

# Cornerstone Behavioral Healthcare

## GOV.10 Employee Conduct

## PM.14 Employee Conduct

### GENERAL

All employees of Cornerstone Behavioral Healthcare (CBH) should know that their behavior reflects on the Company and its programs. Employees engaging in activities damaging to CBH, on or off the job, will result in disciplinary action, which may include dismissal.

### CONFLICT OF INTEREST

Conflict of interest is defined as a situation where employees might be tempted to serve their own interests or the interests of others rather than those of the clients or the employer.

CBH employees shall not participate in the award, administration or evaluation of a contract, grant or project if they or their immediate family have a direct or indirect interest in the contract, grant or project including, but not limited to, financial participation or benefits and prospective employment.

It is the policy of CBH that both actual and apparent conflicts of interest shall be avoided. If such a situation arises the following procedure will be followed:

- Identify the situation as a problem or potential problem
- Review "Code of Conduct" to clarify the situation
- Discuss the situation with the supervisor to get advice on how to handle the situation
- If the supervisor cannot resolve the situation, the Executive Director or CEO should be notified
- The Executive Director or CEO then will manage the situation

### CODE OF CONDUCT

No employee shall engage in any behavior that compromises the professional relationship between CBH and its employees and the individuals who CBH is designed to serve. CBH employees will not participate in any non-professional relationship with any client of CBH.

All employees of CBH must be alert to boundary issues. It is the responsibility of the employee to maintain appropriate boundaries with other employees, clients and their families at all times. Any violation of this policy will result in disciplinary action up to and including dismissal.

Employees will not engage in dual or multiple relationships (i.e. professional, social, business relationships) with coworkers, clients or former clients whereby there would be a risk of potential harm or exploitation. Dual or multiple relationships are further defined as occurring simultaneously or consecutively. Unfair advantage of a client, former client or coworker may not be taken to further an employee's personal, religious, political, or business interests.

CBH staff will act in a manner that considers clients' interests primary and protects clients' interests to the greatest extent possible. CBH staff engaging in dual or multiple relationships with a client or former client will be asked to discontinue non-professional aspects of the relationship. A plan for discontinuance will be developed in conjunction with the employee's supervisor. Failure to execute the plan may result in

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termination of employment. Any dual or multiple relationships involving a sexual relationship with a client or former client will be cause for immediate dismissal and, if applicable, CBH will report this to the clinician's professional licensing board for violation of their professional license.

CBH employee uncertain if he or she could be construed to be in a dual or multiple relationships with a client should bring this concern to the attention of her or his supervisor.

At CBH, employees at all levels of the organization are expected to treat each other with respect at all times. CBH discourages any romantic relationships amongst coworkers. If a relationship occurs amongst coworkers in the same department their direct supervisor must be notified immediately. It is up to their direct supervisor and executive management to determine a course of action. If a relationship occurs, and creates a significant disturbance within CBH, then that is grounds for termination of all involved, at the discretion of management. The success of CBH depends on teamwork among all employees.

#### **1. Gifts, Money, Services and Gratuities:**

CBH employees are prohibited from soliciting and/or accepting money, services and gratuities from contractors, grantees, vendors or other agencies and firms with which CBH does business. Employees are prohibited from soliciting gifts but may accept a gift of token value only defined as having a worth of \$10.00 or less.

Employees of CBH are also prohibited from soliciting and/or accepting money, services or gratuities from persons receiving benefits or services from CBH. Employees are prohibited from soliciting gifts but may accept a gift of token value only as defined above.

Employees of CBH are prohibited from giving gifts or money to anyone served by CBH, but may extend a gift of token value only not to exceed \$5.00.

#### **2. Confidentiality:**

Employees of CBH are bound by a Confidentiality Agreement, found under HIPAA Security Training; a copy of which is attached hereto as Exhibit A.

Employees of CBH shall not divulge to friends, family, clients, contractors, vendors or others, information which is not available to the general public and which might give that person or entity an advantage in obtaining benefits or services from CBH or the appearance of such.

#### **3. Donations of Time and Money:**

CBH encourages its employees, as private citizens, to contribute what they can afford, in time and money, to other community agencies and services.

Since these may be agencies with whom CBH does business and which may serve individuals with eligible disabilities, employees must be careful that there is no confusion or overlap between volunteer activities and work related responsibilities, and donations of time or money are not perceived as an inducement for special consideration.



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## 4. Service for Fee:

Employees of CBH are prohibited from offering for a fee the same services that are offered without charge by CBH.

## 5. Support or Endorsement of Contractors, Vendors or Grantees:

CBH employees may not represent or support CBH contractors, grantees, vendors or other agencies or firms in soliciting or securing work or other benefits from other organizations or individuals or provide an endorsement on CBH behalf without the permission of the Executive Director.

## 6. Expenses and Honoraria:

CBH employees shall not accept any speaking engagements without prior authorization of the Executive Director or Chief Executive Officer (CEO), if:

- the subject of the speech or discussion pertains to the mission, programs or activities of CBH or to the responsibilities of the employee in his/her position at CBH
- the occasion of the speech or discussion is sponsored or hosted by an individual, firm or organization with whom CBH transacts business

Employees should consult with their supervisors if they have questions about the foregoing policies and their application to projects or activities they are involved in.

## 7. Outside Employment:

Given the nature of the work environment, outside employment creates a high potential for conflict of interest. Any full-time employee wishing to hold outside employment must obtain prior approval from the Executive Director or CEO.

If conflict of interest is not a potential issue, the Executive Director may approve such outside employment provided that:

- The employment does not conflict with, or otherwise affect their performance at CBH
- CBH equipment, office supplies (unless approved by an executive of the company), or premises are not used in the performance of such outside employment
- The outside employment does not in any other way violate other provisions of the CBH Personnel Manual



Executive Director/CEO

11-2-2021  
Date