



Consolidated Policies and Guidelines for CHATS Corporate Responsibility

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Approved by (Signature):	Christina Bisanz, Chief Executive Officer

INTRODUCTION

CHATS identifies, develops, and documents its mission, vision and values and required ethical practices in a number of policies, guidelines and plans. These references are embedded as appropriate, in a number of different written materials including personnel policies and operations manuals. The *Consolidated Policies and Guidelines for CHATS Corporate Responsibility* document brings all of these together into one consolidated report. The *Consolidated Policies and Guidelines for CHATS Corporate Responsibility* is the reference guide used for personnel, volunteer and board member training, direction and guidance.

CHATS Mission, Vision and Values

VISION

Older Adults can live independently, safely and well at home.

MISSION

CHATS is an innovative and valued partner in the healthcare system, delivering high quality home and community services and experiences for older adults.

VALUES

Respect - we show respect, responsiveness, and responsibility in all we do, who work with and work for. We value and appreciate diversity and inclusivity.

Empathy – we care for, and about our clients and their caregivers. We are trusted providers, and listen to and understand their needs.

Collaboration – we work with our stakeholders and within the health care system to promote the health, safety and independence of our clients.

Creativity – we discover innovative ways to get better at providing excellent care and work experiences

Quality- we lead by example, act ethically, measure performance and make improvements

Accountability – we use our resources wisely and adapt to our diverse communities' changing needs.

POLICIES AND GUIDELINES FOR CHATS’ CORPORATE RESPONSIBILITY

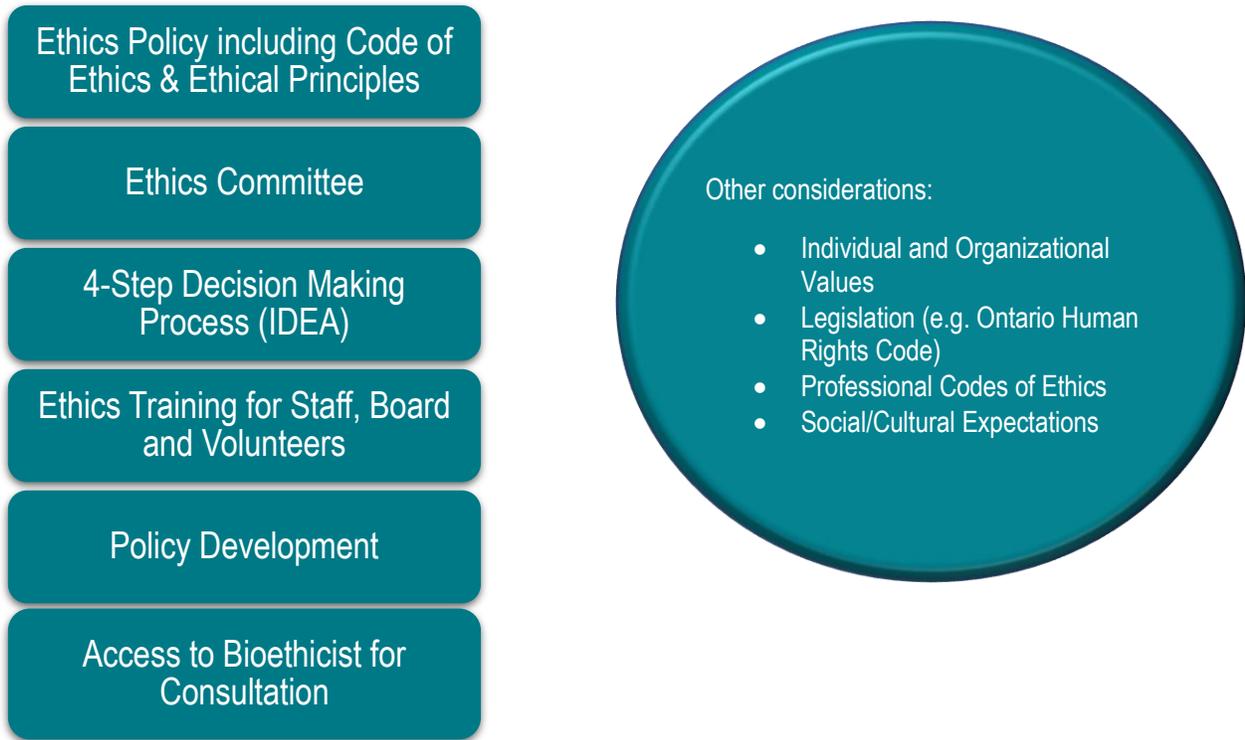
Policies and Guidelines for CHATS’ Corporate Responsibility includes ethics considerations that address:

- Advocacy Efforts
- Business Practices
- Conflict of Interest
- Contractual Relationships
- Corporate Citizenship
- Education of Stakeholders
- Fundraising
- Human Resources
- Marketing and Public Relations
- Professional Responsibilities
- Prohibition of Waste, Fraud, Abuse, and other Wrongdoing
- Service Delivery
- Social Media
- Written procedures to deal with allegations of violations of ethical codes.

ETHICS FRAMEWORK

All of CHATS' codes, policies and guidelines are developed referencing our Ethics Framework. This Framework is used by the governing body and organization's leadership to guide decision-making, the Code of Ethics itself, and subsequent supporting policies, procedures and guidelines:

Ethics Framework



References:

Community Ethics Network Toolkit
CARF Accreditation
Imagine Canada Ethical Code
Kerry Bowman, PhD., Bioethicist, Mt. Sinai Hospital

ETHICS POLICY

The Ethics Policy governs the actions of individual members of CHATS' Board of Directors, Committee members, staff and volunteers, to ensure CHATS' Core Values are evident in all strategic and operational decision-making processes and in the implementation of service plans.

The Ethics Policy is designed to support a safe and non-judgmental environment for Board/Committee members, staff and volunteers to identify ethical issues, and bring them forward so they may be addressed.

CHATS recognizes the complexity of ethical issues that may arise in a community setting. Service is often provided by unregulated Home and Personal Support Workers and volunteers who are not governed by a professional code of ethics. Services are provided both in the community and in clients' homes where clients can choose to live as they wish which may, from a staff perspective, put clients at risk.

As an accredited organization, CHATS is committed to the standards provided by CARF related to ethical issues.

CHATS' Code of Ethical Conduct provides specific ethical principles to address situations we may encounter and guide our relationships with clients, employees, volunteers, Board and the public.

CHATS' Ethics Framework includes: Ethics Policy including the CHATS' Code of Ethical Conduct and principles for ethical decision-making; ethics training for Board/Committee members, staff and volunteers; an Ethics Committee (cross-functional team); and access to a Bioethicist.

DEFINITION:

Ethical Dilemma

An ethical dilemma exists when there is a conflict between a person's personal values and the values of others or those of CHATS. Ethical dilemmas are as individual as the person and their unique value base. They may occur at every level of the organization including staff, volunteers, management, Board/Committees. Ethical issues may relate to, but are not limited to governance, accountability, privacy, confidentiality, conflict of interest, service and program priorities, resource management, ethical fundraising and direct client service interactions. Should ethical dilemmas arise that relate to areas of discrimination governed by the Ontario Human Rights Code (OHRC), CHATS would refer to the current OHRC for legislative compliance.

CHATS' CODE OF ETHICS

Upon joining the organization in either a volunteer or staff capacity, all individuals are required to sign an attestation that they have read and will adhere to our Code of Ethics outlined in our Ethics Policy. This attestation is renewed annually, as follows:

We, CHATS' Board of Directors, Committee members, employees and volunteers, are committed to providing professional, client-centered care in accordance with our ethical principles. Therefore, in our actions and decision-making processes, we shall:

- **Be committed to client informed choice, dignity and independence** by ensuring our clients are fully informed of their options and have all the information they need to make informed decisions. We will demonstrate every respect for human dignity and foster individual independence.
 - Bill of Rights and Responsibilities for Clients
 - CHATS Vision
 - Client Consent to Collect, Maintain and Share Information
 - Client Safety Culture
 - Community Care Coordination Guidelines

- **Demonstrate trust, caring and respect** for individual needs, privacy and human rights in each and every contact with clients, staff, volunteers, Board/Committees, agencies and community groups.
 - Bill of Rights and Responsibilities for Clients
 - CHATS Values
 - Diversity and Inclusion Policy
 - Code of Ethical Conduct Policy
 - Harassment and Discrimination Policy
 - Personal Health Record Disclosure and Access Policy (Client Care and Services)
 - Privacy - Shared Services (HR))
 - Privacy Commitment (HR)
 - Relationship-Based Care Philosophy
 - Violence in the Workplace Policy

- **Be committed to providing the highest quality of service within available resources.**
 - Accreditation review
 - CHATS Mission and Values
 - Client Safety Culture
 - Quality Improvement Plan (QIP)

- **Value the safety of our clients, staff and volunteers** and take the necessary measures to ensure personal safety and create an environment that supports the safe delivery of service.
 - Bill of Rights and Responsibilities for Clients
 - CHATS Vision and Values
 - Client Services Safety Policies
 - Harassment and Discrimination Policy
 - Human Resources Safety Policies
 - Violence in the Workplace Policy

- **Act ethically** refraining from behaviour that might cause harm to the agency, its clients and its stakeholders by adhering to all agency policies, procedures, practices and codes.
 - CHATS Values
 - Employee Code of Conduct
 - Conflict of Interest Policy
 - Ethics Policy
 - Supply Chain Code of Ethics Policy
 - Personnel Manual
 - Support Worker Manual

- **Advocate on behalf of our clients** to help improve accessible, responsive, quality, affordable client-centered care.
 - AODA – Customer Service Standards
 - Board Agenda: Community Engagement Agenda Item
 - CHATS Values
 - Community Engagement (Corporate)
 - Community Engagement Plan

- **Be truthful**
 - CHATS Values
 - Employee Code of Conduct

ATTESTATION:

I hereby confirm that I have read, understand and agree to abide by the terms of this policy and that I am not in breach of its terms. I am aware of CHATS' disciplinary process that could evolve from the violation of CHATS' Supply Chain Code of Ethics and understand that being in breach of this policy could result in disciplinary action, up to and including termination, at the discretion of my employer.

Signed: _____

Dated: _____

POLICIES

CHATS identifies, develops, and documents required ethical practices and corporate responsibility efforts in the following areas as demonstrated by these codes, policies and guidelines:

BUSINESS PRACTICES

Policies:

- Banking Policy (Governance)
- Bill of Rights and Responsibilities for Clients (Client Care and Services)
- Board Monitoring Policy
- Capital Assets (Finance)
- CEO's Authority Limitations Policy
- Client Consent to Collect, Maintain and Share Information (Client Care and Services)
- Confidentiality Policy (HR)
- Conflict of Interest and Funder Accountability Policy (Governance)
- Conflict of Interest Policy (HR)
- Diversity and Inclusion Policy (HR)
- Code of Ethical Conduct Policy (HR)
- Ethical Fundraising and Financial Accountability Policy (Governance)
- Ethics Policy
- Financial Reporting Policy (Governance)
- Harassment and Discrimination Policy (HR)
- MSAA Agreement - Legislation and Regulation Monitoring
- Permanent Client Record Documentation Standards in a Computerized Environment (Client Care and Services);
- Personal Health Record Disclosure and Access (Client Care and Services)
- Procurement Policy (Governance).
- Record Retention and Disposal (Finance)
- Recruitment and Selection Policy (HR)
- Supply Chain Code of Ethics Policy (Governance)
- Subsidy Policy (Client Care and Services)
- Transfer of Authority to Unregulated Care Providers (Client Care and Services)
- Violence in the Workplace Policy (HR)

Guidelines:

- Community Care Coordination Guidelines (Client Care and Services)
- Contracts for Contracted Providers

MARKETING AND PUBLIC RELATIONS

Policies:

- Client Consent to Collect, Maintain and Share Information (Client Care and Services)
- Diversity and Inclusion Policy (HR)
- Ethical Fundraising and Financial Accountability Policy (Governance)
- Ethical Marketing and Communication Practices (Corporate)
- Code of Ethical Conduct Policy (Governance)
- External Communications (Corporate);
- Permanent Client Record-Documentation Standards in a Computerized Environment (Client Care and Services)
- Personal Health Record Disclosure and Access (Client Care and Services)
- Privacy - Shared Services (HR))
- Privacy Commitment (HR)

CONTRACTUAL RELATIONSHIPS

Policies and Contracts:

- Conflict of Interest Policy (HR)
- Contracts for Contracted Providers
- Procurement Policy (Governance)

CONFLICTS OF INTEREST

Policies:

- Client Funds and Personal Property (Client Care and Services)
- Conflict of Interest Policy (HR)
- Ethical Fundraising and Financial Accountability Policy (Governance)
- Code of Ethical Conduct Policy (Governance)

SOCIAL MEDIA

Policy:

- Social Media (Corporate)

SERVICE DELIVERY

Policies:

- Bill of Rights and Responsibilities for Clients (Client Care and Services)
- Cheque and Contract Signing Authority Policy (Governance)
- Client Consent to Collect, Use and Disclose Personal Information (Client Care and Services)
- Client Funds and Personal Property (Client Care and Services)
- Conflict of Interest Policy (HR);
- Do not Resuscitate Policy (Client Care and Services)
- Code of Ethical Conduct Policy (Governance)
- Ethical Fundraising and Financial Accountability Policy (Governance)
- Gift Acceptance Policy (Governance)

- Harassment and Discrimination Policy
- Workplace Fundraising Policy (HR)

Documents:

- Respecting Client’s Property/Witnessing Documents)
- Support Worker Manual (Section II-1-3 Professional Boundaries)
- Support Worker Manual (Section III-28 Client’s Rights & Responsibilities)

PROFESSIONAL RESPONSIBILITIES

Policies:

- Bill of Rights and Responsibilities for Clients (Client Care and Services)
- Client Consent to Collect, Maintain and Share Information (Client Care and Services)
- Client Consent to Collect, Use and Disclose Personal Information (Client Care and Services)
- Elder Abuse (Client Services)
- Code of Ethical Conduct Policy (Governance)
- Employment Verification of Professional Credentials (HR)
- Record Retention and Disposal (Finance and Accountability)

HUMAN RESOURCES

Policies:

- Code of Ethical Conduct Policy (Governance)
- Diversity and Inclusion Policy (HR)
- Ethics Policy (Governance)
- Harassment and Discrimination Policy (HR)
- Violence in the Workplace Policy (HR)

PROHIBITION OF WASTE, FRAUD, ABUSE AND OTHER WRONGDOING

Policy:

- Asset Disposal (Finance and Administration)
- Client Funds and Personal Property (Client Care and Services)
- Conflict of Interest Policy (HR)
- Ethical Fundraising and Financial Accountability Policy (Governance)
- Code of Ethical Conduct Policy (Governance)
- Gift Acceptance Policy (Governance)

CHATS 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.

PROCEDURE TO DEAL WITH ALLEGATIONS OF VIOLATION OF ETHICAL CODES

Any staff member can report an ethical dilemma to their Supervisor or the Human Resources Director, as applicable. Unresolved ethical dilemmas are forwarded to the Ethics Committee for review and recommendation. The Ethics Committee will review the record, seek consultation if necessary and make recommendations.

Employee performance related violations of Policies and Guidelines for Corporate Responsibility are addressed through Performance Management guidelines, including the Investigation Guide, which includes procedures that outline investigation and corrective action. This may include progressive discipline up to and including termination of employment. Timeframes are outlined in applicable policies.

The construct of “no reprisal” is specifically addressed in CHATS’ Violence in the Workplace and Harassment and Discrimination policies, but is reiterated in training, one-on-one discussions, etc. with staff. In addition, this message is reinforced with clients directly, in the Client Bill of Rights and Responsibilities, or through communication means such as Town Halls.

Policies:

- Ethics (HR);
- Code of Ethical Conduct Policy (Governance)
- Termination and Employment Policy (HR)
- Violence in the Workplace Policy (HR).
- Harassment and Discrimination Policy (HR)
- Progressive Discipline Policy (HR)

Documents:

- Corrective Action Form (CAPS form)
- Performance Manual
- Supervisory Training (Power Point and handouts)
- Employment Agreement (termination clause)

EDUCATION ON CODES OF ETHICAL CONDUCT FOR PERSONNEL AND OTHER STAKEHOLDERS

CHAT's ensures that the Consolidated Policies and Guidelines for Corporate Responsibility are clearly communicated to staff in orientation and on an ongoing basis. The methods of communication are as follows:

- Each new employee, whether full-time, part-time, or contractual, receives a copy of and signs and acknowledging receipt and understanding of the Conflict of Interest, Confidentiality and Code of Ethical Conduct policies on hire.
- All new employees receive training during orientation on Confidentiality requirements, Conflict of Interest and Code of Ethical Conduct.
- Copy of the same is kept in the personnel file.
- Thereafter, these policies (or annual attestation that confirms their continued commitment to these principles and policies) are signed at the time of annual performance reviews.
- Staff receive either a Personnel Handbook or Support Worker Handbook outlining key policies and documents.
- CHATS engages in regular reviews of policies, guidelines and other documents at staff meetings, educational sessions and through e-mail communication.
- Each Board member signs the Code of Ethical Conduct Policy, Conflict of Interest Policy and Confidentiality Policy and Board Working Agreement when they start and an annual attestation that confirms their continued commitment to these principles and policies.
- Students and Volunteers receive and sign the Conflict of Interest Policy and Confidentiality Policy when they start working with CHATS.

Policies:

- Code of Ethical Conduct Policy (Governance)
- Conflict of Interest Policy
- Confidentiality Policy
- Board and Committee Working Agreement

Documents:

- Personnel Manual
- Support Worker Manual

ADVOCACY

CHATS engages in activities to promote program and service access to all persons, including:

- Community Job Fairs.
- Board community engagement activities at CHATS' and stakeholder events, meetings with government officials, community and LHIN events.
- Accessibility Plan (HR).
- AODA – Customer Service Standards (HR).
- Actively participating in community boards, committees and planning tables to promote enhanced services and understanding of issues concerning CHATS' clients as well help develop identify emerging issues, strategic directions and issues and barriers to equitable access. CHATS also supports system-wide planning for health care services and delivery through its engagement in these activities.
- Developing an annual Community Engagement Plan to engage the local community of diverse persons and entities when developing plans and setting organizational priorities.
- Engaging in community outreach through information and education opportunities in order to ensure inclusivity, and the elimination of discrimination and stigma for persons served.
- Hosting education and training events for partner organizations and CHATS staff to promote a better understanding of client needs (For example, training to manage Aggressive Behaviours, Gentle Persuasion Approach (GPA), Dementia).
- Providing caregiver support groups.
- Hiring staff that reflect clients to help ensure language, barriers, etc, are not a barrier to service.
- Providing reasonable accommodations to staff to promote their access to opportunities for participate in organizational events and activities, including training, planning tables, conferences, and committees.

Policies:

- AODA – Customer Service Standards
- AODA – Employment Standards
- Board agenda: Community Engagement Standing Agenda Item
- Community Engagement (Corporate)
- Community Engagement Plan
- Harassment and Discrimination Policy (HR)

Documents:

- The Board records engagement activities in Board meeting minutes Board members report their hours of participation.

FUNDRAISING

Policy:

- Ethical Fundraising and Financial Accountability (Governance)

CORPORATE CITIZENSHIP

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, CHATS' leadership is serving on community Boards, Commissions, Ad-Hoc Committees, and Task Force Groups at the federal, provincial and local levels, as applicable. CHATS 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. CHATS corporate responsibility is also evident through our funding of and consultation with grass-roots or community-based organizations, and governmental, public and private organizations. CHATS provides training, consultation, and/or mentoring to organizations, as applicable. The Strategic Plan and Operations Plan references working with partners and within the system to influence enhanced quality of life, independence and safety for clients.

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

Policies:

- Bill of Rights and Responsibilities for Clients (Client Care and Services)
- Client Funds and Personal Property (Client Care and Services)
- Community Engagement (Corporate)
- Conflict of Interest Policy (HR)
- Ethical Fundraising and Financial Reporting (Governance)

CHATS Policies and Documents Referenced:

Governance

- Banking Policy
- Board Monitoring Policy
- Board Bylaw #11
- Cheque and Contract Signing Authority Policy
- Code of Ethical Conduct Policy
- Conflict of Interest and Funder Accountability Policy
- Diversity and Inclusion Policy
- Ethical Fundraising and Financial Accountability Policy
- Ethics Policy and Procedure
- Financial Reporting Policy
- Gift Acceptance Policy
- Procurement Policy

Corporate

- Community Engagement Policy
- Ethical Marketing and Communication Practices Policy
- External Communications Policy
- Social Media Policy

Human Resources

- AODA – Employment Standards
- AODA – Customer Service Standards
- Confidentiality Policy
- Conflict of Interest Policy
- Corrective Action Form Progressive Discipline
- Diversity and Inclusion Policy
- Employee Code of Conduct Policy
- Harassment and Discrimination Policy
- Position Specific Manuals
- Privacy - Shared Services
- Privacy Commitment
- Recruitment and Selection Policy
- Termination and Employment Policy
- Violence in the Workplace Policy
- Workplace Fundraising Policy

Client Care and Services

- Bill of Rights and Responsibilities for Clients
- Client Consent to Collect, Maintain and Share Information
- Client Funds and Personal Property
- Client Safety Culture (Client Care and Services;
- Community Care Coordination Guidelines
- Permanent Client Record-Documentation Standards in a Computerized Environment
- Personal Health Record Disclosure and Access
- Transfer of Care to Unregulated Care Providers
- Use and Disclose Personal Information

Finance and Administration

- Asset Disposal
- Capital Assets
- Record Retention and Disposal

Documents

- Community Engagement Plan
- Contracts for Contracted Providers
- Performance Manual
- Personnel Manual
- Support Worker Manual

Reference:

CARF, Employment and Community Services Standard Manual, Section 1.A.6 Leadership: Corporate responsibility efforts.