



Code of Conduct

Standards of ethics
and integrity for the
Alberta Health Services team



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“We act in trust on their behalf and every decision made going forward must place their interest first and foremost.”

Ken Hughes
Board Chair, Alberta Health Services

Introduction

Alberta Health Services strives to adhere to the highest standards of ethics and integrity in the conduct of its clinical and business operations.

As individuals who provide care and services on behalf of Alberta Health Services, you share the responsibility of ensuring that our daily actions and decisions reflect a commitment to build trust with our patients, our community partners and all Albertans. When faced with difficult decisions, we must make choices that are not only morally and legally correct, but ones that will also stand the test of public scrutiny.

If your personal conduct could reasonably result in valid allegations or criticism from our fellow Albertans, then the conduct is questionable and may be improper.

Conduct that adversely affects the interests of Alberta Health Services or affects an individual's ability to carry out their employment or contractual duties (including non-compliance with established policies) could result in disciplinary action, even dismissal or termination.

Our Code of Conduct outlines the principles and standards of conduct that should guide the behaviour of all Alberta Health Services employees and other Alberta Health Services representatives.

These principles and standards provide general guidance to deal with specific issues or problems that may arise: they are not exhaustive and are not intended to cover all possible situations that could arise. They do not replace established Alberta Health Services bylaws, principles and policies, including the Conflict of Interest Bylaw and the Safe Disclosure Policy.

Alberta Health Services acknowledges that there are numerous professionals employed by or acting as consultants or other

representatives of Alberta Health Services including physicians, registered nurses, dietitians, pharmacists and many others. Most of the professional regulatory bodies whose members work within the Alberta Health Services organization have adopted their own codes of professional ethics or codes of professional conduct.

All professionals who are governed by a regulatory body that has adopted a code of conduct or ethics for its membership are expected to abide by their professional code of conduct or ethics in addition to the Alberta Health Services Code of Conduct.

In the event that there is an inconsistency between your professional code of conduct or ethics and the Alberta Health Services Code of Conduct, you are required to report this inconsistency to the Ethics and Compliance Officer.



Definitions

“You” and “your” means all individuals who provide care and/or services on behalf of Alberta Health Services including:

- members of the Alberta Health Services Board;
- employees of Alberta Health Services and its subsidiaries including permanent full-time or part-time employees, probationary full-time or part-time employees, term employees, casual employees, individuals employed under an individual consulting or service contract; and
- all other consultants, contractors, agents or other representatives of Alberta Health Services and its subsidiaries.



Ethical Concerns

You are responsible for your conduct at all times and you are accountable for all decisions that you make. Also, the onus for reporting an ethical concern always rests with you.

You may experience a situation where you are asked to follow a course of action that you feel uncertain about and are uncomfortable carrying out.

Perhaps you suspect that a fellow employee is engaging in questionable activities in the workplace. Situations such as these require making difficult choices:

- Should I question my supervisor regarding this policy or procedure?
- Should I speak to someone about my suspicions involving my co-worker? I'm not sure that the behaviour is unethical and I don't want to cause any problems.

If you are faced with a situation involving ethics or any other issue raised by the Code of Conduct and are unsure about how you should act, you are required to discuss the matter with your supervisor or the Ethics and Compliance Officer.

If you have any reasonable suspicions that a fellow employee's conduct violates the Code of Conduct, you also have an obligation to report this to your supervisor.

When taking action or making a determination relative to an ethical concern or inquiry, your supervisor is obligated to provide a written account of the matter to the Ethics and Compliance Officer.

Personal Conduct

The written account should include:

- the ethical issue raised;
- how the concern was resolved; and/or
- to whom the matter was escalated for further review and action.

If the issue cannot be resolved with your supervisor, including if the concern relates to the conduct of your supervisor, you can refer the issue to the Ethics and Compliance Officer directly.

If you are unwilling to report any reasonable suspicions to your supervisor or the Ethics and Compliance Officer, you may contact the external confidential reporting and disclosure service that has been engaged by Alberta Health Services.

The external reporting and disclosure service can be contacted at 1-800-661-9675.

All ethical inquiries or concerns will be dealt with in a professional and efficient manner.

Personal or private information will only be shared with those parties whose involvement is deemed appropriate and necessary for the matter to be reviewed and effectively resolved.

Whenever requested, and if it is feasible, efforts will be made to keep your identity confidential.

Provided you have acted in good faith, there will be no repercussions to your employment as a result of bringing forward your concern or enquiry, regardless of the outcome of any investigations.

The highest standards of integrity and trustworthiness are expected from you. Your personal conduct has a direct bearing on Alberta Health Services and how it is perceived by Albertans.

Conduct that compromises your reputation as an honest, trustworthy and competent individual must be avoided. It not only negatively impacts your ability to perform your employment (or contractual) duties, it may also cause other employees or members of the public to question your ability to carry out your duties in a satisfactory manner.

Individual Rights

You are expected to respect the rights of others be they Alberta Health Services employees, patients, suppliers, job applicants, or others with whom you have direct or indirect contact or dealings as a result of your role with Alberta Health Services.

Discrimination or harassment (unwelcome behaviour of a sexual or personal nature), whether against an individual or a group on the basis of race, religious beliefs, colour, gender, physical or mental disability, marital status, employment status, age, sexual orientation, ancestry or place of origin, of any person is neither appropriate nor acceptable.

Disclosure

You have an obligation to promptly advise your supervisor if you are charged with any serious breach of trust or other serious violation of the law, including any offence under the Criminal Code (Canada) or the Controlled Drugs and Substances Act (Canada).

Confidentiality & Privacy

A charge is considered to be a serious violation of the law if an independent third party might reasonably take the view that it brings into question your ability to fulfill your duties and responsibilities to Alberta Health Services.

You must also advise your supervisor of the outcome of any such charges.

For those who are governed by professional regulatory bodies, you also have an obligation to advise your supervisor of any investigation or charges being pursued against you by such regulatory bodies that could directly affect your ability to fulfill your duties and responsibilities to Alberta Health Services, as well as any suspension or revocation of accreditation or certification resulting from such investigation or charges.

Alberta Health Services is committed to ensuring the privacy, confidentiality and integrity of the information we collect, use and disclose in the provision of care and services and in our business operations. It is important that you assist in fulfilling this commitment.

You have a duty to protect the security and confidentiality of health, personal and organizational information verbally provided to you or contained in any records or other documents, whether written, electronic or otherwise, under your care and control.

Your duty extends to ensuring that information is shared only with those who are authorized to receive it.

You may only access health, personal or organizational information to perform your assigned duties. You may not use or disclose this information to benefit your personal interests.

Consequences

Personal conduct that brings into question your ability to fulfill your duties and responsibilities to Alberta Health Services, including violations of this Code of Conduct, breach of trust or violation of law, could result in disciplinary action being taken against you, up to and including termination of employment or other contractual relationship.

You may also be directed to take counselling, treatment, or other measures aimed at reducing or eliminating the problem or the conduct in question.

Health Information Act (HIA)

Alberta Health Services is governed by the Health Information Act (Alberta). In accordance with the HIA, a patient's health information consists of their diagnostic, treatment and care information, registration and health services provider information.

A patient's health information may be collected and used for the treatment of the patient.

A patient's health information may not be disclosed outside of Alberta Health Services without the prior written consent of the patient.

Health & Safety

FOIP Act

Alberta Health Services is further governed by the Freedom of Information and Protection of Privacy (FOIP) Act. FOIP provides any person with a right of access to the records in the custody or control of Alberta Health Services provided that the records are generally not harmful to personal privacy or the business interests of a third party.

Accordingly, please ensure that all communications are expressed in an appropriate and business-like manner.

Any questions that you might have about the HIA or privacy and confidentiality in general should be directed to the Information and Privacy Department of Alberta Health Services.



You and Alberta Health Services have a shared responsibility to ensure that the work environment is healthy and safe for patients and employees. You can do your part by conducting regular and proper assessments of risk and reporting your concerns to your supervisor.

You must be familiar with and comply with Occupational Health and Safety Guidelines, safety policies and practices. You must also participate in safety training when required.

Patient Safety

Alberta Health Services is committed to patient safety. To meet this commitment, we rely on you to:

- comply with all patient safety policies, procedures and other directives in place in any Alberta Health Services hospitals and other patient facilities where you provide care or services on behalf of Alberta Health Services;
- take necessary steps and reasonable precautions to avoid close calls and hazards;
- report all adverse events, hazards and, where appropriate, close calls in accordance with policies, procedures and other directives in place in any Alberta Health Services hospitals and other patient facilities where you provide care or services on behalf of Alberta Health Services;
- engage in open and honest discussions with Alberta Health Services designated individuals when patients have suffered harm; and
- work with us to continue to seek improvement of quality in the provision of care and services.

Time & Attention to Duties

You are expected to devote adequate and appropriate time and attention to your duties and responsibilities to Alberta Health Services.

If you have a position or role for which specific hours of work are set, you must adhere to that schedule.

In positions or roles where hours are not specifically set or are somewhat flexible, you must devote such time as is reasonably required to fulfill your duties and responsibilities.

Personal activities including, but not limited to, personal phone calls, e-mails, internet usage and course work, must not interfere or conflict with your duties and responsibilities to Alberta Health Services and should be conducted during scheduled breaks or outside of your working hours.

Financial Stewardship

You are required to faithfully account for, and deliver to Alberta Health Services, all monies, securities, equipment, supplies, records (including patient, employee and corporate records) and other property which you may from time to time receive from, or on account of, Alberta Health Services.

During the course of your employment (or other contractual relationship) with Alberta Health Services, you are responsible for exercising due care and attention, making appropriate use of and protecting all Alberta Health Services property that is entrusted to you.

If you leave the service of Alberta Health Services, you must deliver to Alberta Health Services all books, records, documents, equipment, effects, monies, securities, computers, telephones, or other property belonging to Alberta Health Services or for which Alberta Health Services is liable or responsible.



Public Statements

Public statements on behalf of Alberta Health Services are only to be made by a designated spokesperson.

If you are approached by the news media to provide information and/or interviews concerning Alberta Health Services' practices or operations, immediately refer all such requests to the Communications Department.

As a representative of Alberta Health Services, which you are by virtue of your role within the organization, it is important to exercise caution at all times and to choose your words carefully when engaging in any form of public speaking. You must not breach confidentiality or privacy regarding any patient, employee or business information.

If you write for publication or in any other public forum, you must ensure that any Alberta Health Services patient, employee or business information is not disclosed and that confidential documents are not made available to unauthorized persons.

Using Information Assets

You are entrusted with computer programs, supplies, data, documentation and facilities that have significant value. Alberta Health Services must maintain high standards of performance, security, and conduct to ensure the integrity and protection of information assets including the confidential patient and employee information they contain.

The following standards of conduct apply to all persons using information assets and resources owned by Alberta Health Services.

Definitions

User:

All persons using Alberta Health Services computer facilities including employees, consultants, contractors, external auditors, and any other parties required to use Alberta Health Services computer facilities.

Information Assets:

Computer hardware, software, networks, all supporting processes, procedures and computer-based services, as well as the patient and employee information and data that Alberta Health Services maintains to deliver health care programs and services.

Owned:

All hardware, software and applications, whether rented, leased or purchased by Alberta Health Services, regardless of their ownership.

Obligations

Users are responsible for making appropriate use of Alberta Health Services information assets including safeguarding the privacy, confidentiality and integrity of patient and employee data, software,



Assistance Information

software and application documentation, and equipment owned by Alberta Health Services.

Users must not exceed the authority level granted to them in accessing, altering or deleting data or applications. Users must also be aware of and abide by information technology policies.

Users have an obligation to adhere to the letter and spirit of all applicable laws, regulations, contracts, licenses, policies, standards, guidelines, business controls, security rules, and other expectations in reference to information assets.

Users must conduct all activities in a manner that is free of any form of dishonesty including theft or misappropriation of money, equipment, supplies and documentation or computer programs. Avoid any acts that compromise security, confidentiality or integrity.

Examples of inappropriate acts include:

- using Alberta Health Services information assets for unauthorized personal or business use, including sending non-work related e-mails;
- falsification of records and documents;
- unauthorized modifications of production programs and files;
- engaging in any conduct that may adversely affect Alberta Health Services or its reputation; and
- accessing, disclosing or destroying patient or employee data other than for the purpose of providing health care services or programs and/or conducting business on behalf of Alberta Health Services in accordance with legal and regulatory requirements.

Breaches of these requirements may be subject to disciplinary action, up to and including dismissal.

General

You are encouraged to discuss this Code of Conduct with your colleagues and your supervisor. Additionally, the Ethics and Compliance Officer will be available to discuss any aspect of the Code of Conduct, Conflict of Interest Bylaw or other bylaws, principles, policies or other directives issued on behalf of Alberta Health Services.

For information visit www.albertahealthservices.ca.

Ethics and Compliance Officer

The Ethics and Compliance Officer can be reached by e-mail at: complianceofficer@albertahealthservices.ca

Reporting Ethical Concerns

Supervisor - You are responsible for reporting any ethical concerns that you have to your supervisor. If the matter cannot be resolved with your supervisor, including if the concern relates to the conduct of your supervisor, you can refer the issue to the Ethics and Compliance Officer directly.

Ethics and Compliance Officer - If an ethical concern cannot be resolved with your supervisor, please contact the Ethics and Compliance Officer.

External Disclosure Service - Alberta Health Services has engaged an external confidential reporting and disclosure service. If you are unwilling to report any reasonable suspicions that a fellow employee's conduct violates the Code of Conduct to your supervisor or the Ethics and Compliance Officer, you may report your suspicions to the external confidential reporting and disclosure service. The external reporting and disclosure service can be contacted at 1-800-661-9675.



**Alberta Health
Services**

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