

Department/Category: EMPLOYEE RELATIONS	Page 1 of 7	Policy # NMHC HR 04.0022 Version: 4.1
Title: RULES FOR PERSONAL CONDUCT	Revision of: 10/16/19	Effective Date: 01/03/2020
		Next Review: 01/03/2025

SCOPE: Applies to entities indicated below as well as their subsidiaries and affiliates

<input checked="" type="checkbox"/> NM – Northwestern Memorial Hospital	<input checked="" type="checkbox"/> NM – Lake Forest Hospital
<input checked="" type="checkbox"/> NM – Northwestern Medical Group	<input checked="" type="checkbox"/> NM – Central DuPage Hospital
<input checked="" type="checkbox"/> NM – Regional Medical Group	<input checked="" type="checkbox"/> NM – Delnor Hospital
<input checked="" type="checkbox"/> NM – Kishwaukee Hospital	<input checked="" type="checkbox"/> NM – Valley West Hospital
<input checked="" type="checkbox"/> NM – Marianjoy Rehabilitation	<input type="checkbox"/> NM – Home Health & Hospice
<input checked="" type="checkbox"/> NM – Huntley / <input checked="" type="checkbox"/> NM – McHenry / <input checked="" type="checkbox"/> NM – Woodstock Hospitals	
<input type="checkbox"/> NM – Other **See “Scope/Persons/Areas Affected” Section below**	

I. PURPOSE:

- A. It shall be the policy of Northwestern Memorial HealthCare (“NMHC”) to establish the highest standards of personal conduct to serve the best interests of NMHC and its patients, visitors, staff and hospital employees. The rules listed in this policy are designed to provide guidance as to the expectations of NMHC regarding employee conduct.
- B. The rules set forth in this policy are not all-inclusive, but are intended to serve as a guide to the types of conduct which may result in discipline. It is expected that all employees will consistently demonstrate adherence to NMHC’s values and mission. Those who, in the opinion of NMHC management, fail to meet these standards will be subject to disciplinary action up to and including discharge. Individual departments may develop their own performance standards based on departmental or unit operating needs, provided such standards are not inconsistent with corporate-wide standards, and are communicated to all department members.
- C. Whenever this policy refers to Northwestern Memorial HealthCare premises or property, it includes all buildings and adjacent sidewalks, walkways, parking lots and non-work areas owned, leased or controlled by Northwestern Memorial HealthCare, its subsidiaries and affiliates.

II. POLICY STATEMENT:

- A. The following are examples of types of conduct that demonstrate disregard for NMHC’s mission of Patients First and may lead to corrective action. Depending on NMHC’s assessment of the individual circumstances, this corrective action may range from verbal counseling to discharge.
 - 1. Leaving a department or assigned work area during work hours without authorization from the person in charge, except for normal personal time.

2. Absence and/or excessive absence, tardiness and/or excessive tardiness. This includes leaving work early and overstaying authorized lunch and break times. Working unauthorized time, including overtime, is prohibited except in emergency situations.
 3. Failure to carry out assigned duties and responsibilities, including refusal to work overtime, except where prohibited by law, or take call without a reasonable explanation.
 4. Smoking and use of tobacco and smoking products, including but not limited to e-cigarettes, in unauthorized areas. This includes but is not limited to campus buildings, grounds and parking lots. (See also II.B.4 in this policy regarding cannabis.)
 5. Failure to properly display or wear the required identification badge at all times while on Northwestern Memorial HealthCare premises, providing another person with use of one's own identification badge, or using another employee's identification badge.
 6. Failure to comply with policies regarding the use of lockers and locker rooms.
 7. Operating or using equipment, materials, or supplies in an unsafe, careless or wasteful manner, or operating or using equipment not assigned to you.
 8. Soliciting or accepting tips, gifts, or donations from patients, visitors, vendors or physicians in violation of Administrative Policy #01.0007, Integrated Code of Ethics, and Administrative Policy #01.007B, Professional Integrity Handbook. (Also refer to Conflict of Interest Policy, #01.0011).
 9. Failure to observe appropriate standards of dress, uniform policies, and hygiene; including, subject to applicable law, wearing of non-professional badges, pins, buttons or other paraphernalia.
 10. Unauthorized or personal use and/or possession of NMHC supplies or equipment or unauthorized conduct of personal business or enterprise, including promoting or selling any article or products in work or patient care areas during the employee's working time and the working time of the employee to whom articles or products are being promoted or sold.
 11. Substandard or unsatisfactory work performance that fails to meet job or departmental standards. Failure to consistently demonstrate appropriate behaviors aligned with the patient satisfaction and service expectations of the organization. Failure to demonstrate NMHC values and utilize quality-associated tools such as Patient Centered Care Model, use of the AIDET(sm) communication model, or I-CARE model.
 12. Use of personal electronic devices (including but not limited to cell phones, smartphones and personal pagers) or non-business-related electronic media, including internet sites, social media and other apps, during working time and/or in any patient-care area is prohibited except for authorized work-related use. Personal electronic devices, internet sites, social media and other apps may be used while on authorized breaks and not in patient-care areas, so long as such use is consistent with all applicable NM policies including non-harassment and non-discrimination policies.
 13. Failure to follow safety protocols/policies and/or failure to wear or use proper safety equipment, including, without limitation, failure to follow hand-hygiene protocol.
 14. Failure to perform obligations under Northwestern Memorial HealthCare's Integrated Code of Ethics. (See also II.B.30 in this policy.)
- B. The following types of conduct are more serious, demonstrating intentional disregard for NMHC's Patients First mission. They may generally lead to discharge even on the first offense.
1. Sleeping, preparing to sleep or being in a sleep-like position in any work, patient care or public hospital space at any time is prohibited. However, an employee with authorization from a person in charge may rest or sleep while on break in a designated non-patient care, non-public hospital space during non-working periods. An employee who is on-call may

- use, with authorization, an appropriate on-call room. Exceptions may be made by an employee's manager for special health reasons in non-patient care, non-public space.
2. Disobeying instructions, procedures or policies, whether through neglect, procrastination or deliberate disobedience. Deliberately refusing to obey the orders or instructions of a manager, person in charge, or security officer.
 3. Concealing another employee's misconduct or inadequate performance, falsifying evidence or testimony, or failing to cooperate in the investigation of such misconduct or inadequate performance.
 4. Coming to work or being at work under the influence of intoxicants (including alcohol or cannabis) or unprescribed narcotics or drugs, being under the influence of prescribed drugs in dosages higher than those prescribed, using or possessing intoxicants (including alcohol or cannabis) or unprescribed narcotics or drugs while on NMHC property or on work time, or reporting to work in a condition unfit for performing work. Being under the influence of any cannabis products (including marijuana) during work hours or while on call, or use of medical cannabis on NMHC premises or while on call regardless of whether an individual may lawfully possess and use cannabis products is also prohibited.
 5. Refusing to be tested or to undergo testing procedures if a manager or person in charge determines there is reason to believe that an employee is under the influence of intoxicants or unprescribed narcotics or drugs, or using or possessing intoxicants or unprescribed narcotics or drugs while on NMHC property or on work time. Refusing to undergo a safety assessment if a manager or person in charge determines there is reason to believe that an employee is not safe to provide patient care.
 6. Testing positive on any tests administered under NMHC's drug testing policies, subject to the employee being offered a reasonable opportunity to contest the basis of the determination.
 7. Selling or offering for sale, distributing, sharing, trading or otherwise making available to others any narcotics, other unprescribed drugs, cannabis products (including marijuana), or drug paraphernalia on NMHC premises.
 8. Forging, altering, falsifying, omitting material, or information from a document, authorization, record, system, or time card, whether hard copy or electronic, or any written or electronic notation (including signing "in" or "out" for another employee or permitting another employee to use one's own identification card or keycard).
 9. Unauthorized possession or concealing of firearms or other weapons while on NMHC property.
 10. Jeopardizing the health or safety of employees, patients, visitors, physicians or other persons affiliated with Northwestern Memorial HealthCare through conduct such as neglect of duty, failing to properly perform assignments, assault or violation of safety rules.
 11. Failing to report to the employee's immediate manager the conviction for a criminal charge or a plea of guilty or "no lo contendre" to any criminal charge (excluding minor traffic violations unless employee drives hospital vehicles).
 12. Failure by an employee to report to his/her manager or director that the employee's professional license has been placed on probation, come under suspension, has been revoked, or has otherwise been subject to disciplinary action. Failure to timely renew required licenses or certifications.
 13. Fighting, horseplay, any kind of unconsented physical contact (even when no injuries result), gambling (including participation in unauthorized lotteries), disorderly conduct, engaging in any illegal or inappropriate activity on NMHC property or during work time.
 14. Mistreatment or neglect of a patient, including without limitation the use of obscene or abusive language or gestures.

15. Interfering with or delaying the work of other employees.
16. Taking breaks in patient rooms or public areas during working time, and/or watching television in patient rooms at any time.
17. Mishandling, destroying, defacing or abusing property that belongs to Northwestern Memorial HealthCare, employees, patients, visitors, vendors, physicians or other persons affiliated with NMHC. Stealing property and/or the unauthorized personal use or possession of property belonging to NMHC, other employees, patients, visitors, vendors, physicians or other persons affiliated with NMHC.
18. Absence for two consecutively scheduled workdays or any absence without making proper notification to the employee's manager, in accordance with department call-in procedures. Absence for two consecutive scheduled workdays without proper notification may be considered a voluntary resignation.
19. Harassment of any kind, including without limitation sexual harassment of an employee, patient, visitor, vendor, physician, intern, nonemployee directly performing services for NMHC (such as a contractor or consultant), or other person affiliated with Northwestern Memorial HealthCare. Engaging in discrimination with respect to any individual on the basis of the individual's race, color, national origin, sex, age, religion, disability, sexual orientation or any other status protected by law.
20. Misappropriation of NMHC assets, funds, property, or time compensated by Northwestern Memorial HealthCare. Misusing NMHC funds, accepting NMHC funds under false pretenses, including but not limited to, PTO, sick or vacation pay, disability and workers' compensation payments. Failure to notify NMHC of overpayments or mispayments and/or failure to make prompt repayment of such overpayments or mispayments.
21. Working at other employment that may create any situation, action or omission which reasonably may be expected to affect independent judgment with respect to the conduct of Northwestern Memorial HealthCare business, or any other violation of General Administration Policy #01.0011, Conflict of Interest. If in doubt whether a conflict exists, it should be reported to management.
22. Misusing confidential information, including protected health information ("PHI") about employees, patients, their families, physicians, or other individuals associated with Northwestern Memorial HealthCare, or proprietary information (i.e., not in the public domain) relating to the medical and business affairs of NMHC, and/or failure to maintain strict confidentiality regarding such information. Misuse includes, without limitation, accessing confidential information for other than legitimate business reasons, disclosing confidential information to unauthorized individuals, attaching PHI to Disciplinary or Corrective Action Reports, grievance and appeal forms, or other employment-related documents. Please refer to privacy and confidentiality policies for definition of protected health information.
23. Making false or misleading statements, either oral or written, which reasonably may have an adverse impact on the reputation or operation of Northwestern Memorial HealthCare or any of its subsidiaries or affiliates.
24. Making audio/video/photographic recordings of work activities with personal electronic communication devices, including but not limited to recording intellectual property, recording conversations between co-workers, conversations with patients, and/or meeting proceedings without the knowledge of the other party(ies) and without permission from management, or recording the images of patients or visitors without the patient's or visitor's written consent.
25. Discourteous, insulting, threatening, intimidating or coercive behavior toward other employees, patients, visitors, vendors, physicians or other persons affiliated with Northwestern Memorial HealthCare. Using obscene or abusive language or gestures.

Non-constructive criticism addressed to its recipient in such a way as to intimidate, belittle, or impute stupidity or incompetence.

26. Violating safety rules including, but not limited to, failure to comply with the Fire and Service Disruption Plan, failure to promptly report an accident, job-related injury, communicable disease or other illness, or creating a safety hazard or contributing to unsanitary conditions.
27. Removal of any Northwestern Memorial HealthCare property without authorization (including without limitation, equipment, supplies, records, damaged goods, scrap material and packages) from NMHC premises or concealing such material on NMHC premises. Failure to submit to and/or cooperate with a security officer or member of Northwestern Memorial HealthCare management in an inspection of materials, equipment, (including such things as lockers, desks and file cabinets), packages, vehicles, or personal affects brought onto, stored on, or removed from NMHC premises.
28. Posting or distribution of inflammatory or offensive material on Northwestern Memorial HealthCare premises or electronic sites.
29. Exclusion from or sanction by any federal or state health care reimbursement program. Failure to report to the employee's immediate manager any sanction or exclusion from any federal health care reimbursement program, including but not limited to Medicare, Medicaid, Tricare, and the Veteran's Administration; or any investigation by any governmental agency in connection with a federal health care reimbursement program.
30. Sufficiently serious or willful disregard for Northwestern Memorial's Integrated Code of Ethics. (See II.A.14 above)
31. Retaliation against an employee for reporting harassment, discrimination, wrongdoing, or violations of any law, regulation or policy, or exercising rights granted under any local, state, or federal law.

III. SCOPE/PERSONS/AREAS AFFECTED:

This policy applies to all regular and temporary, full-time, part-time and casual employees of Northwestern Memorial HealthCare exclusive of any subsidiaries, affiliates, or operating units that have enacted separate policies as approved by NMHC for the subjects covered herein.

IV. DEFINITIONS:

N/A

V. MODIFICATIONS:

This Policy creates no rights, contractual or otherwise. Statements of policy contained herein are not made for the purpose of inducing any person to become or remain an employee of NMHC, and should not be considered "promises" or as granting "property" rights. NMHC may add to, subtract from and/or modify this Policy at any time without notice. Nothing contained in this Policy impairs the right of an employee or NMHC to terminate the employment relationship at will.

VI. RESPONSIBILITIES:

It is the responsibility of all NM employees to understand and comply with the provisions of this policy, and to consult their management or HR if they have questions.

VII. POLICY UPDATE SCHEDULE:

This policy is reviewed or updated every five (5) years or more often as appropriate.

VIII. RELEVANT REFERENCES:

- A. [Northwestern Memorial's Integrated Code of Ethics](#)
- B. [General Administration Policy #01.0015, Privacy and Confidentiality](#)
- C. [General Administration Policy #01.0011, Conflict of Interest](#)
- D. [Human Resources Policy #4.0029, Harassment](#)

IX. APPENDICES:

None

X. MODIFICATIONS:

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XI. SPECIAL:

Questions concerning this policy may be referred to your manager or your Human Resources Business Partner.

XII. APPROVAL:

Responsible Party: Kristine E. Jagnow
Director HR Compliance and Policies

Reviewer: Manager, HR Policy and Compliance

Committee: None

Approval Party: Carol Lind
Senior Vice President, Administration
Electronic Approval: 01/02/2020

XIII. REVIEW HISTORY:

Revised: 09/01/2013
09/01/2015
12/18/2016
10/14/2019
01/01/2020