

CODE OF ETHICS

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Last Review/ Revision – January 2016

Next Review – January 2017

**Approved by:
Chief Executive Officer**

INTRODUCTION

Punjabi Community Health Services (PCHS) is revising its present Code of Ethics to include a more extensive array of ethical responsibilities that are standards for all PCHS employees.

The expanded areas now include ethics that address:

- Business Practices
- Marketing and Public Relations
- Contractual Relationships
- Service Delivery
- Conflict of Interest
- Professional Responsibilities
- Human Resources
- Prohibition of Waste, Fraud, Abuse, and other Wrongdoing
- Advocacy Efforts
- Corporate Citizenship
- Fundraising

Included in this handbook are Code of Ethics, as well are the procedures for addressing and acting on violations of the Code of Ethics.

CODE OF ETHICS

PURPOSE

The purpose of this Code of Ethics is to establish for the employees of PCHS a written code of ethical conduct to foster a positive work environment, bring the ethical aspect of business choices to a conscious level and acknowledge that, as PCHS employees and associates, we are expected to do the right thing, in the right way, for the right reason.

POLICY STATEMENT

PCHS has vision and mission statements that define our direction and business purpose. In addition, PCHS has a set of values and a Code of Ethics that guide our daily conduct.

It is the policy of PCHS that its employees demonstrate the highest standards of ethical and professional conduct at all times in their business activities. These individuals have an affirmative duty to promote and advance the mission of PCHS. In all respects, PCHS must have the confidence of its clients and the public. The community and people we serve trust PCHS based on its long established reputation and integrity. Any misdeed, illegal activity, or appearance of impropriety will impact negatively upon all of us.

In order to maintain that trust, we agree to voluntarily comply with the guidelines and recommendations set forth in this policy. By supporting and adhering to the following ethical principles and standards of conduct we will help maintain PCHS's reputation in the community as a leading provider of services to individuals with barriers to employment.

SCOPE OF POLICY

This policy applies to all employees of PCHS including all volunteers, students, contractors and consultants.

Mission, Vision and Values

PCHS has vision and mission statements that define our direction and business purpose. In addition, PCHS has a set of values and a Code of Ethics that guide our daily conduct.

Vision

Empowered Communities

Mission

To improve the quality of life of the community

Values

1. Respect for Diversity

We respect individual differences and pride ourselves on providing safe, positive and nurturing environment for both clients and staff

2. Service Excellence

We take responsibility to provide excellent service and link all clients with to the most appropriate services and resources in the community

3. Good Governance

We maintain good governance by having an experienced board, sound fiscal responsibility and operating on effective policies and procedures

4. Staff and Volunteer Expertise

We value staff expertise and invest in their ongoing professional growth and skills development

5. Innovation and Partnership

We provide evidence based programs which are managed by equitable partnerships and are continuously evaluated and improved.

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BUSINESS PRACTICES

PCHS shall:

- Engage in and promote honest and ethical conduct.
- Conduct ourselves in a professional manner at all times.
- Provide equal employment opportunities for all persons in our workforce or those being recruited for our workforce; prohibit discrimination in our personnel policies, program practices and operations, and in our working conditions and relationships with employees and applicants for employment; provide employment opportunities without regard to race, color, creed, gender, religion, marital status, registered domestic partner status, age, national origin or ancestry, physical or mental disability, medical condition, sexual orientation, veteran status or any other basis made unlawful by federal, provincial or local laws.
- Avoid actual or perceived conflicts of interest.
- Comply with applicable federal, provincial and local laws, contractual obligations and PCHS policies and procedures.
- Responsibly use and control all assets, resources and information at our disposal.
- Use restricted monies for its requested purpose. We will be able to account for its activity and show how the funds were used.
- Encourage the prompt reporting of any violations of this Code of Ethics or other governing documents to PCHS's member of the Leadership Team or Chief Executive Officer (CEO)

MARKETING AND PUBLIC RELATIONS

PCHS shall:

- Practice honest, transparent and timely communication to facilitate the free flow of essential information in accord with the public interest.
- Ensure that all services and products are promoted in a manner that demonstrates respect for our employees and the people receiving services, as well as sensitivity to cultural values and beliefs.
- Protect confidential information and comply with all legal requirements for disclosure of information affecting the welfare of others.
- Protect the privacy of our employees and clients, and disclose information about them only with expressed, written permission.
- Disseminate accurate information and promptly correct erroneous communication for which we are responsible.

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CONTRACTUAL RELATIONSHIP

PCHS shall:

Maintain its relationships with individuals and entities with whom it has established or is considering establishing a contractual relationship in a legal and ethical manner. In addition to its Code of Ethics that guides business relationships, the following procedures will be observed:

- PCHS will determine that potential and current contractors and consultants have:
 - Capacity to perform at an acceptable level.
 - An ethical track record.
 - A reputation that is consistent with PCHS's mission.
- PCHS will not engage in contractual relationships with individuals or entities whose reputation is not consistent with PCHS's mission, ethics or values.
- Contracts will be reviewed on an as-needed basis.
- The services of the consultants and contractors will be reviewed annually.

SERVICE DELIVERY

Every member of PCHS staff shall:

- **Conflict of Interest**
 - Be alert to, and avoid, conflicts of interest that interfere with the exercise of professional discretion and impartial judgment.
 - Inform persons served when a real, or potential, conflict of interest arises, and take reasonable steps to resolve the issue in a manner that makes the persons' served interest primary and protects the persons' served interest to the greatest extent possible.
- **Exchange of gifts, gratuity and money**
 - Not accept money, exchange gifts, gratuities, or other consideration from anyone other than PCHS for the performance of any act, which he/she would be required or expected to render in the regular course of his/her duties as a PCHS employee.
- **Personal fundraising**
 - Not engage in fundraising activities that are not sanctioned and approved by the CEO as permissible fundraising activities. Examples of fundraising activities that would not be under the domain of the organization may include: the selling of cookies, candy or other items that are personal initiatives of an employee and/or his or her family member.

Punjabi Community Health Services

- **Personal property**
 - Respect and safeguard the personal property of persons served, visitors, and all property of the organization, as may be appropriate in their role.

- **Setting boundaries**
 - Not provide services to individuals, with whom they have a personal, including dating, intimate, prior or current sexual relationship.
 - Not to engage in personal, intimate and sexual relationship with co-workers unless, both parties are employed as husband and wife (or in common law relationships)

- **Witnessing of documents**
 - Not act as a witness to documents such as Power of Attorney, guardianship, advance directives, and/or agency contracts without the expressed written approval of the CEO and Chief Operating Officer(COO)

- Ensure that the organization's person-centered planning philosophy is evident in the service delivery process.
- Ensure that all barriers to accessibility are assessed, addressed, and removed.
- Recognize and respect the inherent dignity and worth of the person and persons within the persons served care system.
- Recognize the cultural, racial and ethnic importance of human relationships.
- Behave in a trustworthy manner with those whom they serve.
- Use language that is respectful and professional when communicating with persons served, employees, volunteers, and other stakeholders.
- Adhere to PCHS's accessibility policy in the areas of, but not limited to, architecture, environment, attitudes, finances, employment, communication, and transportation
- Practice within their areas of competencies and develop and enhance their professional expertise.
- Maintain and update their professional licenses, credentials, certifications.
- Respect and promote the rights of persons served to self-determination, and assist persons served in their efforts to identify and clarify their goals.
- Use clear and understandable language to inform persons served of the purpose of services, and risks related to services.
- Use clear and understandable language to inform persons of limits to services, because of the requirements of the funders.
- Provide persons served with reasonable access to their records.
- Not use derogatory language in their written or verbal communication to, or about, persons served.
- Practice within their areas of competencies and develop and enhance their professional expertise.

Punjabi Community Health Services

- Use accurate and respectful communication to, and about, persons served.
- Make reasonable efforts to ensure continuity of services in the event that services are interrupted by factors such as unavailability, relocation, illness, disability, or death.
- Not in any case make clients sign blank forms.
- Not discuss client's case information without provisions for relative confidentiality.
- Not leave persons' served case record information on desks, or in any other unsecured manner, thus violating persons' served confidentiality.
- Not intentionally or unintentionally mismanage the resources of the organization or other stakeholders.
- Believe in working holistically with the "family" as a whole in addition to working with the client
- Believe in breaking down barriers and eliminating stigma.
- Believe that everyone has the ability to recover and has the right to feel supported and encouraged to develop their strengths, abilities and talents.
- Believe in providing empathy, compassion, acceptance and reassurance

PROFESSIONAL RESPONSIBILITIES

Every member of PCHS team shall:

- Ensure that individual client information is kept confidential according to applicable federal, provincial and local laws, contractual obligations and PCHS policies and procedures.
- Discuss confidential client information only with authorization from the client, as necessary for the provision of services, or as a result of a legal or government order.
- Maintain an atmosphere in which PCHS clients can learn and develop.
- Ensure that PCHS clients are provided equal treatment and services regardless of race, color, religion, national origin/ancestry, disability, medical condition, marital status, sex, age, sexual orientation, or any other basis protected by federal, provincial or local law, except as restricted by specific contractual obligations
- Strictly prohibit client abuse and harassment. Clients have the right and responsibility to report abuse, harassment or any other violation of their rights to their caseworker or a member of the PCHS staff, and to have a confidential investigation conducted on his/her behalf. PCHS does not restrict these rights or use any restrictive procedures.
- Ensure that clients are given the opportunity to provide input into the programs they participate in and the services they receive. This input must always be accepted in a respectful manner.

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HUMAN RESOURCES

PCHS Shall:

- Maintain the highest standards of ethical conduct and be a role model for our employees, clients, students and volunteers.
- Promote fairness for all employees.
- Protect the rights of our employees, clients and volunteers, while ensuring truthful communications and facilitating informed decision-making.
- Maintain diversity within our workforce to effectively meet the needs of the people we serve.

PROHIBITION OF WASTE, FRAUD, ABUSE AND OTHER WRONGDOING

Waste: The careless and deliberate expenditure or allocation of resources in excess of need.

Fraud: A dishonest and deliberate course of action which results in the obtaining of money, property or an advantage to which the recipient would not normally be entitled.

Abuse/Wrong Doing: The misuse or abuse of the Organization's practices or clients properties and associated materials so as to gain a personal advantage for some other purpose that is not in the best interests of the Organization.

It is the policy of PCHS that employees, students, volunteers, or other stakeholders may not participate in fraud, abuse, waste of resources or other wrongdoing, whether illegal or unethical. Employees are encouraged to report any suspicion or evidence in the aforementioned areas to their immediate supervisor or Human Resources Department. PCHS shall uphold a "no reprisal" concept for employees and volunteers in reporting suspected incidents of questionable activities and practices.

DUTIES OF LEADERSHIP TEAM

Leadership Team shall:

- Perform their duties in good faith and in the best interest of the organization.
- Members of the Leadership Team are responsible to promote PCHS's values and ethics, and be a role model for employees, clients, students and volunteers.
- Adhere to all the established laws and regulations regarding fiduciary responsibility, as well as those rules established in PCHS's Articles of Incorporation and Board of Directors By-Laws.

Punjabi Community Health Services

DUTIES OF OPERATIONS TEAM

Operations Team shall:

- Perform their duties in good faith and in the best interest of the organization.
- Members of the Operations Team are responsible to promote PCHS's values and ethics, and be a role model for employees, clients, students and volunteers.
Adhere to all the established laws and regulations regarding fiduciary responsibility, as well as those rules established in PCHS's Articles of Incorporation and Board of Directors By-Laws.

FINANCIAL

PCHS Shall:

- Conduct PCHS's financial matters in accordance with applicable federal, provincial and local laws, and within the standards of Canadian Generally Accepted Accounting Principles.

CONFIDENTIALITY

PCHS Shall:

- Protect proprietary and confidential information in a manner designed to prevent unauthorized use or disclosure, and in accordance with applicable federal, provincial and local laws, contractual obligations, Personal Health Information Protection Act (PHIPA) and PCHS policies and procedures.
- Disclose confidential and nonpublic information only for a valid business purpose and with proper authorization.

HEALTH, SAFETY AND ENVIRONMENTAL

PCHS Shall:

- Provide a safe environment for employees, clients, students, volunteers and visitors.
- Comply with applicable federal, provincial and local health, safety and environmental regulations and PCHS policies and procedures.

COMPLIANCE

PCHS shall:

- Conduct PCHS's operations in accordance with applicable provincial and federal laws, contractual obligations and PCHS policies and procedures.

Punjabi Community Health Services

PROCEDURE TO DEAL WITH ALLEGATIONS OF VIOLATION OF ETHICAL CODES

Human Resources Department will receive all Incident Reports containing violations of the Code of Ethics. The Human Resources Department will receive the report, conduct the investigation, record the investigation, and provide feedback and follow up, as may be appropriate.

PCHS shall uphold a “no reprisal” concept for employees and volunteers in reporting suspected incidents of questionable activities and practices within the organization.

A “no reprisal” system simply means that employees shall not be subject to any retaliation, penalties, discrimination, confrontation, or any other type of consequences for making a report.

A. Reporting

Any staff member may report a violation of the Code of Ethics by completing an Incident Report and submitting the form to their supervisor and provide a copy to the Human Resources Department. If the supervisor is involved in the misconduct, then the employee should directly submit the form to Human Resources Department. Staff members are encouraged to report the incident within thirty (30) working days.

B. Investigation

The Human Resources Department, in consultation with the respective Supervisor and all other parties involved, will investigate the report within ten (10) business days of receiving the report, and complete the investigation with a final report completed within thirty (30) business days.

C. Acting on Violation

If there is sufficient evidence, as determined by the investigation, a report and recommendation will be submitted to the CEO by the Human Resources Department. The CEO will facilitate and approve the recommendations of Human Resources Department, which may include, but not limited to: a number of corrective action strategies, including training, supervision, and/or disciplinary action.

D. Documenting the Investigation

The Human Resources Department will maintain a log of all Code of Ethics investigations and report same to the CEO on an annual basis. In addition to maintaining a log, Human Resources Department will use the following process:

- Create a separate file for the investigation.
- The investigation file should include:
 - The complaint
 - The Report of Investigation

The CEO will report to the Board on an annual basis an analysis on Code of Ethics violations and/or trends and patterns.

Punjabi Community Health Services

MONITORING AND EDUCATION ON CODE OF ETHICS FOR PERSONNEL AND OTHER STAKEHOLDERS

The Human Resources Department and Leadership Team shall ensure that the Code of Ethics is clearly communicated to staff on an ongoing basis. The methods of communication will be as follows:

- Each new hire, whether full-time, part-time, or contractual, will receive a copy of the Code of Ethics on their first day of employment.
- Each new hire will sign off acknowledging receipt and understanding of PCHS's Code of Ethics. Copy of the same will be kept in the personnel file.
- Student and volunteers will also receive a copy of the Code of Ethics and sign it. Copy of the same will be kept in the personnel.
- The Human Resources Department will monitor trends, patterns, and code violations and recommend to the CEO additional training or supervision strategies to reinforce compliance with the Code of Ethics.

ADVOCACY

PCHS Shall:

Continue to advocate for persons served, personnel, and other community stakeholders. PCHS's advocacy efforts include partnering with other organizations and the general community to provide training and education that will reduce the stigma associated with the needs, challenges, diagnoses, and disabilities of our clients.

PCHS's advocacy efforts also include providing oral testimony, and developing and submitting position statements that support the needs of persons served and/or the needs for policy revisions at the local, provincial, and federal levels. PCHS works in collaboration with other organizations to coordinate our advocacy efforts on behalf of not only persons served, but PCHS's general geographic service area as well.

PCHS will continue to demonstrate a commitment and value for advocacy services on behalf of persons served through a number of venues, including the recipient rights process, corporate responsibility strategies, and as a part of ongoing service delivery.

The continuum of advocacy services will include from time to time, based upon the changing needs of our clients and the community, the following:

- Linking clients to local advocacy groups, agencies, and organizations

Punjabi Community Health Services

- Personal Advocacy: One-on-one advocacy to secure the rights of the persons served.
- Systems Advocacy: Seeking to change a policy or practice that affects the person served.
- Legislative Advocacy as permitted by law: Seeking legislative enactments that would enhance the rights of and/or opportunities for the person served.
- Legal Advocacy: Using the judicial and quasi-judicial systems to protect the rights of the person served.
- Self-Advocacy: Enabling the person served to advocate on his/her own behalf.

FUNDRAISING

PCHS will demonstrate the utmost transparency and accountability through accurate and accessible disclosure of information in a readily accessible location on its website. (see *Ethical Fundraising Policy*)

CORPORATE CITIZENSHIP

PCHS Shall:

Continue to encourage corporate responsibility at all levels of the organization. Corporate responsibility demonstrates what an organization stands for including its ethical, social, and environmental values. Corporate responsibility assists in: advocating for the persons served; promoting ethical business practices; developing efficiency as an organization; and considering the impact of organizational activities on persons served, personnel, other stakeholders, and the environment. The participation of staff in corporate responsibility activities requires communicating with the CEO and receiving approval from the CEO for corporate responsibility activities that must be conducted during the course of the regular work day. Also, more of PCHS's leadership is serving on community Boards, Commissions, Ad-Hoc Committees, and Task Force Groups at the federal, provincial and local levels. PCHS supports the involvement of staff in corporate responsibility activities as a way to not only advance the mission, philosophy, values and goals of the organization, but to advocate for the needs, wants, and desires of its consumers and the community. PCHS's corporate responsibility is also evident through our funding of and consultation with grass-roots or community-based organizations, and governmental, public and private organizations. PCHS provides training, consultation, and/or mentoring to organizations

The leadership of PCHS is serving in network groups to improve funding, policies, and services to the most at-risk and disenfranchised groups/families in our community.