

POLICY AND PROCEDURE	
Policy/Procedure	Code of Ethics/Conflict of Interest
Original Creation Date	07/02/2015
Policy Approved by	Lorrie Heffernan (Chief Executive Officer)
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Policy Owner	Deborah Paus (Chief Human Resources and Organizational Effectiveness Officer)
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Policy Statement

Pathways to Independence reputation depends upon the integrity and behaviour of people involved in the direct or indirect delivery of or decision making regarding of Pathways services. It is imperative that a high standard of ethical, moral and legal conduct is evident in all Pathways to Independence practices and day to day operations.

Scope

This policy applies to all employees, students, volunteers, Board Members, contracted professionals and Family Home Providers at Pathways.

Definitions

Policy

All employees, Family Home providers, students and volunteers, including Board Members, are expected to share in preserving and enhancing Pathways to Independence's image and reputation of integrity, credibility and honesty.

The Code of Ethics is included in employee, student, volunteer, Family Home Provider, and Board orientation training and each person is required to read, sign, and abide by the Code of Ethics Affirmation (Appendix A). It is expected that the spirit and intent identified by the Code of Ethics will guide a person's course of action in their day to day interactions with others in the course of their duties and responsibilities. The Code of Ethics will be reviewed annually by all employees, Family Home Providers, and Board Members.

Failure to adhere to the Code of Ethics may result in discipline up to and including termination of employment, professional services, volunteer, or student contract, or Family Home Agreement.

The following areas are included in Pathways Code of Ethics:

1. National Alliance of Direct Support Professionals Code of Ethics;
2. Responsibility to Supported Persons;
3. Conflict of Interest;
4. Business, Purchasing & Financial Practices;
5. Marketing Activities;
6. Personal Fundraising;

7. Gifts and Gratuities; and,
8. Board of Directors.

National Alliance of Direct Support Professionals' Code of Ethics (NADSP).

Pathways has adopted the NADSP Code of Ethics to guide direct support professionals through ethical dilemmas that they may face on a daily basis. The Code provides clarity and expectations to direct support professionals in the following areas:

- Person Centred Supports;
- Integrity and Responsibility;
- Confidentiality;
- Justice, Fairness and Equity;
- Respect;
- Relationships;
- Promoting Physical and Emotional Wellbeing;
- Self- Determination.

The full text of the NADSP Code of Ethics forms part of this policy and is included as Appendix B.

Responsibility to supported persons.

- In accepting a person for services at Pathways, employees agree to protect and promote the interests and informed choices of persons served by making it possible to develop their ultimate potential.
- With full knowledge that Pathways exists for the purpose of providing services to people with disabilities, the organization's employees will strive to provide the highest level of quality services prescribed for the people we support.
- Pathways employees will set a proper example for the people we support in the areas of personal development, proper social skills and good work habits.
- Supported individuals are informed of their rights and responsibilities by their case manager or appropriate personnel.
- Supported individuals retain all legal rights when they receive services from Pathways. Hence, a client's legal rights must be respected at all times.
- The organization must be ever mindful of the attitudinal, architectural and communication barriers that may exist in the agency. Where barriers exist, the organization will consider corrective action.
- Supported individuals receiving services must always be treated with respect and dignity, regardless of disability or other potential deficit areas.

Conflict of Interest

- Employees, volunteers and Family Home Providers of Pathways are expected to conduct themselves with personal integrity, ethics, honesty and diligence in performing their duties for the organization. Employees are required to support and advance the interests of the organization and its supported clients, but to avoid placing themselves in situations where their personal interests actually or potentially conflict with the interests of Pathways or its clients.
- A conflict of interest occurs when a person's private interest differs from his/her professional obligations in

such a manner that will result in the person directly or indirectly gaining a benefit (monetary or otherwise) from a situation. A position of undeclared conflict of interest may have both legal and personal consequences.

- A statement of Disclosure of Conflict of Interest (Appendix C) must be reviewed and signed by employees, volunteers, students, contracted professionals and Family Home Providers at orientation.
- Any conflict of interest that arises after the initial orientation session to Pathways must be declared to the person's manager.

Business, Purchasing & Financial Practices

- The organization's business and financial practices will be conducted in accordance with solid and recognized ethical business practices. All funds accruing to the organization will be accounted for, and regular financial reports will be developed, maintained, and reviewed by the Chief Executive Officer (CEO) and the Board on a regular basis.
- All funds kept for persons served receiving services will be strictly accounted for to ensure the integrity of the system.
- All policies and procedures that guide the financial and business practices will be in writing, reviewed on a regular basis, and adhered to on a consistent basis.
- The CEO will submit to the Board of Directors a quarterly report which details the month's business and financial activities.
- All people involved with purchasing or other supply chain related activities must act, and be seen to act with integrity and professionalism. Honesty, care and due diligence must be integral to all supply chain activities within and between organizations, suppliers and other stakeholders. Confidential information must be safeguarded.
- Supply chain activities must be open and accountable. In particular, contracting and purchasing activities must be fair, transparent and conducted with a view to obtaining the best value for public money. All participants must ensure that public sector resources are used in a responsible, efficient and effective manner.
- All people involved in purchasing or other supply chain related activities must comply with this Code of Ethics and the laws of Canada and Ontario.

Marketing

- Marketing programs are part of Pathways accountability to the public, the people we support and other stakeholders, and will not knowingly mislead, misinform the public or misrepresent Pathways.
- Marketing programs will respect the dignity and privacy of those receiving services and supports.
- Marketing programs will uphold the integrity of Pathways so as to merit the continued support and trust of the public, the people we support and other stakeholders.

Fundraising

- Any fundraising event or promotion that involves the use of the Pathways to Independence logo or name must be approved in advance. Employees are to submit their fundraising proposals to the

Manager of Pathways Foundation.

- Approval must be obtained for any fundraising event or promotion that involves persons served solicitation and involvement on behalf of Pathways. All requests for persons served participation are to be submitted to the Manager of Pathways Foundation.
- Requests for individual employee fundraising activities such as Girl Guide cookie sales, sales of candy bars to support a child's school and various walk-a-thons for organized charities are to be submitted and approved by the Manager of Pathways Foundation.

Gifts and Gratuities

- In order to avoid a conflict of interest or the appearance of a conflict of interest employees of Pathways are prohibited from soliciting or accepting gifts or gratuities of a nominal value in excess of \$50.00.
- An occasional nominal business courtesy, such as a lunch, dinner, or promotional item provided by a vendor, contractor, or service provider is acceptable. Gifts, gratuities or favours valued in excess of \$50 are not acceptable, nor is a cash distribution of any amount.
- Pathways approved gifts to employees or prizes that are part of Pathways sponsored events such as acknowledgements of years of service, recognition rewards, raffles are not considered gifts for the purposes of this Code of Ethics.
- Employees who are uncertain as to whether a conflict of interest exists should confer with their Manager or the Human Resources Department.

Board of Directors

Members of the Board of Directors will promote and maintain high ethical standards of conduct and will abide by the Board of Directors Code of Ethics Affirmation Statement outlined in Appendix C.

Procedure

Responsibility		Action
Employee, Volunteer, Student, Family Home Provider, Board Member, Contracted Professionals.		Read and sign Code of Ethics policy and affirmation at orientation and annually thereafter.
Manager		Review Code of Ethics annually with employees

Appendices:

Appendix A: Code of Ethics Affirmation

Appendix B: NADSP Code of Ethics

Appendix C: Statement of Disclosure of Conflict of Interest

Appendix C: Board of Directors Code of Ethics Affirmation Statement