



# Harbor Care

HOUSING ▾ HEALTHCARE ▾ VETERAN SERVICES

## Code of Conduct

Updated March 2025

### Contents

Introduction .....	1
Code of Ethics .....	2
Compliance with Standards .....	2
Harassment and Mistreatment .....	3
Whistleblower Protections .....	3
Fraud, Waste and Abuse .....	3
Conflict of Interest .....	4
Safety.....	4
Anti-Kickback Laws .....	5
Confidentiality .....	5

### Introduction

Harbor Care’s Code of Conduct sets the standard for ethical behavior necessary to maintain our reputation and commitment to the highest standards of integrity and excellence. The standards described in the Code of Conduct support Harbor Care’s mission, vision, values, and Philosophy of Care, as well as applicable federal and state laws and regulations. These standards apply to Harbor Care employees, volunteers, and Board of Directors, as well as our relationships with clients, partner agencies, third party payors, vendors, consultants, and each other.

It is expected that employees, volunteers, contractors and vendors abide by the standards of the Code of Conduct as well as applicable policies, procedures, and protocols, and will ask for assistance when necessary to understand their legal obligations. Harbor Care is a recovery

friendly workplace; however, we will not do business with individuals or organizations suspected or known to engage in activities that would jeopardize our reputation for conducting business according to the highest ethical standards.

Any violations or suspected violations must be reported immediately. Reports may be made in person, by email, telephone or in writing to any member of Harbor Care Management, or the Compliance Officer by calling 603-816-6383.

## Code of Ethics

Harbor Care's Code of Ethics sets the standard for ethical judgment. The Code of Ethics goes above and beyond the law. It supports Harbor Care's Philosophy of Care, values, mission, and vision by compelling all individuals to do the right thing in every situation, not just because the law requires it.

Harbor Care holds its employees and independent contractors to the highest ethical, moral, and legal standards in their conduct and service delivery. Harbor Care expects its employees and independent contractors to maintain respect for the privacy and well-being of the persons served. It is not possible to maintain an ethical environment without professional boundaries. Therefore, creating and upholding strong professional boundaries is a core responsibility for all, including employees, volunteers, contractors, and clients. Harbor Care strives to enhance the principles of mutual respect, competency, accountability, responsibility, nondiscrimination, and service excellence. Harbor Care employees must also follow all applicable professional codes of ethics, specific to their individual roles. Harbor Care employees and independent contractors, voluntarily agree to act according to these principles in fulfilling Harbor Care's mission, including acting with integrity in the community and outside of work hours.

---

### Ethics in Practice

*A Harbor Care case manager talks with a client during an intake session. Before asking the client to sign a release of information form to share the client's records with another provider, the case manager explains the purpose and ensures the client understands everything on the form.*

---

We earn and preserve our clients' trust by treating them with honesty and integrity and in a professional, courteous manner. We listen to our clients and challenge ourselves to continuously improve our services and response to client needs.

## Compliance with Standards

Harbor Care upholds these standards by implementing effective training and communication strategies, utilizing monitoring and auditing systems reasonably designed to detect criminal conduct by its employees and other agents, and by having in place and publicizing a reporting system whereby employees and other agents may report criminal conduct by others within the organization without fear of retribution.

The standards are consistently enforced through appropriate disciplinary mechanisms, including, as appropriate, discipline of individuals responsible for the failure to detect an offense. Adequate discipline of individuals responsible for an offense is a necessary component of enforcement; however, the form of discipline that will be appropriate will be case specific.

After an offense has been detected, Harbor Care will take all reasonable steps to respond appropriately to the offense and to prevent further similar offenses, including any necessary modifications to its program to prevent and detect violations of law.

## Harassment and Mistreatment

Employees, volunteers, service recipients, and anyone doing business with Harbor Care shall not engage in sexual abuse, physical abuse, neglect, harassment, or any form of mistreatment of any service recipient, visitor, volunteer, or other Harbor Care employee. Harbor Care has a zero-tolerance policy for acts of abuse, neglect, harassment, or mistreatment. All employees, regardless of position or title, reasonably suspected or believed to have violated this policy will be appropriately disciplined, up to and including termination of employment, as well as criminal prosecution.

### Reporting Mistreatment in Practice

*A 79-year-old Harbor Care client discloses to front desk staff that she is experiencing abuse at the hands of her caregiver. The front desk staff responds with compassion, then immediately informs the supervisor and calls the state agency to investigate.*

If any Harbor Care employee or volunteer witnesses or becomes aware of a situation involving sexual abuse, physical abuse, neglect, harassment, or mistreatment of a service recipient, visitor, volunteer, or other Harbor Care employee, they will report the situation to their supervisor (or other member of leadership if their supervisor is implicated), and, if the situation involves a minor or vulnerable adult, to the appropriate state agency.

## Whistleblower Protections

Any employee, trustee, volunteer, agent or consumer of Harbor Care who suspects that dishonest, misleading or fraudulent information has been provided shall notify the Compliance Officer immediately. Information provided shall be handled in a confidential manner; no employee, trustee, agent or consumer may be harassed, punished, discriminated against or terminated because of filing a complaint.

## Fraud, Waste and Abuse

The leadership of Harbor Care is fully committed to the need to prevent and detect fraud, fiscal mismanagement and misappropriation of funds.

Some important definitions are:

- **Fraud:** Deception deliberately practiced to secure unfair or unlawful gain. Examples: billing for services not rendered, double billing, over billing, etc.
- **Waste:** The production of excess and unwanted materials and articles. Can be either intentional or unintentional.
- **Abuse:** A corrupt practice or custom. Can be either intentional or unintentional. Examples: misreporting.

- **Other Wrongdoing:** Immoral or improper behavior - either intentional or unintentional. Examples: embezzlement, incompetence.

Employees have a duty to report suspected or known fraud, waste, abuse, or other wrongdoing and could face disciplinary procedures if they fail to report concerns to a manager, Compliance Officer, or Ethico, the third-party compliance hotline. Any employee may call Ethico to report suspected or known compliance violations and can remain anonymous if they choose. The Compliance Officer will investigate any concerns within 30 days.

---

### Compliance in Practice

*A Harbor Care accountant receives an invoice that includes some unallowable expenses. The accountant brings the invoice to his supervisor to discuss his concerns.*

---

Harbor Care will not retaliate or take any form of reprisal against any individual who brings a complaint or concern forward. Any such retaliation is prohibited.

## Conflict of Interest

Harbor Care will take all reasonable steps to avoid conflicts, or appearance of conflicts, between private interests and the official responsibilities and performance of our duties. Harbor Care employees have a duty to report any actual or perceived conflicts of interest to Compliance and Human Resources.

## Safety

Harbor Care employees will comply with all work and safety rules, regulations and policies.

---

### Safety in Practice

*A Harbor Care provider is walking into the clinic and starts to slip on some ice that has not been cleared. The provider notifies the Facilities Team right away and completes an incident report to document the near miss.*

---

Harbor Care will take all reasonable precautions to ensure the safety of employees, as well as the safety of clients, visitors, and other personnel.

Harbor Care maintains and regularly communicates its emergency plans and procedures to employees and clients to maximize safety. Harbor Care employees practice safety awareness by thinking defensively, anticipating potential hazards and reporting unsafe conditions immediately. Harbor Care maintains an atmosphere that is free from workplace

violence. Harbor Care does not engage in verbal or physical confrontation with a potentially violent person.

Smoking or other use of tobacco products (including, but not limited to cigarettes, pipes, cigars, vapors, electronic cigarettes) is not allowed within any of the offices at Harbor Care and Agency-owned vehicles, or while transporting clients using personal vehicles. Finally, Harbor Care promotes an environment that is drug and alcohol free. The illegal possession, distribution, use, sale or abuse of controlled chemical substances or alcohol while on company business or on company premises is strictly prohibited.

## Anti-Kickback Laws

Harbor Care employees and agents shall not knowingly and willfully solicit, offer to pay, pay, or receive any remuneration, either directly or indirectly, overtly or covertly, in cash or in kind, in return for:

- Referring an individual to a person for the furnishing, or arranging for the furnishing, of any item or service for which payment may be made, in whole or part.
- Purchasing, leasing, ordering, or arranging for, or recommending the purchasing, leasing, or ordering of any good, facility, service to item for which payment may be made in whole or part.

Remuneration may include not only kickback payments and bribes, but also rebates, refunds, educational grants and other benefits to clients. Certain legally permitted practices, such as group purchasing agreements, are excluded from this prohibition.

## Confidentiality

Confidentiality is a fundamental component of quality services. It is therefore the policy of Harbor Care to safeguard clients' right to privacy in accordance with laws regarding confidentiality (HIPAA, HITECH, and 42 CFR Part 2). All Harbor Care clients deserve, and are legally entitled to, the confidentiality of their information. Harbor Care employees, volunteers, and third parties with access to client information shall be alert to the sensitive personal information they may learn in the course of their duties and complete annual training about the legal and ethical responsibility to maintain client confidentiality. Employees, volunteers, and third parties will maintain client and co-worker confidentiality upon termination of a relationship with Harbor Care.

---

**Confidentiality in Practice**  
*Harbor Care employees are careful not to share any information about a client unless it is necessary for the client's care.*

---

Violation of client confidentiality by an employee, volunteer, or third party, will result in disciplinary action that may include termination of employment or contractual relationship. Violation of one client's confidentiality by another client may result in termination of services to the client who initiated the breach.