

	Manual Corporate	Section Human Resources	Type Policy & Procedure	Pages 1-5	Number 038-HR																																																			
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This policy applies to all employees, members of the professional staff, volunteers, learners, contractors and all persons who have a relationship with SJHH																																																								
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1.0 Purpose and Goals

SJHH is strongly committed to maintaining an environment in which staff are respected and are free to report, in good faith, a concern or wrongdoing without fear of intimidation and/or retribution, regardless of the investigation's outcome. St. Joseph's Healthcare Hamilton (SJHH) is committed to the highest ethical standards of honesty and integrity in dealing with our all stakeholders including patients, employees, professional staff, learners, volunteers and suppliers. Our goal is an ethical and transparent culture which values ethical leadership and personal integrity. In line with that commitment, we maintain a Workplace Ethics Policy that reflects our values and beliefs as individuals and as an organization.

2.0 Definitions

Whistleblower - Individual(s) who report real or perceived serious wrongdoings are sometimes referred to as "whistleblowers". Building an ethical culture at SJHH requires each and every one of us to act with integrity and model ethical behaviour. Individuals who report serious wrongdoing enable us to take appropriate action to protect SJHH, its people, and its assets.

Wrongdoing - Wrongdoing involves any unlawful or unethical behaviour and can include:

- Questionable reporting, accounting or auditing practices;
- An unlawful act whether civil or criminal;
- Unprofessional conduct or business/professional practices that fail to meet acceptable standards;
- Dangerous practice likely to cause physical harm or damage to any person, property, or the environment;
- Conflict of interest;
- Theft, embezzlement, bribery or fraud; and
- Failure to comply with or efforts to circumvent SJHH's internal compliance policies or internal controls.

3.0 Policy

This policy applies to all people working at or for St. Joseph's Healthcare Hamilton. Our commitment is to operating in accordance with SJHH Mission, Vision, Values and the Workplace Ethics Policy. Board Members, Management, Professional Staff and all Employees are required to observe high standards of personal ethics in the conduct of their duties and responsibilities. Every staff member is expected to practice honesty and integrity in fulfilling their

responsibilities and complying with all applicable laws, regulations and Hospital policies.

Compliance with this policy means conducting our work in such a manner that SJHH will continue to be recognized as a good corporate citizen.

3.1 Reporting Responsibility

It is the responsibility of all Employees and Professional Staff to comply with the SJHH Workplace Ethics Policy and to report actual or perceived acts of wrongdoing that they become aware of in the course of their employment or professional activities (on or off-site) in accordance with this Policy.

3.2 Acting in Good Faith

Anyone filing a complaint concerning a real or perceived serious wrongdoing must be acting in good faith and have reasonable grounds for believing the information disclosed indicates a violation of this Policy. Any allegations which prove to have been made maliciously or knowingly to be false will be viewed as a serious disciplinary offence.

3.3 No Retaliation

This Policy is intended to encourage and enable employees to raise serious concerns without fear of reprisal, subsequent discrimination or disadvantage. Any employee who, in good faith, reports a serious wrongdoing whether there is ultimately a finding of wrong doing or not, shall not suffer harassment, retaliation, or adverse employment consequences. This includes any reports of unethical or illegal conduct or of violations or suspected violations of this Policy made in good faith. Any individual who is found to have retaliated against someone who has reported a violation in good faith is subject to discipline up to and including termination or loss of privileges at SJHH.

4.0 Procedure

4.1 Reporting

In most situations, your immediate Supervisor or Manager may be in the best position to address your ethical dilemmas. They are responsible to address your concern and guide your access to further assistance, if required. In situations where you may be uncomfortable talking to your Supervisor or Manager, or they are unable to help, you are encouraged to speak with the next level Manager or seek assistance from Human Resources, Clinical Ethics Consultant, the Chief Privacy Officer, the Risk Management department, a professional practice lead, related regulated

college, or in case of a physician, you may contact the Head of Service or Chief of Department.

If the above options have not resolved your issue and you still believe it is a serious violation of the Workplace Ethics Policy (refer to Ethics Policy for definition of serious violations), you may make an on-line report through the Workplace Ethics Reporting Line at:

A. Website: <http://www.GrantThorntonCARE.ca>

B. Dedicated toll-free number for SJHH: 1-855-484-CARE (2273)

C. By email: UseCARE@ca.gt.com

4.2 Response to Concerns

SJHH will ensure that each reported serious breach of the Workplace Ethics Policy will be dealt with expeditiously and will be thoroughly investigated. All staff have the duty to cooperate in an investigation.

4.3 Confidentiality

Wrongdoings or suspected wrongdoings may be submitted on a confidential basis or may be submitted anonymously. Reports of wrongdoings or suspected wrongdoings will be kept confidential to the extent possible, consistent with the need to conduct an adequate investigation.

5.0 References

5.1. Internal References

Workplace Ethics Policy – 039-HR

Code of Conduct/ Standards of Behaviour – 149-ADM

SJHH internal Policies and Procedures

5.2. External References

Workplace Ethics Reporting Line

Website: <http://www.GrantThorntonCARE.ca/>

Dedicated toll-free number for SJHH: 1-855-484-CARE (2273)

By e-mail confidentially at: UseCARE@ca.gt.com

6.0 Authors

Human Resources

7.0 Sponsor

VP People & Organizational Effectiveness

8.0 Posting Dates

Initial Posting Date: 30/01/200

Posting Date History: 30/01/2010, 12/04/2012, 08/03/2019

9.0 Schedule Review Date