

### Goodwill Monocacy Valley

# Code of Conduct

Creating hope, jobs, and futures in our community

### Goodwill Industries of Monocacy Valley Mission: Creating Hope, Jobs and Future in Our Community

Goodwill in Industries of Monocacy Valley is a nonprofit organization that believes in giving people "a hand up, not hand out." Since 1969 our mission has been to: "Create Hope, Jobs, and Futures in our community." By providing free job training and placement programs to employment for individuals with disabilities and disadvantages. Material goods donations play a crucial role in out ability to fulfill our mission. Goodwill collects donated clothing and household goods, and then sells these items in our Retail & Donation Centers throughout Frederick and Carroll counties. Whether a person needs a gentle push to help them along their road to independence, or a guiding hand through the entire process. Goodwill programs are designed to meet the needs of job seekers who need help. The people who come through our doors are a diverse group, from single parents and recent immigrants to ex-offenders and adults who did not finish high school. Everyone is looking for the same thing - a better life.

#### **Training Objectives**

By the conclusion of reading this, you will understand

- The vision, mission and values of Goodwill MV
- The standards of conduct
- Your role as an employee of Goodwill MV
- The non-retaliation policy
- What to do when you "see" something that is not right
- The ethics hotline
- You commitment to the corporate integrity program

# Goodwill's Vision: This is the end state We are working towards

All individuals with disabilities and other challenges are embraced as valued and dignified members of our community

# Goodwill's Mission: This is how we are going to get there

Building independence, quality of life, and work opportunities for individuals with disabilities and other barriers

# Goodwill's Values: This is the way we will conduct ourselves as we work

- Integrity The highest level of self-honesty, trustworthiness and keeping promises
- C Caring Caring for others, while caring about the Organizations success
- A Accountability of self, for problem solving, actions, decisions and results
- Respect For all people, regardless of diverse traits or backgrounds
- Excellence in leading initiatives and delivering services to achieve highly valued results

## Why Is it important to have a Corporate Integrity Program?

- It is important to have a Corporate Integrity Program to:
- Ensure that our work is done in a way that upholds the highest standards of ethics and accountability
- Uphold our responsibility to preserve Goodwill's reputation of excellence, and effective use and preservation of our assets
- Provide a program that prevents conduct that leasts to loss of liability
- ITS THE RIGHT THING TO DO

#### Our Corporate Integrity Commitment

- We recognize that we are responsible for our choices, and that we are "expected to do the right thing, in the right way, for the right reasons" at all times. Such a culture is rooted in our strong set of core values, which we live every day in delivering our mission
- We are committed to preforming our jobs, and conducting business, ethically and in conformance with applicable laws, regulations, policies and standards
- We are committed to prevention and detection of fraud, fiscal mismanagement and/or misappropriation of funds or theft, to safeguard our reputation, assets and to live our mission

# On the following pages, please familiarize yourself with the standards of conduct in each of the following categories:

Quality of Services
Health and Safety
Protection of Property
Human Resources
Marketing and Communication
Compliance with Laws and Regulations
Financial Reporting
Conflicts of Interest

## **Standards of Conduct for Quality of Services**

- We will anticipate and respond to participants' needs and whenever possible, exceed their expectations in obtaining employment and/or community access
- We encourage open and honest communication with out program participants, their families, co-workers, employees and customers
- We will employ experienced and credentialed staff with proper expertise to serve our diverse programs and services

#### Health and Safety

- We will take reasonable precautions and follow safety rules and regulations to promote and maintain a safe environment for our participants employees, visitors and customers
- We will follow the rules and regulations regarding the universal precautions and out infection control policy
- We will follow the Drug Free Workplace Policy
- We will promptly report and accidents involving injury to participants employees, volunteers, board members, or visitors though the incident reporting system

#### **Protection of Property**

- We will correctly use and care for all property, equipment, and donations entrusted to us.
- Wet will not permit making unauthorized copies of computer software or using personal software on computer equipment
- We will not communicate or transfer any information or documents to and unauthorized person

#### **Human Resources**

- We will provide a diverse work environment for all employees, free from harassment and intimidation. Harassment is defined as physical or verbal conduct that offends or is hostile towards and employee
- We will not discriminate against any employee on the basis of race, color, creed, national origin, religion, sex, sexual orientation, veteran status, disability or age
- We will endeavor to maintain open lines of communication so that the view of each employee may be considered and their opinions given proper respect
- We will show respect and consideration for one another, regardless of status or position

# Compliance with Laws and Regulations

- We will maintain program participant, employee systems, and other information in a confidential manner and we will not share or access that information in an unauthorized manner
- We will not shred or destroy legal records or company documents in and unauthorized way
- We will not provide kickbacks, rebates, or anything else of value in order to influence referrals of participants or services payable by a government entity or otherwise
- We will immediately submit to the Risk Management Supervisor, any subpoenas, search warrants, investigative or other legal documents that we might receive on behalf of the company

# Marketing and Communications

- We will practice honest, transparent and timely communication to facilitate the free flow of essential information in accordance with the public interest
- We will respect the privacy of the people served and use their stories only with their expressed written permission

#### Financial reporting

We will ensure compliance withe the requirements of grants, contracts, gifts from the government, and private sources, which donate or provide funds to Goodwill

We maintain a commitment to fair and accurate accounting and billing practices that are in accordance with relevant laws and regulations

We will only bill for services that are actually provided and documented in the relevant records. We will assign billing codes that accurately reflect the services and products that were provided. Upcoding, or any other means of artificially enhancing reimbursement is unlawful and is prohibited

We will not knowingly submit payment or reimbursement claim we know to be false, fraudulent, or fictitious

#### **Understanding HIPAA**

The Health Insurance Portability and Accountability Act (HIPPAA) of 1996

To understand HIPAA, you'll need to understand the Following key terms:

<u>Notice of Privacy Practices</u> - A summary that is provided to program-participants at least once

<u>Protected Health Information</u> - (PHI) - Any individually identifiable health/billing information (electronic, verbal, or written)

<u>Disclosure</u> - The release or sharing of information to a person or business outside of Goodwill Monocacy Valley (except as required by a referring agency)

<u>Authorization</u> - A single form allowing disclosure of PHI to outside persons (e.g., family attorney, school, friend, etc.)

<u>Business Associate</u> - Any third party, who receives or uses PHI on behalf of Goodwill Monocacy Valley (e.g. consultants, healthcare insurers, etc.) Goodwill may share PHI with a business associate when Goodwill has a signed contract

#### Your Role Regarding HIPAA

- Be careful with all communications. Confidential information should only be discussed or disclosed on a "need to know" basis (minimum necessary) to preform a task or duty; or when needed for billing, budgeting, QA, etc
- Never look at a participant's or employee's information unless necessary to perform your job
- Carefully dispose of confidential information and records (request direction if unsure)
- Reasonably verify fax numbers, secure location of the receiving machine, and identity of the person receiving the fax
- Never share your password
- Report violations promptly as the may result in serious corrective action

#### **Your Responsibility**

- First, contact your direct suporvisor or manager
  - Second, if you have raised an issue and it's not getting proper attention, or being resolved, relay your concerns to the next level of management
- Third, seek guidance from Human Resources, or the appropriate Executive staff member

## What is Our Non-retaliation Policy?

• No disciplinary action or other form of retaliation shall be taken against and employee who, in good faith, reports an issue, problem, concern, or violation to management and/or human resources

## **Understanding**"Conflict of Interest"

- We will not misuse our position for personal gain
- We will not pursue any activity that might conflict, or appear to conflict, with the interests of Goodwill. A conflict exists whenever an employee, volunteer, board member, or related party (e.g. family member, friend, or business associate0 may receive a benefit from any decision or action taken
- The acceptance or provision of business-related activities. such as meals and entertainment must comply with corporate policies

#### Questions to Ask When You Observe Something You Believe to be Improper

- Do I have all the facts?
- If I need more information, where do I find it?
- Are there any laws, regulations, policies or procedures that apply to this situation?
- Have I followed normal procedures to try to resolve my concern?

## In Summary, Your Role At Goodwill Is To:

- Perform your job in an excellent manner
- Engage in and promote honest and ethical conduct that prevents wrong-doing
- Avoid the actual, or appearance of, conflicts of interest
- Comply with applicable governmental laws, rules, and regulations
- Use and control al assets, resources, and information in your possession. This includes donations, reporting, accurately hours worked, legitimate business expenses incurred, and all work activites
- Use restricted monies for its requested specific purpose. Be able to account for its activity and show how it was used. No entry may be made on company records that hides or disguises the true nature of any transaction or activity
- Immediately report and questionable activities and practices to prevent wrong-doing, intentional or not, and corporate with any investigations that might arise. Failure to report wrong-doing, theft, fraud, waste of abuse, etc, is not acceptable: employees will be held responsible for their failure to detect or report offences. Failure to report a known violationmay result in dicilpinary action even if you were not involved





