

Subject: Code of Conduct and Ethical Behaviour	Board, Staff
Policy Number: 16	Pages: 5
Implementation: November 2014	Reviewed: November 2015, January 2016, September 2018 Revised: February 2017, Nov 2019 Next Review: Nov 2020 Annually
Cross Reference: By-Law #5; Confidentiality, Anti-discrimination and Accommodation, Harassment free workplace, Conflict of Interest, and Media and PR policies, Volunteer and Student Manual, Record Storage and Retention, Information Technology (IT), Complaint Policy	Approved By: Board of Directors

Purpose

This policy is intended to document the principles of conduct and ethics to be followed by the employees, students, and volunteers as well as officers and directors of the Vaughan Community Health Centre.

Its purpose is to:

Promote honest and ethical conduct in accordance with the Vaughan Community Health Centre's core values;

Promote compliance with the VCHC mission, vision and values, as well as applicable policies and government legislation and regulations;

Promote disclosure of potential breaches of conduct or conflicts as well as establish a safe and structured process to address and monitor them.

Promote prompt internal reporting of violations of this policy to the direct supervisor

Promote a positive public reputation for the Vaughan Community Health Centre.

The Vaughan Community Health Centre expects all staff, students, volunteers and directors to comply and act, at all times, in accordance with the principles and provisions provided herein.

One or more violations of this policy may be grounds for disciplinary action up to and including immediate termination of employment/student or volunteer placement, or revocation of the position of officer or board membership. Compliance with this policy will be reviewed during performance reviews for employees, students and volunteers of VCHC as well as during the annual board evaluation process.

Every director, staff, student, and volunteer will be provided with a copy of this policy at the beginning of their relationship with VCHC and will be required to sign-off then, whenever the policy is revised, and, thenceforward, annually.. In order to ensure the effectiveness of this policy, regular education concerning the content and principles contained in this policy will be provided.

This policy will be reviewed annually by the board

Work Environment

The VCHC values an inclusive work environment and promotes diversity and inclusion in all its stakeholders.

Staff, students, volunteers, officers and directors are prohibited from engaging in defamation or illegal, disrespectful, or discriminatory behaviour, including harassment or violence of any kind. VCHC's anti-discrimination/accommodation and harassment-free workplace policies will be followed to ensure a healthy work environment for all.

Staff, students, volunteers, officers and directors will, at all times, act in a professional manner, with integrity and honesty, in good faith, and in the best interests of the corporation.

Respectful Conduct

It is recognized that employees, students, volunteers, officers and directors of the Vaughan Community Health Centre bring to the Centre diverse backgrounds, skills and experience. In particular, if members of the groups previously mentioned disagree with their peers on issues, all discussions and debates shall take place in an atmosphere of mutual respect and courtesy.

At the board level the authority of the Chair must be respected by all directors.

Third Party Relationships

Conflict of Interest

Staff, students, volunteers and directors are to avoid conflicts between personal interests and activities and their responsibilities to VCHC. They will disclose those interests that constitute actual or potential conflicts.

Staff, students, volunteers, and directors shall not misuse their status, position or information obtained through their work at the Vaughan Community Health Centre for personal gain.

Gifts or entertainment must not be solicited, offered to, or accepted from any client, supplier, contractor or other third party of the VCHC except those considered nominal or reasonable, currently defined as an amount not to exceed \$150 from a single source in a given year.

Public Relations

Unless specifically authorized to represent the Vaughan Community Health Centre to the media, staff, students, volunteers and directors will not respond to media inquiries or requests for information. Media contacts should be referred to the Board Chair or the Executive Director.

Government Relations

Staff, students, volunteers and directors may only participate in the political process as private citizens. The Vaughan Community Health Centre's advocacy activities, if any, shall be subject to the overall direction of the board of directors.

Information and Records

Confidential Information

Staff, students, volunteers and directors shall not disclose confidential information to persons outside the Vaughan Community Health Centre, including their family members, and should share it only with other VCHC staff, students, volunteers and directors who have a legitimate need to know.

All staff, students, volunteers and directors are responsible and accountable for safeguarding the confidentiality of VCHC's documents and information to which they have direct or indirect access.

Record Retention All records maintained at the VCHC (including all records recorded on VCHC information systems) are the property of the VCHC. Where the Vaughan Community Health Centre is required by law or government regulation to maintain particular records or where it has reason to know of a threatened or pending government investigation or litigation relating to such records, the Vaughan Community Health Centre prohibits the unauthorized destruction of, or tampering with, any records whether written or in electronic form. Records should be handled in accordance with the VCHC's Record Storage and Retention Policy.

Vaughan Community Health Centre's Assets

Use of Vaughan Community Health Centre Property

The use of Vaughan Community Health Centre property (information, technology, premises, equipment, software, cash) for individual profit or any unlawful unauthorized personal or unethical purpose is prohibited.

Destruction of Property and Theft

No one shall intentionally damage or destroy the property of the Vaughan Community Health Centre or commit theft.

Intellectual Property

Staff, students, volunteers, officers and directors may not reproduce, distribute or alter copyrighted materials without permission of the copyright owner or its authorized agents. Software used in connection with the Vaughan Community Health Centre's business must be properly licensed and used only in accordance with the license.

Information Technology

The Vaughan Community Health Centre's information technology systems, including computers, e-mail, intranet and internet access, telephones and voice mail are the property of the Vaughan Community Health Centre and are to be used primarily for business purposes as per VCHC's Information Technology (IT) policy.

Staff, students, volunteers, officers and directors may not allow others to gain access to the Vaughan Community Health Centre's information technology systems through the use of their password or other security codes.

Using this Code of Conduct

It is the responsibility of all staff, students, volunteers, officers and directors to understand and comply with this Code of Conduct.

Staffs, students, volunteers, officers or directors who experience, observe or become aware of an actual or potential violation of this Code or of any policy, law or regulation, will report the circumstances and cooperate with any ensuing investigation. VCHC is committed to providing an atmosphere of open communication for compliance issues and to ensure that staff, students, volunteers, officers and directors acting in good faith have the means and support to report actual or potential violations.

There will be no reprisals for good faith reporting of compliance concerns or violations.

Investigation and Remediation of Complaints

Following the receipt of any complaints, the complaint shall be investigated in accordance to the complaints policy.

The objectives of the investigation will be to:

- Review the circumstances surrounding the breach.
- Review the adequacy of existing policies and procedures.
- Address the situation on a systemic basis.
- Identify opportunities to prevent a similar breach from happening in the future and change practices as necessary.
- Consider whether outside resources are necessary to conduct the investigation or to advise on plans to improve practices.
- Ensure directors, staff, volunteers and students are appropriately re-educated and re-trained with respect to compliance with the code of conduct policy and the circumstances of the breach and the recommendations of how to avoid it in the future.
- Continue notification obligations as appropriate including updates on what happened, the scope of the breach and what has been done to improve practices after the investigation is complete.

- Consider any disciplinary consequences for VCHC stakeholders that follow this code of conduct.

The board of directors or Executive Director may enlist VCHC employees, and/or outside legal, accounting, or other advisers, including a third-party ombudsperson, as appointed by the Board for this purpose, as appropriate, to conduct the investigation, and shall use reasonable efforts to protect the confidentiality and anonymity of the complainant. The confidentiality of the allegations of the complaint and the identity of the persons involved is subject to the need to conduct a full and impartial investigation, remedy any violations of VCHC's policies, or monitor compliance with or administer the policies.

Dealing with Breaches:

- Identify if there are VCHC stakeholders affected by the breach and notify them at the first reasonable opportunity, if appropriate/necessary. The timing may happen after the investigation in order to provide useful information to those affected.
- The type of notification will be determined based on the circumstances (such as the sensitivity of the information, the number of people affected, and the potential effect the notification will have on them). For example, notification may be by telephone in writing or in person depending on the circumstances. It will provide details of the extent of the breach and the specifics of it.
- Advise any affected VCHC stakeholders of the steps that have been, or will be, taken to address the breach, both immediate and long-term.
- Consider notifying as appropriate:
 - Legal counsel
 - VCHC's insurer
 - The VCHC Board

In the event that an investigation establishes that a staff, student, volunteer or director has engaged in conduct or actions in violation of this Code, immediate and appropriate corrective action will be taken, up to and including termination of that person's employment, student or volunteer placement, or board membership.

In the event that the investigation reveals that the complaint was made frivolously undertaken for improper motives, made in bad faith or made without a

reasonable basis, that complainant's Board Chair or relevant supervisor will take whatever disciplinary action may be appropriate in the circumstances.

AGREEMENT AND SIGNATURE

I have read VCHC's Code of Conduct Policy outlined above and, by signing this policy, I hereby acknowledge that I understand it and agree to be bound by it.

Name

Signature

Witnessed by:

Name of Witness

Signature of Witness

Date