

Code of Conduct Engage Policy

Effective: 1/1/2011

Reviewed: 02/10/15

Revised:

Authoring Origin: Enterprise Risk Management, SVP/Chief Risk Officer, AVP Compliance and Information Security, Rod Hochman, MD - President/CEO

Origin Reference #: INHS-1722

Scope: This policy applies to Providence Health & Services and its Affiliates¹ (collectively known as “Providence”) and their entities, caregivers/employees, employees of affiliated organizations, volunteers and others who are in the direct control of Providence; and members of the Providence System Board; Community Boards; and Foundation Boards (collectively referred to as workforce members). This is a governance level policy approved by the Board of Directors and signed by the President/CEO.

Purpose: To define personal and professional standards of conduct and acceptable behavior for workforce members, while carrying out assigned responsibilities within Providence, including workforce members at certain sites. The term Code of Conduct as used in this document refers to all such documents maintained by Providence.

Policy: Providence will maintain Codes of Conduct for its workforce members across different Providence entities. For example we currently have one Code of Conduct specific to Swedish workforce members and one for Providence workforce members. Additional Codes of Conduct may be added from time to time based on the needs of Providence. The foundation for professional conduct of Providence workforce members derives from our mission, and values, Code of Conduct, Integrity & Compliance Program and associated policies. The standards of conduct outlined in a Code of Conduct helps to assure a positive environment for workforce members as well as patients, customers and visitors.

Definitions:

Integrity and Compliance Program is fully described in the Providence Integrity and Compliance Program Description (approved by the Audit & Compliance Committee of the System Board of Directors).

Workforce Member is defined as all caregivers/employees, board of directors, community board members, foundation board members, volunteers, students, independent contractors and other persons under direct control of a Providence entity, whether or not they are paid by Providence.

Requirements:

1. It is the responsibility of workforce members to:
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¹ For purposes of this policy, “Affiliates” is defined as any entity that is wholly owned or controlled by Providence Health & Services or Western HealthConnect (for example, Swedish Health Services, Swedish Edmonds, Kadlec Regional Medical Center, PacMed Clinics and Inland Northwest Health Services).

- a. Act in a manner consistent with the Code of Conduct, its supporting policies and procedures as well as applicable federal, state and local laws and regulations;
 - b. Support the Code of Conduct by holding others accountable to the standards of conduct established in the Code of Conduct;
 - c. Seek clarification of any part of the Code of Conduct that is not understood or where a question arises; and
 - d. Report concerns or alleged violations promptly as outlined in the Code of Conduct.
2. The Code of Conduct is available to workforce members in printed and/or electronic form in languages determined by management to meet the needs of Providence's diverse workforce.
 3. The Code of Conduct is reviewed and updated periodically.
 4. Generally, a Code of Conduct will cover the following topics:
 - a. Mission and values;
 - b. Purpose of the Code of Conduct;
 - c. Information on the Compliance Program;
 - d. How to report a concern;
 - e. Non-retaliation and corrective action;
 - f. Standards that address, for example, Patient Standards, Legal and Regulatory Compliance, Workplace Environment and Business and Financial Information; and g. Glossary of Terms.

References:

Code of Conduct
Compliance Program Description
INHS-1700 Integrity Program
INHS-1719 – Non-Retaliation
Integrity and Compliance Program System Policies