

The Code of Conduct



Children's Hospital Boston

Document: CM 00.0.000

Children's Hospital Boston is committed to conducting all its activities in accordance with all applicable state and federal laws and established standards of business and professional ethics. We strive to carry out our activities with honesty, integrity and diligence.

Children's Hospital Boston has adopted this Code of Conduct to affirm its commitment to the principles stated in the Code and as part of its responsibility to set the strategic and operational direction for the Hospital. This Code of Conduct applies to the trustees, employees, and medical staff of Children's Hospital Boston and the physician practice groups at the Hospital (the Foundations). The terms "Children's Hospital Boston" and "Hospital" in this Code refers to all such entities. This Code also applies to people or entities working with Children's Hospital Boston, including volunteers, contractors and vendors.

Compliance with this Code requires knowledge of and adherence to the manuals, policies and procedures that apply to our duties and responsibilities at Children's. The list below highlights and summarizes many important examples, but is not comprehensive. Each employee or associate of the Hospital is responsible for ensuring that he or she understands the policies and procedures that apply to his or her role.

Compliance Program

The Hospital maintains a comprehensive [Compliance Program](#) to help maintain awareness of and compliance with all applicable laws, regulations and standards. The Compliance Program includes a [Compliance Committee](#), [Compliance Officer](#), several appointed compliance directors in different operational areas, and a [Compliance Manual](#) that applies to all members of the Hospital community. Among the important policies in the Compliance Manual are those governing financial compliance, including compliance with laws prohibiting [false claims](#) and [fraud and abuse](#).

Conflict of Interest Policy and Annual Conflict of Interest Disclosure Statement

The [Conflict of Interest Policy](#) requires disclosure of any actual or potential conflict of interest to an individual's supervisor. Certain members of the Hospital community are also required to complete an [Annual Disclosure Statement](#) in connection with the Conflict of Interest Policy. Depending on your role, additional conflict of interest policies may also apply to you, including the [Harvard Medical School Policy on Conflicts of Interest and Commitment](#), the [Committee on Clinical Investigations' Conflict of Interest Policy](#) and [National Institutes of Health Conflict of Interest Policies](#).

Guidelines for Ethical Computing

The [Guidelines for Ethical Computing](#) outlines the appropriate use of information technology and use that is prohibited.

Insider Trading

The policy on [Insider Trading and Confidential Information](#) applies to all members of the Hospital community.

Intellectual Property

The [Children's Hospital Policy on Inventions and Intellectual Property](#) outlines arrangements for the management of equity interests in hospital-owned technology.

Personnel Policies

Standards of conduct and behavior included in the [Personnel Policies](#) apply to Hospital Employees and Associated Personnel. Among the significant policies in this manual are policies pertaining to [Sexual Harassment](#); [Discipline, Discharge and Standards of Conduct](#); and [Diversity, Equal Employment Opportunity and Affirmative Action](#). Also related to general conduct by clinicians at the Hospital is the Nursing Administrative Policy: [Professional Behavior for Clinicians](#) and the MSEC Policy: [Professional Behavior for Physicians](#).

Patient Privacy and Confidentiality

The [Patient Health Information Policies](#) govern the protection of patient privacy in all aspects of Hospital operations. The [Information Security Policies](#) govern further protections of information in electronic form and the security of the Hospital's information systems more generally.

Scientific Misconduct

The Research Policy: [Research Misconduct](#) outlines important policies and Hospital processes applying in the scientific arena.

Vendor Policy

The [Vendor Policy](#) governs relationships with companies that do or are seeking to do business with the Hospital. Among other things, this policy prohibits acceptance of gifts for personal use, and establishes guidelines for relationships with company representatives such as pharmaceutical and medical device company sales representatives.

Conclusion

Adhering to the highest professional and business ethics and all applicable legal and regulatory requirements is part of being a member of the Children's Hospital Boston community. This Code of Conduct, the policies to which it refers, and other policies that apply to particular jobs at Children's, are tools to help us meet this high obligation. It is also the obligation of every member of the Children's community to help us maintain our high standards by reporting any actual, apparent or potential violation of law, regulation or hospital policy. Reports may be made to one's supervisor, to the Compliance Officer, to the General Counsel, or to the confidential hotline, Compliance Line, at (888) 801-2805. Reports will be investigated and handled with appropriate confidentiality. Anyone making such a report in good faith will not be subject to retaliation or retribution.

The personal commitment of all members of the Children's community is required to maintain our high standards of conduct. If you have questions about how this Code of Conduct applies to you, please contact the General Counsel or the Compliance Officer.