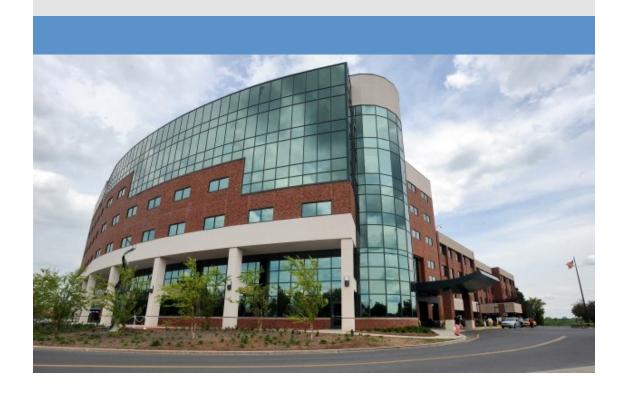


# **CODE OF CONDUCT**



#### Dear Colleague:

Welcome to the Glens Falls Hospital team. Every person on our team has a responsibility to provide high-quality, patient -centered care for our patients – to every patient, every day. This is a team effort, and one that can only be accomplished working together.

The Code of Conduct is an essential part of successfully providing patient-centered care. This document provides you with guidelines, policies and information that define expectations and behaviors required from every employee. I take the Code of Conduct very seriously and ask that you do as well.

Feel free to ask your leader any questions on information that may be unclear.

Thank you again for choosing to be part of the Glens Falls Hospital team.

Sincerely,

Paul Scimeca
President & CEO

# **Table of Contents**

D	enavioral Expectations	
1.	Glens Falls Hospital Core Values	5
2.	Professional Appearance	5
3.	Confidentiality	6
4.	Quiet, Peaceful Environment	6
A	dministrative Rules	
1.	General Record-Keeping	7
2.	Use of Hospital Resources	8
3.	Intellectual Property	8
4.	Relationships - Competitors and Vendors	9
5.	Questionable Gifts	9
6.	Conflicts of Interest	10
7.	Parking	10
8.	Personal Use of Electronic Devices	11
9	Personal Use of Social Networking Sites	11

# **Important Information**

1. Patient Care and Service

2.	Patient Satisfaction	12
3.	Regulatory and Accrediting Agencies	13
4.	Open and Honest Communication	14
5.	<b>Equal Opportunity</b>	14
6.	Drug-Free Workplace	15
7.	Tobacco-Free Workplace	16
8.	Workplace Environment	16
9.	Workplace Safety and Health	17
10	. Visitors and Vendors	17
11	.Emergency Treatment	18
12	.Directions/Way Finding	19
13	Political Activity and Lobbying	19
14	.Regulatory Agency Representatives	20
15	.Compliance Program	20
16	.General Requirements	21
17	. Condition of Employment	21
C	onclusion	22

**12** 

# **Behavioral Expectations**

# 1. Glens Falls Hospital Core Values

GFH Cares
Collaboration
Accountability
Respect
Excellence
Safety

# 2. Professional Appearance

Glens Falls Hospital adheres to a professional appearance standard. As employees in a healthcare environment, we need to be aware the image we project is one in which patients, families, visitors and all other customers feel comfortable, confident and secure. The personal appearance of employees contributes significantly toward one's overall impression of GFH.

For more information, please reference the Professional Appearance Policy.

# 3. Confidentiality

Glens Falls Hospital is committed to protecting all aspects of patient information. We do not share confidential patient information with anyone that does not have a legal right to that information.

We respect patient's rights to confidentiality and privacy; and we maintain policies and procedures to ensure compliance. During the registration process, patients are provided privacy choices. The *Joint Notice of Privacy Practices* is available at all registration areas and upon request.

On a yearly basis, you will be required to sign a confidentiality agreement that obligates you to protect the confidentiality of patient information.

### 4. Quiet, Peaceful Environment

It is important to ensure a quiet and peaceful environment for our patients and visitors. We request that you speak in quiet tones regardless of the time, and especially during nighttime hours.

# **ADMINISTRATIVE RULES**

# 1. General Record-Keeping

- Do not falsify facts or create false records.
- Create only those records that are necessary to the performance of your job and those required by law.
- Provide records only to individuals who have a legal "need to know".
- Preserve patient confidentiality.
- Maintain records as long as the law requires.
- Follow policies pertaining to court orders, subpoenas, and search warrants.
- In the case of medical records, each page must contain the patient's name and identification number (medical record number, account number, or date of birth).
- Your signature must always be legible on any given document.
- Comprehensive and accurate medical records documentation must be maintained for all patients and all services and care provided. Record keeping is important to ensure quality of care and patient safety and serves as evidence to support payment.

# 2. Use of Hospital Resources

Supplies and/or equipment belonging to Glens Falls Hospital will not be given or loaned to any person, including hospital employees, volunteers, groups, or community agencies, for personal use. Supplies and/or equipment may be given or loaned only when the action supports a public health or human service need and written authorization is granted from a hospital administrator.

# 3. Intellectual Property

Intellectual property pertains to the protection of copyrights, trademarks, patents, and trade secrets that belong to Glens Falls Hospital. Protection of this property is everyone's responsibility.

#### **Employees should not:**

- Install computer software without the proper license.
- Reproduce copyrighted materials for reasons other than person use.
- Sell or give away a new process or device developed by Glens Falls Hospital.

# 4. Relationships with Competitors and Vendors

In all relationships with vendors and competitors, we must make sure not to violate the law that prohibits direct or indirect financial incentives to purchase a vendor's product or service. Glens Falls Hospital has a Vendor Policy and a Vendor Code of Conduct in place on the Glens Falls Hospital Intranet. Potential conflicts of interest should be brought to the attention of your manager.

#### 5. Questionable Gifts

We must all exercise good judgment and discretion when accepting gifts. We should never accept gifts, favors, services, entertainment or other items of value to the extent that acceptance would in any way impact our decision-making. Please refer to the Vendor Policy on the Glens Falls Hospital Intranet for more information.

#### 6. Conflicts of Interest

#### Potential conflicts of interest include:

- Diverting patients to an entity in which someone has a financial interest.
- Being employed by or a board member of an entity in which that person has a financial interest.
- Using hospital property to conduct one's own business.
- Accepting gifts or entertainment from another organization.
- Competing either directly or indirectly with the services, programs, or activities of Glens Falls Hospital.
- Holding a financial interest in a company with which Glens Falls Hospital does business.

Possible conflicts of interest should be discussed with your manager who can help determine if a conflict of interest exists and help take whatever action is necessary to solve the problem.

## 7. Parking

Glens Falls Hospital is committed to a "Patients First" parking philosophy and policy. Every patient and their family members have the ability to park in a safe location preferentially closest to the hospital or an off-site facility. Every employee is expected to read the Parking Policy on the

Glens Falls Hospital Intranet. If you have any questions or concerns regarding this policy, please contact your manager.

#### 8. Personal Use of Electronic Devices

Glens Falls Hospital restricts the use of electronic devices (cell phones, smart watches, tablets, etc.) for personal purposes, except during your lunch or break time, or in the case of an emergency. During those times, we ask that employees exercise good judgment when using these types of devices.

# 9. Personal Use of Social Networking Sites

Access to social networking Internet sites (i.e. Facebook, Twitter, etc.) for personal use through Glens Falls Hospital computers is not permitted. When accessing such sites outside of your working environment, we ask that you always show respect for GFH, our patients, and employees; and refrain from making derogatory comments about the Hospital, its practices, or its affiliates.

#### IMPORTANT INFORMATION

#### 1. Patient Care and Service

We are committed to providing exceptional care to our patients. Poor care or service will not be tolerated. If you observe or become aware of poor care or service, it is your duty to report it.

#### 2. Patient Satisfaction

Glens Falls Hospital is a patient-focused organization. We are committed to providing exceptional patient experiences. Our patients and their family members are the most important customers we serve, and we regard them as our partners in care.

Our patients provide us with the valuable feedback on how well we provide care and services. A percentage of them receive a survey which they are encouraged to complete and return. We use their feedback to improve our performance.

We recognize that every healthcare provider is a patient advocate, and therefore we have a Patient Experience / Patient Representative Department. The Department's purpose is to work with staff on behalf of our patients to assure patient's personal needs are met, including providing

them with comfort, solving problems, resolving complaints and informing them of their rights and responsibilities as a patient in any hospital in New York State.

# 3. Regulatory and Accrediting Agencies

Glens Falls Hospital maintains relationships with a number of regulatory agencies such as Det Norske Veritas (DNV), the New York State Department of Health and Centers for Medicare and Medicaid Services. Complying with or exceeding the standards and regulations set forth by these regulatory bodies is also an expectation of Glens Falls Hospital employees and those associated with the provider. As an example, the DNV establishes yearly National Patient Safety Goals to guide healthcare organizations on areas like infection control, patient identification, and medication safety, to name a few.

These standards represent excellence in the delivery of quality and safe patient care and ethical and legal practices. Glens Falls Hospital is committed to complying with the various agencies and the criteria they establish for healthcare organizations.

# 4. Open and Honest Communication

Glens Falls Hospital is dedicated to maintaining a professional environment where you feel comfortable sharing your concerns about any issue — an environment where colleagues demonstrate collaboration, accountability, and communication is open and honest. If you need help communicating with your manager, please contact the Human Resources Department at **518-926-1801**.

# 5. Equal Opportunity

Our promise to staff and patients is that we will treat others with respect and dignity. Leadership, in turn, promises to ensure employees that make complaints, or witness such behavior, will not be victimized or retaliated against.

Glens Falls Hospital is an "equal opportunity employer." We do not allow discrimination based on race, creed, color, religion, gender, national origin, age, disability, marital status, sexual orientation, predisposing genetic characteristics, status as a domestic violence victim, protected veteran, or other protected classification.

## 6. Drug-Free Workplace

Glens Falls Hospital maintains a drug-free workplace. The use, possession, solicitation for, or sale of narcotics or other illegal drugs, alcohol, or prescription medication without a prescription on hospital grounds and at off-site facilities that are owned and/or leased by Glens Falls Hospital is explicitly prohibited. The presence of any detectable amount of prohibited substances in your system while at work is also prohibited.

If you suspect or know of someone that is impaired while at work, you are expected to report your suspicions to your manager. If you are tested for drugs or alcohol and the results indicate a violation of this policy, or if you refuse a request to submit to testing under this policy, you may be subject to appropriate disciplinary action, up to and possibly including discharge from employment.

## 7. Tobacco-Free Workplace

As an established leader in the healthcare industry, Glens Falls Hospital is committed to providing and promoting a safe and healthy environment for employees, visitors, and patients. The hospital has implemented a tobacco-free policy that prohibits the use of tobacco products on hospital grounds and off-site locations owned and/or leased by Glens Falls Hospital. Tobacco products include but are not limited to cigarettes, cigars, electronic cigarettes, pipe smoking and chewing tobacco.

# 8. Workplace Environment

Glens Falls Hospital is committed to maintaining a safe and healthy work environment where we treat each other with honesty, dignity, and respect. Leadership promises to ensure employees who make complaints or, witness such behavior, will not be victimized or retaliated against. We also maintain an environment that is free from violence, threats of violence, and the influence of alcohol and illegal drugs.

# 9. Workplace Safety and Health

Glens Falls Hospital follows all health, safety, and environmental laws and regulations. We strive to make the workplace as clean, comfortable, and cheerful as possible. If you are unsure of the correct procedure to follow or you observe unsafe actions or conditions, check with your manager, review online procedures.

#### 10. Visitors and Vendors

Glens Falls Hospital expects every visitor and vendor to follow all applicable hospital policies and procedures (i.e. infection control, noise, safety, security, respect). All hospital policies exist for the protection of our visitors, patients, and employees.

Vendors are required to complete and agree to the Glens Falls Hospital Vendor Code of Conduct available on the Glens Falls Hospital Intranet. Vendors are not allowed to visit units, departments, or other areas without first checking in with Materials Management and obtaining a visitor identification badge.

Some vendors may appear wearing their own corporate vendor identification badge. These badges are not appropriate documentation and should not be accepted. Only a vendor identification badge issued by Materials Management is acceptable.

Employees should refuse to meet with any vendor who has not complied with this policy and should contact their manager.

# 11. Emergency Treatment

Glens Falls Hospital follows the Emergency Medical Treatment and Labor Act (EMTALA) in providing an emergency medical screening examination and necessary stabilization to all patients, regardless of their ability to pay. As long as we have the capability and capacity, we treat anyone who has an emergency medical condition. Patients with emergency medical conditions are transferred only at the patient's request or if the patient's medical condition cannot be treated here and appropriate care is knowingly available at another facility. We do not admit, discharge or transfer patients with emergency conditions based on their inability to pay or any other discriminatory factor.

In an emergency situation or if a patient is in labor, we do not delay the medical screening and necessary stabilization treatment in order to receive financial and demographic information.

If you encounter any person on the Glens Falls Hospital campus in need of immediate medical treatment, please contact the operator at **ext. 5555** and request a "Code 250" while supplying the operator with the location of the person in need.

All EMTALA-related policies and procedures are available on the Glens Falls Hospital Intranet.

# 12. Directions/Way Finding

Every member of the Glens Falls Hospital staff is dedicated to making sure that anyone who in need of assistance (i.e. directions) is given that assistance and is treated with respect.

# 13. Political Activity and Lobbying

Glens Falls Hospital is exempt from paying taxes because of our purpose and mission. The organization cannot give money, property, services or employee work time to political parties or individuals running for public office. You may, however, give your own money to political candidates and participate in campaign activities as a private citizen on your own time.

# 14. Regulatory Agency Representatives

Representatives from various regulatory agencies periodically visit Glens Falls Hospital. If such a representative approaches you and asks questions or seeks any type of information from you, you must direct the individual to your manager.

# 15. Compliance Program

Glens Falls Hospital has a Compliance Program and a Compliance Officer. The Compliance Program is in place to prevent illegal conduct and promote honest and ethical behavior. Everyone is responsible and required to report situations of possible illegal or fraudulent activity or suspected compliance violations to their manager, the Compliance Department, or the Confidential Message Line. Everyone is expected to assist in the resolution of any identified compliance issues. Non-compliant behavior, including encouraging, directing, facilitating, or permitting non-compliant behavior, failure to report a concern or assist in an investigation, may be deemed misconduct, a violation of this Code, and subject to GFH's policy on discipline.

# 16. General Requirements

All of us must comply with all laws and rules that impact our jobs – not just the expectations outlined in this booklet. When in doubt, ask for clarification from your manager or contact Human Resources at 518-926-1801.

# 17. Condition of Employment

Abiding by the Code of Conduct is a condition of your employment at Glens Falls Hospital. Failure to meet the standards and principles defined in this code may be the subject of discipline, up to and including termination, based on the severity and frequency of the violation. The disciplinary process is outlined in the Corrective Action policy on the Glens Falls Hospital Intranet.

We also expect all employees to inform their leadership of any potential concern or behavior in violation of the Code of Conduct.

# **CONCLUSION**

If you are uncomfortable approaching your manager with your concern or believe the issue has not been resolved, you may contact the Corporate Compliance Office. You may also place an *anonymous*, *untraceable* call to the Confidential Message Line at (518) 264-TIPP.



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