

What does the Ethics and Compliance Office do?

The Ethics and Compliance Office provides guidance and direction and supports Alberta Health Services (AHS) staff and representatives to understand and comply with the following three key ethical conduct governance documents (Governance Documents):

- [Code of Conduct](#)
- [Conflict of Interest Bylaw](#)
- [Safe Disclosure/Whistleblower Policy](#)

What type of inquiries does the Chief Ethics and Compliance Officer (ECO) respond to?

The ECO responds to requests and inquiries that fall under the Governance Documents from a variety of sources such as AHS representatives, stakeholders and members of the public.

What does the ECO do when they receive an inquiry?

The ECO assesses, reviews, and has discretion to investigate or direct an investigation. The ECO may also determine whether there has been a breach of one or more of the Governance Documents.

Who does the ECO report to?

The ECO reports to the Governance Committee and to the Audit and Finance Committee of the AHS Board. If appropriate, the ECO will communicate any significant issues or risks to AHS management based on the nature of your concern.

What should I do if I believe there is a breach of a Governance Document?

First, discuss your concern with your manager or professional practice leader. You may also wish to involve other resources such as your local human resources contact, union representative or your professional regulatory body. If the matter is still not clear or if you believe there has been a breach, you and/or your manager may contact the ECO or the External Confidential Reporting and Disclosure Service to further discuss your concern.

What steps are taken once I contact the ECO with an alleged breach?

There are several steps which may take place.

- The ECO will acknowledge receipt of your concern.
- An initial assessment of your concern will be done to determine whether it falls within the mandate or jurisdiction of the ECO. If additional information or facts are required to make this assessment, the ECO will request that information from you.
- If your concern does not fall under the mandate of the ECO, this will be communicated to you.
- If your concern falls under the mandate of the ECO, the ECO will conduct a preliminary review of your concern and determine whether additional information or expertise is required to address your concern.

What are some examples of situations that fall outside the mandate of the ECO?

AHS operational and policy decisions and non-AHS matters such as private physician offices that do not involve AHS, fall outside of the mandate of the ECO.

Will the ECO contact me before sharing confidential or personal information with others?

If your concern involves confidential or personal information, and the ECO needs to share the information in order to address your concern, the ECO will first request your permission to share the information*. Exceptions to requesting permission include situations such as:

- Contact not possible, e.g., an anonymous complaint - no contact information provided,
- Urgency in proceeding such as where time is of the essence, e.g. risk of danger including imminent harm, threats to safety,
- Reporting or notification duties that are required or authorized by law or policy, or
- Request for permission is inappropriate in the judgment of the ECO for other reasons.

***Note:** If permission is **not** granted the ECO may be unable to address your concern further (unless your concern falls into one of the exceptions above) and will close the file.

Once I give permission to share personal information, what happens next?

The ECO coordinates ongoing developments that may involve further assessment, review, and/or investigation, findings, recommendations and advice, before making a determination on the matter. After the determination is made, you will then be advised of the general outcome.

If your concern falls exclusively under another area within AHS with a specific mandate to address your concern, e.g., Patient Concerns (regulation), Senior Physician Executive (e.g., medical staff bylaws), Information Access and Privacy, Internal Audit & Enterprise Risk Management, Contracting Procurement & Supply Management or Environmental Public Health, the ECO may:

- Advise you about the other area of expertise where your concern would be more appropriately handled and provide you with the contact information so that you can directly contact that area, or
- Request your permission to share the information that you provided in order for the ECO to transfer your concern to that other area of expertise for handling. In this case, the ECO will attempt to provide you with the new contact information, and advise that the matter is being transferred.
- The ECO closes the file after advising you of the general outcome.

Can I report confidentially?

You may request anonymity either when you make direct contact with the:

- ECO at complianceofficer@albertahealthservices.ca, or the
- External Confidential Reporting and Disclosure Service at **1-800-661-9675***.

***Note:** In some situations it may be necessary to disclose explicit details about your concern to other individuals or areas of expertise which may include disclosure of your identity. If this is the case, you will be advised of this determination and your permission will be requested to share the necessary amount of personal and other information that is needed to enable your concern to be addressed.

As a general rule the information about your anonymous concern and your identity will not be shared without your permission. However, there are exceptions as previously noted that include the risk of imminent harm, threats to safety and reporting or notification duties that are required or authorized by law or policy.

Will I be protected if I raise a concern with my Manager or the ECO?

You should report to your manager any concerns about retaliation, adverse action or retribution against you that you believe arose as a result of you reporting an improper activity. If the allegation is about your manager, you should report your concerns to your manager's manager, your local human resources contact, the External Confidential Reporting and Disclosure Service or to the ECO.

How are disciplinary actions or other types of sanctions imposed?

Behavior requiring sanctions would typically be addressed under a more specific type of document such as an AHS policy or procedure, contract, collective agreement or medical staff bylaw. The ECO does not impose disciplinary sanctions or action under the Governance Documents. Consistent with other disciplinary situations at AHS, the appropriate sanctions are determined by your manager or professional practice.

Does the ECO review operational or policy decisions?

As a general rule, the ECO does not review or revisit AHS operational or policy decisions (e.g., decisions about staffing, disciplinary actions or budgetary matters).

Are there other limits to when the ECO gets involved?

If the substance of your concern is already being addressed through another appropriate type of process or proceeding such as your union, manager, local human resources contact, a grievance, disciplinary action, professional regulatory body, administrative tribunal, legal, criminal or civil court proceeding, you will be advised to complete that process as the ECO does not engage in multiple or duplicative proceedings.

If someone breaches a general AHS Policy or similar guideline, does the ECO get involved?

The Governance Documents require AHS representatives to comply with any applicable AHS or other bylaws, policies, procedures, standards, guidelines, regulations and directives as well as to carry out their employment or contractual duties. If you believe there has been a breach of one of the above types of policy documents that does not directly involve a Governance Document, the ECO still may have a role to play in ensuring that proper attention is given to compliance with these other types of policy documents.

Where can I find the Governance Documents?

The Governance Documents are available on:

AHS Website www.albertahealthservices.ca - Select

- About AHS
- Bylaws & Policies

Insite insite.albertahealthservices.ca/default.asp

- Under forms, policies and tools, or on the
- Ethics and Compliance team page <http://insite.albertahealthservices.ca/1188.asp>

Quick links to the Governance Documents

- [Code of Conduct](#)
- [Conflict of Interest Bylaw](#)
- [Safe Disclosure/Whistleblower Policy](#)

Where can I access the necessary ECO forms?

- [Conflict of Interest Declaration Form](#)
- [Information Request](#)
- [Concerns Report](#)

How can I provide feedback on the Governance Documents?

Comments about the Governance Documents are always welcomed and can be provided at any time directly to the:

- ECO at complianceofficer@albertahealthservices.ca
- AHS Policy - policy@albertahealthservices.ca
- Your Human Resources Contact
- Your Manager or
- External Confidential Reporting Disclosure Service at 1-800-661-9675

How can I contact the ECO?

Mail: Ethics & Compliance
2nd Floor Seventh Street Plaza North Tower
10030 – 107 St. NW
Edmonton, AB T5J 3E4

E-mail: complianceofficer@albertahealthservices.ca

Fax: 780-735-1450

External Confidential Reporting Disclosure Service: 1-800-661-9675