

**Deborah J. Wilson** President & Chief Executive Officer Lawrence General Hospital

Dear Colleagues,

Lawrence General Hospital has a rich history of delivering high quality care while ensuring patient safety and respectfulness. Integrity must be at the core of our efforts every day. This Code of Ethical Conduct serves every member of the Lawrence General family, including our employees, clinical staff, physicians, residents, students, volunteers and Board of Trustees.

Just as we are committed to clinical excellence, patient safety and quality of care, we are also committed to embracing a culture of ethical and legal conduct.

Compliance is our responsibility as an organization, and therefore, our responsibility as members of that organization. Please read this Code of Ethical Conduct and familiarize yourself with our core principles, ethical values, and the trust we place in each of you to carry this out for our patients and families. If you have any questions about the LGH Code of Ethical Conduct, please don't hesitate to ask your Supervisor or the Chief Compliance Officer.

Thank you for embracing this code, and for all you do every day.

### Lawrence General Hospital Code of Ethical Conduct

### **Core Compliance Principles:**

- Dedication to Professional Excellence
- Teamwork
- Patient Safety
- Respectful Environment of Inclusion and Diversity
- Zero Tolerance for Criminal or Inappropriate
  Conduct
- Adherence to Laws, Regulations and Policies
- Effective Communication

### **Our Code**

The Code of Ethical Conduct at Lawrence General Hospital exists for the benefit of our entire LGH family, in conjunction with our requirement to adhere to the laws, procedures, bylaws and rules that guide our efforts every day.

As part of this code of conduct, any Conflict of Interest must be reported, and Gifts should not be accepted that could appear to influence patient care or a decision to use a vendor. Also, political interests must be kept personal and not intended to be representative of Lawrence General Hospital, as required as a tax-exempt entity. **Together we have a shared responsibility to maintain this Code of Conduct.** 

If you question the appropriateness of an act or decision, contact us.

#### Confidential and Anonymous Reporting Lawrence General Hospital Compliance Hotline 888.228.4298

Compliance is Everyone's Responsibility.



Lawrence General Hospital 1 General Street, P.O. Box 189 Lawrence, MA 01842-0389 978-683-4000

www.lawrencegeneral.org

So good. So caring. So close.



# **Corporate Compliance**

# **Code of Ethical Conduct**

Please feel free to contact the Compliance Program of Lawrence General Hospital through the anonymous reporting Compliance Hot Line at 888.228.4298

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### **Honest and Ethical Conduct**

Lawrence General Hospital (LGH) is committed to observing high standards of ethical conduct in its business and operational practices. We pledge to act with integrity, and to treat our fellow employees, patients, and visitors with dignity, courtesy, honesty, and respect.

As members of the Lawrence General Hospital team, we agree to avoid conflicts of interest, and to:

- carry out our duties responsibly, faithfully, honorably, honestly, respectfully, and with the highest integrity.
- avoid conflicts between our personal interests and professional responsibilities.
- report (in good faith) actual or potential conflicts of interest.
- avoid not only actual conflict, but any appearance of a conflict of interest.

### Compassionate Caregiving, Dedication to Professional Excellence & Teamwork

## We pledge compliance with the highest standards of patient care, professional actions, and teamwork.

Lawrence General Hospital is committed to providing the highest quality of care, service and satisfaction to our patients, their families and the communities we serve. We are dedicated to treating every patient with compassion and respect, and delivering care that is reasonable, necessary, and appropriate by only qualified personnel though collaboration and teamwork. We agree to properly screen and treat emergency patients in accordance with the Emergency Medical Treatment and Active Labor Act (EMTALA) regulations.

### Patient Safety

## We pledge to keep our patients safe at all times and avoid preventable harm.

Lawrence General Hospital is committed to a "culture of patient safety" where all employees are mindful of the risks inherent in our work and continuously striving to eliminate them.

We ask all staff to report any adverse events and any unsafe situation that could possibly result in harm to patients, visitors, or our colleagues. Using the RL System is imperative for understanding the root cause of any issue and allows the hospital to make any process changes needed to prevent this from happening again.

### **Respectful Environment**

#### Zero Tolerance for Criminal or Inappropriate Conduct

#### We pledge the utmost respect for patient privacy.

Lawrence General Hospital is committed to respecting the integrity and privacy of every patient served with regard to their personal and healthcare information. We fully comply with state and federal confidentiality rules; we do not publicly discuss or disclose patient information; we never view patient information, in any format, unless necessary for us to provide the care required by the patient.

## We pledge to respect the rights and dignity of employees, patients, and others.

Lawrence General Hospital is committed to ensuring an environment of integrity that treats our fellow employees, physicians, residents, patients, volunteers, visitors and others with dignity, courtesy, honesty and respect. We are prohibited from harassing, discriminating or harming anyone based upon race, religion, gender, sexual orientation, marital or parental status, national origin, citizenship or military status, age or disability.

## We pledge to maintain an inclusive workplace and provide equitable care to all patients.

Lawrence General Hospital is committed to embracing and celebrating diversity, acknowledging and eliminating the negative impact of explicit and implicit bias through continuous reflection and learning, and safeguarding against bias through equitable policies and governance.

### We pledge to maintain an environment free of drugs, alcohol, and tobacco.

The illegal use, sale, purchase, transfer, possession, or presence of illicit drugs and/or alcohol, as well as not adhering to the tobacco and vape-free workplace policy, is strictly prohibited.

#### Adherence to Laws, Regulations & Policy

#### We pledge compliance with regulatory requirements.

The Compliance Program shall foster an environment in which employees and affiliated professionals comply with all relevant laws and regulations and report any concerns about business practices set forth under this policy. If we question the appropriateness of a decision or action, we will speak with a Supervisor or the Chief Compliance Officer.

## We pledge to conduct all business with honesty, fairness, and integrity.

Lawrence General Hospital is committed to conducting all business with patients, payors, grantors, vendors, competitors, affiliates, and community partners with honesty and integrity. In addition to other requirements, we will adhere to all laws that prevent bribes or kick-backs, wrongful referrals, price fixing and improper sharing of protected or competitive information. All purchases of supplies and services must come from qualified sources and may not benefit any employee. We will not view or share protected business information unless identified as part of our work.

#### We pledge to create, maintain, and preserve accurate records.

We understand that our records, documents, and claims must be accurate, complete and in compliance with institutional and government regulations. We will bill only for services provided as medically necessary, and which are supported by the required documentation. All patient bills will conform to applicable legal and payer requirements.

## We pledge compliance with environmental and occupational safety regulations.

We will comply with the health and safety laws, regulations, policies, and procedures that govern and protect all patients and persons who come in contact with Lawrence General Hospital facilities or personnel. We will comply with all environmental laws, regulations, licenses, permits, approvals, storage, and disposal requirements for any toxic or biohazardous materials.

### **Effective Communication**

### We pledge commitment to honest and open conversations regarding critical concerns.

Open and honest conversation ensures effective communication with our colleagues and patients. Effective communication plays an integral role in our efforts to establish and maintain our reputation as an organization of integrity.

In support of these efforts, members of the LGH family are encouraged to voice and discuss any concerns with colleagues, supervisors, administrators, and the Chief Compliance Officer.

## We pledge commitment to the promise of no retaliation for reporting.

Every member of the LGH family has a responsibility to ensure our actions are in compliance with this Code of Ethical Conduct, and therefore a responsibility to report those actions that are inappropriate, questionable or in violation. If you question the appropriateness of an action or decision, please contact the **Compliance Hotline** at **888.228.4298**. You may also file a RL Report, contact your supervisor, Human Resources, or the LGH Chief Compliance & Privacy Officer.

Retaliation for filing a compliance report is against Lawrence General Hospital's Compliance Program and is in direct violation of this Code of Ethical Conduct. It is also in direct violation to take any adverse action against anyone who reports or files a concern or potential compliance violation in good faith – regardless of whether or not the report is proven after an official investigation.

Reporting a concern or potential compliance violation is confidential and anonymous and will be investigated by authorized personnel. Lawrence General Hospital will make every reasonable effort to keep the identity of anyone reporting a suspected violation confidential, to the extent permitted by law.

Violations of this Code of Ethical Conduct will not be tolerated by Lawrence General Hospital and may lead to disciplinary action, up to and including termination.