



THE FOUR VILLAGES COMMUNITY HEALTH CENTRE

ORGANIZATIONAL MANUAL

CHAPTER 5: RIGHTS, RESPONSIBILITIES AND CODE

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SECTION 1: HUMAN RIGHTS

1.1 Human Rights – General Policy¹

Four Villages adopts the following set of beliefs and commitments regarding human rights:

- a) We believe that the diversity of our clients, Board, staff, students, volunteers and community are sources of enrichment and strength.
- b) We believe that prejudice and discrimination of any kind deny people rights and opportunities and that without full access to participation, people do not have social, economic and political power. We also recognize that prejudice and discrimination exist in our community and may exist in Four Villages itself.
- c) We recognize that we live in a society which reflects a history of injustice towards First Nations people and inequities of race, gender, class, religious beliefs, physical ability, mental ability, age, sexual orientation and other forms of discrimination.
- d) We believe in the ideas expressed by the United Nations Universal Declaration of Human Rights, the Canadian Charter of Rights and Freedoms, the Ontario Human Rights Code, and the City of Toronto Non-Discrimination Policy.
- e) Four Villages will not tolerate prejudice, discrimination or harassment of any kind.
- f) Four Villages seeks to redress inequity among people involved in Four Villages.

Four Villages is committed to providing an environment in which all individuals are treated with respect and dignity. Each individual has the right to work in an atmosphere which promotes equal opportunities and prohibits discriminatory practices. Breach of policy will lead to investigation and, when appropriate, formal progressive disciplinary action.

1.2 Diversity and Equity Policy

Diversity is a core organizational value. Four Villages develops and maintains capacity and leadership in the area of organizational equity and diversity.

¹ Please see Chapter 1 – Guide to the Manual, Section 2.1 Policy-Related Definitions
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Organizational Manual, Chapter 5: Rights, Responsibilities and Code of Conduct
Last Reviewed: September 26, 2018

- a) Board members and senior management are equity and diversity champions.
- b) Recruitment processes for Board, staff, volunteers and students make full efforts to align with community demographics and priority population needs. Processes reflect Four Villages' commitment as an equal opportunity organization.
- c) Discrimination or harassment demonstrated in any recruitment process will not be tolerated.
- d) Board and staff training on diversity take place appropriately.

1.3 Workplace Violence and Harassment

Four Villages is committed to providing a safe and healthy work environment, free from violence, threats of violence, discrimination, harassment, sexual harassment, intimidation, and any other misconduct.

Workplace violence and harassment will not be tolerated from any one. This applies to, but is not limited to staff, visitors, clients, and volunteers. Everyone at Four Villages must be dedicated to preventing workplace violence and harassment. Managers, supervisors, and workers are expected to uphold this policy, and will be held accountable by Four Villages. Staff or volunteers who violate this policy are subject to disciplinary and corrective action, up to and including termination of employment or volunteer placement.

It is also a violation of this policy for anyone to knowingly make a false complaint of violence or harassment or to provide false information about a complaint.

This policy prohibits reprisals against individuals acting in good faith who report incidents of workplace violence or act as witnesses. Management will take all reasonable and practical measures to prevent reprisals, threats of reprisal, or further violence. *Reprisal* is defined as any act of retaliation, either direct or indirect.

Four Villages will also provide appropriate assistance to any employee who is the victim of violence or harassment.

Four Villages will ensure that all employees are trained and educated on workplace violence and harassment and that they are clear about their roles and responsibilities, as well as this policy, the corresponding program, and all workplace procedures. In addition, a copy of this policy will be made available to all employees.

Record Keeping

Four Villages will ensure that appropriate records of complaints and investigations relating to workplace violence and harassment are kept, including:

- a) a copy of the complaint or details about the incident;
- b) a record of the investigation including notes;
- c) a copy of the investigation report (if any);
- d) a summary of the results of the investigation that was provided to the worker who allegedly experienced the workplace violence and the alleged assailant, if the alleged assailant is a Four Villages worker or volunteer; and
- e) a copy of any corrective action taken to address the complaint or incident of workplace violence or harassment.

Confidentiality

Four Villages will do everything it can to protect the privacy of the individuals involved and to ensure that complainants and respondents are treated fairly and respectfully. Four Villages will protect this privacy so long as doing so remains consistent with the enforcement of this policy and adherence to the law. Neither the name of the person reporting the facts nor the circumstances surrounding them will be disclosed to anyone whatsoever, unless such disclosure is necessary for an investigation, disciplinary or corrective action, or required by law.

1.3.1 Definitions

For the purpose of this policy, the definitions of workplace harassment and violence shall be consistent with those contained in the *Ontario Human Rights Code* and *Bill 168* which amends the *Occupational Health and Safety Act (OHSA)*.

Workplace harassment means engaging in a course of vexatious comment or conduct against a worker in a workplace – a comment or conduct that is known or ought to be reasonably known to be unwelcome. Workplace harassment may include bullying, intimidating or offensive jokes or innuendos, displaying or circulating offensive pictures or materials, offensive or intimidating phone calls, or any other unsolicited, unwelcome, disrespectful or offensive behavior that demeans, belittles, or causes personal humiliation or embarrassment to an individual.

Harassment may also relate to a form of discrimination as set out in the *Ontario Human Rights Code*.

Workplace harassment *does not* include the reasonable exercise of management



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authority at Four Villages, including but not limited to regularly evaluating and monitoring performance, changes to work or working conditions, disciplinary actions/termination, or conducting workplace investigations. It also does not include interpersonal conflict or disagreement where no harassment occurs as defined above.

Sexual harassment means any visual or physical conduct, comment, gesture or contact of a sexual nature (related to sex, sexual orientation, gender identity or gender expression), that is likely to cause offense or humiliation to an individual, or that might reasonably be perceived by the individual as placing a sexual condition on employment, student placement, position in the Board or as a volunteer, training and promotion.

It may include but is not limited to the following:

- a) an implied or expressed threat of reprisal for refusal to comply with a sexually-oriented request;
- b) a demand for sexual favours or sexual assault;
- c) unwelcome remarks, jokes, innuendos, propositions, or taunting about a person's body, attire, sex or sexual orientation;
- d) displaying of pornographic or sexist pictures or materials;
- e) leering (suggestive persistent staring); and
- f) physical contact such as touching, patting, or pinching, with an underlying sexual connotation.

Workplace violence means:

- a) the exercise of physical force by a person against a worker, in a workplace, that causes or could cause physical injury to the worker;
- b) an attempt to exercise physical force against a worker, in a workplace, that could cause physical injury to the worker;
- c) a statement or behavior that it is reasonable for a worker to interpret as a threat to exercise physical force against the worker, in a workplace, that could cause physical injury to the worker.
- d) disruptive behaviour that is not appropriate to the work environment (e.g., yelling or swearing).

Domestic violence means a pattern of coercive tactics which may include physical, psychological, sexual, economic and emotional abuse perpetrated by

one person against an adult intimate partner, with the goal of establishing and maintaining power and control over the victim. If an employee is at risk of experiencing domestic violence at work, such domestic violence is considered workplace violence.

1.3.2 **Workplace Harassment Policy**

Everyone has the right to be free from harassment. Four Villages is committed to providing a work environment in which all individuals are treated with respect and dignity.

Reporting Incidents

Four Villages encourages reporting of all incidents of harassment, regardless of whom the offender may be, and is committed to protecting both the rights of those who have been accused of harassment as well as those who have been subject to harassment.

Four Villages will work to prevent harassment and to investigate and take action when a formal complaint has been received or when there is significant evidence that harassment has taken place.

If reasonable to do so, workers are encouraged to try to resolve the situation with the person who is alleged to have engaged in the harassment. Where the situation cannot be resolved or the situation continues, workers shall report the conduct to their supervisor or to Human Resources should the worker for any reason not wish to bring their complaint to their supervisor.

Investigations will be conducted by the supervisor or by Human Resources.

A worker that subjects another worker, client or other person to workplace harassment may be subject to disciplinary action up to and including termination.

Nothing in this policy prevents or discourages a worker from filing an application with the [Ontario Human Rights Tribunal](#) on a matter related to the [Ontario Human Rights Code](#) within one year of the last alleged incident. A worker also retains the right to exercise any other legal avenues available.

For more information about filing harassment complaints, see [Chapter 5, Section 5.2.1 – Complaint Procedure](#).

1.3.3 Workplace Violence Policy

Four Villages has developed a Workplace Violence Prevention Program, as described in [Appendix A](#) that implements this policy. It includes a risk assessment process, measures and procedures to protect workers from workplace violence, including a means of summoning immediate assistance, training of staff about workplace violence, a process for workers to report incidents or raise concerns, a process for investigating complaints of violence and communicating the results of the investigation to all involved parties.

The Four Villages Community Health Centre as the employer will ensure that this policy and the supporting program are implemented and maintained and that all workers and supervisors have the appropriate information and instruction to protect them from violence at Four Villages. Supervisors are responsible for ensuring that violence prevention measures and procedures are followed by workers and that workers have the information and instruction to protect themselves.

Every worker must work in compliance with this policy and the supporting program. All workers are encouraged to raise any concerns about workplace violence and to report any violent incidents or threats. Four Villages will investigate and deal with all incidents and complaints of workplace violence in a timely and fair manner, respecting the privacy of all concerned as much as possible.

Please see
[Appendix A: Workplace Violence Prevention Program](#)

1.4 Employment Equity Policy

It is Four Villages' policy to make decisions on hiring, promotion, job assignment and training, rewards and other human resource management functions on the basis of qualifications, ability and performance. This ensures equitable opportunities for all employees and job applicants regardless of race, national origin, colour, religion, age,

socio-economic status, sex, marital status, physical disability, sexual orientation or any other factor unrelated to job performance.

Guidelines

Responsibility

Equity in employment will be achieved only by the dedicated commitment and integrity of all individuals.

Employment Equity Procedures

Four Villages' Employment Equity practices include the following areas:

- a) **Recruiting**
Hiring procedures will be reviewed regularly to ensure that standards, tests and other selection criteria do not limit job opportunities for any prospective employee.
- b) **Training**
All eligible employees will be encouraged to take advantage of training and development opportunities.
- c) **Career Development**
Every effort will be made to inform employees of career opportunities within the organization.
- d) **Compensation**
Compensation practices ensure that all employees are treated in a fair and equitable manner.
- e) **Working Environment**
Four Villages is committed to providing an environment in which all individuals are treated with respect and dignity. Each individual has the right to work in an atmosphere which promotes equal opportunities and prohibits discriminatory practices.

1.5 Barrier-Free Environment Policy

Four Villages is a barrier-free working environment and will not tolerate discrimination or harassment of individuals with any disability or disadvantage resulting from such factors as illness or injury, pregnancy, religion, etc.

1.6 Accommodation Policy

Four Villages endeavours to provide reasonable work accommodations to meet the needs of staff, students, volunteers and Board members, resulting from such factors as disability, illness or injury, pregnancy, religion, etc.

Definition

Accommodations may include but are not limited to the alteration to the physical work environment or equipment, work schedules or hours of work or job function. Wherever possible, the individual's assistance will be solicited in developing the accommodation plan. Financial hardship on Four Villages, the hardship on Four Villages' staff, impact on services to clients and other circumstances will be considered in determining accommodation needs.

1.7 Non-Discrimination Policy

Four Villages is committed to ensuring that all staff, students, Board members and volunteers are protected in their right to work in an environment free from all forms of discrimination.

Four Villages strives to ensure that oral and written communications do not perpetuate cultural biases and prejudices based on the above factors.

Definition

Discrimination - Any action, behaviour or attitude which negatively affects or could negatively affect the work and/or employment conditions of individuals based on their race, colour, ancestry, place of origin, ethnic origin, language, citizenship, creed, religion, age, gender, sex, sexual orientation, marital or family status, socio-economic status, mental or physical disability, or any other basis identified in applicable legislation.

1.8 Positive Work Environment Policy

Four Villages endeavors at all times to provide a work environment that encourages positive morale and which is supportive of the productivity, personal goals, dignity and self-esteem of every person. The work environment consists of the shared physical and social surroundings where work activities take place. A positive work environment should be free from unwelcome remarks, materials or behaviour.

Procedures

The responsibility for creating and maintaining a positive work environment rests with all persons sharing the workplace. Volunteers, managers, supervisors, Board members and co-workers are expected to recognize and refrain from actions which offend, embarrass or humiliate others, whether deliberate or unintentional.

Four Villages will not, and individuals should not, condone behaviour in the workplace that is unacceptable and likely to undermine work relationships or productivity. This includes being under the influence of alcohol or other intoxicating substance, or the use of profanity.

Management has an ongoing responsibility as they become aware of any activity to respond immediately by stopping any activity in the workplace which undermines a positive work environment, whether or not there has been a complaint. Staff, students, volunteers and Board members have the responsibility not to be frivolous or vindictive in making accusations.

1.9 Accessibility

Purpose and Application

Under the *Accessibility for Ontarians with Disabilities Act, 2005* Four Villages must meet requirements of accessibility standards established by regulation. This policy establishes the accessibility standards for customer service for the Four Villages, in accordance with Ontario Regulation 429/07. This policy applies to all employees of the Four Villages, agents, volunteers and contracted service staff.

Definitions

Accessible means client service is provided in a manner that is capable of being easily understood or appreciated; easy to get at; capable of being reached, or entered; obtainable.

Disability means:

- a) any degree of physical infirmity, malformation or disfigurement that is caused by bodily injury, birth defect or illness and, without limiting the generality of the foregoing, includes diabetes mellitus, epilepsy, a brain injury, any degree of paralysis, amputation, lack of physical co-ordination, blindness or visual impairment, deafness or hearing impediment, muteness or speech impediment,

or physical reliance on a guide dog or other animal or on a wheelchair or other remedial appliance or device;

- b) a condition of mental impairment or a developmental disability;
- c) a learning disability, or a dysfunction in one or more of the processes involved in understanding or using symbols or spoken language;
- d) a mental disorder; or
- e) an injury or disability for which benefits were claimed or received under the insurance plan established under the *Workplace Safety and Insurance Act, 1997*.

Guide Dog means a dog trained as a guide for a blind person and having the qualifications prescribed by the Blind Persons' Rights Act R.S.O. 1990, c. B.7, s. 1 (1).

Service Animal is an animal for a person with a disability, if it is readily apparent that the animal is used by the person for reasons relating to his/her disability; or if the person provides a letter from a physician or nurse confirming that the person requires the animal for reasons relating to the disability.

Policy

Four Villages is committed to providing exceptional and accessible service for its clients. Goods and services will be provided in a manner that respects the *dignity and independence* of all clients. The provision of services to persons with disabilities will be *integrated* wherever possible. Persons with disabilities will be given an opportunity *equal* to that given to others, to obtain, use or benefit from the goods and services provided by and on behalf of the Four Villages.

Policy Requirements

1) Accessibility Training Policy

Every person who deals with members of the public or who participates in developing Four Villages' policies, practices and procedures governing the provision of goods and services to the public; including staff, volunteers, agents, contractors and others who provide service on behalf of the Four Villages will receive training regarding the provision of goods and services to persons with disabilities and on the requirements of the Customer Service Regulation.

The training will include the following information:

- a) the purposes of the Accessibility for Ontarians with Disabilities Act;
- b) how to interact and communicate with persons with various types of disabilities;
- c) how to interact with persons with disabilities who use an assistive device, or require the assistance of a service animal or support person; and
- d) how to use equipment made available by the Company to help people with disabilities to access goods and services.

Training will be provided to each person according to his or her needs and duties and as soon as is practicable on an ongoing basis in connection with changes to policies, practices and procedures governing the provision of goods or services to persons with disabilities. A record of the dates on which training is provided and the number of individuals to whom it is provided will be kept by Human Resources.

2) Feedback Process

Four Villages accepts feedback from the public in a variety of methods including:

- a) Phone
- b) In person
- c) Fax
- d) Email
- e) Through feedback forms and our annual client satisfaction survey

All feedback is reviewed by the management team. Formal complaints are addressed per Four Villages' Client Complaint policies and procedures.

3) Use of Service Animals and Support Persons

If a person with a disability is accompanied by a guide dog or other service animal, Four Villages will ensure that the person is permitted to enter any of Four Villages' facility with the animal and to keep the animal with him or her unless the animal is otherwise excluded by law. Where a service animal is excluded by law, Four Villages will ensure that other measures are available to enable the person with a disability to obtain, use and benefit from the services. The service animal must be under the care and control of the individual at all times.

If a person with a disability is accompanied by a support person, Four Villages will ensure that both persons are permitted to enter the facility, and that the person with a

disability is not prevented from having access to the support person. Four Villages may require a person with a disability to be accompanied by a support person when in a facility, but only if a support person is necessary to protect the health or safety of the person with a disability or the health or safety of others in the facility. If an amount is payable by a support person for admission, or otherwise, to a premise, Four Villages will ensure notice is given in advance about the amount.

4) Notice of Temporary Disruptions

Four Villages shall provide notice of disruption of services to the public.

Any Notice of Disruption will contain the following:

- a) Reason for the disruption
- b) Anticipated duration
- c) Alternative facilities or services

Staff will provide such notice in at least one of the following three methods:

- a) Notice physically posted at the site of the disruption
- b) Notice on the website
- c) Notice in local newspaper

5) Notice of availability of documents

Four Villages will provide the public notice of the availability of the documents, required by the Accessibility Standards for Customer Service, (O. Reg 429/07) upon request. Notice of availability will be provided on the Four Villages web site and through other printed methods.

6) Format of documents

If Four Villages is required, by the Accessibility for Ontarians with Disabilities Act, 2005, to give a copy of a document to a person with a disability, Four Villages will take into account the person's ability to access the information and will provide the document or information contained in the document in a format that meets those needs as agreed upon with the person.

7) Related and Supporting Documentation

- a) Four Villages Policies and Protocols
- b) Accessible Customer Service Training Records

- c) Ontario Regulation 429/07, Accessibility for Ontarians with Disabilities Act, 2005 – Accessibility Standards for Customer Service

SECTION 2: RIGHTS & RESPONSIBILITIES

Policy

Four Villages has established rights and responsibilities for clients, staff, volunteers and students.

2.1 Client Bill of Rights and Responsibilities

2.1.1 Rights

Four Villages recognizes the basic human rights of clients to independent expression, choice and action. Four Villages ensures that each individual is given consideration, privacy and confidentiality, and is treated with respect, dignity and without discrimination.

Clients of The Four Villages Community Health Centre have the right to:

- a) receive considerate and respectful care in a safe and secure service environment;
- b) participate in decision-making affecting their care and the care of their children or dependents;
- c) obtain complete, current information concerning their diagnosis, treatment, and prognosis, in terms that the clients can be reasonably expected to understand;
- d) know the name of the health care provider(s) responsible for their care;
- e) receive information necessary to give informed consent prior to the start of any procedure and/or treatment;
- f) withhold or withdraw their consent to collect, use or disclose their personal health information;
- g) know how we may use and disclose their personal health information and how to get access to it;
- h) make choices about their own health;
- i) refuse treatment or advice and to be informed of the consequences of their refusal;
- j) be informed about preventative health care;
- k) make a complaint about the care or services they received at Four Villages; and
- l) die with dignity.

2.1.2 Responsibilities

Clients have the responsibility to:

- a) respect staff, students, volunteers and other clients, no matter what their race, gender, sexual orientation, gender identity, ability, financial status, ancestry, family status or background;
- b) be polite, patient, and understanding, to be considerate of others, and to respect property;
- c) be on time;
- d) keep their appointments or provide at least 24-hour cancellation notice;
- e) ask their health care provider when they need more information, or when they do not understand instructions;
- f) follow the treatment plan agreed upon with their provider, or contact their provider when unable to do this; and
- g) inform Four Villages if they believe they were treated unfairly, or received poor service.

Student Bill of Rights and Responsibilities

2.1.3 Rights

Students have the right to:

- a) receive appropriate orientation, supervision and feedback;
- b) be provided space and equipment necessary to complete their placement;
- c) be offered exposure to relevant practical experience;
- d) work in a safe and clean learning environment;
- e) be treated with fairness and respect;
- f) receive evaluation of their performance during the placement;
- g) refuse to provide service at any point, if the client's behaviour or the client's living environment presents a threat or risk to the student; and
- h) terminate service, if the relationship between the client and the student becomes non-therapeutic.

2.1.4 Responsibilities

Students have the responsibility to:

- a) abide by all the relevant policies and procedures of Four Villages;
- b) provide client-centred care;
- c) carry out their duties and obligations with integrity and objectivity;
- d) be punctual, and to contact their supervisor in case of absences;
- e) protect the confidentiality of all client information;
- f) be aware of the extent and limits of their mandates and competence and to seek advice and support accordingly; and
- g) provide an evaluation of their placement at Four Villages.

2.2 Volunteer Bill of Rights and Responsibilities

2.2.1 Rights

Volunteers have the right to:

- a) have a suitable assignment within the resources of Four Villages to provide;
- b) be treated as a member of the team;
- c) receive a thorough orientation to Four Villages;
- d) receive training on the volunteer role/responsibility;
- e) be given sound guidance, direction and support;
- f) have regular evaluation of volunteer performance;
- g) be given a variety of experiences within the resources of Four Villages to provide;
- h) be recognized for their contribution to Four Villages; and
- i) have input into their volunteer position.

2.2.2 Responsibilities

Volunteers have the responsibility to:

- a) honour the commitments made when starting the volunteer position;
- b) be held accountable for their own actions;
- c) be willing to learn and participate in orientation, training programs, meetings and to continue to learn on the job;

- d) participate in evaluation, as required;
- e) respect confidentiality;
- f) serve as goodwill ambassadors for Four Villages;
- g) cooperate with other volunteers and staff; and
- h) keep a record of volunteer hours.

2.3 Staff Bill of Rights and Responsibilities

2.3.1 Staff Rights

Staff have the right to:

- a) have a work environment that is safe, healthy and clean;
- b) be treated with fairness and respect;
- c) work in a harassment and violence free environment;
- d) refuse service at any point, if the client's behaviour or the client's living environment presents a threat or risk to the health care provider;
- e) terminate service, if the relationship between the client and the health care provider becomes non-therapeutic;
- f) personal privacy and confidentiality;
- g) seek knowledge and training that enhances their skills and competencies;
- h) receive and participate in supervision and in a review of their performance;
- i) seek and make recommendations for improvement within the Centre;
- j) identify a concern or make a complaint according to the Centre's policies and procedures.

2.3.2 Responsibilities

Staff have the responsibility to:

- a) comply with all federal and provincial laws, legal regulations, legal statutes, and with standards of equity and justice;
- b) abide by all the relevant policies and procedures of Four Villages;
- c) provide client-centred care and maintain clear and professional boundaries;
- d) advocate for change in the best interest of the client;
- e) protect the confidentiality and privacy of all client information;

- f) have and maintain competence in the provision of service to a client;
- g) pursue professional development in their field under the standards outlined by Four Villages in Chapter 8 (Personnel);
- h) promote excellence in their field; and
- i) adhere to their profession's Code of Ethics;

SECTION 3: CONFLICT OF INTEREST

3.1 Policy

All staff, Board members, volunteers and students of Four Villages are expected to use good judgment, act honestly and in good faith, perform their duties with a view towards the best interests of the organization and to maintain and enhance the public confidence and trust in the integrity, objectivity and impartiality of Four Villages.

Under Four Villages' By-laws, no staff may be elected or appointed to the Board of Directors. Former staff must not be employed by Four Villages in any capacity for at least twelve (12) months before being eligible for nomination to the Board of Directors.

3.2 Guiding Principles

Conflict of interest occurs when position or status within Four Villages, a close personal relationship, obligation or special interest interferes, or would be perceived by a reasonable person to interfere, with a person's ability to act in the best interests of the organization or the client. This includes situations that result in a benefit or material gain to the person, a person's close personal relationship or business associate. A conflict of interest also occurs when a person has knowledge of a private interest that is sufficient to influence the exercise of her/his duties and responsibilities.

An actual conflict of interest exists when a staff member, Board member, student or volunteer of Four Villages, or a member of their family, benefits, directly or indirectly, from a decision or action by Four Villages that he or she has influenced.

A potential conflict of interest exists when a staff member, Board member, student or volunteer of Four Villages or a member of their family, is involved in an action from which, depending on the organization's decision, he/she may benefit either directly or indirectly.

A perceived conflict of interest exists when a reasonable and objective observer, viewing such actions, would conclude that a staff member, Board member, student or

volunteer of Four Villages, or a member of their family, participating in such actions, will or may benefit, either directly or indirectly, from these actions.

All three of the above are considered Conflict of Interest for the purposes of this policy.

Areas of Conflict

Areas of conflict of interest include, but are not limited to:

- a) **Material Gain**
 - A person has a conflict of interest when she/he participates in discussion or decision-making or acts in a manner which may, directly or indirectly, benefit her/him, someone with whom the person has a close personal relationship or her/his private interest regardless of the size of the benefit.
- b) **Outside Employment/Contracts or Volunteer Work**
 - A person has a conflict of interest when her/his outside employment or association causes her/him, or would reasonably be perceived to cause her/him, not to act in the best interests of the organization.
 - A staff member, Board member, student or volunteer of Four Villages is expected to declare if she/he is a member of a Board of Directors, or is asked to become a member of a Board of Directors, of any other local, associated or otherwise related organization.
- c) **Undue Influence**
 - A person has a conflict of interest if that person uses her/his status within the organization to exert undue influence on another person in the organization in the execution of that person's duties for the benefit of the individual who has exerted the undue influence. Furthermore, a staff member, Board member, student or volunteer has a conflict of interest if that person uses her/his status within the organization to exert undue influence on any decision-making process of the organization for her/his own benefit.

3.3 General Procedures

Disclosure

All current staff, Board members, students and volunteers must declare conflict of interest if any arises.



Conflict of Interest is a standing agenda item for all Board and Board Committee meetings.

If circumstances arise for a person where she/he believes that she/he is or may be in a conflict of interest, she/he must inform her/his supervisor who will discuss the matter with the CEO (Board President for Board members) so that a solution may be worked out.

In situations where someone other than the person involved has reasonable grounds to believe that another person is in a conflict of interest, that person shall inform her/his supervisor (or Board President for Board Members) of the concern. The supervisor, CEO and/or President of the Board will investigate the conflict of interest, formally if required.

If the CEO is in conflict of interest, the matter must be reported to the President of the Board. If the President of the Board is in conflict of interest, the matter must be presented to the Board for investigation and resolution.

Resolution

The supervisor, CEO or Board President will conclude the investigation of the conflict of interest within 14 days unless extraordinary circumstances necessitate a longer timeframe. The supervisor, CEO or Board President will complete the investigation report, discuss the contents of the report with the person with the alleged conflict and obtain the staff person's signature on the report and will forward it to the CEO (or the Board President, when applicable) for review and signature. The signed form will be placed in the person's personnel or student/volunteer file.

In the case when a Board member is being investigated for conflict of interest, the report is contained in the minutes of the Board during a meeting that is held in camera.

After investigation, if it is identified that a conflict of interest exists, the person with the conflict will remove her/himself, or be removed, from the circumstances creating the conflict.

For staff, where there are reasonable grounds to believe that the person was aware of the conflict but did not disclose it, the staff person will be disciplined in accordance with Personnel Policies².

Where the nature of the conflict disclosed or discovered cannot be resolved, and in Four Villages' reasonable opinion the conflict of interest makes it impossible for the person to perform most or all of her/his function, the person will be asked to resign.

Specific Requirements:

Staff, Board, Volunteer and Student members:

- a) must arrange their personal and private affairs in such a manner that will prevent real, potential or perceived conflicts of interest from arising;
- b) must not take advantage of, or benefit from, information obtained in the course of their official duties and responsibilities that is not available to the public;
- c) must not act, after they leave the position, in such a manner as to take improper advantage of their previous position.
- d) may not have a relative/partner working and reporting directly or indirectly to them;³
- e) shall not use Four villages' name for endorsements, including products or vendors;
- f) shall not benefit from any activity which could result in the compromise of the above principles or in any kind of embarrassment to Four Villages; and
- g) shall never refer a Four Villages client or potential client (one who has contacted Four Villages for service) to her/his private practice, or to the private practice of another staff person/student/volunteer at Four Villages without full disclosure to the client or potential client and her/his supervisor.

Board members are also guided by the governance policy and By-laws sections on conflict of interest

3.4 Use of Services by Staff and Students

Policy

Staff, students and their immediate families may not be clients of Four Villages.

² Please see Chapter 8 Personnel Policies.

³ Please also refer to Chapter 8 Personnel Policies

Procedures

When clients are hired as staff (permanent or temporary), they are requested to transfer their care to another community health centre or family practitioner as part of their employment agreement.

Staff are encouraged to visit their own family practitioners for medical services. When appropriate, Four Villages' medical staff may offer TB tests or flu shot clinics for staff. If there is a medical emergency in the building or on the grounds, 911 is called. Four Villages staff may provide first aid until the ambulance arrives.

Four Villages may continue providing services to staff's immediate family members (partner, children) under certain circumstances. The following will be considered only for existing clients of Four Villages:

- a) length of client's history with Four Villages;
- b) any special needs of the client;
- c) level of comfort of providers to continue offering care to the client;
- d) complexity of condition; and
- e) continuity of care concerns (e.g. level of difficulty the client is likely to encounter finding alternate care arrangement)

Family members are not accepted as new clients.

If one or more of the above considerations apply to the family member of staff, the decision regarding the continuation of the client's care at Four Villages will be made by providers of the client and the CEO. Individual providers may not make this decision alone.

3.5 Use of Services by Board of Directors, Other Volunteers

Policy

Directors of the Board and other volunteers may be clients of Four Villages.

Procedures

If a client becomes a Board member, as part of the Board recruitment and orientation, it is clarified that being on the Board does not confer special privileges for services as a client.



At appointments, Board members and staff are required to maintain their respective roles as client and provider. Concerns about Four Villages' operations should not be discussed during an appointment. Such issues should be addressed with the CEO or Board President.

The above procedures apply to all other volunteers of Four Villages.

3.6 Dual Relationships

Policy

Dual relationships occur when a staff member, in addition to her/his professional relationship, has one or more other relationships with a client, student, another employee, volunteer, Board member or supervisor.

Staff are responsible for avoiding dual relationships with clients or former clients, students, other staff, Board members and supervisors that could impair their judgment or increase the risk of exploitation or harm to clients, others or the organization.

Staff must not have sexual relationships with a client or with anyone whose work they are currently supervising.

A dual relationship does not necessarily constitute a conflict of interest; however, where dual relationships exist, there is a strong potential for conflict of interest and there may be an actual or perceived conflict of interest, which needs to be declared to the supervisor for review and action, if appropriate.

3.7 Reporting a Colleague

Staff are required to address illegal, unethical, inappropriate or inadequate practices, professional misconduct/incompetence and violations of organizational policies by staff that they believe will adversely affect or harm a client or staff, prevent the effective delivery of service, or cause damage to the property or reputation of Four Villages. This is to be done in a way that is consistent with the requirements of each profession's regulatory college and Regulated Health Professions' Act, maintains the primacy of the best interest of the client and is respectful of the provider whose practice is in question.

Four Villages will not retaliate against and will protect the confidentiality of individuals who make good-faith reports.

The process includes the following steps:

1. When staff have concerns regarding a colleague's inappropriate and inadequate practices, concerned staff should speak directly about their concerns to the staff member whose practice is in question and try to resolve the problem as directly as possible in a manner consistent with the good of all concerned.
2. If no change occurs, or clarification is not satisfactory, and/or the concern is of considerable seriousness, the concerned staff should speak to the appropriate supervisor or CEO, who will follow up with the provider whose practice is in question;
3. Follow up may involve support, education, disciplinary action or reporting to the relevant professional body.

3.8 Client Gifts

Policy

Staff shall not accept personal cash gifts from clients. If clients desire to make a cash contribution, they should be informed of Four Villages' charitable status and the opportunity for donations to this organization.

Non-cash gifts should be discouraged but small non-cash gifts (under \$100) may be accepted.

Staff should be aware of the standards of practice available through the various professional colleges.

Staff may not solicit gifts of any kind nor should they give the impression that they are soliciting gifts. Quality of care is not contingent on gift giving.

3.9 Driving Clients

Policy

Providers must not drive clients in their personal vehicles. At the discretion of the provider, clients may be issued TTC tickets or taxi vouchers, as follows:

- a) in emergency situations; or
- b) where there is demonstrated need.

3.10 Handling Client Money

Policy

Staff of Four Villages must not hold client monies.

SECTION 4: CONFIDENTIALITY

4.1 Confidentiality⁴

Policy

All staff, students, volunteers, Board members, and any other persons who may have access to confidential information at Four Villages are required to have signed the Confidentiality Agreement. Any breach of this agreement or refusal to sign it may be grounds for termination.

Clients of Four Villages are entitled to the protection of their privacy with respect to all aspects of services obtained from Four Villages, limited only as set out in these guidelines.

Principles

Confidentiality in social and health services is an ethical and legal obligation, based on the rights of individuals and of the community to the protection of personal disclosures made in a professional relationship.

Staff, students, volunteers and Board members at Four Villages may come into possession, or otherwise gain knowledge of confidential information relating to clients of Four Villages, community residents, the business of Four Villages, other staff, Board members, volunteers and students. As such:

- a) Any information received where there is trust that the information will be considered confidential **is** confidential;
- b) Confidentiality is upheld in all forms of communication relating to the clients, staff, volunteers and Board members, or business of Four Villages;

⁴ Please see *Chapter 13 Records Management, Section 3 Personal Health Information*
The Four Villages Community Health Centre
Organizational Manual, Chapter 5: Rights Responsibilities and Code of Conduct
Last Reviewed: September 26, 2018



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- c) There must be a clearly justifiable purpose for obtaining and storing confidential information;
- d) Individuals should have free access to personal information about themselves;⁵
- e) Every person's right to privacy should be recognized and protected, consistent with public interest and relevant legislation;
- f) The right to privacy extends to third parties who may provide personal information in relation to the provision of service to Four Villages' client;
- g) Confidential information is communicated only when there is a need to do so and after securing the appropriate releases and/or permissions;
- h) Confidentiality is maintained after employment or involvement with Four Villages has ended.

Guidelines with respect to client confidentiality

- a) To maintain confidentiality, no discussion of a client's circumstances or medical history should take place in the reception or waiting room area.
- b) Staff, Board members, volunteers and students must keep in strict confidence any information received, observed or otherwise acquired about a Four Villages' client.
- c) Client-related information may be disclosed or made public only if authorized by the client, or as required by an overriding professional, legal or ethical obligation.
- d) When booking first-time appointments, new clients are asked for instructions regarding method of contact at the phone number provided.
- e) Clients' last names are not used in the course of service delivery except where necessary. Confidential matters are discussed with clients in private rooms or where the discussion cannot be overheard, and not at the front desk or in the waiting room.
- f) Clients are not discussed professionally, even without a name, where an unauthorized individual may overhear the discussion.
- g) Charts, forms and other documentation containing client information are placed in a manner so that other individuals cannot see the information (i.e. face-down on desks whenever not being worked on, computer screen off or viewing access limited).

⁵ Please see *Chapter 13 Records Management, Section 1 Client Records for access to information by clients*



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- h) Staff, students and volunteers do not counsel clients previously known to them outside of their role with Four Villages, unless the client agrees in a private discussion with a different staff member.
- i) Clients seen in places other than Four Villages or off-site program facilities are not acknowledged as clients unless the client makes the first move in identifying themselves as such.
- j) Specific case histories are not used, even without a name, to illustrate one's experiences in non-professional situations outside of the agency.

Please see

[Appendix B: Confidentiality Agreement for Board, Volunteers, Students and Third Parties](#)

[Appendix C: Confidentiality Agreement for Employees](#)

SECTION 5: COMPLAINTS AND GRIEVANCES

5.1 Client Complaints/Concerns

Preamble

Four Villages endeavours to provide the best possible care for our clients and community. We recognize, however, that concerns sometimes arise. The purpose of this policy is to ensure that any such complaint/concern is dealt with in a fair, timely and transparent manner and in accordance with policy and legislative requirements.

A complaint/concern is registered as such when the individual:

- a) makes clear they wish to submit a complaint/concern;
- b) there is a possibility of a legal suit; or
- c) the client is seeking punishment

Policy

The client or community member has a right to complain or raise a concern about the care or services they have received at Four Villages, about Four Villages' facilities or systems. The complaint/concern can also be about a staff member, a volunteer, or a student, in this policy generally referred as "staff".

A complaint/concern may be made in person, by telephone and/or in written format.

Clients cannot be penalized for voicing a concern or complaint. Resolution of the complaint/concern should be timely so as not to delay appropriate action for the complainant or cause undue stress to any of the parties involved.

The Client Complaint/Concern Policy and Procedures shall be posted. A copy may be provided to any person on request.

Process for complaint/concern resolution

Clients or community members can address complaints/concerns to the staff, student, or volunteer with whom they are dissatisfied, or to the appropriate supervisor, as they prefer. Resolution of difficulties should be sought between the staff, student or volunteer and the complainant whenever possible before resorting to more formal procedures. Unresolved complaints are investigated and a response is provided within 10 business days. If the client prefers, the supervisor or the CEO can become involved immediately.

Please see
[Appendix D: Client Complaint Form](#)
[Appendix E: Letter of Confirmation Complaint received by CEO](#)
[Appendix F: Client Complaints Process Flow](#)

Process flow for complaints/concerns that have not been resolved informally or are brought directly to the CEO or one of the supervisors.

1. If the issue is not resolved, or if the complaint/concern puts staff and/or organization at risk, the CEO investigates further, and may assess the need for an impartial review of the complaint by an independent expert.
2. If an independent expert is used, he/she will review the written materials, and may meet separately with the complainant and the affected individual, if the complainant agrees. A written report of the findings, with recommendations, will be presented to the CEO. Based on this review and recommendation a decision will be reached regarding the complaint and this will be communicated to the complainant. The CEO will be responsible for follow-up with the complaint.
3. The onus is on the complainant to take further action if not satisfied with the outcome.

4. If sufficient evidence exists to indicate possible professional misconduct, incompetence, or incapacity, the CEO and the supervisor, if applicable, will inform the individual of his/her right to legal advice. The CEO shall follow the procedure on reporting a professional to the relevant college.⁶
5. Following legal advice, the CEO will decide how to proceed with further investigation of the allegations.
6. In the event the incident calls into question the ability of the individual to function competently, the person may be suspended from work by the CEO. Depending on the circumstances this suspension may be with or without restrictions; leave of absence for therapy; provision of therapy while on the job; relocation; or termination.
7. If the outcome is the termination of employment or placement, the CEO shall prepare a report and forward it within thirty (30) days to the appropriate professional College.

Reporting of Complaints/Concerns to the Board

The CEO reports to the Board each month complaints/concerns that could damage the organization's reputation, pose a risk to the organization, potentially result in legal action or have serious implications to the quality of care provided or staff safety. Annually, the CEO reports on the number of complaints, general theme of complaints and actions taken to address them.

Twice a year, Management will review all complaints/concerns and nature of complaints/concerns for the purposes of identifying quality and process improvements that could be pursued to reduce complaints/concerns and improve client satisfaction.

Litigation and Insurance Coverage

When a client provides notice, oral or written, of an intention to commence a lawsuit against Four Villages or any of its staff, the CEO shall be informed immediately.

Upon receipt of such information, the CEO shall, as soon as is practicable, provide written notice to Four Villages' insurer of the claim or possible claim and formally inform the Chair of the Board.

⁶ Please see [Section 3.7 Reporting a Colleague](#) in this chapter.

Staff should contact the legal departments of their respective professional associations; i.e. a physician who is a member of the Canadian Medical Protective Association (CMPA) shall likewise contact that Association, Registered Nurses shall contact the legal department of the Registered Nurses Association of Ontario (RNAO).

All staff members shall cooperate fully in providing statements and any other information to Four Villages' insurer, its adjusters and its lawyers in respect of a claim.

5.2 Complaints (Staff, students, volunteers, Board members)

This policy applies to staff, students, volunteers and Board members.

5.2.1 Complaint Procedure

Policy

An individual, who feels she/he has been mistreated, harassed, or is a victim of any form of discrimination, has the right to make a complaint. Both the complainant and the respondent have the right to receive fair treatment during an investigation.

Procedure

1. It is recommended that anyone who feels that they have been subjected to mistreatment, harassment or any form of discrimination in the workplace report the matter to their immediate supervisor, to the CEO or to Human Resources. A mutually agreed-upon third party can be present for support and verification. Notes from the meeting will be kept and signed by all parties, with a copy going to the complainant.
2. Human Resources will conduct an investigation and if necessary bring in a third party to conduct the investigation
3. A report will be generated based on the findings of the investigation, making clear whether or not any harassment has taken place including any corrective action recommended.
4. A copy of the report is shared with all parties including recommended corrective action
5. Any breach of code of conduct may be grounds for progressive discipline or immediate dismissal.

5.2.2 Conflict Resolution

Policy

Staff, Board, students and volunteers use the conflict resolution process established for Four Villages.

Process

All reasonable steps must be taken to resolve differences when they occur and resolution should be sought. If the parties in conflict cannot resolve differences, the immediate supervisor(s) will attempt to resolve.

The supervisors or the CEO are available for consultation prior to or during the conflict resolution process.

If conflict cannot be resolved, the concerned parties will submit their complaint in writing to the CEO. The CEO will have ten (10) days to review the complaint. During this period the CEO may seek additional background information on which to base a decision and then make a recommendation in writing. The CEO may recommend that the parties in conflict consider mediation. In order to proceed with mediation, both parties must agree to it. Should the mediation process be refused, or deemed to be unsuccessful, the CEO will render a decision.

Information on mediation is contained in Four Villages' Mediation Process, which describes mediation and what can be expected from it.

Please see
[Appendix G: Mediation Process](#)

5.2.3 Grievance Procedure

The CEO is responsible for the successful operation of Four Villages, including ensuring that fair and appropriate supervision is provided for all staff. Every staff member has the right to file a grievance if she/he believes that she/he has been unjustly treated. Every effort shall be made to settle differences, which may arise between an employee and her/his direct or indirect supervisor at the earliest stages of the grievance procedure.

Grievance processes should remain confidential at all times.

Definition

A ***grievance*** is a formal written complaint regarding the interpretation, application, administration or alleged violation of personnel practices, or a complaint by an employee that s/he has been disciplined without just cause. However, termination of employment, including termination during a probationary period, shall not be the subject of a grievance.

Process

Employees are encouraged to resolve any workplace differences directly through open and direct communication. Before filing a grievance, employees should first attempt to resolve the issue via informal discussion or conflict resolution procedures. An employee may proceed directly to the grievance process in extreme cases, for instance, in cases of workplace violence or sexual harassment.

If the employee is not satisfied with the discussion and wishes to grieve the complaint, the following procedure shall be followed:

1. The employee will submit the complaint in writing within five (5) business days of the unsuccessful informal resolution. The grievance should be submitted to the employee's supervisor, with the following exceptions:
 - a) If the complaint is against the employee's supervisor, the grievance should be submitted directly to the CEO.
 - b) If the complaint is against the CEO, the grievance should be submitted to the Chair of the Board of Directors (see section 5.2.4)
2. The supervisor, CEO or Board Chair (as appropriate) will respond to the grievance in writing within five (5) business days.
3. If the matter remains unresolved, the employee may, within five (5) business days of receiving the reply, appeal the decision by submitting the same written complaint to the CEO. The CEO or her/his designate shall respond in writing within five (5) business days. If the CEO has already reviewed the grievance, the grievance may be submitted directly to the Grievance Committee.
4. If the matter remains unresolved, the employee may appeal the decision of the CEO by submitting the same written complaint to the Grievance Committee.

5. The Grievance Committee shall consist of:
 - a) one member chosen by the Griever;
 - b) one member chosen by the CEO; and
 - c) a Human Resources representative.
6. The CEO shall forward to the Grievance Committee a copy of the grievance and all replies. The Grievance Committee shall meet within thirty (30) calendar days of receipt of the appeal from the employee. The employee and the CEO may make oral submissions to the Grievance Committee. The Grievance Committee shall decide the outcome and any redress that is appropriate by a majority within thirty (30) calendar days of hearing the grievance.
7. The Board will be informed of the decision of the Grievance Committee. This decision shall be final and binding except where, on motion of a member of the Grievance Committee, two-thirds (2/3) of the full Four Villages' Board vote to overturn the decision of the Grievance Committee. If the decision of the Grievance Committee is overturned, the decision of the Board shall be final and binding.
8. An employee may be assisted or represented by a Four Villages' staff advisor at any stage of the grievance process.
9. All records relating to grievances, including replies, appeals and any follow-up actions, will be kept in the employee's personnel file.

5.2.4 Staff Complaint and Grievance against the CEO

If informal conflict resolution is unsuccessful, grievances against the CEO should be submitted directly to the Chair of the Board of Directors.

Within five (5) working days of the employee's submitted grievance about the CEO:

1. the President of the Board of Directors will receive and acknowledge receipt of the grievance;
2. the President will set up a Grievance Ad Hoc Review Team composed of a minimum of the President plus two additional Board Directors;
3. the Grievance Ad Hoc Review Team shall meet within five (5) working days of the request being received;

4. the Grievance Ad Hoc Review Team shall provide a written reply to the employee, with a decision concerning the grievance. The reply shall be delivered to the employee within fifteen (15) working days of the Team's meeting.

If the employee is not satisfied with the decision of the Grievance Ad Hoc Review Team, he/she may request the Grievance Ad Hoc Review Team to bring an appeal before the next scheduled Board meeting for its consideration. The Board will be asked to rule on the employee's appeal and to notify the employee in writing of the decision.

In cases of professional impropriety (breach of confidentiality, falsifying records, theft and client/staff abuse), staff have an obligation to report these events to the Board President.

5.2.5 Whistleblower policy

Four Villages is committed to integrity and ethical behaviour in the workplace, and will foster and maintain an environment where employees can work safely and appropriately, without fear of retaliation.

This policy has been adopted to ensure that all employees understand that they may report any wrongdoing that may adversely impact Four Villages, its clients, employees, the Board of Directors, volunteers or the public at large, without fear of retaliation or a negative impact on their employment status at Four Villages.

Procedure

1. Individuals who believe they have witnessed an act or acts of wrongdoing should report the incident(s) immediately to their immediate supervisor or to the CEO. [Section 5.2.4](#) applies if the wrongdoing relates to the CEO.
2. Supervisors and managers are directed to take all appropriate steps to prevent and stop wrongdoing in their areas of responsibility. Any supervisor or manager who is subjected to, witnesses, or is given written or oral complaints of wrongdoing or retaliation shall immediately report it to the CEO.
3. The CEO will keep the Board informed.
4. The complaint is investigated. Any breach of code of conduct may be grounds for progressive discipline or immediate dismissal.



The Whistleblower shall receive no retaliation or retribution for a report that was provided in good faith and with honest intentions. Acts of retaliation include, but are not limited to, interference, coercion, threats, and restraint.

The Whistleblower shall suffer no adverse employment action in the form of, but not limited to, demotion, suspension, termination, unfavourable transfer, denial of promotion, denial of benefits, threat, harassment or denial of compensation as a result of the reporting of wrongdoing, or any manner of discrimination against an employee in the terms and conditions of employment because of any other lawful act done by the employee pursuant to this policy, or any applicable Canadian legislation.

Anyone who retaliates against the Whistleblower who reported an event in good faith and with honest intentions will be subject to discipline, up to and including termination from the Board or employee status.

The identity of the Whistleblower, if known, shall remain confidential to those persons directly involved in applying this policy, unless the issue requires investigation by law enforcement.

All records of workplace wrongdoing reports and subsequent investigations are considered confidential and will not be disclosed to anyone except to the extent required by law. Four Villages will do everything it can to protect the privacy of the individuals involved and to ensure they are treated fairly and respectfully so long as doing so remains consistent with the enforcement of this Policy and adherence to the law.

It is a violation of this Policy for anyone to knowingly make a false complaint of wrongdoing or to provide false information about a complaint. Individuals who violate this Policy are subject to disciplinary and/or corrective action, up to and including termination of employment.

5.2.6 Students

Students will follow staff complaints procedures outlined above.

5.2.7 Volunteers

Four Villages provides a safe and respectful environment for all volunteers, promotes equity and prohibits discriminatory practices. Four Villages is committed to making every effort to resolve complaints confidentially, impartially and in a timely manner. If a volunteer has a problem with an assignment or the relationships with other volunteers or a staff person, he/she should first strive to resolve it with the other person involved. If he/she is unable to reach an effective resolution and continues to have a concern, he/she must involve the volunteer coordinator. If the volunteer coordinator cannot resolve the situation, the Complaints and Grievances procedures for staff apply, as described above.

SECTION 6: PUBLIC RELATIONS

6.1 Letters of Support Policy

Letters of support regarding operational matters may be written by Four Villages' staff on issues that are in accordance with Four Villages' mission and are within the scope of the World Health Organizations' definition of health. They require approval by the CEO.

Letters of support may also be written by the Board, signed by the Board President, as deemed strategic and/or needed.

6.2 Membership in External Organizations

Four Villages' staff maintains a presence and takes part in public health and community development associations, especially associations that are active in Four Villages' catchment area or of relevance to clients.

No members of the Board, Committees of Board, volunteer or staff may formally represent Four Villages without the approval of the Board or the CEO as appropriate.

Requests for membership in external organizations may originate with staff, Board members, community groups or government.

Where staff time is involved, all such requests shall be referred to the CEO and supervisors for discussion and recommendation. Where a Board or Committee member's time is involved, all such requests shall be referred to the Board President for discussion and recommendation.

6.3 Communication with Media and Police Policy

Four Villages values the opportunities opened through communications with media, and when necessary, with Police.

The CEO and/or an appointed alternate staff are the spokespersons to the media and Police. When appropriate and related to programs and services delivery, other staff may be authorized by the CEO to contact the media or the Police.

A spokesperson is a staff member who is officially appointed or who has received authorization from the CEO to deal with media communications or relations.

The Board follows a protocol for media and public relations described in the Governance chapter.⁷

6.4 Responsibilities for the Organizational Spokesperson

Responsibilities of the organizational spokesperson are:

- a) to give on-the-record media interviews within their areas of responsibilities; and
- b) to communicate and explain factual information relating to programs, policies, activities or events that have been announced or implemented.

6.5 Limitations

The spokesperson will:

- a) avoid answering questions on issues that are the responsibility of others;
- b) exclude any communication dealing with matters under study or discussion;
- c) exclude personal opinion;
- d) exclude speculation on future policies or ongoing studies, deliberations or negotiations; and
- e) exclude opinions on political matters.

⁷ Please see Chapter 6 Governance

Please see
[Appendix H: Communicating with the Media](#)

6.6 Release of Four Villages' Publications and Information

Policy

All publications and information about Four Villages released to the public (including flyers, multimedia, reports, electronic information, etc) need to include the full name of Four Villages, i.e. The Four Villages Community Health Centre. The logo needs to be clearly visible.

Four Villages complies with the requirements of the Service Accountability Agreement with Toronto Central LHIN (TCLHIN), and will acknowledge TCLHIN support, as appropriate.

Photographs of people should only be used with written permission.

Please see
[Appendix I: Photo Consent Form](#)

Publications or materials that advertise or share information about programs and services offered at Four Villages should include the staff contact information for particular programs and should be written in plain language.

All such publications and materials should be approved by a supervisor and should not contravene Four Villages' vision, mission and values statements or policies and protocols of the organization. Information released to the media should follow the media protocol.

6.6.1 Intellectual Property

Intellectual property is defined as:

- a) Brand-name, tagline and design that distinguishes Four Villages from the other organizations within or outside the Community Health Centre sector;
- b) materials (written or graphic) developed by, or for, Four Villages for the purpose of the operations and governance, such as articles, reports, needs assessments, organizational policies and procedures, planning and evaluation frameworks, web site information;
- c) knowledge;
- d) research;
- e) work processes;
- f) methodologies;
- g) domain name;
- h) copyrights. Legal recognition that the authors of original work are protected against unauthorized reproduction, but recognizes the balance between the rights of authors and the rights of users.

It is recognized that within the CHC sector, information that assists with the formulation of organizational policies, procedures and some work processes is openly shared, used and adapted to develop, improve and maintain best practices.

The Board, staff, students and volunteers are all bound to the confidentiality policies⁸. Board Directors act within their fiduciary capacity and are in-trust repositories of organizational information.

Policy

Four Villages has defined procedures and practices to protect its intellectual property, publications and authorship.

Four Villages ensures that any person who has substantially contributed to the concept or design of a document, organizational symbol, or research project is acknowledged.

Information sharing can take place through a request for information process or standard public disclosure method. Requests for information should state the nature and purpose of the request. Four Villages reserves the right to decide if document sharing is open or restricted to one sector, group or individual,

⁸ Please see [Section 4](#) of this chapter.

depending on the sensitivity or development level of the information requested. Four Villages also has the right to reasonably deny access to documents.

Procedures

a) Protection of property

Ownership notice on publications and other disseminated materials:

- as appropriate, documents produced by Four Villages (i.e. policies, frameworks, templates, etc.) will include a footer as follows: “The Four Villages Community Health Centre – name of document – date”
- to be acknowledged, authors accept responsibility for ensuring the validity of the material produced. A principal author may be appointed to oversee the accuracy of a publication. All authors must be involved in making decisions about the publication and should have the opportunity to review research results, analysis and interpretations used in the paper. Each author should have access to the full manuscript prior to its submission for publication and should agree to being listed as co-author. All authors should be involved in deciding the order of authorship. As standard practice, the principal author(s) will be the person(s) who have made the greatest contribution to the writing of the paper. In the case of equal authorship, alphabetical order will be used.
- Staff will list Four Villages as their affiliation on any publication. In the case of students, a note will be included to indicate that the research/project was undertaken as part of, or in the context of, a practicum at Four Villages.

b) Restrictions on Domain Names and Web Site Information Contracts With Independent Consultants, Authors and Other Organizations:

- Registration of a domain name follows standard registration rules with a domain company. The domain name is secured with an external domain company after name search confirms that the name is unique and can be owned by Four Villages. This is secured through a contract, renewed at determined times

c) Contracts with Independent Consultants, Authors And Other Organizations:

- The following standard provision will be included in contracts: “Four Villages reserves the right to alter or modify the product resulting from this project as needed. The consultant agrees that Four Villages has exclusive right to the unique products of this project and hereby wholly waives in favour of Four Villages their Copyright Act moral rights in the materials.

Four Villages will appropriately credit the consultant as a contributor to these products. Similarly, Four Villages will acknowledge the consultant as the author and owner of any materials that the consultant brings to the project that pre-exist the project and will only use these materials with the express permission of the consultant”

d) Addressing Requests For Sharing Materials Produced By Four Villages
Information can be shared through the following venues:

Public Sharing:

- i. Four Villages posts on the web site pre-selected documents for public viewing, i.e. program descriptions, program calendar, annual report. The following statement would be included in the website: “Property of The Four Villages Community Health Centre, not to be copied, used or disseminated without permission”
- ii. Sharing of materials for the purpose of organizational processes:
- iii. Four Villages develops electronic portals, or similar means, to be used by Board and/or staff where pre-selected documents are available through a security code
- iv. Requests to share information from CHC sector, partners and other community organizations:
- v. All requests will indicate a reason and purpose.
- vi. Requests to share information from consultants and other parties:
- vii. Information may be shared with consultants or other parties, subject to purpose of use, at the discretion of the CEO.
- viii. Documents will be shared through any of the following ways:
 - PDF format; or
 - Password protected files

CHAPTER 5 APPENDICES

Appendix A: Workplace Violence Prevention Program



Appendix A - Workplace Violence Prevention Program.pdf

Appendix B: Confidentiality Agreement for Board, Volunteers, Students and Third Parties



Appendix B - Conf Agreement for Board Volunteers Students and 3rd Parties.docx.doc

Appendix C: Confidentiality Agreement for Employees



Appendix C - Confidentiality Agreement.doc

Appendix D: Client Complaint Form



Appendix D - Client Complaint Form.doc

Appendix E: Letter of Confirmation of Complaint Received by Supervisor or CEO



Appendix E - Letter of Confirmation of Complaint Received by Supervisor or CEO.doc

Appendix F: Client Complaints Process Flow



Appendix F - Client Complaints Process Flow.jpg

Appendix G: Mediation Process



Appendix F - Mediation Process.doc

Appendix H: Communicating With the Media



Appendix G - Communicating with the Media.doc

Appendix I: Photo/Video Consent Form



Appendix H - Photo Consent Form.doc