## Table of Contents

From President Kevin Coughlin: Our Shared Commitment .................................. 1  
BID-Plymouth’s Mission .................................................................................................. 2  
Our Core Values .............................................................................................................. 2  
Our People - Including You - Create Our Culture .................................................... 4  
A Culture of Respect and Dignity .................................................................................. 5  
Confidential Ways to Ask a Question or Report a Concern ...................................... 5  
Topics We All Need to Know .......................................................................................... 6  
  ● The Patient is at the Center ......................................................................................... 6  
  ● Keep Information Private ............................................................................................ 6  
  ● Avoid Conflicts with BID-Plymouth’s Interests ....................................................... 9  
  ● “No, Thank You” to Gifts ........................................................................................... 10  
  ● High Standards for Research ..................................................................................... 11  
  ● Responsible Use of Controlled Substances ............................................................... 12  
  ● BID-Plymouth Property and You ................................................................................ 13  
  ● Create a Safe Environment ........................................................................................ 13  
  ● Keep the Right Records .............................................................................................. 14  
  ● Billing and Coding for a Strong BID-Plymouth ....................................................... 15  
  ● Let’s Be Clear About Politics ..................................................................................... 16  
  ● Media Calls and Filming .............................................................................................. 17  
  ● Welcome and Cooperate with Government Agents ................................................ 17  
We All Have Shared Responsibility ................................................................................ 18  
  ● Speak Up Without Retaliation ................................................................................... 18  
  ● Managers Have Greater Responsibility ..................................................................... 19  
The Office of Compliance and Business Conduct ..................................................... 20  
  ● Evaluating Our Performance .................................................................................... 21  
  ● Training and Outreach ............................................................................................... 21  
Quick Guide – How do I: Ask questions, raise concerns or report a violation, learn more, share ideas? ................................................................. 22
From President Kevin Coughlin: Our Shared Commitment

Dear BID-Plymouth Community Member,

Every day, we are trusted to do the right thing for our patients, their family members, and fellow employees at Beth Israel Deaconess Hospital-Plymouth. Our patients expect nothing less than this and our reputation is at risk when we fall short of their expectations.

This Code of Conduct is important reading for volunteers, employees, nurses, and physicians at BID-Plymouth. You will find guidance for common situations and resources for your questions, whether you work in a clinical or non-clinical role. Information about reporting concerns – both directly and anonymously – is also included.

The Code of Conduct is the foundation of our Compliance Program at BID-Plymouth.

Please read this Code of Conduct and live it on a daily basis. Also, plan to review it periodically to keep fresh in your mind our principles and the trust that has been placed in you by those we serve.

Thank you for all you do to make BID-Plymouth a great place to work and to receive care.

Sincerely,

Kevin Coughlin
President and Chief Executive Officer
Beth Israel Deaconess Hospital-Plymouth
Beth Israel Deaconess Hospital-Plymouth’s Mission

To improve the health and well-being of our patients and community by providing a full continuum of healthcare services with excellence and compassion.

Our Core Values

BID-Plymouth’s core values serve as the foundation of our Code of Conduct. They guide everyday behavior and decision-making for BID-Plymouth employees, physicians, researchers, volunteers, students, staff-in-training and vendors.

Integrity

- We speak and act with honesty
- We own our individual actions and behaviors

Respect

- We create a professional work environment, wherein we support, acknowledge and depend on the contributions of each member of the hospital team
- We are caring and compassionate in all that we do

Trust

- We engage in open, honest and timely communications
- We rely on one another to deliver individual and team responsibilities to the highest standards

Teamwork

- We work together to achieve shared goals
- We appreciate the diversity of our co-workers and those we serve

Excellence

- We pursue the highest quality and best practices in all we do
- We anticipate and meet the needs and expectations of our patients, their families and the community
Strategic Initiatives

Learning Organization

Building a Learning Organization is one of BID-Plymouth’s long-term strategic goals. By developing a Learning Organization, we will empower our employees to continue to consistently deliver excellent and compassionate patient care and to establish a foundation upon which further trust, collaboration, and shared governance can be built.

The hospital wants to ensure that employees at all levels have learning opportunities to help them grow professionally and personally. That’s why we foster a culture that encourages and supports continuous employee learning, critical thinking, and risk taking with new ideas. It is an environment in which people are allowed to make mistakes and employee contributions are recognized and valued, where they learn from experience and experiment, and knowledge is disseminated throughout the organization for incorporation in day-to-day activities.

Physician Hospital Compact

The hospital physician compact is a set of shared principles agreed upon by the Hospital Administration and the Medical Staff. This compact sets the “rules of the road” for the relationships including expectations of mutual respect, clear communication, and most importantly, a stated goal that the patient is always our primary focus. The compact gives a clear understanding that high quality patient centered care and mutual respect between the hospital and medical staff are the drivers of this organization.

The Patient Experience

At BID-Plymouth we put patients at the center of everything we do. We strive to provide an exceptional patient experience by engaging staff from all disciplines and services, including our physician and provider colleagues, to define and improve our communication, responsiveness, and environment of care in service to patients and families who choose us for their health care needs.
Our People – Including You – Create Our Culture

We want you to experience firsthand every day how important the people of BID-Plymouth are to creating a culture of integrity. So at BID-Plymouth we do the following:

• Support employees and managers through our Human Resources staff who help ensure a positive and respectful work environment.
• Hire the most qualified person for the job, without discrimination based on race, religion, gender identification, disability or any other legally protected status.
• Develop fair and consistent policies.
• Encourage staff to raise concerns about conduct and behavior, without fear of retaliation.
• Provide a drug-free work place.
• Stand against harassment or other inappropriate behavior.
• Promote employees’ professional development.
• Value staff members’ viewpoints and seek input and feedback.
• Create an atmosphere that is welcoming to all patients, family members, employees, visitors and members of the community.

What We Ask of You

• Meet the highest standards of your role at BID-Plymouth.
• Maintain any qualifications and other requirements of your profession.
• Work within all laws, rules, policies and standards as you do your work and care for our patients, giving priority to patient safety and patient rights.
• Report to your manager, supervisor, or chief any errors, near-misses or problems-waiting-to-happen, even if they appear small, so we can protect the health and safety of our patients and fellow workers.
• Treat one another fairly and respectfully.
• Help make BID-Plymouth the best place it can be.
A Culture of Respect and Dignity

A respectful working environment is one that is free from harassment and other inappropriate behavior. BID-Plymouth’s culture of respect means we are committed to treating each other and our patients and their family members with dignity and respect. We must speak up about behaviors that create an intimidating, hostile or offensive workplace. This includes offensive remarks, comments, jokes, slurs or harsh words pertaining to race, color, sex, sexual orientation, gender identity, age, religion, creed, national origin, disability, military service or other legally protected status.

Harassment can include offensive pictures, images, communications and emails, sexual remarks, sexual advances, requests for sexual favors and physical conduct, including touching and gestures. Shouting or raising a voice in anger, name-calling or directing profanity or threats at another individual are not allowed. There is simply no place for these behaviors at BID-Plymouth.

Confidential Ways to Ask a Question or Report a Concern

Directors, Managers, Vice Presidents, and Chiefs often are closest to a situation and can offer the best guidance if you have questions about the Code of Conduct or activities in your department or unit.

If you are uncomfortable talking with people around you about certain issues, Human Resources and the Office of Compliance and Business Conduct are always available. We handle inquiries as confidentially as possible, depending on the circumstances. You can contact the Office of Compliance and Business Conduct anonymously. (See page 22 for contact information.)
Topics We All Need to Know

This Code of Conduct lays out BID-Plymouth’s general expectations for integrity and respect. Keep in mind that to work or practice at BID-Plymouth, you must become familiar with the Code of Conduct and follow the rules, regulations and policies that apply to you or you may face disciplinary action, up to and including termination. On page 22, you’ll find a full list of resources with more information about policies and contact information. In this section, we will review several topics that are important to every member of the BID-Plymouth community.

The Patient is at the Center

Did you know that BID-Plymouth is a community leader when it comes to improving patient care quality and safety? We share our progress and what we have learned with BIDMC and affiliates, as well as others who deliver health care in our community. We promote excellence through sponsorship of innovation, education and research that is targeted to patient care quality and safety. As part of this work, we each have responsibilities:

• Follow all policies, procedures and guidelines related to the safe delivery of patient care.
• Accurately document the care that we provide for our patients.
• Report patient safety events or near-miss events in the Patient Safety Incident Reporting System.
• Notify our Managers and/or Chiefs with any concerns about patient care.

Keep Information Private

Patients, family members and our fellow co-workers at BID-Plymouth trust us with their protected health information (PHI) and personal information (PI). You need to protect this information and use only the minimum amount necessary to do your job. Here is what we do:

• Look at and share PHI only when you need the information for treatment, payment (or other financial transaction) or hospital operations (known as “TPO”) to perform your job responsibilities.
• Never view PHI or PI out of curiosity.
• Protect medical records, financial data, research data, business strategies and plans about BID-Plymouth activities by logging out of your computer, locking offices, and securing files and records.
• Keep information secure from being lost, stolen or viewed by the wrong people:
  • At your desk or work area;
  • When you file it;
  • When you carry it from one place to another: ask yourself if you really need to carry information with you, whether on paper or on a thumb drive. Are you able to securely access the same information from another location?
  • When you share it – by fax, email or in person; and
  • When you throw it away, be sure to use locked shredding bins.
• Be aware when contributing to social media – Facebook, Instagram, Twitter, etc. – in your life outside of work:
  • Never share patient information, photos, or other confidential or proprietary information, such as business or research plans.
  • Make it clear your opinions are your own and do not represent BID-Plymouth.
• Cell Phone camera use is restricted due to patient and employee privacy. Taking pictures and/or video of patients or staff is allowed only after obtaining prior approval from the individual/s and the hospital Marketing and Communications Department. We respectfully ask you not to post any photographic image or video on any social media site without receiving the express permission from a member of the hospitals Marketing and Communications Department.

WHAT IF...
You realize that you handed the wrong visit summary to a patient who has left the clinic. What do you do?

TAKE ACTION
Report to your manager and the Privacy Officer in the Office of Compliance and Business Conduct at (508) 210-5942 or 5943 when you know protected health information or personal information has been lost, stolen or viewed by someone who should not have access to it. In addition, if computer equipment is lost or stolen, immediately contact the Information Services Support Desk at (508) 830-2038. (See page 22 for all contact information.)

LEARN MORE
Visit the SharePoint documentation system on the BID-Plymouth iPortal to review the HIPAA Privacy and Security Policies such as: Social Media Policy #LD0017, Disposal of PHI #HIPP0001.
• Keep information secure when using computers:
  • Create strong passwords/passphrases.
  • Never share your passwords.
  • Never use someone else’s password.
  • Always log out or lock the computer when you leave.
• Use BID-Plymouth-owned laptops and other equipment and confirm with Information Services that they are encrypted. Encryption requires a special software that protects information so that only authorized users can read it.
• If your job requires you to use your own equipment to access BID-Plymouth systems, make sure it is encrypted, password protected and that all software is up-to-date.
• Always keep portable equipment with you; never leave a laptop or tablet in your car or a public place.
• Do not click on links or attachments that are not familiar; it may be “phishing,” which means someone is trying to steal your information or break into BID-Plymouth systems.
• Do not download unknown programs, images or files.
• Never back up documents with PHI or PI on publicly available cloud storage. Call the Information Services Help Desk if you have questions or special storage needs.

WHAT IF...
You receive an email from the “BID-Plymouth Information Services Department” telling you to immediately click on a link to change your password or you won’t be able to get into clinical applications. What do you do?

TAKE ACTION
Don’t click on it! BID-Plymouth Information Services will never send you an email that asks you to click on a link to change your password. The only place you change your password is on the log-in page of the BID-Plymouth Portal. If you do click on a “bad” link, contact the IT Help Desk immediately at (508) 830-2038.

LEARN MORE
Visit the SharePoint documentation system on the BID-Plymouth iPortal to review the HIPAA and IT policies such as: Computer Access and Management #IM0003, Workstation and Mobile Devices #IM0019 and #IM0018, Electronic PHI #HIPP0009, and Electronic Communications #HIPP0010.
Avoid Conflicts with BID-Plymouth’s Interests

A conflict of interest occurs if a member of the BID-Plymouth community puts personal, social, financial or political interests ahead of what is best for BID-Plymouth. We must ensure all financial and business decisions are made for the greater good of the hospital. Ensure your actions do not conflict, or appear to conflict, with the right thing to do:

- Make fair decisions at work, never letting your outside activities or personal interests influence or appear to influence your choices.
- Choose medications, instruments, medical devices, other supplies and services based on how well they work for our patients or staff and their value.
- If you are participating in a business decision for BID-Plymouth, let your supervisor know about all financial interests or business relationships that you or members of your family have with the vendor.
- Avoid conflicts of interest, especially in research, by disclosing all financial interests or outside roles that are related to your professional expertise.
- Remember, if you are a Harvard Medical School faculty member, you must also follow the Conflicts of Interest and Commitment Policy of Harvard Medical School.

WHAT IF...

You work as a part-time consultant for your friend’s business on your own time. But now that business is in the running for getting a big BID-Plymouth contract. What do you do?

TAKE ACTION

Contact your director, manager, vice president or chief or the Office of Compliance and Business Conduct at (508) 210-5942, 5943 or 5944. Your manager and the Office of Compliance and Business Conduct will review the information and provide guidance on what to do next.

LEARN MORE

Visit the SharePoint documentation system on the BID-Plymouth iPortal to review the Conflict of Interest Policy for Institutional Transactions #CMPL0001.
No, Thank You’ to Gifts

Ensure personal gifts never influence – or even appear to influence – patient care, education or research:

• Never ask for, offer or accept a personal gift such as money, gifts, gift cards, jewelry, entertainment or sports tickets, or other items of value such as tote bags, etc.:
  • To influence patient care;
  • To influence others to refer patients to us;
  • In exchange for doing business with contractors, vendors, government representatives or anyone in a position to benefit BID-Plymouth; or
  • From anyone who provides goods or services to BID-Plymouth or is seeking to do business with BID-Plymouth unless permitted by policy.

• You can accept tokens of gratitude such as food or flowers from patients or their family members as long as the gift is less than $100 in value and it is shared with everyone in your department. If a patient or family member wants to donate money, please ask them to contact the Philanthropy Department directly at 508-830-2420.

• Accepting food or meals or small token items such as pens, pins, etc. from vendors is highly discouraged. Food can only be accepted in rare circumstances and must be provided in conjunction with an educational or scientific presentation.

Note: There are specific requirements surrounding anti-kickback laws that make it clear how important it is for us to avoid benefitting or appearing to benefit from any kind of influence – either the giving or receiving of gifts, entertainment and more.

Rules on Giving Goods or Services to Patients

In general, no BID-Plymouth staff member may provide goods or services of value to patients to influence their decision to seek or receive care at BID-Plymouth. Regulations do allow some exceptions, including some preventive services and small gestures, such as providing a cafeteria voucher after a patient has experienced an unusual waiting time.
High Standards for Research

BID-Plymouth works with physicians and others who conduct research that contributes to the health of our patients and the body of scientific knowledge that benefits society. At BID-Plymouth, we uphold high standards of ethical research conduct, using good judgment and acting responsibly. To ensure research integrity, we take these actions:

- Follow all applicable federal or state laws, regulations, standards, and institutional policies and procedures when conducting research activities.
- Protect and respect the rights and welfare of all participants in our research.
- Promote the welfare of laboratory animals if used, through sound scientific practices and humane care and use.
- Give appropriate credit when citing another person’s ideas, processes, results or words.
- Manage, share and store data responsibly.
- Foster productive mentor-trainee relationships.
- Promote a culture of safety by prioritizing safe laboratory practices and protecting our staff from potential hazards through the use of controls, training and education.
- Protect intellectual property rights.
- Never allow conflicts of interest to compromise the scientific integrity of the research we conduct.
- Ensure good stewardship of funds that support research, including proper management and oversight of sponsored projects. Register and update clinical trial information with ClinicalTrials.gov as required by federal law and BID-Plymouth policies.

LEARN MORE

Visit the SharePoint documentation system on the BID-Plymouth iPortal to review the IRB Guidelines and the Human Subjects Protection Education for Research Team Members Participating in Cancer Center Clinical Trials.

For information on or about the BID-Plymouth Institutional Review Board (“IRB”), please call (508) 830-2004.
Responsible Use of Controlled Substances

“Controlled Substances” are drugs or chemicals that may be prescribed by a physician/provider or used in research that are regulated by existing federal and state regulations. Drugs in this category may have an increased potential for dependence, abuse, physical or mental harm, or illegal use and sale.

We ask those using controlled substances for research or clinical care to do the following:

• Become familiar with and follow all laws, regulations and BID-Plymouth policies regarding these substances, including procedures related to ordering, security, record-keeping and disposal.

• Make sure registrations with federal and state agencies are up-to-date and under the proper license every time each substance is used.

• Immediately report theft, suspected theft, unauthorized use or loss of controlled substances to your Manager, the Director of Pharmacy or the Director of Public Safety, and, for researchers, to the IRB Chairperson at BID-Plymouth.

LEARN MORE
Visit the SharePoint documentation system on the BID-Plymouth iPortal to review the Controlled Substance Procurement, Handling, Return, Destruction and/or Disposal #MM0033.
BID-Plymouth Property and You
Respect what BID-Plymouth owns and use it for the benefit of BID-Plymouth. Keep personal use to a minimum and never use BID-Plymouth’s medical or office equipment, computers, phones, copiers or any other item for personal gain or solicitation:

- Protect important equipment from being stolen, damaged or misused.
- Follow established maintenance schedules.
- Immediately inform your manager if BID-Plymouth property is damaged, lost or stolen.

Create a Safe Environment
A healthy work environment and the well-being and safety of all members of the BID-Plymouth community are central to our core values. These actions help to create a safe environment:

- Follow all laws, regulations and policies related to environmental health and safety, including fire, chemical, biological and radiation safety.
- Handle and dispose of all waste properly, including medical waste and hazardous materials.
- Always work in a safe, responsible way.
- Contact a manager, or the Environmental Health and Safety Officer when you encounter an unsafe practice. (See page 22 for contact information.)
- If you have a work-related injury or symptoms of illness, alert your manager and Employee Occupational Health Services. (See page 22 for contact information.)
Keep the Right Records

Records – paper and electronic – document the hospital’s financial, operational, legal, research, educational and patient care activities. Patients and family members depend on BID-Plymouth to maintain, protect and properly destroy patient records. We take the steps needed to meet state, federal and other regulations – and BID-Plymouth’s own high standards:

- Maintain complete and accurate records.
- Follow the records schedule found in BID-Plymouth’s Records Management policy.
- Preserve original documents that may be needed for legal purposes.
- Discard or destroy records according to BID-Plymouth policy, making sure information is not lost, stolen or accessible to people who should not have access.
- If you are not sure whether you need to keep a record, always ask your manager or the Office of Compliance and Business Conduct.
Billing and Coding for a Strong BID-Plymouth

At BID-Plymouth, we make sure we correctly document and charge for the care and research-related services we provide. We accurately bill insurance companies and government payers, research grants and patients. We follow state, federal and payer regulations as well as our own BID-Plymouth policies and procedures. We train coders, billers and any other staff involved in this work so they know the right way to do things. We never knowingly document, charge, code or bill incorrectly. And if we make a mistake, we correct it.

Documenting Care, Charging, Billing or Coding

- Create documentation that matches the care provided or the research conducted.
- Enter the correct codes and bill tests, services and other types of care accurately after services have been documented. Your careful work results in cleaner claims, fewer delays and greater business efficiency.
- Ask your manager for help whenever you have questions to ensure correct codes are charged.
- Never create or change documents in an effort to mislead someone. Don’t leave out or falsify any relevant information. All of our work must meet internal review and external audit standards.
- If you are a physician, be accountable for making sure coding and charges are right, even if you delegate the actual coding to a coder.

WHAT IF...

You work in a clinic and you notice an unexplained revision to an electronic visit ticket you completed earlier for care provided in your area. You know this ticket is an important early step to make sure the billing is done correctly.

TAKE ACTION

Talk to your manager – it could just be a misunderstanding. If not, you or your manager should contact the Office of Compliance and Business Conduct at (508) 210-5942, 5943 or 5944 to talk through the issue and seek guidance on next steps.

LEARN MORE

Visit the SharePoint documentation system for specific billing and coding policies such as the Charge Posting and Adjustment Procedure #FS0013.
Let’s be Clear About Politics

We encourage all staff to be active citizens by voting and participating in civic activities for the greater good. BID-Plymouth is also committed to being a responsible corporate citizen. The hospital itself does not support individual candidates or make contributions — that’s important to keep our tax-exempt status. But if there are issues that impact health care or our communities, we share our experiences and knowledge with government authorities or candidates.

WHAT IF...

You see your co-worker using the office copy machine to make flyers for her brother-in-law’s city council campaign. It’s not that much money; should you say something?

TAKE ACTION

Mention to your co-worker that BID-Plymouth has a policy about this and suggest she find out more by calling a manager, Human Resources at (508) 830-2030, or the Office of Compliance and Business Conduct at (508) 210-5942, 5943 or 5944 for guidance or clarification.

LEARN MORE

Visit the SharePoint documentation system to view the Advocacy, Political Campaigns, Contributions to Public Campaigns, and Lobbying Activities #CMPL0016.
Media Calls and Filming

BID-Plymouth receives frequent requests from the news media and other outside organizations to interview medical staff, employees or patients. Keep in mind the following:

- If members of the news media or other outside agency asks you for information or to film on-site, please contact BID-Plymouth Marketing and Communications Department at (508) 830-2427 or page the Communications on-call staff person, available at all times through the hospital page operator at (508) 387-2929.

- Communications will assure accurate, timely and appropriate release of hospital and patient-related information and coordination between medical center departments and outside parties.

- If you have news to share or a story idea, please contact BID-Plymouth Communications.

Welcome and Cooperate with Government Agents

BID-Plymouth fully cooperates with government and regulatory agency investigations and inspections. Be prepared when law enforcement officials or regulators arrive:

- Immediately notify your Director, Manager, Vice President or Chief and the BID-Plymouth Office. You can reach the Administrator or Counsel at any time by dialing the hospital page system operator ("0").

- Inform the agent that the Administrator has been contacted, and will arrive shortly.

- Wait for assistance.
We All Have Shared Responsibility

BID-Plymouth is able to thrive as an institution because of the contributions of each individual. We each have a role in creating and fostering integrity and respect at BID-Plymouth. Each of us has responsibilities:

• Read and understand this Code of Conduct.

• Know what laws, regulations, standards and policies are relevant to your role.

• Ask your Director, Manager, Vice President or Chief or the Office of Compliance and Business Conduct when something is unclear.

• You are required as an employee to speak up about any real or potential violation of any law, rule, regulation, safety standard, BID-Plymouth policy, procedure and the Code of Conduct. Talk with your Director, Manager, Vice President, Chief, Human Resources, the Office of General Counsel, Chief Compliance and Privacy Officer. When needed, reach out to federal, state and local agencies.

• Cooperate fully with all internal or external investigations.

Speak Up Without Retaliation

At BID-Plymouth, we are committed to protecting employees, physicians and anyone who, in good faith, report actions they believe violate laws, policies or our culture of respect and integrity. Retaliation – treating someone differently or threatening them because they speak up – has no place at BID-Plymouth and is a violation of federal laws and our own policies.

So speak up with confidence as a staff member. Managers, senior leaders, Human Resources and the Office of Compliance and Business Conduct are open to your questions and concerns about a wide range of issues – patient care, how we document and charge for our care, how we use resources, how we conduct business, how we treat each other in the workplace and much more. You can contact the Compliance Office anonymously by phone or online, if needed. (See page 22 for details.) The Compliance staff and Human Resources can advise you on next steps or, when necessary, conduct a formal investigation into the issue.
Managers Have a Greater Responsibility

Directors, Managers, Vice Presidents, Chiefs and Administrators set the tone for an ethical workplace. We look to you to set a good example and be available to your employees when they have concerns. Being a manager means you have a greater responsibility:

• Read and be familiar with the Code of Conduct and the laws and policies that apply to your team.
• Listen to your staff and promote open conversations about ethical and compliance issues.
• Report concerns to the Office of Compliance and Business Conduct and your department leaders when there is a problem or potential problem.
• Make sure your staff know about the Anonymous Compliance Helpline, (888) 753-6533 or https://bidmccompliance.alertline.com, and other resources available to them for their questions or concerns.
• Make it clear that retaliation is not tolerated in your area, and live that example yourself.
The Office of Compliance and Business Conduct

Like good medicine, prevention and communication are the foundations of a good Compliance Program.

The Office of Compliance and Business Conduct at BID-Plymouth strives to ensure that you have the information you need to do your job according to city, state, federal and agency laws as well as BID-Plymouth’s own policies, procedures and guidelines.

Following these laws and policies is not only the right thing to do – it is also a requirement of working, practicing or conducting research here. For outside vendors and contractors, it is required for doing business with BID-Plymouth.

Our Compliance Program supports all BID-Plymouth workforce members, including employees, physicians, researchers, volunteers, vendors, contingent workers and contractors. Together, we all strive to meet the highest ethical standards in caring for patients, educating clinicians-in-training, and promoting health through basic and clinical research. We are committed to you:

- We provide ways for you to ask questions and report concerns, including anonymous options. See page 22 for all the ways to contact us.
- We answer your questions as quickly as possible.
- We investigate violations of law or policy in a timely way and bring in other resources from both within and outside of BID-Plymouth as needed.
- We work to improve the way we do things if staff identify a near-miss or potential compliance violation.
- We work with leaders and staff throughout BID-Plymouth to write and maintain fair, consistent and transparent policies.

We answer directly to the Chief Executive Officer and the Board of Directors of BID-Plymouth.
Evaluating Our Performance

BID-Plymouth is always finding ways to measure the effectiveness of our day-to-day work with the goal of improving what we do. Internal auditing and monitoring help ensure that we are efficient and thorough in our work. More importantly, auditing and monitoring provide BID-Plymouth the capacity to detect, and sometimes prevent, problems that keep us from meeting our own high standards as well as government and other regulations. Compliance and Business Conduct staff welcome the opportunity to work with hospital staff on a wide range of risk and effectiveness initiatives.

Training and Outreach

We never want a lack of information to be a barrier to doing the right thing:

- We create trainings regarding laws and policies, best practices in the workplace, business conduct and more. Some are mandatory because we want to ensure every member of the BID-Plymouth community is on the same page when it comes to the basics.
- We recognize that you may have additional required trainings and certifications, depending on the nature of your work and specific role.
- We supply materials, videos, BID-Plymouth Portal columns and other activities to keep you up-to-date and aware of the information you need.

Thank you for taking the time to read BID-Plymouth’s Code of Conduct. If you have any questions about the Code or feedback to share, please call the Office of Compliance and Business Conduct at (508) 210-5942, 5943 or 5944.

Most of all, thank you for your commitment to working with integrity every day. You bring the mission and values of BID-Plymouth to life and make BID-Plymouth an exceptional place to work and receive care.
Quick Guide – How do I:
Ask questions, raise concerns or report a violation, learn more, share ideas?

| Ask Questions | • Start with your Director, Manager, Vice President or Chief — they know the most about the laws, regulations and policies that impact your area  
• Contact the Office of Compliance and Business Conduct (OCBC) directly: (508) 210-5942, 5943 or 5944  
• Human Resources: (508) 830-2030 |

| Raise Concerns or Report a Violation | • Confidential and Anonymous Reporting — Anytime 24/7, 365 days a year:  
• BID-Plymouth Anonymous Compliance Helpline: (888) 753-6533  
• E-mail: compliance@bidplymouth.org  
• https://bidmccompliance.alertline.com  
• Contact the Office of Compliance and Business Conduct (OCBC) directly: (508) 210-5942, 5943 or 5944  
• Privacy Officer: (508) 210-5942  
• Research Compliance: (508) 830-2004  
• Human Resources: (508) 830-2030  
• Environmental Health and Safety: (508) 732-8609  
• Employee Occupational Health Services: (508) 732-0401  
• For stolen or lost equipment,  
• IT Services Support Desk: (508) 830-2038  
• Public Safety: (774) 454-4843 |

| Learn More | • Access the BID-Plymouth policies and procedures on the SharePoint documentation system such as: Reporting, Investigation, Progressive Discipline, and Resolution of Privacy and Data Security Issues #HIPP0003 or the Reporting, Investigation, and Resolution of Compliance Issues #CMPL0008. |

| Share Ideas | • Talk to your Director, Manager, Vice President or Chief if you have ideas about improving the way your area or BID-Plymouth meets the standards set out in the Code of Conduct  
• Reach out to the Office of Compliance and Business Conduct at (508) 210-5942, 5943 or 5944 |
Office of Compliance and Business Conduct
Beth Israel Deaconess Hospital-Plymouth
275 Sandwich Street, Plymouth, MA 02360
(508) 210-5942, 5943 or 5944

BID-Plymouth’s Anonymous Compliance Helpline:
(888) 753-6533
or
E-mail: compliance@bidplymouth.org or privacy@bidplymouth.org
or https://bidmccompliance.alertline.com