discovered through the use of HPCO property, information or position without the consent of the CEO for situations involving employee, contractor or non-board volunteers, or the Board of Directors for situations involving the CEO or Board Members. No employee, volunteer, or contractor may use Organization property, information, or position for personal gain, and no employee, volunteer, or contractor may compete with the Organization directly or indirectly. Employees, volunteers, or contractor owe a duty to HPCO to advance the Organization's interests when the opportunity to do so arises.

Confidentiality

It is to be understood that information related to all aspects of HPCO operations is the property of HPCO, not the property of the individual employee, volunteer, and contractor. Unless designated as public, such information cannot be released to anyone without approval of the CEO or board of directors except where disclosure is required by law or contractual obligations.

The following information is designated as confidential at all times:

- Membership information
- Personnel information, including any and all information relating to applicants, hiring procedures, supervision, evaluations, disciplinary actions, terminations, etc.
- Proceedings and minutes of "in Camera" Board and Committee meetings.
- Proceedings of any meeting of staff, volunteers, committees, working groups, or advisory groups unless expressly designated as non-confidential by the CEO, Board Chair, or the Chair of the meeting, committee or group.
- Purchase of property, tendering applications, all legal matters.
- Any other information relating to and/or generated through the day-to-day operations of the corporation identified as confidential by the CEO or Board of Directors.

Non-Compliance with this policy constitutes a breach of confidentiality.

- A breach of confidentiality may result in termination of a volunteer relationship or termination of employment.
- In some instances, and depending upon the severity and frequency of the non-compliance, alternate actions such as providing reminders and/or formal disciplinary action may be implemented instead of, or prior to, termination of association with HPCO.
- All information received while employed or volunteering with HPCO will remain confidential when the staff member or volunteer is no longer involved with HPCO.

All employees, volunteers, and contractors will sign this Code of Conduct which also serves as a Confidential Agreement, and will maintain confidentiality as per this Code of Conduct.

As a publicly-funded organization some information, including but not limited financial statements and information about services are available to the general public through HPCO's funders and through the agency itself. If you are unsure about what information is public, please speak with your supervisor or the Chair of your committee or group.

Copyright

HPCO is the owner of the copyright and of all copyrighted works produced by employees, volunteers, and contractors who have been engaged by HPCO to prepare such works for HPCO, whether compensated or not.

Use of HPCO Information Systems and Electronic Equipment

The use of HPCO computers, file servers (including cloud based storage), the internet, internet connections and e-mails is subject to monitoring at any time. Employees, volunteers, and contractors may only use such equipment and HPCO email addresses for business purposes.

Record-Keeping, Financial Controls and Disclosures

HPCO requires honest, accurate and timely recording and reporting of information in order to make responsible business decisions.

All business expense accounts must be documented and recorded accurately in a timely manner in accordance with HPCO policy. An immediate supervisor should be consulted regarding the legitimacy of an expense where uncertainty exists.

All of the Organization's books, records, accounts and financial statements must be maintained in reasonable detail, must appropriately reflect HPCO's transactions, must be promptly disclosed in accordance with any applicable laws or regulations and must conform both to applicable legal requirements and to the Organization's system of internal controls.

Business records and communications often become public, and we should avoid exaggeration, derogatory remarks, guesswork, or inappropriate characterizations of people and companies that may be misunderstood. This applies equally to email, internal memos, and formal reports. Records should always be retained or destroyed according to HPCO's record retention policies.

Improper Influence on Conduct of Auditors

Employees, volunteers, and contractors are prohibited from directly or indirectly taking any action to coerce, manipulate, mislead or fraudulently influence HPCO's independent auditors for the purpose of rendering the financial statements of the Organization materially misleading. Prohibited actions include but are not limited to those actions taken to coerce, manipulate, mislead or fraudulently influence an auditor: (1) to issue or reissue a report on the HPCO's financial statements that is not warranted in the circumstances (due to material violations of generally accepted accounting principles, generally accepted auditing standards or other professional or regulatory standards); (2) not to perform audit, review or other procedures required by generally accepted auditing standards or other professional standards; (3) not to withdraw an issued report; or (4) not to communicate matters to the HPCO's Audit Committee.

Corrupt Practices

Most countries have laws prohibiting making offers or payments and giving gifts or other things of value to government officials to influence their actions. Many countries have laws that prohibit people and companies subject to their laws from engaging in corrupt conduct even when it is committed outside the country. Many countries also extend these prohibitions to cover bribes to private parties, as well as bribes to government officials.

HPCO prohibits giving or authorizing directly or indirectly any illegal payments to Canadian government officials and officials of other countries.

Protection and Proper Use of Organization Assets

Employees, volunteers, and contractors should protect HPCO's assets and ensure their efficient use. Theft, carelessness, and waste have a direct impact on the Organization. All HPCO assets are to be used for legitimate business purposes. Any suspected incident of fraud or theft should be immediately reported for investigation.

Personal/Sexual Harassment

HPCO has a zero tolerance policy with respect to Personal/Sexual Harassment. Personal/Sexual Harassment in any form is strictly prohibited and may be grounds for termination as a volunteer, or, in the case of an employee or contractor, immediate dismissal for just cause without notice or pay in lieu of notice.

Diversity Management

HPCO is committed to social justice in the elimination of organizational structures and actions that oppress, exclude, limit or discriminate on the basis to gender, race, color, creed, and ancestry, place of origin, political beliefs, religion, marital status, gender identification, disability, age, or sexual orientation.

Health and Safety

HPCO strives to provide each employee and volunteer with a safe and healthy work environment. Each Employees, volunteers, and contractors has responsibility for maintaining a safe and healthy workplace by following environmental, safety and health rules and practices and reporting accidents, injuries and unsafe equipment, practices or conditions. Violence and threatening behavior are not permitted.

Employees, volunteers, and contractors are expected to perform their work in a safe manner, free of the influences of alcohol, illegal drugs or controlled substances. The use of illegal drugs in the workplace will not be tolerated.

Implementation

Management has the responsibility of ensuring compliance with all codes and policies of HPCO.

Compliance Procedures

We must all work to ensure prompt and consistent action against violations of this Code. However, in some situations it is difficult to know right from wrong. Since we cannot anticipate every situation that will arise, it is important that we have a way to approach a new question or problem. These are the steps to keep in mind:

- (a) *Make sure you have all the facts.* In order to reach the right solutions, we must be as fully informed as possible.
- (b) *Ask yourself: What specifically am I being asked to do? Does it seem unethical or improper?* This will enable you to focus on the specific question you are faced with, and the alternatives you have. Use your judgment and common sense; if something seems unethical or improper, it probably is.
- (c) *Staff discuss the problem with their supervisor (board members with the Board Chair).* This is the basic guidance for all situations. In many cases, your supervisor will be more knowledgeable about the question, and will appreciate being brought into the decision-making process. Remember that it is your supervisor's responsibility to help solve problems.
- (d) *Seek help from Organization resources such as HPCO's employee assistance program.* In a case where it may not be appropriate to discuss an issue with an immediate supervisor, or local management, the Chairman of HPCO Board of Directors should be contacted via phone or e-mail.
- (e) *You may report violations in confidence and without fear of retaliation.* If your situation requires that your identity be kept secret, your anonymity will be protected. The Organization does not permit retaliation of any kind against employees, volunteers, and contractors for good faith reports of suspected violations.
- (f) *Always ask first, act later:* If you are unsure of what to do in any situation, seek guidance before you act.

Annual Code of Conduct Declaration

By signing below I acknowledge that I have read, understand and agree to abide by the Code of Conduct of HPCO and I understand that such adherence is a condition of my employment or volunteer work.

I understand that a violation of the Code of Conduct may be grounds for disciplinary action including termination.

Name

Signature

Date

HPCO Representative (name)

HPCO Representative (signature)