



**Code of Conduct**

**2014**

## Table of Contents

<b>Introduction .....</b>	<b>3</b>
To whom does the Code of Conduct apply? .....	3
What is the Code of Conduct? .....	3
Vision.....	4
Purpose .....	4
Values.....	4
What you can expect from Island Health .....	5
What Island Health expects from you .....	5
Compliance to the Code.....	6
Post-Employment Restrictions for Senior Leaders .....	6
Where to go for help.....	6
Respectful workplace.....	7
<b>Protection of General Corporate Information and Confidential Personal Information .....</b>	<b>8</b>
Confidentiality and Privacy .....	8
<b>Integrity, Impartiality and Accountability.....</b>	<b>9</b>
Conflict of interest .....	9
Outside relationships or associations .....	11
Working relationships.....	12
Outside remunerative and volunteer work .....	13
Private interests.....	14
External communications and public comments.....	15
Use of social media .....	15
Political activity .....	16

**Reporting ..... 17**

    Theft, fraud, corruption, and non-compliant activities ..... 17

    Whistle blowing ..... 18

**Commitment and Compliance ..... 19**

    Compliance with the laws, rules, and regulations ..... 19

    Getting Help and Advice ..... 20

*The Code of  
Conduct is a  
set of  
guidelines  
intended to  
support  
ethical  
behaviour and  
decision  
making for all  
employees of  
Island Health.*

## **Introduction**

### ***To whom does the Code of Conduct apply?***

With the exception of the Respectful Workplace Policy, which applies to all individuals at the Vancouver Island Health Authority (Island Health), this Code of Conduct and associated policies applies equally to all employees of Island Health including: individuals employed directly by Island Health including line staff, the Chief Executive Officer, Executives, Management and Supervisory employees; medical staff, residents, clinical trainees, and students; and post secondary faculty and support staff who work at Island Health facilities. Volunteers, contractors, physicians with privileges at any Island Health site and individuals authorized to access Island Health information, information systems or equipment are to act within the spirit of the Code of Conduct.

### ***What is the Code of Conduct?***

The Code of Conduct is a set of guidelines intended to support ethical behaviour and decision making for all employees at Island Health.

In this document, you will read about the values, policies and behavioural expectations that, together, comprise the Island Health Code of Conduct. Not every situation you will encounter is covered; some guidelines are black and white while others may have shades of grey. You are entrusted to use good judgment in your day-to-day activities and to seek further information or assistance when you need it.

Like all large organizations, Island Health is often faced with challenges that require difficult decisions. The Island Health Code of Conduct explains the behaviour that is expected of employees at all levels of the organization and provides information on where to find additional help.

As an Island Health employee, you are responsible to become familiar with this guide, comply with the ethical and legal standards of conduct it describes, and to lead by example in the workplace. Regardless of position, role or location, this is our responsibility.

This Code of Conduct does not replace professional Codes of Ethics. It supplements them. Employees who are covered under a professional Code of Ethics are expected to practice according to their profession's Code of Ethics as well as Island Health's Code of Conduct.

## ***Vision***

Excellent health and care for everyone, everywhere, every time.



## ***Purpose***

To provide superior health care through innovation, teaching and research and a commitment to quality and safety – creating healthier, stronger communities and a better quality of life for those we touch.

## ***Values***

**C**ourage: to do the right thing – to change, innovate and grow

**A**spire: to the highest degree of quality and safety

**R**espect: to value each individual and bring trust to every relationship

**E**mpathy: to give the kind of care we would want for our loved ones

## ***What you can expect from Island Health***

### **Island Health commits to providing all employees with:**

- A safe, healthy, respectful, and productive work environment
- Fair and equitable treatment
- Continuous learning and opportunities for advancement
- Protection from discrimination and harassment
- Protection from retaliation after good faith disclosures of improper activities

## ***What Island Health expects from you***

### **Island Health expects all employees to:**

- Act with integrity at all times
- Be present and productive during working hours
- Operate within the law
- Follow the Code of Conduct and organizational policies and practices
- Take personal accountability for their workplace actions
- Demonstrate respect, loyalty, good faith, and responsibility toward one another and the organization
- Maintain confidentiality of individual as well as organizational information
- Exercise sound judgment in decision making
- Report violations of the Code of Conduct and organizational policies and practices

*The Code of  
Conduct  
applies to all  
employees of  
Island Health  
and supports  
the Value of  
“Aspire to the  
highest degree  
of quality and  
safety.”*

### ***Compliance to the Code***

Employees are expected to comply with the Code of Conduct and the policies and practices it represents. Violations of the Code of Conduct, policies, or practices may result in disciplinary action up to and including dismissal.

### ***Post-Employment Restrictions for Senior Leaders***

There is a one-year break in service post-employment restriction required to meet the public accountability of the province, for employment offers made by an Island Health contractor, vendor or other non-public sector organization when the offer could be viewed as a real or perceived conflict of interest. This is described in detail in this Code (page 9) and in Island Health policy 5.5.1 Conflict of Interest.

Any exceptions are to be addressed by the Corporate Director of People and Organizational Development who will consider the request. Exceptions must be approved by the Island Health Board of Directors.

### ***Where to go for help***

Island Health’s Code of Conduct is an overview of workplace conduct. It will not provide rules and regulations for all situations you may encounter as an employee. For more information, advice or assistance, consult your collective agreement or your immediate supervisor.

If you have tried these resources and still need help, you should contact HR Access at the following:

- Direct Dial 28411 - in Victoria 250-519-7717
- Toll Free: 1-888-296-3963
- email: [hraccesshumanresources@viha.ca](mailto:hraccesshumanresources@viha.ca)

## ***Respectful workplace***

Every Island Health employee has the right to a workplace free from discrimination and harassment.

This includes discrimination and harassment based on a person's race, colour, ancestry, place of origin, political belief, religion, marital status, family status, physical or mental disability, sex, sexual orientation, age or unrelated criminal conviction.

At Island Health we consider it the obligation of supervisors and managers of the organization to address and respond to any incidents of discrimination or harassment they may witness, or of which they become aware.

Every employee has a right to and responsibility to contribute and participate in a respectful workplace.

### **As an Island Health Employee:**

- Treat others the way they would like to be treated, with respect, courtesy, fairness and sensitivity
- Do not initiate or take part in any form of discrimination or harassment
- Exercise authority with care and in a way that is not considered or seen as discrimination or harassment
- Do not be afraid to speak up and be assertive if you feel you are being harassed or discriminated against

It is important to note that forms of harassment or discrimination are breaches of the Respectful Workplace Policy and may also constitute a breach of the British Columbia Human Rights Code.

For more information, read the [5.5.2 Respectful Workplace Policy](#) and the [BC Human Rights Code](#).



## Protection of General Corporate Information and Confidential Personal Information

### *Confidentiality and Privacy*

Confidential information, in any form, that employees receive through their employment must not be disclosed, released or transmitted to anyone other than persons who are authorized to receive the information.

Both clients and employees have a legal right of privacy regarding their personal information, which includes an individual's right to determine with whom he or she will share the information, and to know of and exercise control over collection, use, disclosure, access and retention concerning any personal information collected about him or her.

#### **As an Island Health Employee:**

- Collect, disclose, publish and dispose of personal or sensitive information, electronic media or devices over which you have care or control appropriately
- If in doubt as to whether certain information is confidential, ask the appropriate authority before disclosing, releasing or transmitting it
- Do not use any confidential information that you receive through your employment for the purpose of furthering any private interest, or as a means of making personal gains

The proper handling and protection of confidential information is applicable both within and outside the organization and continues to apply after the employment relationship ends. For more information, read policies:

[5.5.1 Conflict of Interest](#), [1.5.1 Confidential Information- Privacy Rights of Personal Information](#), [1.5.2 Confidential Information-Third Party, Island Health Business and Other Non Personal](#), [1.5.3 Release of Patient Information to Law Enforcement Personnel in Urgent or Emergency Situations](#), [1.5.4 Breach Assessment Reporting and Incident Management Tool](#), [16.1.1 Information and Data Governance](#), [16.1.1.2 Data Classification Scheme](#), and [16.6.1 Maintaining Respect for Individuals and Their Personal Information When Staff and Physicians Undertake Recording Activities in Island Health Facilities and Service Areas](#)

\* [The Freedom of Information and Protection of Privacy Act](#) overrides these policies.

## Integrity, Impartiality and Accountability

### *Conflict of interest*

While Island Health recognizes the right of its employees to be involved in activities as citizens of the community, employees must keep their role as private citizens separate and distinct from their employment responsibilities and must avoid situations in which they, inadvertently or otherwise, place themselves in a conflict of interest.

Potential and actual conflicts of interest need careful monitoring and pro- active management to ensure that they do not undermine or appear to undermine:

- The performance of an employee's duties and responsibilities, or
- The confidence and trust of the public in Island Health as a government funded organization dedicated to the provision of health care services to the residents of British Columbia

#### **As an Island Health Employee:**

- Do not use Island Health property, equipment or your position, office or government affiliation to pursue personal interests or the interests of another organization
- Do not place yourself in a situation where you are under obligation to a person who might benefit from, or seek to gain special consideration, advantage or favour
- In the performance of your official duties, do not give preferential treatment to an individual, corporation, or organization, including a non profit organization, in which you, a relative, acquaintance or friend of yours has an interest – financial or otherwise
- Do not place yourself in a situation where you would benefit from, or it is reasonably perceived by others that you would benefit from, the use of information or relationships acquired solely by reason of your employment
- Do not accept or solicit for yourself or other employees – from an individual, corporation or organization, directly or indirectly as a personal gift – benefits or services that arise out of employment with Island Health, other than:

- The exchange of hospitality between persons doing business together
- Tokens exchanged as part of protocol
- The normal presentation of gifts to persons participating in public functions, or
- The normal exchange of gifts between friends

The following four criteria, when taken together, are intended to guide the judgment of employees who are considering the acceptance of a gift:

- The benefit is of nominal value (less than \$25.00)
- The exchange creates no obligation
- Reciprocation is easy, and
- It occurs infrequently

On occasion, a person, firm or corporation that has dealings with Island Health or seeks to do business with Island Health may offer to underwrite a course or seminar to an employee. Under those circumstances the organization must complete a [Full Disclosure Financial Contribution Form](#) for consideration by Island Health Executive.

**After leaving Island Health, at the end of employment:**

- Do not disclose any information that is not available to the general public
- Do not use such information for your own purposes (in particular do not use it to obtain any intellectual property registration or to secure employment)
- Do not derive improper benefits as a result of your former position(s) at Island Health
- Senior leaders (Directors, Executive Directors, Executive) are restricted for a one-year period from accepting an offer to work with a vendor, supplier or non-public sector entity that benefits from its involvement, engagement or business with Island Health, where the senior leader had a direct business relationship with that vendor, supplier or non-public sector entity in the course of their employment with Island Health.

Employees who find themselves in an actual, perceived, or potential conflict of interest must disclose the matter to their supervisor or manager.

For more info, read policies: [5.5.1 Conflict of Interest](#) and [1.5.2 Confidential Information – Third Party, Vancouver Island Health Authority Business and Other Non Personal Information](#)

## ***Outside relationships or associations***

Island Health recognizes that employees will have a wide range of relationships and associations outside work.

### **As an Island Health Employee:**

Be aware that employees, unless specifically approved, are prohibited from:

- Giving or appearing to give preferential treatment to relatives, friends, or organizations in situations where they have a personal interest
- Placing themselves in a position in which a potential conflict of interest exists between their personal or volunteer interests and their employment duties to Island Health – for example, service on a board of an organization, which would represent a potential conflict of interest
- Providing directive, managerial or consultative services to any person, firm or corporation that does business with, seeks to do business with, is funded by or competes with the services of Island Health, without providing full disclosure in accordance with this policy, including the obtaining of prior managerial approval
- Providing input into the development of proposals to Island Health on behalf of any person, firm or corporation that is affiliated with, or is seeking to be associated with or contracted to Island Health, unless specifically directed to engage in this activity as part of their job
- Holding a position or having a material financial interest in an organization that competes directly or indirectly with Island Health in the purchase or sale of property, property rights, interests or services or provides goods or services to Island Health

For more information, read the following policy [5.5.1 Conflict of Interest](#).

### ***Working relationships***

Employees involved in a personal relationship outside work which compromises objectivity, or the perception of objectivity, should avoid being placed in a direct or indirect reporting relationship to one another.

#### **As an Island Health Employee, be aware:**

That employees who are direct relatives or who permanently reside together may not be employed in situations where:

- A reporting relationship exists where one employee has influence, input, or decision making power over the other employee's performance evaluation, salary, premiums, special permissions, conditions of work, and similar matters
- The working relationship affords an opportunity for collusion between the two employees that would have a detrimental effect on Island Health's interest or other employees of Island Health

If a personal relationship exists between employees as described, then employees must disclose the nature of that relationship to their superiors.

For more information, read the following policy [5.5.1 Conflict of Interest](#)

### ***Outside remunerative and volunteer work***

Employees may hold jobs outside Island Health, carry on a business, receive remuneration from public funds for activities outside their position, or engage in volunteer activities provided that these outside activities do not:

- Interfere with the performance of your obligations as an Island Health employee
- Bring Island Health into disrepute
- Represent a conflict of interest or create the reasonable perception of a conflict of interest
- Appear to be an official act or to represent Island Health opinion or policy
- Involve the unauthorized use of work time or Island Health premises, services, equipment, or supplies
- Gain an advantage that is derived from their employment with Island Health

For more information, read the following policy [5.5.1 Conflict of Interest](#).

## ***Private interests***

Island Health employees may have personal business interests outside the workplace, participate in political activities, and comment on public issues.

However, employees are prohibited from engaging in business interests, participating in political activities, and making comments that would jeopardize the perception of impartiality during the performance of their Island Health duties and responsibilities.

## **Business Interests**

### **Employees are prohibited from:**

- Using their status as an employee or Island Health's property to pursue personal interests or private practice – this includes, but is not limited to, the sale of goods or services to clients
- Providing service to Island Health as a contractor while also an employee of Island Health, except where approved according to procedures outlined in this section
- Providing concurrent services to Island Health patients as an independent contractor, unless:
  - Island Health service is actually complete, or
  - The service is not provided through Island Health or is substantively different than that service provided through Island Health, or
  - Island Health cannot reasonably provide the service
- Devoting paid time during normal working hours to an outside interest or activity that deprives Island Health of the employee's full services without an offsetting benefit to Island Health, unless prior managerial approval has been given and alternate arrangements have been made

## ***External communications and public comments***

**Island Health employees may comment on public issues but are prohibited from:**

- Engaging in any activity or speaking publicly where this could be perceived as an official act or representation (unless authorized by Island Health)
- Jeopardizing the perception of impartiality in the performance of duties by making public comments or entering into public debate regarding Island Health policies, activities or operations
- Using their positions in Island Health to lend weight to the public expression of their personal opinions

## ***Use of social media***

At Island Health, we believe our staff is our most valuable resource. Through their relationships with people outside the organization, our staff add value to the wider community and promote an open exchange of ideas. Social media offers us the opportunity to connect with our stakeholders in an informal way.

**As an Island Health employee participating in social media, you should:**

- Visit Island Health's [Social Media web page](#) for more information about Island Health's considerations and [Social Media Use by Employees](#) policy
- Know and follow Island Health's policies for [Privacy & Confidentiality](#), and [Acceptable Use of Assets and Resources](#)
- Not use Island Health equipment for social networking purposes, nor should social networking occur during work time unless the social networking is directly related to Island Health business
- Be aware that any comments you make on these networks that may compromise the privacy or reputation of a patient, co-worker or the organization will be subject to the application of these policies – to ensure that this does not occur, do not identify or reference patients, clients, staff, or suppliers (contact the Information Access and Privacy Office if you have questions: [www.viha.ca/info\\_privacy](http://www.viha.ca/info_privacy))



- Be mindful of your privacy settings and your own personal information – “private” information can quickly spread beyond a close network of friends
- Be aware that your participation in social media is voluntary, is to be done on your free time, and you are personally responsible for the content you publish
- Respect yourself and others – do not use slurs, insults, obscenities, or engage in conduct that is offensive to others
- Do not share anything that would harm your professional integrity or that of others, or that would compromise your ethics and professional standards

For more about protecting your privacy, visit the Information Access and Privacy Office at: [www.viha.ca/info\\_privacy/frequently\\_asked\\_questions.htm](http://www.viha.ca/info_privacy/frequently_asked_questions.htm)

For more information on the use of electronic equipment, please read: [16.4.2.1 Security of Electronic Information](#), [16.4.2.3 Acceptable Use of Assets and Resources](#), [16.4.2.4 Remote Access](#) and [16.4.2.5 Mobile Computing](#).

### ***Political activity***

Island Health employees may participate in political activities including membership in a political party, supporting a candidate for elected office or seeking elected office. Employees' political activities; however, must be clearly separated from activities related to their employment.

#### **If engaging in political activities, employees must:**

- Remain impartial and retain the perception of impartiality in relation to their duties and responsibilities at Island Health
- Not engage in political activities during working hours or use Island Health facilities, equipment or resources in support of these activities

Partisan politics are not to be introduced into the workplace; however, informal private discussions among co workers are acceptable.

For more information, read the following policy [5.5.1 Conflict of Interest](#).

## Reporting

### ***Theft, fraud, corruption, and non-compliant activities***

Island Health is committed to fostering integrity in our workplace and is opposed to all forms of theft, fraud, corruption, and non-compliant activities as defined in the Theft, Fraud, Corruption, and Non Compliant Activities Policy.

Internal controls and processes that are intended to prevent or detect improper activities have been established, but even the best systems and controls cannot provide absolute safeguards.

#### **As an Island Health Employee:**

- Act honestly, with integrity, in good faith, and safeguard the Island Health resources for which you are responsible
- Report any irregularities in good faith and based on reasonable grounds

Any suspected or known case of theft, fraud, corruption, or non compliant activity will be investigated and dealt with appropriately.

For more information, read the policies [5.5.4 Theft, Fraud, Corruption and Non Compliant Activities](#), [5.5.1 Conflict of Interest](#) and [5.5.12 Whistle Blowing](#)

## ***Whistle blowing***

Island Health is committed to the highest standards of business conduct. Following through on this commitment is every employee's responsibility.

Island Health encourages employees, who have information or allegations of improper activities, such as violations of Island Health policies and practices, to report them in good faith without fear of reprisal or retaliation.

Island Health will investigate all reported, alleged improper activities, while maintaining the confidentiality of all information reported and disclosed during the course of the investigation to the extent reasonably practicable.

### **As an Island Health Employee:**

- Immediately report any improper activities to your immediate supervisor (or other authorities), without fear of reprisal
- Cooperate fully in the investigation resulting from reporting a potential improper activity
- Use the reporting and investigation procedures only for the types of issues described in the Whistle Blowing Policy
- Consult with Human Resources if you think that an activity may be improper but are not sure

If for some reason you feel uncomfortable raising a potential improper activity with your supervisor, you should submit a report to the Designated Central Point of Contact (DCPC), or online, by phone or mail to the independent third-party reporting service:

- Online through the secure website at <http://www.clearviewconnects.com/>
- By phone to **Vancouver Island Health Authority dedicated toll-free number 1-877-365-1598**, or
- By mail through a confidential post office box at:  
P.O. Box 11017, Toronto, Ontario M1E 1N0

For more information, read the following policy [5.5.12 Whistle Blowing](#).

## Commitment and Compliance

### *Compliance with the laws, rules, and regulations*

Island Health and persons associated with the organization shall maintain knowledge and must comply at all times with all laws, rules, and regulations of any government, government agency and regulatory organization governing professional activities such as FIPPA, Public Mental Health Act, Health Authorities Act and Hospitals Act as well as the overall Code of Conduct and all policies governing conduct such as the Respectful Workplace Policy and the Theft, Fraud, Corruption and Non Compliant Activities Policy.

#### **As an Island Health employee:**

- Avoid any situations which could be perceived as improper or indicate a casual attitude towards compliance with the above
- Do not commit or condone an unethical or illegal act or instruct another person to do so
- Do not falsify any record of transactions

If you find yourself in a situation where you have a potential personal, moral or professional conflict with a law, rule or regulation, please talk to your resource on the Ethics Committee.

Island Health will work with the Public Sector Employers' Council Secretariat (PSEC) to determine appropriate enforcement measures for standards of conduct.

For more information, please read the following policies: [5.5.2 Respectful Workplace](#) and [5.5.4 Theft, Fraud, Corruption and Non Compliant Activities](#).

## Getting Help and Advice

*This is a summary of all the policies and procedures to which you can refer for further information or call Human Resources*

If you have questions about...	Policies and Procedures
<b>Conflict of Interest</b>	5.5.1 <a href="#">Conflict of Interest</a> 1.5.2 <a href="#">Confidential Information – Third Party, VIHA Business &amp; Other Non Personal Information</a>
<b>Privacy, Confidentiality &amp; Security</b>	5.5.1 <a href="#">Conflict of Interest</a> 1.5.1 <a href="#">Confidential Information – Privacy Rights of Personal Information</a> 1.5.2 <a href="#">Confidential Information – Third Party, VIHA Business &amp; Other Non Personal Information</a> 1.5.3 <a href="#">Release of Patient Information to Law Enforcement Personnel in Urgent or Emergency Situations</a> 1.5.4 <a href="#">Breach Assessment Reporting, Reporting &amp; Incident Management Tool</a> 16.1.1 <a href="#">Information and Data Governance</a> 16.1.2 <a href="#">Data Classification Scheme</a> 16.4.2.1 <a href="#">Security of Electronic Information Policy</a> 16.4.2.3 <a href="#">Acceptable Use of Assets and Resources</a> 16.4.2.5 <a href="#">Mobile Computing</a> 16.6.1 <a href="#">Maintaining Respect for Individuals</a>
<b>Working Relationships</b>	5.5.1 <a href="#">Conflict of Interest</a>
<b>Outside Remuneration and Volunteer Work</b>	5.5.1 <a href="#">Conflict of Interest</a>

<b>Respectful Workplace</b>	5.5.2 <a href="#">Respectful Workplace</a> <a href="#">BC Human Rights Code</a>
<b>Theft, Fraud, Corruption and Non-Compliant Activities</b>	5.5.4 <a href="#">Theft, Fraud, Corruption &amp; Non-Compliant Activities</a> 5.5.1 <a href="#">Conflict of Interest</a> 5.5.12 <a href="#">Whistle Blowing</a>
<b>Whistle Blowing</b>	5.5.12 <a href="#">Whistle Blowing</a>
<b>Use of Social Media</b>	2.3.2 <a href="#">Social Media Use by VIHA Employees</a> 16.4.2.1 <a href="#">Security of Electronic Information Policy</a> 16.4.2.4 <a href="#">Remote Access Policy</a> 16.4.2.5 <a href="#">Mobile Computing</a>
<b>External Communication and Public Comment</b>	5.5.1 <a href="#">Conflict of Interest</a>
<b>Compliance with the Laws, Rules and Regulations</b>	5.5.2 <a href="#">Respectful Workplace</a> 5.5.4 <a href="#">Theft, Fraud, Corruption &amp; Non-Compliant Activities</a>

*This above chart is not an exhaustive list of Island Health Policies and may be updated.  
Refer to the [Island Health intranet](#) for current Policies and Procedures.*

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