



STANDARDS OF CONDUCT

It is the policy of Gateway Hudson Valley to conduct business and deliver services in accordance with both the law and the highest clinical and professional standards. It is our intent to provide clear direction to our employees, board members, and affiliates with respect to behavior within the scope of their practice using Gateway's Standards of Conduct.

Gateway will not tolerate any form of unlawful or unethical behavior by anyone associated with this organization. We expect and require all employees, board members, and affiliates to be law-abiding, honest, trustworthy, and fair in all of their business dealings maintaining the highest standards of ethics.

1. Gateway requires compliance by all employees, board members and affiliates with laws to which it is subject. When the application of law, regulation, or other policy is uncertain, the employee, consultants and affiliates must seek the guidance and advice in accordance with the Corporate Compliance Plan.
2. When either directly providing or managing the provision of services, Gateway takes all reasonable efforts to ensure that the services are appropriately prescribed, medically necessary, and performed in accordance with standards of care.
3. Gateway will treat all individuals with dignity, respect, and courtesy. The individuals we serve and their families will be involved in decisions regarding the treatment delivered to the extent practical and possible. In all circumstances will we attempt to treat individuals in a manner appropriate to their background, culture, religion, gender identity, sexual orientation and heritage, and respect their objectives for care.
4. Employees, board members, and affiliates shall not engage in any activity that constitutes abuse, neglect, or any kind of unauthorized physical restraints of any kind toward any individual.
5. There shall be no discrimination toward any individual for any reason, including race, color, religion, creed, sex, sexual orientation, national origin, ancestry, ethnicity, age, disability, citizenship, marital status, military or veteran status, predisposing violence victim status, domestic violence victim status, HIV status or any other characteristic protected by law.
6. Gateway will not refuse, transfer, or discharge individuals who are in need of our services based upon any factor that is unrelated to individual care needs.
7. Gateway recognizes that from time to time, conflicts will arise among those who participate in agency and service recipient care decisions. Whether this conflict is between employees, board members, or affiliates or between individual caregivers and the service recipients, Gateway will seek to resolve all conflicts fairly, objectively, and in a timely manner. In cases where mutual satisfaction cannot be achieved, the service recipient, their representative, the administration or appropriate group can engage in the conflict resolution process. Other staff, or if needed, outside experts will be involved and their opinions sought as needed to pursue a mutually satisfactory resolution.

8. All service recipient information is private and confidential and as such, staff is charged to protect the privacy and confidentiality of the individuals we serve and to communicate in a professional manner in accordance with all applicable New York State and Federal regulations.
9. Service Recipient-Staff Relations: Staff shall keep relations on a professional level that is above question of any kind. The guidelines are as follows:
 - a.) There shall be no personal financial transactions between staff and service recipient. This includes accepting gifts of obvious significant value and lending or borrowing money under most normal circumstances.
 - b.) Staff will not include service recipients as guests in their home or take them on personal outings unless approved by the program Vice President.
 - c.) There is to be no fraternization with service recipients via any form of electronic communication.
 - d.) During conversations and treatment, discretion should be exercised in sharing the details of staff private life.
 - e.) Sexual contact with a service recipient by staff is prohibited. Contact for hygiene, weather, or medical incidents are permitted based on care needs. (See Sexual Harassment Policy)
 - f.) Dating service recipients or similar romantic involvement is not appropriate at any time or under any circumstances.
 - g.) Staff who are assigned, through their job description, the duties and responsibilities of counseling are the only authorized persons to carry out this function.
 - h.) Sexual Harassment or the creation of a hostile work or living environment is unacceptable.
10. Staff are obligated to report any of the following to a supervisor: suspected abuse and/or neglect of service recipients, situations which may jeopardize quality service delivery, misuse of agency resources, and/or violate agency policy or procedures, and any perceived Corporate Compliance violations.
11. Service recipients shall not carry out the duties of staff unless such tasks are described in the participant's plan of services for the purpose of increasing skills.
12. No firearms or other weapons may be stored or brought to any facility or grounds of this agency.
13. The unlawful manufacture, distribution, dispensing, possession or use of alcohol, cannabis, illegal drugs or controlled substances on Agency property, in an Agency vehicle or while engaged in Agency Activities are strictly prohibited.
14. Staff shall be models of appropriate and acceptable behavior.
15. All staff, when acting as a representative of Gateway must always uphold the integrity of the agency through their words and actions, no matter the format in which it is communicated.

16. All Gateway financial transactions must be properly authorized by management and be accurately and completely recorded on Gateway's books and records in accordance with generally accepted accounting principles and established corporate accounting policies.
17. Gateway requires the undivided diligence of its employees, board members, and affiliates while exercising their responsibilities. Except where otherwise approved, personal investments or activities that may create a conflict of interest are prohibited, and situations that may give the appearance of conflict are to be avoided. Outside employment that raises any question in this regard must be disclosed to Gateway and approved in advance by the President & Chief Executive Officer. In the event the President & Chief Executive Officer needs to make disclosure, or needs permission as set forth above, he/she shall address him/herself to the Chair of the Board of Directors of Gateway Hudson Valley or to the Executive Committee.
18. If any circumstance presents itself which casts any doubt on the integrity of services delivered by Gateway operations the employee, board member or affiliate are directed to contact the Chief Quality and Compliance Officer immediately so that timely investigation and necessary correction may be enacted.
19. As Corporate Compliance is a highly complex area, and this document cannot address all situations in which breach or concern may apply, employees, board members and affiliates must contact their supervisor as appropriate, or the Chief Quality & Compliance Officer, who will make necessary determinations. The best policy is "if in doubt, ask".

In addition, to the information listed above, other rules of staff conduct must be maintained in order for employees to work efficiently and effectively together in an organization such as Gateway Hudson Valley. Lack of adherence to the rules will result in disciplinary action, up to and including termination. Infringements are summarized below:

- Habitual absenteeism or lateness
- Failure to properly notify your supervisor when late or absent
- Failure to perform assigned duties as directed
- Insubordinate, unlawful or disorderly conduct
- Verbal or physical altercations with other individuals
- Theft or misappropriation of Gateway Hudson Valley property

These guidelines are not meant to restrict day-to-day relationships. They are general guidelines of behavior in the course of job performance. If any questions should arise, please discuss the situation with your program director.