



THE CODE OF CONDUCT

The Boston Children's community consists of people from many different backgrounds. Our patients, their families, our employees, and academic colleagues come from around the world. We embrace our diversity and do not discriminate based on religion, ethnicity, national origin, race, gender, gender orientation, age, handicap or veteran status. Children's will always be a community built around respect—respect for those we serve, and each other. We believe in the mission to improve global health for all children. We will continue to provide a safe and welcoming environment for all who share in that mission.

***“Children’s is
a place where
we can write
the greatest
children’s
stories ever
told.”***

***Sandra Fenwick,
Chief Executive Officer***

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Introduction

Members of the Boston Children's Hospital Community are committed to honesty, integrity, and diligence in performing all daily activities and functions. Boston Children's adopted this Code of Conduct to affirm our noble principles, and to use them in setting the strategic and operational direction for the organization. Every employee must help maintain our high standards by reporting any potential violations to your supervisor, Office of the General Counsel (OGC), Compliance Department, and/or the confidential

[Anonymous Compliance Hotline at \(888\) 801-2805.](#)

Calls are handled with appropriate confidentiality. Boston Children's Hospital does not engage in retaliation or retribution against good faith reporters.

Mission



Our mission is . . .

to provide the highest quality healthcare;

to be the leading source of research and discovery;

to educate the next generation of leaders in child health; and

to enhance the health and well-being of the children and families in our local community.

Our Goals

We have outlined five core goals that everyone should keep in mind so that we may accomplish our mission.

1. [Complex Patients](#). Improve our capacity to care for all patients, particularly those with complex conditions.
2. [Growth and Accountable Care](#). Develop relationships with other providers and payers that increase the number of patients with integrated access to complex care, and improve our ability to manage total medical expenses for defined populations and patients.
3. [Research and Innovation Leadership](#). Maintain our international leadership position in pediatric research and innovation to remain at the forefront of scientific and clinical advances, and to set us apart from other pediatric institutions.
4. [Operational and Administrative Effectiveness](#). Improve administrative and operational systems and processes to support patients and providers and maximize their satisfaction.
5. [Staff and Employee Engagement](#). Develop and execute programs and improved processes that increase the engagement, satisfaction, and capabilities of our staff and employees, as well as support and enhance our workforce diversity.

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Our Values

Communication. Speaks and listens respectfully, communicates clearly and responds thoughtfully and promptly.

Respect. Treats others with empathy and compassion; values our differences.

Excellence. Achieves the highest standards of performance every moment of every day.

Accountability. Hold each other to high standards of performance through attention to detail and personal integrity.

Teamwork. Collaborates to achieve cooperative solutions.

Innovation. Demonstrates and supports openness to change and new ideas.

Commitment to Safety – High Reliability

We have an enterprise-wide commitment to becoming a highly reliable organization. This means doing things right the first time, every time. The three pillars of High Reliability are:

① Speaking Up for Safety, ② Communicating Clearly, and ③ Paying Attention to Detail

We are dedicated to increasing the quality of our alertness and attention to details. Failures are embraced in order to take action to stop further damage from occurring, to learn why an event occurred, and to prevent it from happening again. Our focus is on an increased sensitivity to operations – which means looking at what the organization is actually doing regardless of what we are supposed to do based on intentions, designs, and plans. These commitments strive to achieve ZERO preventable harms affecting any patient, family member, or team member at Boston Children's.

Scope

This Code applies to the Children's Hospital Corporation d/b/a Boston Children's Hospital ("Hospital"), its parent corporation, Children's Medical Center Corporation, and all of its corporate affiliates and satellite locations as well as the Hospital's affiliated medical foundations (collectively, "Hospital affiliates"), together with all of their respective trustees, directors, officers, employees, independent contractors, medical and research staffs, faculty members, fellows, residents, students, visiting faculty or scientists, consultants, and volunteers (whether compensated or not). This Code also applies to individuals and entities engaged by the Hospital to provide services on its behalf, including but not limited to professional consultants, contractors and vendors. Each employee of the Hospital or any of the Hospital affiliates is responsible for ensuring that they understand the Compliance Manual and policies and procedures that apply to their job role. Conduct that does not conform to the requirements of the Compliance Manual or applicable policies and procedures is deemed to be outside the scope of employment and may be subject to discipline.

Bylaws, Manuals, Policies and Procedures

The following topics are the major bylaws, manuals, and policies and procedures governing all employees at Boston Children's. More specific individual department guides will assist you with your job responsibilities. Each section heading is a hyperlink to the referenced information.

Boston Children's Hospital Medical Staff Bylaws

The Medical Staff Bylaws govern medical appointments and practice at Boston Children's Hospital. Medical Staff need to demonstrate that their experience, educational background, training, professional competence, health, adherence to professional ethics, good reputation and ability to work with others are adequate to assure the Board of Trustees that they will perform their activities in a competent and ethical manner; and that any patient treated by them will receive efficient and quality care. Staff are required to meet the applicable qualifications, standards, and requirements set forth in the Bylaws and all organizational policies and procedures.

Clinical Services

Clinical Services' programs aim to be accessible, culturally appropriate, developmentally sensitive, socially responsible, and family-centered. The International Health Services Manual describes staff obligations and supports coordination of services for all international patients. The Patient Experience Manual is the sum of all interactions, shaped by our organization's culture, that influence patient perceptions across our continuum of care. The Ambulatory Services Manual describes departmental-specific information on operations, services, and includes policies and procedures.

Compliance

Our Compliance Program ensures that the organization conducts its business in compliance with all governing law; and that our operations are in accordance with established standards of business and professional ethics. The Board of Trustees charges the Chief Compliance Officer and Compliance Management Committee to review specific compliance matters that arise. The program has four key areas of focus: (1) Billing and Coding, (2) Conflict of Interest, (3) Privacy and Security, and (4) Research Compliance. Each area has specific policies and procedures that further describe important standard operating procedures. Employees must also review the [Compliance Manual](#) – a broad overview of important organizational legal and ethical principles.

Facilities Management

The Facilities Management Manual describes space assignment, use, and management of Emergency Response Floor Plans. The plans describe evacuation routes, and identify room numbers and areas. The Contractor Safety Guide supports project managers and construction personnel in safe and efficient building operations.

Finance

The Finance Department provides accurate, timely, and clear financial and statistical information that supports the organization's understanding of its operations. Additionally, the department efficiently processes financial transactions. The Finance Manual describes financial practices that impact the organization and its employees. The Finance Employee Manual describes departmental-specific organization, operations, and policies. The Health Information Systems Manual describes patient financial transactions such as pre-approval and billing.

Hospital Trust

The Trust secures philanthropic support for Boston Children's patient care, research, education and community service initiatives. If you need support for an important program, the Trust can help identify sources and partner with you to bring in philanthropic funding.

Human Resources

Human Resources helps the organization foster an environment that is respectful and supportive. It accomplishes this by recruiting and retaining bright people who have the opportunity to excel as individuals and as teams. All employees should be aware of the information in the Human Resources Manual, which covers: Sexual Harassment; Discipline, Discharge and Standards of Conduct; and Diversity, Equal Employment Opportunity and Affirmative Action. Additionally, the Clinician Administrative Manual provides standards and expectations of professional behavior. Your benefit information can also be accessed at bostonchildrenshr.org.

Information Services

The Information Services Department (ISD) delivers top quality support and develops innovative solutions. We build security systems to prevent the loss, modification or misuse of patient and organizational information. The ISD Manual describes acceptable use of computer and network resources. The ISD Employee Manual describes departmental-specific organization, operations, and policies. It also describes the functions and responsibilities of the various areas in Boston Children's overall computing environment. ISD also oversees the Patient Health Information Manual that specifies patient medical care documentation, as well as access, storage and release of medical records.

Marketing and Communications

The Marketing and Communications Department performs marketing, communications, research, media relations and public affairs functions. It is responsible for branding and promoting Boston Children's and the community that we serve. We develop programs that encourage patients to seek clinical care at all of our locations by raising visibility and strengthening our reputation.

Patient Care Services

Patient Care Services covers various departments that provide excellent patient care. The following manuals guide them to ensure the delivery of quality care:

- [Biomedical Engineering Manual](#) – addresses medical equipment management, safety, and performance measures.
- [Clinician Administrative Manual](#) – describes clinician governance, staffing, and personnel policies.
- [Graduate Medical Education Manual](#) – outlines standards and policies for the program.
- [Infection Prevention and Control Program Manual](#) – reduces the impact of infectious diseases or organisms on patients, personnel, and visitors. This helps to ensure that Boston Children's is an environment free from hazards, which may result in injury or illness.
- [Emergency Response Manual](#) – works in conjunction with the Hospital Incident Command System (HICS) to identify responders' roles, responsibilities, and strategies during an emergency. It contains site-specific response plans to incidents that disrupt operations.
- [Laboratory Medicine Manual](#) – contains policies and procedures for the Department of Lab Medicine and Point of Care Testing.

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- Nursing Orientation Handbook – describes training for new nursing staff, and the parameters for safe, consistent, and quality interventions.
- Pathology Manuals – describe standards for pathology and cytopathology services provided by the Pathology Department.
- Patient Care Manual – contains policies related to safe patient care and specialty care content for: Ambulatory Care, Behavioral Health Care, Cardiovascular and Critical Care Manual, Case Management, Child Protection, Clinical Operations, Nutrition, Emergency Services, NICU Care, Pediatric Oncology Care, Peri-Operative Care, Radiation Sedation, Respiratory Care, and Trauma Program Care.
- Patient Experience Manual – is the sum of all interactions, shaped by our organization's culture, that influence patient perceptions across the continuum of care.
- Pharmacy and Therapeutics Manual – includes policies regarding medication prescription, preparation, administration and pharmacy monitoring activities to ensure safe medication use.
- Radiology Department Manual – describes department organization, operations, policies, and patient care information.

Program for Patient Safety and Quality

We are committed to providing the highest quality pediatric care to all patients and families. The Program for Patient Safety and Quality (PPSQ) provides leadership oversight and coordination for activities involving Patient Safety & Quality within BCH. The primary goal of our institution-wide program is to ensure that all care is safe, highly effective, patient-centered, timely, efficient and equitable. PPSQ also focuses on Clinical Regulatory Compliance and ensures organizational compliance by embedding regulatory standards into practice. Clinical Regulatory Readiness implements processes, prepares for surveys and inspections, and works with regulators and stakeholders to remedy and address any necessary corrective actions.

Purchasing

Purchasing enforces the Vendor Management Policy that governs relationships with outside entities that are seeking to do business with the organization. It prohibits acceptance of personal gifts and establishes guidelines for relationships with representatives (like those from pharmaceutical and medical device companies).

Research Administration

Research Administration supports our research mission of providing high quality care and leading pediatric institutions in the development and education of research personnel. The Institutional Review Board (IRB) is committed to safeguard the rights and welfare of all children, adolescents, adults and family members who volunteer to participate in research. The Research Administration Employee Manual describes departmental-specific structure, operations, and policies and procedures. The Education and Quality Improvement Program (EQulP) has a manual that outlines specific standard operating procedures. The Radiation Safety Manual has guidelines that promote the safest conditions possible for staff, patients, contractors, visitors, and the environment. The Sponsored Research Manual has cost policies that Researchers need to follow. The Technology and Innovation Development Office maintains the [Intellectual Property Policy](#) that outlines development of research and clinical discoveries that benefit the public, encourage inventorship, and build our research endowment. The [Research Misconduct Policy](#) upholds the primary goal of fostering a research environment that promotes a culture of responsibility, integrity, and ethical behavior.

Support Services

Support Services include Materials Management, Operations, Parking & Transportation, Environmental Health & Safety, Safety, and Security. The Chemical Hygiene Plan contains policies and procedures that ensure safe use, storage, and disposal of chemicals and reflects our commitment to providing a safe and healthful environment for all patients, visitors, staff and volunteers. The Parking & Commuter Services Manual provides information for leased parking spaces and daily parking vouchers, bicycle cages, and commuter programs (like T-passes and Commute Works). The Environmental Health & Safety Manual outlines the responsibilities of the Safety Officer On-Call as well as other employees that are involved in managing safety incidents. The Security, Operations, & Reception Manual promotes a safe environment through protection of individuals and property at Boston Children's.

Thank You

Dear Fellow Member of the Boston Children's Community,

We really appreciate that you chose to work at Boston Children's Hospital.

We sincerely hope that you enjoy the time that you spend working here and thank you for your service.

Welcome!



Timothy C. Hogan
Chief Compliance Officer