



# CODE OF ETHICAL CONDUCT

Version 1.2 June 2021



**Our Mission:** To create credible and result oriented alternative for care of infertility related challenges using assisted reproductive technology, by bringing together various cadres of staff who will be happy to deliver on the promises to clients



**Our Vision:** To make use of quality, affordable items at the best possible cost, whilst achieving comparable results as anywhere in the world



## Core Values:

- ▶ Care
- ▶ Innovation
- ▶ Confidence

We provide fertility care with innovation that give our customers the confidence of outcomes comparable anywhere in the world



## 1. Introduction

Primecare Fertility Clinic encourages its employees to uphold the highest ethical standards of conduct while representing the Clinic to customers, visitors, government authorities, third party assessors, and suppliers.

This Code of Ethical Conduct along with the Code of Professional Conduct (e.g. Medical ethics for physicians, nurses, laboratory scientists, etc.) is a guide for all the employees of Primecare Fertility Clinic. It is about the expectations of standard of behaviour required by the Clinic's employees, and articulating the responsibility we all share to provide quality healthcare to our customers and to conduct all customer care and business activities ethically, with integrity, and consistent with applicable laws. The Code of Ethical Conduct will help to distinguish Primecare Fertility Clinic from the competition by ensuring that our actions reflect our Vision, Mission, and Core Values.

This Code of Ethical Conduct is a work in progress that will be modified as needed to meet the Clinic's requirements and expectations..

## 2. Responsibilities under the Code

### 2.1 To whom is the ethical code applied

This Code applies to all Employees; Directors, Managers, Volunteers, Contractors, Vendors, Interns, Students and Consultants of Primecare Fertility Clinic.

### 2.2 Who should implement the code

The Top Management, Heads of Departments and Supervisors are responsible for their staff and should remind and ensure that their staff abide by and adhere to this code of ethical conduct as part of good clinical and administrative practice.



## 2.3 Employee's responsibilities with regard to the Code

- A. When you have questions about how this Code apply to your work, make sure you ask your supervisor or other relevant personnel for help and explanation.
- B. Employees must be aware at all times that continuous violations of the General Code of Conduct will jeopardize their job.
- C. Any conduct that you believe may be in violation of the Code should be reported to top management or supervisor else you may be charged for abetting.
- D. Customers, family members, visitors, or co-workers may have questions, complaints, or concerns, which you should listen to and address.
- E. When an investigation is underway, employees are required to cooperate fully.

## 2.4 Breaches of Code / Monitoring and Compliance

The Clinical Director, Matron and Human Resource Department will monitor those instances of breaches of the Code of Ethical Conduct which have been brought to their attention and the final decision rests with the Clinical Director.

## 3. Quality of Service and Care

Primecare Fertility Clinic employees must ensure that the Clinic's services are of the greatest quality, delivered with compassion and dependability to the Clinic's customers.

- A. Employees must respect the dignity and privacy of each of our customer and treat them with courtesy, and respect at all times.
- B. Employees should treat all customers with respect, regardless of race, religion, age, gender, country origin, disability, or political standing.
- C. Employees should continuously strive to deliver customer service that meets clinical and safety requirements.
- D. To comply with the Clinic's healthcare information policies, accreditation criteria, quality management systems requirements and applicable laws and regulations, employees should keep accurate and detailed records of consumer information.
- E. Employees should support and promote a continuous quality and performance improvement program throughout the Clinic



## 4. Confidentiality and Privacy

Primecare Fertility Clinic is dedicated to safeguarding the confidentiality and privacy of client and employee information. This is in accordance with legal and ethical standards. Breaches of confidentiality will not be tolerated.

- A. Employees must follow all confidentiality and privacy rules, procedures, and legislation, including the National Health Act of 2014.
- B. Customers, visitors, co-workers, bystanders and medical professionals must all have their privacy respected at all times.
- C. Customers' health and personal information, as well as employees' personal information, must be protected and safeguarded at all times, whether in paper, electronic, verbal, telephonic, or any other form.
- D. Employees should only have access to a customer's medical data if they are directly involved in the customer's care or if access is required for a genuine work-related cause such as medical treatment, billing, administrative, teaching, or research.
- E. Employees should not discuss client information in open areas such as elevators, corridors, or the cafeteria, reception or lounge.
- F. Customers' information should not be discussed in front of or with other customers or with other colleagues.
- G. Employees should only utilize client information for the purpose for which it was collected.

## 5. Workplace and Behaviour

Primecare Fertility Clinic recognizes that its greatest strength lies in the competencies of the staff who creates the organization's success and determines its reputation. Therefore, all employees of Primecare Fertility Clinic should treat everyone with respect, dignity and courtesy.



## 5.1 General behaviour

- A. In carrying out their responsibilities, all employees should act with honesty, integrity, and fairness.
- B. Employees should accurately report their time, attendance and operate efficiently while on duty.
- C. All employees should promote teamwork and develop structures, processes, and programs that allow a positive culture to thrive.
- D. Disruptive behaviour that intimidates others and has a negative impact on employee morale or turnover will not be tolerated and will be dealt with appropriately.
- E. All employees shall avoid retaliating or the act of seeking revenge against another employee, who in good faith, reports a violation of the law, rule, standard, policy, or this Code of Ethical Conduct.
- F. All employees should make every effort to prevent and detect any fraudulent, wasteful, or abusive behaviour that may have an impact on the Clinic's customers, employees, or resources, and should report any such activity.
- G. Employees are not allowed to drink or use drugs in the workplace, and they should seek for permission not to report to work if they are under the influence of alcohol or drug.
- H. Employees are expected to follow the norms of their professions and use sound judgment when carrying out their responsibilities.
- I. All prospective employees may be required to present a security report that they have not been sanctioned by any law enforcement or regulatory agency and are qualified to carry out their entitled responsibilities.

## 5.2 Dress code

- A. Dressing in a formal and decent attire is required by all employee
- B. For medical professionals please refer to your code of conduct with regards to this
- C. Jeans, branded t-shirts, excessive make-up, sinkers are not allowed
- D. National or traditional attires are to be worn on Fridays only



### **5.3 Restricted substances and social media**

- A. All employees should ensure to procure, maintain, dispense and transport drugs and controlled substances used in the treatment of customers according to applicable laws and regulations
- B. Any statement to a government body or third party by an employee regarding work related matter should only be made with prior approval from top management.
- C. Employees must refrain from using social media during working hours, which will hinder the quality of service.
- D. Employees who use social media after office hours should refrain from making statements with regard to the Clinic and its services unless authorized to do so and should not disclose any confidential information of the Clinic, Employees and Customers.

## **6. Conflicts of Interest**

Primecare Fertility Clinic abhors any form of conflict of interest in the provision of services to customers. Employees should avoid conflicts or the appearance of conflicts between employees' own interests or an outside interest and the interests of the Clinic.

### **6.1 Dedication and focus to work**

- A. During working hours, all employees should commit their complete attention and abilities to the Clinic.
- B. Employees must not engage in any activity, practice, or behaviour that is in direct or indirect contradiction with the Clinic's interests.
- C. Employees should notify their immediate supervisor or manager of any actual or suspected conflicts of interest.
- D. Personal or official fund-raising efforts should only be carried out with the Clinical Director's permission, and they should never be carried out on the premises or during working hours. The use of the Clinic's facilities and resources is also prohibited.
- E. Employees should act in the best interest of the Clinic, as an agent of the Clinic, and in dealings with suppliers, customers or government, non-government agencies etc. This obligation includes those acts formalized in written contracts, as well as everyday business relationships.



## 6.2 Prohibitions

- A. All Employees are strictly prohibited from giving or receiving gifts (in cash, material, food or kind), tips, payments, kickback or bribe for whatever reason or to induce the referral or the purchase of any healthcare service, equipment, medicine and consumables.
- B. No employee shall accept any improper inducements or favours and kickbacks from vendors to influence our customers or others connected with the Clinic to use a particular product or service.
- C. All employees must inform vendors of the Clinic's ethical code of conduct and compliance with law, as well as our expectation that vendors act in accordance with such law and codes.

## 7. Safeguarding Clinics Resources and Assets

Employees should ensure safeguard of the Clinic's assets and physical property and ensure the appropriate use of the Clinics resources.

- A. Employees should protect the assets of the Clinic and the assets of others entrusted to the Clinic against loss, theft or misuse. This includes physical and intellectual property.
- B. All employees should maintain internal controls within their areas of responsibility to safeguard the Clinic's assets and verify the accuracy of health information, financial statements and all other relevant records and reports.
- C. All Employees must use Clinic property appropriately and take measures to prevent any unexpected loss of equipment, supplies, materials or services.
- D. Employees should adhere to established requirements, policies and procedures governing record management and comply with the record retention and destruction policies/schedules for their departments.



## 8. Environment, Health and Safety

Primecare Fertility Clinic is committed to maintaining a safe and secure environment for the health and safety of its customers, visitors and employees.

- A. Employees must comply with and abide by all applicable environmental, health, and safety laws and regulations established by Top Management, Government or regulating agencies.
- B. Employees will take all reasonable precautions such as using safety equipment and gears and follow all rules and regulations to maintain a safe environment for the Clinics customers, their families, employees, and visitors.
- C. Employees should exercise good judgment with regard to the environmental aspects of the use of Clinic buildings, property, laboratory processes and medical products.
- D. The Clinic is a smoke-free environment and all employees should comply with established policies in this matter.
- E. Employees should immediately advise their supervisor if, as a result of work, they are injured or contract an occupational illness.
- F. Employees should alert the appropriate departments and personnel if unsafe conditions or practices are observed in the work environment.
- G. Employees shall adhere to all regulations and procedures for disposing of medical waste and hazardous material.
- H. Employees should safely store, secure, and count all drugs and pharmaceuticals. Missing or diverted drugs will be promptly reported to the appropriate supervisor.



## 9. Employee Issues and Concerns

If there is a question, query or concern about a situation that an employee feels may be illegal or unethical, please seek guidance from the immediate supervisor. If employees feel uncomfortable addressing the issue with the immediate supervisor or the supervisor has failed to address the issue in a timely manner then please inform the Clinical Director or the Human Resource Office. Top Management is committed in responding to issues or concerns identified by employees.

### General Advise

- A. All employees should be able to justify and be accountable for actions taken and omissions
- B. All employees should establish and maintain clear and appropriate professional boundaries in their relationship with customers and colleagues at all times
- C. All employees should respect the individuality and diversity of the customer, service providers and colleagues



**Exercise 1:** Highlight any conflict between this Clinic's Code of Conduct and your professional code of conduct?

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**Exercise 2:** Highlight the benefits of adhering to this Clinic's Code of Conduct

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**Exercise 3:** Do you think there are persons that are affecting your ability to keep to this code of ethical conduct?

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**Exercise 4:** Areas you need more explanations on this document?

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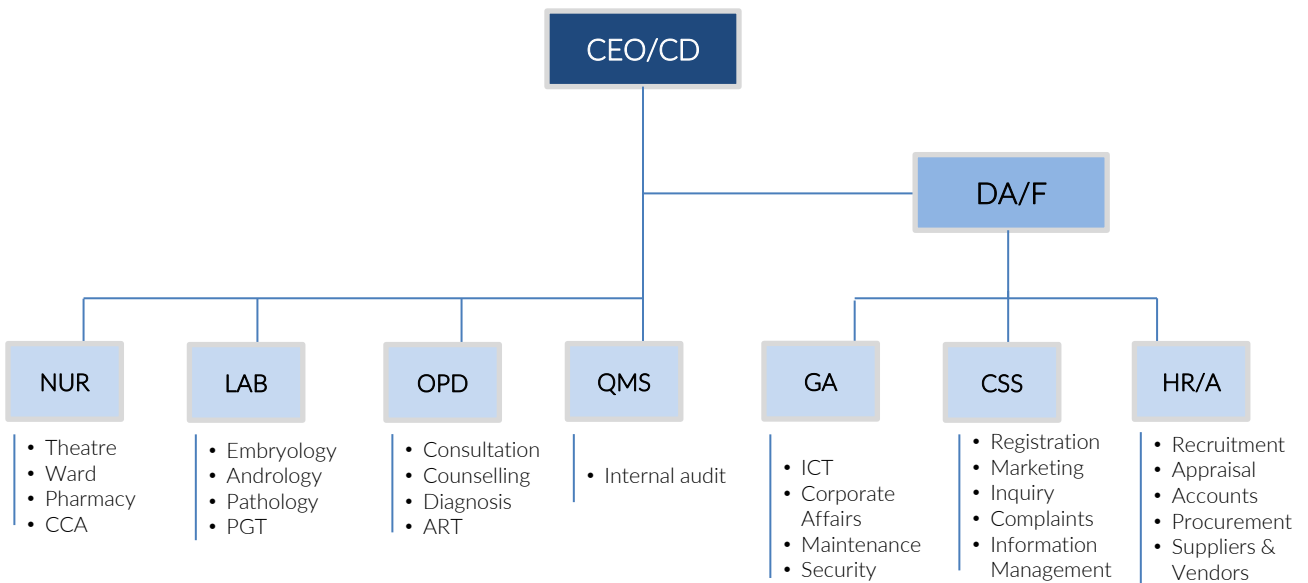
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# ORGANOGRAM



## Legend

CE/CD = Chief Executive/Clinical Director

DA/F = Director of Administration and Finance; NUR = Nursing; LAB = Laboratory

OPD = Out Patient Department; QMS = Quality Management System; GA= General Administration

CSS = Customer Service & Information Management; HR/A = Human Resource & Accounts

ART = Assisted Reproductive Technology

CCA = Client Care Assistant

PGT = Pre-implantation Genetic Testing



FOR MORE INFORMATION  
GET IN TOUCH

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