



Policy Administration Console

Policy:	Standards for Business Conduct		
Policy Owner:	VP Finance & CFO		
SLT Sponsor:	VP Finance & CFO		
Approval By:	Senior Leadership Team	Date:	2008-06-25
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2009-07-01	2012-01-03	2012-01-03	

This policy applies to: LHSC

Similar policy at St. Joseph's: **Policy Name:** Standards for Business Conduct
Policy Owner(s): Chief Financial Officer

POLICY

The [Standards](#) for Business Conduct (Standards) embodies and builds upon the fundamental principles that govern our ethical and legal obligations to the hospital. It pertains not only to our conduct within the hospital but also to conduct involving our patients, staff, suppliers and related organizations. All staff and [hospital affiliates](#) (hereinafter referred to as "individual/s") are subject to these Standards.

Every individual is responsible for providing services that comply with all laws, regulations and standards including the Broader Public Sector Accountability Act (BPSAA). Individuals must demonstrate integrity and act in ways that are consistent with the London Health Sciences Centre (LHSC) mission, vision, values and comply with LHSC policies, as an expression of our stewardship and accountability responsibilities.

These Standards extend to include activities that:

- Pose a risk to staff, visitors, patients;
- Constitute financial misconduct, or breach of legal obligations
- Constitute misuse of, or a threat to, hospital assets.

These Standards do not supplant other professional codes of conduct, rather are intended to complement all other related guidance.

[Ethical dilemmas](#) may be encountered in the performance of work related duties, and this document can not address every circumstance that may arise. Individuals requiring clarification as to whether an activity is in contravention of these Standards or is perceived to be illegal or unethical are encouraged to first discuss the issue with their Leader.

PROCEDURE

Obligation to Report

Individuals have an obligation to report any activities judged to be in conflict with these Standards or any other related policy. This includes observed activities as well as those directly affecting the individual. Reporting of any such activities must follow the guidance found in Reporting of Inappropriate Activities ([Appendix A](#)).

All disclosures under these Standards are to be made by way of written or electronic correspondence to a person in [Leadership](#).

Disclosures under these Standards may result in serious consequences to those involved.

Disclosures therefore must not be frivolous in nature, and must be evidence-based to the fullest extent possible in the circumstances.

Any individual who is concerned with maintaining confidentiality and is reluctant to come forward is encouraged to discuss the matter with the Vice President, Human Resources or follow the options found in Reporting of Inappropriate Activities ([Appendix A](#)).

Managing External Stakeholder Relationships

Business relationships with [suppliers](#) must be equitable to both parties, based on merit, comply with London Health Sciences Centre policies, and not place individuals in a position of conflict. Business decisions must be based solely on the best interest of London Health Sciences Centre, its patients, and the community it serves. All contracts are to be awarded based on product or service suitability, economic value, delivery, and quality and in accordance with the BPSAA.

- **Loans or Prizes** from suppliers for a personal nature may not be received. Personal receipt of any prize or award from a supplier must be disclosed to Leadership. Prizes beyond a [nominal value](#) are deemed gifts to the corporation and should be surrendered to your leader.
- **Any form of payment** from a supplier for speeches, presentations or articles, attendance at conferences, or training is not permitted if the recipient is in a position of influence or decision making with suppliers and vendors on behalf of the hospital. All like payments must be disclosed to Leadership in advance if possible, with all such payments forwarded to the hospital.
- **Any payment or “kickback”** intended to influence or provide for favorable consideration to the benefit of a supplier or vendor in a contractual or other business relationship is not permitted.
- **Transportation and lodging** provided by a supplier or other third party are acceptable when the trip is for business purposes and is approved in advance by the individual employee's Leader. When the transportation and lodging are provided by a supplier or potential supplier, the individual's Leader should consult with the General Manager, HMMS or designate, prior to providing approval to see if there are any possible conflict of interest situations such as, upcoming tenders for contracts. The individual's appropriate leader must pre-approve any travel that is going to be at the hospital's expense.
- **Gifts or other favours** that could in any way influence or appear to influence business or care decisions are not to be accepted. Acceptance of unsolicited gifts of goods or flowers from patients, their families, or business associates given in appreciation or gratitude may be accepted however they should be shared with other department employees and should not exceed the nominal value. Gifts or other favours in excess of the nominal value should not be accepted. In circumstances where the decline of such gifts may offend the giver for reasons related to the giver's culture, gifts may be accepted on behalf of the hospital upon consultation with the individual's leader. For the purposes of this section, a donation made to the London Health Sciences Foundation and which is eligible for a charitable receipt is not considered a gift for the purpose of these Standards. Subject to the Conflict of Interest section of this policy, invitations from suppliers to attend either Foundation or Hospital sponsored events will be exempt from this definition.
- **Entertainment** other than for the purpose of business discussion or the enhancement of a business relationship is not permitted. Permitted entertainment must be reasonable, occur infrequently, and not involve lavish expenditures. An individual may not encourage or solicit entertainment from any individual or company with whom the hospital does business. If an invitation to entertainment seems inappropriate, the offer should be rejected. All offers of entertainment accepted or not, should be disclosed to the individual's leader. Subject to the Conflict of Interest section of this policy, invitations from suppliers to attend either Foundation or Hospital sponsored events will be exempt from this definition.

Should there be any uncertainty regarding the nature of individual's relationships in this regard, ask

your leader first.

Conflict of Interest

An individual's position of knowledge gained through their employment or affiliation is not to be used in a manner that a conflict of interest or an appearance of a conflict of interest arises. Objectivity must be maintained in both appearance and in fact. We must continually ask if the situation does, or gives the impression that it does, impair objectivity in any way. For example, individuals are to be particularly aware of the conduct under this policy during periods of contract negotiations or issuance of requests for proposals.

An individual may not have an undisclosed vested interest in an external business with which the hospital deals.

No employee (individually, through a partnership, corporation or other business vehicle) shall conduct a private practice at London Health Sciences Centre unless prior written approval from the hospital has occurred.

In matters of the provision of health care services or referrals for health care services, full disclosure to the recipient will be made of all related third parties with a business interest.

Individuals must disclose any kind of financial or personal obligation or interest that affects (or may appear to affect) their judgment in the transaction of business with outside firms or individuals, on behalf of London Health Sciences Centre.

Each individual must examine his/her own activities and those of his/her family to be sure that no such obligation or relationship exists that could create (or appear to create) a conflict of interest.

Power of Attorney/Executor

An employee may not act as an attorney under the Power of Attorney for property or personal care for a patient/resident/client or be appointed as an Executor of a will for a patient/resident. This policy shall not apply to an employee who is a spouse, partner, or relative of a patient/resident, or if an appointment as Attorney under Power of Attorney for property or personal care or Executor occurred prior to the patient/resident's admission. Such a situation must be declared in writing to his/her Leader/Program Director/Chief of the Department

Relationships with Family

Relatives of employees are eligible to pursue employment opportunities provided they are qualified and will not supervise or be supervised by a family member. An employee may not participate in any selection process which may include a candidate who is a family member.

Any individual involved in recommending or hiring an individual, or purchasing goods and services, must disclose in writing to the General Manager of HMMS and/or the Vice President, Human Resources, any known material interest, whether personal, family, or financial, in a prospective vendor, service provider or employee. If deemed appropriate, the individual will withdraw from the decision-making process.

An individual must not use their position for any other personal benefit or for the benefit of family and friends such as endorsement of product or services, or influencing access to care.

Stewardship of Hospital Resources

Every individual will safeguard all property that is placed in our care.

An individual may not use hospital resources for personal use unless approved in advance by the individual's leader. Approval may be provided for activities in the community consistent with the mission of the hospital.

Political Activities

Use of hospital resources including time during normal working hours on any personal political activity (local, provincial, or federal) is not permitted. This does not include the right to vote.

Consequences of Violation and Protection from Retaliation

Illegal or unethical practices or conduct in violation of these Standards by an individual, subjects the offending individual to disciplinary measures appropriate to the violation, up to and including termination of employment or affiliation with the hospital.

Individuals who in good faith report [inappropriate activities](#) will be protected from threats or acts of retaliation.

Any individual who engages in threats or acts of retaliation will be subject to disciplinary action up to and including termination of employment or affiliation with the hospital. Refer to Workplace harassment and Discrimination policy.

DEFINITIONS

Hospital Affiliates is defined as individuals who are not employed by the organization but perform specific tasks for the organization, including: Physicians, Dentists, Midwives, Extended Class Nurses, Students, Volunteers, Contractors or contractors' employees who may be members of a third-party contract or under direct contract to the organization, and individuals working at the organization, but funded through an external source (e.g. research employees funded by UWO).

Standards are rules or principles that provide guidance to appropriate behaviour and/or give direction or advice about a decision or course of action.

Ethical Dilemmas: In the decision making process, where there are opportunities to pursue two or more courses of action, the best interests of the organization and the individual may be in conflict or are incongruent.

Business is defined as occupation or transactions in the nature of trade for economic benefit.

Supplier means any person, group of persons, firm or corporation, who is providing or seeking to provide, goods or services to London Health Sciences Centre Health Care London. This includes contractors, consultants and agents.

Leadership is defined as a person holding a position in management within the hospital the individual is associated with or employed at.

A gift is something acquired without compensation, such as, a meal, a ticket to a special event, cash, a gift certificate, a piece of jewelry, a bottle of alcohol, etc.

A favour is a privilege or concession, such as, a reduction in the price on an item or service.

Nominal Value is defined as anything less than \$100.

Entertainment means something that amuses, pleases, or diverts, especially a performance or show, such as cultural, musical, or sporting event, for which there is a charge for admission.

REFERENCES

London Health Sciences Centre

[Code of Conduct](#)

[Corporate Communications and Public Relations](#)

[Mission, Vision, and Values](#)

[Risk Management](#)

Corporate Policies[Acceptable Use of Information Technology Resources](#)[Confidentiality](#)[Corporate Procurement of Goods and Non-Consulting Services](#)[Corporate Expense Policy](#)[Corporate Policy Statement on Health, Safety and Environment](#)[Electronic Mail \(E-mail\) Use](#)[Harassment and Discrimination](#)[Managing Abusive and Inappropriate Behaviours: Patients, Family and Visitor](#)[Managing Abusive and Inappropriate Behaviours: Staff and Affiliates](#)[Privacy Policy](#)**HMMS**[Standard Purchase Order Terms and Conditions](#)**London Health Sciences Foundation**[Donor Bill of Rights](#)[Association of Healthcare Professionals' Statement of Professional Standards and Conduct](#)**Children's Health Foundation**[Imagine Canada Ethical Fundraising and Financial Accountability Code](#)[Donor Bill of Rights](#)**APPENDICES**[Appendix A - Reporting of Inappropriate Activities](#)

Please refer to the On-line Corporate Policy Manual for the most up to date version of this policy. LHSC cannot guarantee that hard copy versions of policies are up-to-date.

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