



Employee Code of Conduct

Policy Title	Employee Code of Conduct
Policy Owner	Human Resources/Compliance
Policy Approver(s)	Human Resources Specialist and Chief Compliance Officer
Related Policies	Corporate Compliance Plan
Related Procedures	Spanish Peaks Behavioral Health Systems Policies and Procedures Manual
Storage Location	Human Resources, Compliance Officer, Intranet website.
Effective Date	4/20/2011
Next Review Date	4/2012

Mission

To make available a comprehensive range of quality community-based mental health care services in the least restrictive manner to residents of Pueblo, Huerfano, and Las Animas Counties.

Purpose

Spanish Peaks Behavioral Health Systems employees, contract providers and volunteers will exhibit behavior based on honesty, integrity and a sense of fairness. It is the responsibility of these individuals to maintain the highest standard of legal and ethical behavior. This includes complying with all local, state and federal laws and regulations designed to assure adequate and appropriate care and taking timely and responsive positive action to prevent or correct any improper or inappropriate acts. The Center's Board of Directors and management are committed to providing avenues through which ethical issues may be raised, reviewed and resolved openly and honestly.

The purpose of the Employee Code of Conduct is to strengthen the ethical environment of Spanish Peaks Behavioral Health Systems (SPBHS) by providing guidance on the principles, standards, and responsibilities of conduct for all employees in the performance of their duties. These behavioral expectations are directly derived from SPBHS's core values, which are:

- **We believe** that our clients are our highest priority. They are the reason why Spanish Peaks Behavioral Health Systems exists.
- **We believe** in the preservation of human dignity, self respect, and client rights in a caring environment.
- **We believe** in the client-centered approach to care in which the total health needs of the client are addressed. The clients' families are encouraged to become involved in their loved one's treatment efforts.
- **We believe** that Spanish Peaks Behavioral Health Systems should be responsive to the mental health care needs of its communities and should direct its resources to meet those needs in a cost effective manner.
- **We believe** that Spanish Peaks Behavioral Health Systems should be a good corporate citizen of the community, maintaining communications with the various publics we serve and participating actively in community affairs, particularly related to health and behavioral health care.

Scope

SPBHS's Employee Code of Conduct policy applies to all employees at SPBHS regardless of employment status, unless specifically excluded by contract or collective agreement.

This Employee Code of Conduct represents guiding principles only – it cannot anticipate all circumstances and situations that employees may encounter. The exercise of good judgment is still expected from employees at all times. If in doubt in regards to appropriate behavior or course of action, SPBHS strongly encourages employees to seek out guidance from others in the organization including supervisors, the Human Resources Department, the Chief Compliance Officer, or Administration.

Responsibility and Authority

All members of management are responsible for implementing and enforcing the Employee Code of Conduct in consultation with the Human Resources Department.

On an annual basis, employees are required to sign an acknowledgement that they have read, understand, and agree to comply with the Employee Code of Conduct.

If an employee becomes aware of a serious breach of this Employee Code of Conduct, the employee has a responsibility to report that breach to LuAnn Bickle/Human Resources Specialist or Barb Mettler/Chief Compliance Officer. Any employee who reports a breach in

good faith is protected from reprisal for doing so, even if the reported breach is not confirmed through investigation.

Any questions regarding the scope, interpretation, or application of the Employee Code of Conduct should be referred to Human Resources or the Chief Compliance Officer.

RESPONSIBILITY TO CLIENTS:

- Staff members will treat clients with respect, courtesy, and good faith.
- Staff persons will not, under any condition, engage in sexual intimacies with SPBHS clients.
- Staff persons will not exploit clients for personal or financial advantage.
- Staff persons will avoid relationships or commitments with clients that could jeopardize the therapeutic process.
- Staff persons will not impose their personal, religious, political, or philosophical beliefs on clients.
- Clinicians will actively seek supervision:
 - When a situation is outside the clinician's own expertise or training;
 - When personal problems or conflicts develop which may interfere with responsibilities to clients;
 - When it appears that another staff member is violating a client's rights;
 - When it is reasonably clear that a client is not benefiting from treatment.
- Clinicians will notify the client promptly and seek transfer, referral, or other means to continue service when interruption of service is anticipated.
- Staff will seek supervision whenever they have a question regarding any type of involvement with a client.

Employee Code of Conduct

The ethical behavior of SPBHS employees is essential to maintaining the public's confidence and trust. This code emphasizes that SPBHS employees are professionals who are resolved to uphold SPBHS's legal obligations and ethical principles. Staff will not recruit to their own private practice clients who are actively being seen at the Center. Staff shall remain alert during their working hours.

While employees must always be guided by their own professional judgment, SPBHS hopes that consideration of this code will help when difficulties arise.

Rights

Employees may be exposed to potential abuse from customers, co-workers, and business partners. All employees have the right to demand fair and courteous behavior from everyone, including senior management and administrators that might control their positions and manage their paychecks. Employees should not tolerate irate or otherwise disrespectful behavior from

anyone. If an employee feels as though he or she has been treated badly, document the event and present it to the immediate supervisor (if appropriate).

Compliance with Laws and Regulations

Employees must comply with the state, federal and contract laws and regulations that impact SPBHS and how they do their jobs. All efforts should be made by employees to ensure their co-workers do the same.

Confidentiality and Privacy

Employees may come into contact with privileged information. The employee has the duty to the owners of the information to protect the confidentiality of all such information. All employees are subject to HIPAA requirements when releasing protected health information.

All appropriate effort should be made by the employee to enforce security measures to protect SPBHS confidential information and personal employee information.

Respect

SPBHS values courtesy, honesty, diversity, tolerance, equity and dignity. All employees have the right to feel safe and comfortable in their place of work. Employees must behave respectfully and professionally in all interactions with colleagues, suppliers, customers, or the public at large. Discriminatory, offensive, intimidating, humiliating and otherwise disrespectful behavior will not be tolerated.

Protection of Assets

Employees are provided access to SPBHS assets for the purpose of performing work-related activities. SPBHS name assets will not be used for anything other than legitimate SPBHS business. Employees are expected to take good care of SPBHS assets in their possession and will take reasonable actions to protect these assets from damage, loss, misuse or theft.

Health and Safety

Leadership at SPBHS is committed to providing a clean, safe and healthy workplace for all employees. Employees must comply with all safety policies and directives and must take reasonable precautions to ensure not only their own safety and health, but also that of others affected by their work. Employees are obligated to report any unsafe conditions to the Chief Financial Officer or the Chief Operations Officer. Visitors to SPBHS must be escorted by an employee at all times while on the premises.

Conflict of Interest

A conflict of interest exists if an employee engages in activities or has any personal interests which might conflict with, or even have the appearance of conflicting with, the interests, obligations or duties of SPBHS or one of our customers. A conflict of interest may arise due to

the following circumstances: access to information, community activities, dealings with competitors, consulting, endorsements, financial interest in another company, giving or receiving of gifts or hospitality, and other employment.

Employees must avoid having financial interests in entities that could jeopardize their objectivity or create the appearance of impropriety in their dealings on behalf of SPBHS. If a conflict of interest exists or an employee knows of a conflict of interest existing with another employee, this information must be disclosed immediately.

Communication

The employee must keep other employees informed about matters that may affect them. This information must be presented in a manner designed to ensure understanding and awareness.

An employee will answer questions and give support in a timely and effective manner, while openly declaring any limitations of personal knowledge and conflicts of interest.

Media Relations

All inquiries from the media must be directed to the CEO. SPBHS's confidentiality, privacy, and security policies must be taken into consideration before any information is publically disclosed.

Social and Environmental Responsibility

Employees are required to maintain and expand their understanding of the legal and social issues that arise in relation to their work environment and communicate that understanding to others where appropriate.

Work Ethic

A strong work ethic will be required to maintain high levels of quality in the work performed. Employees are placed in such a position of impact upon the business of SPBHS that the required level of trust can only be maintained by outstanding performance and moral conduct.

Professionalism

Dealing with customers, co-workers, vendors, consultants, upper management requires the utmost care and patience to ensure that the highest level of respect is maintained.

Actions that enhance the image of the profession are highly encouraged. Employees will cooperate with and support their fellow professionals.

Infringement

Employees will not act with, nor tolerate from others, discrimination against other employees in the performance of their work duties.

Employees will not exercise their authority other than is necessary for their role, and then only to a degree that is necessary to perform that role, while remaining within established policies.

Enforcement

Any employee who is found to have violated this policy may be subject to disciplinary action, up to and including termination of employment.

Agreement

I have read and understand the Employee Code of Conduct. I understand that if I violate the rules explained herein, I may face legal or disciplinary action according to applicable law or company policy.

Employee Name

Employee Signature

Date

Revision History

Version	Change	Author	Date of Change