

Bridgepoint Active Healthcare: Guide to Interpretation and Application of Code of Ethics

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Bridgepoint Active Healthcare Code of Ethics¹

- 1. Compliance with professional codes and standards**
 - Bridgepoint Active Healthcare maintains the highest possible standards of practice in patient care, teaching and research, and upholds professional Codes of Ethics and standards.
- 2. Conflicts of interest**
 - The Bridgepoint Active Healthcare Community – which includes Bridgepoint Hospital, Bridgepoint Foundation, Bridgepoint Collaboratory for Research and Innovation, and Bridgepoint Family Health Team – maintains a duty of loyalty to Bridgepoint Active Healthcare. As a result, members must avoid any activities which may involve a conflict of interest or that may influence or appear to influence their ability to render objective decisions in the course of their job responsibilities or other services they furnish to Bridgepoint Active Healthcare. Where a Member identifies a potential conflict of interest, (s)he must disclose it to the Chief Compliance Officer.
- 3. Protection and proper use of corporate assets**
 - All members of the Bridgepoint Active Healthcare Community are expected to use Bridgepoint assets for their intended purpose and to take necessary precautions to protect Bridgepoint property.
- 4. Confidentiality of private information**
 - Members recognize that the provision of health care services generates private patient-related, business and financial information that requires special protection. Members will honour practices to ensure such information is collected and used appropriately and zealously safeguarded.
- 5. Fair dealing with stakeholders**
 - The Bridgepoint Active Healthcare community is committed to treating all in an equitable manner. We treat stakeholders with dignity, respect and integrity.
- 6. Compliance with statutes, regulations, and rules**
 - Bridgepoint Active Healthcare keeps abreast with applicable health and related law. We shall continuously and vigorously promote full compliance.
- 7. Workplace health and safety**
 - We consider the health and safety/security of Bridgepoint Active Healthcare Community members in all of our activities.
- 8. Respect for environment**
 - Bridgepoint Active Healthcare strives to protect the environment.
- 9. Employment practices, human rights**
 - Bridgepoint Active Healthcare recognizes that our strength derives from our community. We recognize that a diverse workforce enriches the life experience of patients and all members of Bridgepoint Active Healthcare Community.
- 10. Assault, abuse and harassment**
 - Bridgepoint Active Healthcare has a zero tolerance for any form of assault, abuse, harassment or reprisal.
- 11. Mutual respect**
 - Everyone will be treated with respect. This should be reflected in the attitude, communications and actions of all community members.

¹ This is a summary document. For details, see the Bridgepoint Active Healthcare Guide to Interpretation and Application of Code of Ethics document and Code of Ethics Policy available on all patient care units.

I. Introduction

This Code of Ethics (Code) describes the fundamental principles that guide our behaviour and support our clinical, business and research decision-making. The Code outlines our expectations for the Bridgepoint Active Healthcare Community and represents a commitment by Bridgepoint Active Healthcare to achieve the highest ethical standards. The Code is supplementary and complementary to our Mission, Vision and Values.

II. Purpose

Bridgepoint Active Healthcare developed this Code to provide standards of behaviour for the Bridgepoint Active Healthcare Community. Its purpose is to protect and promote organization-wide integrity and to enhance Bridgepoint Active Healthcare's ability to achieve its organizational mission. It is a resource for all members of the community to use in handling routine as well as exceptional situations in our work.

III. Applicability

The Code is a guide to assist employees, volunteers, physicians, dentists, researchers, students², agents,³ faculty, board members, (hereafter referred to as "The Bridgepoint Active Healthcare Community" or "Members") to make sound decisions. This Code is to be read in conjunction with all existing policies and procedures. For detailed information, please consult the respective policy.

IV. Mission

We change the world for people living with complex disease and disability by:

- Providing them with an integrated network of programs and services in complex care and rehabilitation;
- Advancing knowledge, expertise, and care through research, teaching and learning; and
- Engaging our community and health care partners to create a networked system of support.

V. Vision

To be Canada's leader in complex care and complex rehabilitation - the new frontier of health care.

² Student: means "student" as defined in Section A9 of the *University of Toronto, Code of Student Conduct*. Available at <http://www.utoronto.ca/govcncl/pap/policies/studentc.html>

³ Agent: "Agent" means a person empowered to act for or represent Bridgepoint.

VI. Core Values

- *Meaningful Mission:* Our work makes a difference. We are dedicated to providing compassionate, exceptional care and service.
- *Integrity:* We are committed to working together with trust and honesty, professionalism, accountability and acceptance.
- *Investment, Growth, and Development:* We continually invest in professional development, knowledge development, employability, tools and research.
- *Leadership:* We are innovative. Our decision-making is guided by evidence and expertise.
- *Celebrating Individual Spirit, Hopes and Dreams:* We are proud of our accomplishments. We celebrate and promote individual achievement, expression and worth.
- *Social Responsibility:* We passionately advocate for the rights and needs of our patients and staff. We contribute to building a healthy community.

VII. Responsibilities Under the Code

What are your responsibilities with regard to the Code? As a Member of the Bridgepoint Active Healthcare Community, you are expected to

- **Read the standards of ethical conduct** and think about their application to your work. You should have a reasonable understanding of issues covered by each standard.
- **Seek assistance from your supervisor**, the Chief Compliance Officer, or other Bridgepoint Active Healthcare resources when you have questions about the application of the standards to your work.
- **Understand the options that Bridgepoint Active Healthcare makes available to you for raising questions** about conduct or ethical concerns, and to raise your concerns promptly.
- **Cooperate in investigations** concerning potential violations of law, this Code of Ethics, the Compliance Program, policies and procedures

VIII. Standards of Conduct and Ethics

1. Compliance with professional codes and standards

The Bridgepoint Active Healthcare Community maintains the highest possible standards of practice. Members are responsible for upholding the Code and professional standards established by their respective regulatory body and/or professional association.

- Members are expected to comply with the Standards of Conduct policy⁴.
- In addition to this Code, University of Toronto students are expected to abide by: the Code of Student Conduct⁵, Code of Behaviour on Academic Matters⁶, and Policy on Ethical Conduct in Research⁷.

⁴ As outlined in Bridgepoint Active Healthcare Administrative Policy Manual, AH 380

⁵ Code of Student Conduct, February 14, 2002 available at <http://www.utoronto.ca/govcncl/pap/policies/studentc.html>

⁶ Code of Behaviour on Academic Matters, June 1, 1995 available at <http://www.utoronto.ca/govcncl/pap/policies/behaveac.html>

2. Conflicts of Interest

The Bridgepoint Active Healthcare Community maintains a duty of loyalty to Bridgepoint Active Healthcare. As a result, members must avoid any activities which may involve a conflict of interest or that may influence or appear to influence their ability to render objective decisions in the course of their job responsibilities or other services they furnish to Bridgepoint Active Healthcare.

- Members of the Bridgepoint Active Healthcare Community must not use their positions to pursue or advance their personal interests, the interests of a related person,⁸ business associate(s), corporation, union or partnership, or the interest of a person to whom the Member owes an obligation (where using the Member's position would be seen as fulfilling this obligation).
- Bridgepoint Active Healthcare maintains policies⁹ with clearly delineated scenarios that illustrate when a Member's private interests would inappropriately interfere with the interests of Bridgepoint Active Healthcare.
- Bridgepoint Active Healthcare provides supportive resources for Members to question whether a particular outside activity or relationship could be construed as a conflict of interest.
- Members are required to inform the Bridgepoint Active Healthcare Chief Compliance Officer of personal business ventures and other scenarios that could be perceived as a conflict of interest.
- Members are not permitted to use any proprietary or non-public information acquired as a result of their relationship with Bridgepoint Active Healthcare for any reason including for personal gain or for the benefit of others or another business opportunity.
- When in a position to influence any decision made by Bridgepoint Active Healthcare, Members may not derive a benefit for themselves or others, direct or indirect, from the decision, or else they must declare their conflict of interest and absent themselves from the discussion and decision.
- Members shall not offer any financial inducement, gift, payoff, kickback, or bribe to induce, influence, or reward favourable decisions of any government personnel or representative, customer, contractor, or vendor in a commercial transaction.
- Decisions about the purchase of outside services and goods shall be based on the supplier's ability to best satisfy Bridgepoint Active Healthcare's needs, and not on personal relationships with suppliers.

3. Protection and proper use of corporate assets

All Members of the Bridgepoint Active Healthcare Community are expected to take necessary precautions to protect Bridgepoint Active Healthcare property.

- Members are expected to use this property only in the manner and for the intended purpose as authorized by Bridgepoint Active Healthcare. Members who wish to use Bridgepoint property for other purposes must first obtain prior express written permission.
- Members are prohibited from the unauthorized use or taking of Bridgepoint Active Healthcare equipment, supplies, materials, or services.
- Prior to engaging in any activity on Bridgepoint Active Healthcare time, which will result in remuneration to the Member or use of Bridgepoint Active Healthcare equipment, supplies, materials or services for personal or non-work related

⁷ Policy on Ethical Conduct in Research, March 28, 1991 available at <http://www.utoronto.ca/govcncl/pap/policies/ethicalr.html>

⁸ Related person means spouse, child, parent or sibling

⁹ As outlined in Bridgepoint Active Healthcare Administrative Policy Manual, AH 120

purposes, members shall obtain the prior written approval from the appropriate supervisor or manager.

4. Confidentiality of private information

Members recognize that the provision of health care services generates private patient-related, business and financial information that requires special protection. Members will honour practices to ensure such information is collected, and used appropriately and zealously safeguarded.

Patient Information

- Members respect the privacy of patients. Members recognize that access to private information is established on a “need to know” basis in accordance with assigned responsibilities.
- Members are committed to following the [Personal Health Information Protection Act](#) and [Quality of Care Information Protection Act](#).
- Members limit the use and disclosure of health information to the amount necessary to accomplish the intended purpose in accordance with the law.
- Members must not discuss or post patient information in any public area, including elevators, hallways and the cafeteria.
- Members are only permitted to discuss patient information if such information is required by another health care professional for the provision of health care to the patient, in accordance with the law.
- Bridgepoint Active Healthcare has appropriate policies¹⁰ in place governing patient privacy and confidentiality.
- Members are committed to the security and accuracy of documents and records in our possession, and maintains systems, policies and procedures sufficient to safeguard the integrity of documents and records, including systems, policies and procedures to:
 - Establish retention periods and protocols for patient records in the Bridgepoint Active Healthcare system;
 - Prevent the altering, removal, or destruction of records or documents except in accordance with our records retention policy and applicable ethical and legal standards;
 - Protect the privacy and security of patient medical, billing, and claims information by implementing sufficient physical, systemic, and administrative measures to prevent unauthorized access to or use of patient information, and to track disclosures of such information as required by law; and
 - Provide access to their medical, billing, and claims information for our patients and their legal representatives as required by law.

Business information

Members shall:

- Exercise care to ensure that confidential and proprietary information is carefully maintained and managed to protect its value;
- Control and monitor access to Bridgepoint Active Healthcare communications systems, electronic mail, Internet access, and voicemail to ensure that such systems are accessed appropriately and used in accordance with Bridgepoint Active Healthcare’s policies and procedures;
- Promote the accurate, thorough, detailed, and complete documentation of all business, financial, and patient transactions.

¹⁰ As outlined in Bridgepoint Active Healthcare Administrative Policy Manual, AH 090

Staff information

Members shall:

- Safeguard the personal information of our employees and their human resources data including salary, benefits, personnel files, disciplinary information, medical, and other information retained within the human resources system in accordance with the law.
- Assist Bridgepoint Active Healthcare to administer and maintain appropriate policies¹¹ to safeguard staff information.

5. Fair dealing with stakeholders

Bridgepoint Active Healthcare Community is committed to treating all stakeholders in an equitable manner. We treat stakeholders with dignity, respect and integrity.

Patient Relationships

Bridgepoint Active Healthcare Community is committed to providing a high quality of healthcare and services to patients, their families, visitors and the community. All patients shall be accorded respect and dignity. All patients shall be provided with the necessary and appropriate care. Members shall:

- Recognize the right of our patients to receive quality services provided by competent individuals in an efficient, cost effective and safe manner.
- Continually monitor the clinical quality of the services we provide and will endeavor to improve them.
- Apply our admission, treatment, transfer and discharge policies to all patients on the basis of identified patient needs. Our policies will be consistent with all legal requirements applicable to Bridgepoint Active Healthcare.
- Listen to our patients, families and visitors so that we understand their concerns or complaints.
- Involve patients or their Substitute Decision Maker(s) in decisions about their care.
- Fully and fairly evaluate requests to transfer patients to our care from referring organizations.
- Accept such patient transfers as clinically appropriate.
- Maintain licensure and credentialing standards to further the provision of clinical services by properly trained and experienced practitioners.
- Ensure background checks are performed for all Members to verify credentials.

Relationship with Payers

The Bridgepoint Active Healthcare Community will consistently strive to satisfy the conditions of payment required by our payers.

- We promote compliance with laws governing the submission and review of bills for our services and will address billing inquiries in an honest and forthright manner.
- We implement reasonable measures to prevent the submission or filing of inaccurate, false or fraudulent claims to payers.
- We utilize systematic methods for analyzing the payments we receive and will reconcile inaccurate payments in a timely manner after discovery and review.
- We investigate, in a timely way, inaccurate billings or payments to determine whether changes to current protocol or other remedial steps are necessary.
- We implement systems to create and maintain complete and accurate documentation of services provided.

6. Compliance with statutes, regulations, and rules

Bridgepoint Active Healthcare keeps abreast of applicable health and related law. We shall continuously and vigorously promote full compliance.

¹¹ As outlined in Bridgepoint Active Healthcare Administrative Policy Manual, AH 100

- We continuously review our legal obligations and create policies and procedures that promote compliance.
- At all times we govern ourselves in compliance with both the letter and the spirit of all applicable statutes and associated regulations.
- We support training sessions to teach Bridgepoint Active Healthcare Community, about the impact of the law and to promote compliance.
- We maintain resources/expertise to support Members in voicing questions about the proper interpretation of a particular statute, regulation, policy or procedure.

7. Workplace health and safety

We consider the health and safety/security of Bridgepoint Active Healthcare Community Members in all of our activities.

- We work together to implement appropriate environmental and occupational safety and healthy workplace policies to maintain a workplace free from health and safety hazards. Our policies and procedures comply with federal and provincial safety laws, regulations and workplace directives.
- We encourage members to notify their managers of unsafe or potentially unsafe work conditions.
- We have policies and procedures to complete emergency assessments as required, whenever requested.
- We have appropriate policies regarding dress and grooming¹².

8. Respect for environment

Bridgepoint Active Healthcare recognizes its part in protecting the environment.

- We comply with applicable environmental laws and regulations, and follow proper procedures with respect to handling and disposing of hazardous and biohazardous waste.
- We work together to implement appropriate environmental protection policies and endeavor to keep Bridgepoint Active Healthcare green. Our policies and procedures comply applicable federal and provincial environmental statutes, regulations and best practice guidelines.

9. Employment practices, human rights

Bridgepoint Active Healthcare recognizes that our strength derives from our community. We recognize that a diverse workforce enriches the life experience of patients and all members of Bridgepoint Active Healthcare Community. We comply with the provisions of the Ontario *Human Rights Code*.

- We have equal opportunity policies and procedures whereby employees will be recruited, hired, promoted, transferred, managed, demoted or terminated on the basis of their skill, experience, performance and conduct.
- Our policies and procedures promote compliance with laws governing nondiscrimination in human resources practices, including recruiting, hiring, evaluation, transfer, workforce reduction, termination, compensation, counseling, discipline, and promotion of employees.
- We promote diversity with respect to individuals with disabilities, and will make reasonable accommodations as required by law.
- We encourage and support employees in developing their individual skills, talents and understanding of their jobs.
- We abide by policies that prohibit illegal possession, distribution, use or being under the influence of illegal drugs, alcohol or other substances in the workplace.

¹² As outlined in Bridgepoint Active Healthcare Administrative Policy Manual, AH 160

10. Assault, abuse and harassment

Bridgepoint Active Healthcare has zero tolerance for any form of assault, abuse¹³, harassment or reprisal.

- We do not tolerate abuse or harassment of or by any patient or Bridgepoint Community Member in any form.
- We provide treatment and medical services free of discrimination on any basis.
- We recognize the right of our employees to a workplace free of violence and harassment, and will not tolerate any form of harassment or violence toward our employees.
- We have policies and procedures that promote appropriate conduct in the workplace and prohibit harassment and unwanted or hostile interaction, including degrading or humiliating jokes, physical or verbal intimidation, slurs, or other harassing conduct.
- We implement policies^{14,15} to report, investigate, and correct abusive behaviours.
- We maintain policies and procedures that ensure a safe and supportive working environment that is free of harassment or abuse.
- "Harassment" shall include, but is not limited to, behaviour or comments that demean, insult, or offend, and may constitute a form of discrimination where such conduct is based on a prohibited ground (i.e., race, sex, sexual orientation, transgender status, same sex partner status, colour, ancestry, place of origin, ethnic origin, marital status, age, disability, citizenship, family status, or religion) where the offending Member knows or ought to know that such behaviour or comments are unwelcome.
- "Harassment" may include words, gestures, electronic messages (including, but not limited to telephone, voicemail, fax or computer messages), innuendoes, graffiti, signs, pictures or other acts.
- "Sexual Harassment" means engaging in a course of harassing conduct related to a person's sex, sexual-orientation, transgender status, same sex partner status, or any sexualized activity that is known or might reasonably be known to be unwelcome, unwanted, offensive, intimidating, hostile, or otherwise inappropriate.
- We do not tolerate any form of sexual harassment, either overt, such as request for sexual favors in return for promotions, or less obvious forms of harassment, such as sexual innuendo.

11. Mutual respect

Every person must be treated with respect. Such treatment must be reflected in the attitude, communications and actions of all Bridgepoint Active Healthcare Community Members.

- We treat all Members of the Bridgepoint Active Healthcare Community with dignity, courtesy, honesty, fairness and understanding.
- We treat patients with dignity, courtesy, compassion, honesty, fairness and understanding.
- We expect all parties to demonstrate mutual respect.
- We engage in human relations practices that promote the personal and professional advancement of each person.

¹³ The term "abuse" encompasses all forms of assault, neglect and exploitation as defined in the Bridgepoint Active Healthcare Administrative Policy Manual, AH 080

¹⁴ As outlined in Bridgepoint Active Healthcare Administrative Policy Manual, AH 080.

¹⁵ As outlined in Bridgepoint Active Healthcare Administrative Policy Manual, AH 130

IX. Compliance with Code of Ethics

Duty to Comply

Compliance with this Code is expected and required of all Members of the Bridgepoint Active Healthcare Community. Members are expected to read, understand, and adhere to all aspects of this Code.

Members are required to review and sign the Personal Commitment Certificate that appears at the end of this Code at the commencement of association with Bridgepoint Active Healthcare. At the time this Code is adopted by Bridgepoint, all existing members will be required to sign the Personal Commitment Certificate.

Reporting Mechanism

Bridgepoint Active Healthcare is committed to providing all Members with a means of reporting any conduct that the member suspects is or may be a violation of this Code. Members are required to communicate any suspected violations of the Code to their immediate supervisor and the Chief Compliance Officer. The Chief Compliance Officer function will normally be served by the Chief Administrative Officer of Bridgepoint Active Healthcare.

X. Frivolous and vexatious complaints

- It is the expectation that all reports and complaints will be made in “good faith”. This means that Members will report instances when they genuinely believe there has been a violation or when there is the potential or likelihood that a violation will occur.
- It also means that Members will not make frivolous, vexatious, bad faith, or false reports. Nor will they use the various compliance reporting mechanisms for any sort of retaliation against another individual. Anyone who makes such a complaint shall be treated as having engaged in harassment and will be disciplined accordingly.

XI. Reprisals

All Bridgepoint Active Healthcare Community Members have the right to file a complaint, participate or co-operate in an investigation, or provide information relevant to a complaint without reprisal or threat of reprisal.