



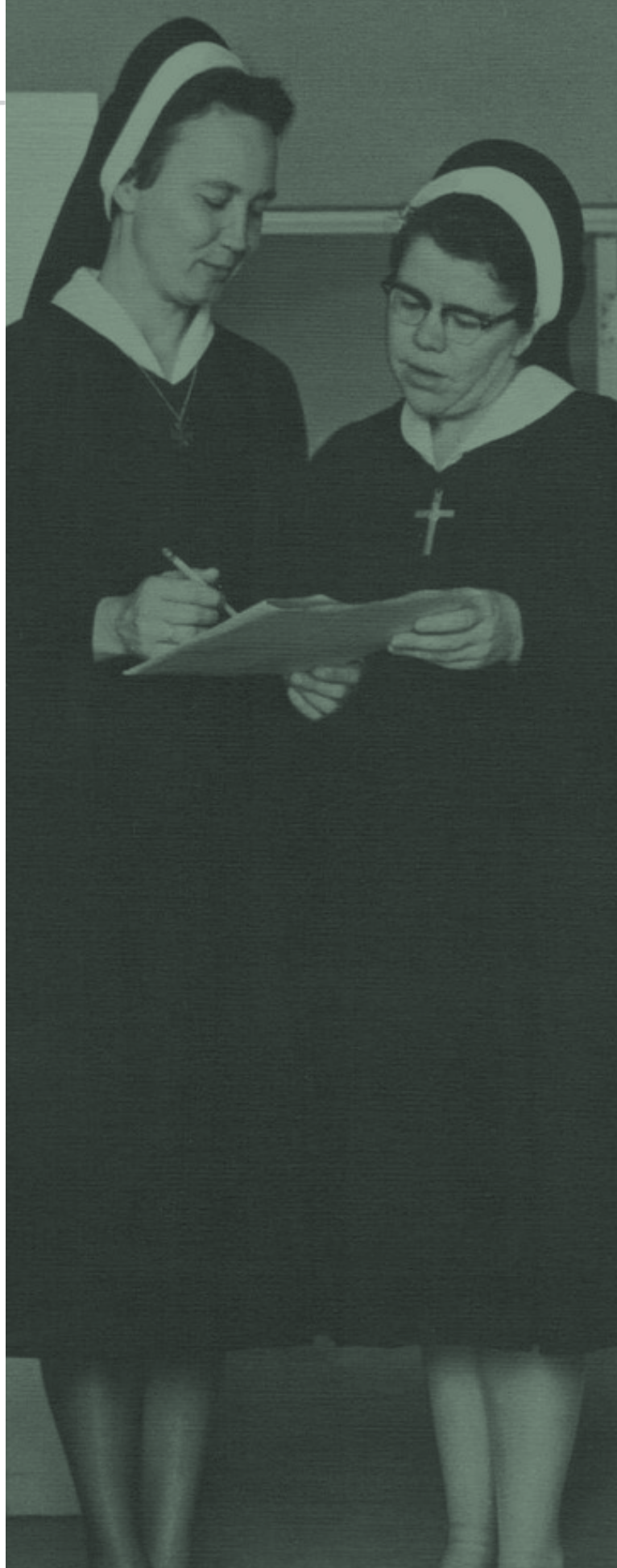
**Providence High School**  
**YOU BELONG HERE.**



**Doing the Right Thing Right**  
Providence High School Code of Conduct

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## PROVIDENCE HIGH SCHOOL REPORTING OPTIONS:

- 1** Immediate Supervisor **2** Director of Human Resources **3** Head of School or Principal **4** Compliance Rep  
**5** Integrity Hotline at (888) 294-8455.





## HEAD OF SCHOOL'S MESSAGE

We are pleased that you are working at Providence High School. We take great pride in our School community, and we value our employees and their efforts. A substantial portion of our lives is spent at our place of employment. It is one of the School's primary goals to make that time as pleasant and personally satisfying as the circumstances will permit. This includes providing a comfortable and cheerful working environment and competitive wages and benefits.

Since Providence High School is an educational service organization, we know that its success is heavily dependent upon the skills, abilities and attitudes of its employees, as well as their sense of loyalty and responsibility. We set a particularly high value on these latter two qualities, and we ask that you keep them uppermost in mind in the performance of your work assignments and in everything you do or say that involves your work and the School.

This Code of Conduct is designed to inform you about Providence High School's personnel policies and practices and the many benefits the School offers. The policies set forth in this Code of Conduct have been developed over a period of time, and we will notify you of any changes by incorporating them in revisions to this Code of Conduct at the time they are made.

All employees are expected to read the Code of Conduct and familiarize themselves with its contents. We hope we have succeeded in making our personnel policies clear to you, but please feel free to discuss them with your supervisor if you find any clarification is needed.

We hope you will find your work assignments interesting and challenging, and your association with Providence High School gratifying in every respect!

Yours in Providence,

Mr. Joe Sciuto  
Head of School

## PROVIDENCE MISSION, VISION AND PROMISE

**Mission:** As expressions of God's healing love, witnessed through the ministry of Jesus, we are steadfast in serving all, especially those who are poor and vulnerable.

**Vision:** Health for a Better World.

**Promise:** Know me, care for me, ease my way.

## PROVIDENCE VALUES

### Compassion

*Jesus taught and healed with compassion for all.*

**-Matthew 4:24**

We reach out to those in need and offer comfort as Jesus did. We nurture the spiritual, emotional and physical well-being of one another and those we serve. Through our healing presence, we accompany those who suffer.

### Dignity

*All people have been created in the image of God. -Genesis 1:27*

We value, encourage and celebrate the gifts in one another. We respect the inherent dignity and worth of every individual. We recognize each interaction as a sacred encounter.

### Justice

*Act with justice, love with kindness and walk humbly with your God. -Micah 6:8*

We foster a culture that promotes unity and reconciliation. We strive to care wisely for our people, our resources and our earth. We stand in solidarity with the most vulnerable, working to remove the causes of oppression and promoting justice for all.

### Excellence

*Whatever you do, work at it with all your heart. -Colossians 3:23*

We set the highest standards for ourselves and our ministries. Through transformation and innovation, we strive to improve the health and quality of life in our communities. We commit to compassionate, safe and reliable practices for the care of all.

### Integrity

*Let us love not merely with words or speech but with actions in truth. -1 John 3:18*

We hold ourselves accountable to do the right things for the right reasons. We speak the truth with courage and respect. We pursue authenticity with humility and simplicity.

## PROVIDENCE HIGH SCHOOL VISION AND STATEMENT OF PHILOSOPHY

Guided by our Catholic tradition, we develop each student's academic potential, moral values, love of learning and commitment to faith and service.

### Statement of Philosophy

Providence High School is a Catholic, college-preparatory, coeducational institution serving students of varied academic capabilities and from diverse religious, cultural and socio-economic backgrounds. As a ministry of Providence Health & Services, Providence High School continues the educational heritage and vision of our founders, the Sisters of Providence. The School carries on the educational mission of the Church within the Catholic Archdiocese of Los Angeles. We participate in the total mission of the Church by proclaiming the Gospel of Jesus, by creating an environment of Christian community and by encouraging service to others.

Christ is the model of the total person we are seeking to develop. We are committed to providing an education that values each student as a unique individual with distinct abilities, insights and needs. Guided by these principles, we lead our students toward a responsible and God-centered life, preparing them for higher education and lifelong learning.

Providence High School offers a comprehensive college preparatory curriculum that includes Honors and Advanced Placement courses. Providence also offers three selective Focus Programs in the fields of health care, media and technology. In addition, we have outstanding Athletics, Christian Service and Visual and Performing Arts Programs.

We encourage our students to make positive choices, to demonstrate personal responsibility and to be involved in promoting human dignity. We share this responsibility with the Church, the community and the families of our students, who are their primary educators.

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# WHY WE HAVE A CODE OF CONDUCT

At Providence High School we are committed to “doing the right thing right” and conducting ourselves with the utmost integrity. The success of the School and the continuing heritage of the Sisters depend on us building honest and trusting relationships with our fellow employees, students, parents, School-related business partners, regulators and the communities we serve. To achieve our Mission, we commit to conducting all business activities in an honest, fair and ethical manner.

In today's operating environment, the rules that govern business practices are more demanding than ever before, and require us to keep integrity at the core of all we do in advancing our Mission. It requires a commitment from each of us to conduct our business honestly and ethically, regardless of the situation.

The Mission and our values provide guidance and inspiration as we make sound, ethical choices to deliver quality education and services while meeting our organizational goals. The School commitment to integrity is a vital part of who we are as a Catholic education ministry.

The Code of Conduct provides us with a set of standards that guides our decision-making and our commitment to “doing the right thing right.” This means conducting our business within appropriate ethical, legal and regulatory standards and complying with the School's policies and standards.

In addition to the Code of Conduct, there are institutional policies, procedures and standards that may apply to your work. Copies of these may be obtained through your supervisor, manager or the School portal site. This Code of Conduct and certain compliance policies are also available on the School portal site.

# HOW SHOULD I USE THE CODE OF CONDUCT?

The Providence High School Code of Conduct asks you to reflect on our Mission and values as you apply ethical and legal standards to your work. The Code of Conduct helps you answer these questions:

- Are my actions and decisions consistent with the School's Mission?
- Am I supporting the spirit, as well as the letter, of laws, regulations, policies or standards?
- Can I explain my actions or decisions without embarrassment to family, friends, coworkers or students?
- Would my behavior harm the School's reputation in the community?
- Whom should I contact if I believe a violation has occurred?
- What do I do if retaliation occurs when I raise a concern?
- Whom should I contact with questions?
- How do I contact my local compliance and privacy representative?





# INTEGRITY AND COMPLIANCE

We communicate openly and we act with integrity.



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## Our Commitment

The School is committed to acting with integrity in all we do. We require compliance with California and federal laws and regulations, this Code of Conduct and School policies and standards. Our Compliance Program applies to employees, students, Board of Regents members, parents, members of our system, community volunteers, trainees, independent contractors and others who may be on campus or participating in any events sanctioned/funded by our School.

The Audit and Compliance Committee of the Providence St. Joseph Health (Providence) System Board provides oversight and direction for the Compliance Program. Providence St. Joseph Health's Senior Vice President/Chief Risk Officer serves as the School's Chief Compliance Officer.

The School Compliance Office and Providence Risk and Integrity Services Compliance are responsible for the day-to-day direction and implementation of the Compliance Program. This includes developing resources (policies, procedures, education programs and communication tools) and providing support (managing the Providence Integrity Hotline and other reporting mechanisms, conducting program assessments and providing advice) to ministry compliance representatives and others.

Our human resources staff members are also highly knowledgeable about many of the employment and workplace compliance-risk areas described in this Code of Conduct. You are *encouraged* to report any concerns about your work situation to human resources. Compliance professionals work closely with human resources to investigate and resolve matters relating to employment and workplace situations.

## Reporting a Concern

Providence expects that integrity, compliance or legal concerns will be reported promptly. Each School employee has a responsibility to report any activity that appears to violate laws, rules, regulations, standards or this Code of Conduct.

If you have a concern you believe poses a **serious or immediate** compliance risk that can significantly affect licensure, reimbursement, accreditation or may lead to a major legal claim, report these concerns either directly to the system compliance office or to your regional Compliance Office. Numbers are listed on the back cover. Safety of our students and employees is of paramount importance to the School and any safety concerns you have should be reported using any of the following options.

All other integrity, compliance and legal concerns can be reported using any of the options below (preferably in this order):

1. Discuss the matter or concern with your immediate supervisor.
2. Discuss the matter or concern with your HR Director.
3. Contact the compliance or privacy representative directly.
4. Call the 24/7 Integrity Hotline at 888-294-8455 or use Integrity Online, our web-based reporting option. You may report concerns anonymously.

The Providence St. Joseph Health Integrity Hotline and Integrity Online are answered by a third-party company, which sends all reports to the Compliance Office for investigation. Reporters receive a tracking number in order to retrieve information about the status of their reports.

If you report a concern anonymously, it is important to clearly describe the situation, provide a ministry location and give enough detail so that your concern can be properly investigated and resolved. We may not be able to investigate your concern if you do not provide enough factual information.

## Confidentiality of Reports

We make every attempt to protect the confidentiality of information provided in connection with a reported concern, to the extent allowed by law, unless maintaining confidentiality could create a significant health or safety risk or could significantly impair the ability to conduct a complete investigation.

## Confidentiality, Work Product and Media

Employees may not disclose confidential information gleaned from business transactions and must protect confidential relationships between the School and its employees, faculty, students and suppliers. The School's employee, faculty, suppliers and student information that has not been made public is confidential. Employees may not release confidential information to anyone unless required for a business purpose of the School or by a legal process such as a subpoena or court order. Employees may not use confidential information for private interest or personal gain. No employee may remove School information, confidential or not, from the School's property without permission from the employee's supervisor, outside the ordinary course of performing duties on behalf of the School. These materials include, without limitation, documents, notes, files, records, computer files or similar materials. The School prohibits employees from attempting to obtain and from possessing confidential information for which they have not received explicit permission, access or authorization. An employee who is unsure about the confidential nature of specific information or the employee's authority to access or use confidential information, must ask his or her supervisor for clarification.

The School retains legal ownership of the work product of its employees. Work product includes, but is not limited to, written and electronic documents, audio and video recordings, system code and all intellectual property developed for the School, regardless of whether the work product is used by the School.

No employee may act or speak for the School in response to media inquiries or in press releases, publications, speeches or other public declarations without specific authorization from the School.

Any time an employee identifies himself or herself as an employee of the School while not communicating on the School's behalf, the employee must:

- Make it clear the communication is the employee's alone, is not made by the School and does not necessarily reflect the views of the School;
- Not disclose any information that is confidential or proprietary to the School or to any third party that has disclosed information to the School;
- Not make defamatory statements about the School's employees, customers, partners, affiliates, suppliers, employees and others, including competitors; and
- Not do so in any way that interferes with the employee's work or customer commitments, while on work time or on the School's equipment.

## Retaliation Will Not Be Tolerated

Providence prohibits any retaliation against a School employee or workforce member for reporting a concern in good faith or assisting in the investigation of a concern. Anyone who engages in retaliation or harassment – directed at a person who raises a concern, is believed to have raised a concern or assists in an investigation – is subject to disciplinary action in accordance with the School's policy (expulsion for students or termination for employees).

If you believe that retaliation or harassment is occurring, report it to human resources, our compliance representative or to the Providence Integrity Hotline at 888-294-8455.

## Corrective Action

Where an internal investigation substantiates a reported violation, the School will initiate corrective action. Action may include notifying the appropriate government agencies, taking disciplinary action and/or implementing other corrective actions to prevent a similar violation from occurring in the future.

Violation of the law, any School policy or procedure or School values, is grounds for disciplinary action, which can include termination of employment.

Contact your supervisor or human resources if you have any questions concerning any School policy, practice or condition of employment.

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## Employee Responsibilities

- Follow the Code of Conduct.
- Perform your job duties in accordance with all federal and state laws or regulations that apply.
- Participate in Compliance Program training and job-specific compliance education or departmental training as necessary for your job duties.
- Report all concerns or alleged violations promptly.
- Keep information obtained confidential.
- Whenever you are in doubt about something, ask questions.

## Leadership Responsibilities

- Support the School's commitment by upholding our Mission, values, vision and promise.
- Model ethical behavior and foster a culture of transparency by listening and being receptive to employees' and others' concerns about compliance-related matters.
- Ensure that written compliance policies and procedures specific to your department are developed and followed.
- Provide employees with initial and continuing compliance education and document that education.
- Monitor and ensure compliance with the Code of Conduct, School policies and standards and federal and state laws and regulations.
- Take appropriate corrective or disciplinary action to resolve matters when necessary.
- Prevent retaliation against any employee who reports, supplies information about or assists in an investigation into an integrity or compliance concern.



# FACULTY AND STAFF STANDARDS

We nurture the spiritual, physical and emotional well-being of one another and those we serve.



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## Faculty Conduct

As members of the faculty of the School and part of the Catholic academic community created by the Sisters of Providence, we aspire to the highest standards of ethical behavior. We affirm the spirit of this Code is grounded in the Catholic ethic of love for all persons and in individual responsibility to God and people. The purpose of the Code is to encourage responsible actions, sensitivity and mutual support among all members of the academic community.

Each of us strives to respect the dignity of others, to acknowledge the right of others to express differing opinions and to foster and defend intellectual honesty. Students are entitled to an atmosphere conducive to learning, to fair and just treatment in all situations and an attitude of support for each member of the academic community. Faculty members strive to be objective in professional judgment of colleagues and assist all members to reach their full potential as educators and members of the School community.

## General Conduct

Employees must possess a personal philosophy compatible with, and desirous of contributing to, the Catholic School environment. Employees must behave in a manner that promotes good public relations for the School. In all interactions with students, employees are mentors and representatives of the School and must conduct themselves appropriately. Employees must exhibit courteous, considerate and professional behavior and language toward students, faculty, visitors, the public and other employees. Employees must behave with care and attention to the students' needs and the School's quality standards and requirements. Employees must work in an efficient, economical, confidential and safe manner. Unsatisfactory work performance will result in disciplinary action and possible termination. Employees at all times must maintain professional standards of conduct appropriate to the School's business.

Failure to comply with the School conduct guidelines or any other guidelines, rules, regulations, policies, procedures or practices of the School, whether in this Code of Conduct or not, may result, at the School's discretion, in disciplinary action being taken, including termination of employment.

## Disruptive Behaviors

Our value of compassion leads us to nurture the spiritual, physical and emotional well-being of those we serve. We apply this value to our work with each other and to the care and service we provide. In keeping with this value, employees are expected to treat others with respect and courtesy and to conduct themselves in a professional manner. Expected behaviors that contribute to a positive work environment include:

- Speaking in a respectful manner to students, families, facility personnel and others in private and public places;
- Responding to requests for information in a timely and supportive manner, whether related to education delivery, collegial and professional interactions or to students and families;
- Handling conflicts, disagreements and other differences of opinion in appropriate settings and through appropriate administrative channels;
- Offering constructive feedback to improve student learning and operations; and
- Practicing in a manner consistent with federal and state laws and regulations.

Disruptive behavior is a style of interaction between employees, family members or others that interferes with campus life. Examples of disruptive behaviors may include, but are not limited to:

- Threatening or abusive comments;
- Profanity or similarly offensive language;
- Demeaning behavior such as name-calling;
- Criticizing other employees in front of students or other staff;
- Racial or ethnic jokes or comments;
- Inappropriate physical contact, sexual or otherwise;
- Sexual comments or innuendo;
- Refusal to cooperate with other employees or Administration staff; and
- Refusal to abide by organizational policies, rules and regulations or to perform student academic responsibilities.



## Fraternization with Students

Employees may not offer or request sexual favors or intimacy to or from, make sexual advances to, or engage in, sexual conduct or intimacy, consensual or otherwise, with any School students or alumni whom they knew personally as a School student. Fraternalizing/socializing between faculty and students is not permitted as it may compromise the School as well as the student/teacher relationship. School personnel are expected to maintain their professionalism and act responsibly.

## Psychological Harm

Employees must not behave in ways a reasonable person would consider to be offensive, intimidating, humiliating or threatening. Such conduct might include, yet is not restricted to: targeting students with unfair and continued criticism; making excessive or unreasonable demands of others; and making any form, either oral or written (including electronic communication), of derogatory comments to students, parents, work colleagues or the general public. Should such unacceptable behavior occur, then all recipients of such behavior have recourse to the processes contained within the School's Grievance Policy.

## Student Safety

Safety comes first at Providence High School. Every employee contributes to our Emergency Operations Plan by supporting each other at all times, valuing teamwork and placing student safety above all else. Our intent is to always provide a safe, quiet, comfortable and clean learning environment for every student we serve.

We put student safety first by putting our first and best efforts into safety precautions. When safety is involved, we pay more attention and we are more compliant. We make reliability a reality by working together as collegial teams. We are all equals in student safety. We keep our students safe by communicating the right information, the right way, at the right time. We keep our students safe by thinking together in teams. We improve student safety every day by reporting events and problems and learning from others' experiences.

## Student Rights

All employees are guided by the appropriate rules of discretion, and are not to discuss publicly, nor pass on, personal details about students, parents or fellow employees, unless the person concerned expressly gives permission. This is especially true about "loose" conversations that take place in the faculty lounge, multi-purpose room, workrooms, hallways or anywhere else on campus. In all instances, members of the Administration are to be informed of details that pertain to the well-being of the students, families and employees of Providence High School.

## Student Information and Privacy

The School treats the personally identifiable information (PII) of our students with special care. There are numerous federal and state laws that protect the privacy and security of a student's PII, including the Family Educational Rights and Privacy Act (FERPA).

We collect information to provide high-quality education and services and will protect access to this information whether it is contained in a computer system, student record or other documents. Consistent with FERPA and applicable state laws, we do not access, use, disclose or discuss student-specific information with others unless it is necessary to serve the student or complete our job duties, is required by law or the student/authorized representative has authorized the release.

Report suspected theft, loss or inappropriate uses or disclosures of student information promptly to your direct supervisor and compliance/privacy office or the Providence Integrity Hotline at 888-294-8455.

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## Best Practices for Safeguarding Student Information

- Do not leave student information visible on computer screens. Lock your screen or log off your workstation when away.
- Do not leave records or other confidential information open and visible on desks or counters.
- Shred printed documents containing student data when you are done with them or place in designated secure shred bins.
- Use only the minimum necessary information for academic and operations purposes.
- Avoid student-related discussions in public areas and on social networking sites.
- Avoid informal or casual discussions of student situations not directly related to care.
- Do not leave voice or phone messages containing sensitive information.
- Avoid inadvertent disclosures by taking special care in situations that are not private.
- Follow secure email and fax policies for transmitting confidential information and only send to those with a need to know.
- Double check fax numbers to ensure a fax is directed to the correct recipient. If a fax is sent in error, immediately contact the recipient and request destruction or return of the fax.
- Do not take student data off site, except as necessary and in accordance with the School's and individual department policies.
- Never leave student data, whether stored on an electronic device or on paper, unattended. It must always be in the possession of a School employee or agent or in a secure location.





# LEGAL AND REGULATORY COMPLIANCE

We set the highest standards for ourselves and for our School.



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## Family Educational Rights and Privacy Act

The Family Educational Rights and Privacy Act gives parents certain rights with respect to their children's education records. These rights transfer to the student when he or she reaches the age of 18 or attends a school beyond the high school level. Students to whom the rights have transferred are "eligible students."

Generally, schools must have written permission from the parent or eligible student in order to release any information from a student's education record. However, FERPA allows schools to disclose those records, without consent, to the following parties or under the following conditions (34 CFR § 99.31):

- School officials with legitimate educational interest;
- Other schools to which a student is transferring;
- Specified officials for audit or evaluation purposes;
- Appropriate parties in connection with financial aid to a student;
- Organizations conducting certain studies for or on behalf of the School;
- Accrediting organizations;
- To comply with a judicial order or lawfully issued subpoena;
- Appropriate officials in cases of health and safety emergencies; and
- State and local authorities, within a juvenile justice system, pursuant to specific state law.

Schools may disclose, without consent, "directory" information such as a student's name, address, telephone number, date and place of birth, honors and awards and dates of attendance. However, schools must tell parents and eligible students about directory information and allow parents and eligible students a reasonable amount of time to request that the school not disclose their directory information. Schools must notify parents and eligible students annually of their rights under FERPA. The actual means of notification (special letter, inclusion in a PTA bulletin, student handbook or newspaper article) is left to the discretion of the School.

## Credentials and Certification

Providence High School verifies the qualifications of academic professionals who work with our students. The School requires staff to follow all applicable credentialing and certification requirements.

## Fraud and Other Dishonest Acts

In order to ensure we use our resources as effectively as possible and that we comply with the law, fraudulent and other dishonest acts are not tolerated. Employees are required to report fraud or other dishonest acts when they have a reasonable basis to believe such an act has occurred. Administration is responsible for educating employees about proper conduct, creating an environment that deters dishonesty and maintains internal controls that provide reasonable assurance of achieving management objectives and detecting dishonest acts.

Examples of fraud or dishonest acts include taking cash or other property; making false time reports; forgery or alteration of documents or reports; improper handling or reporting of financial transactions or audit information; and incurring contractual or other obligations that exceed appropriations.

## Gifts and Entertainment

Accepting gifts, gratuities, favors, rewards and offers of entertainment creates a risk that our judgment and decisions can be influenced. In some cases, acceptance of gifts and entertainment may be considered a violation of federal and/or state laws. No employee may give any gift, gratuity, favor, entertainment, reward or any other item of monetary value unless it is of nominal value (less than \$100), is customary in the industry, will not violate any laws, and will not influence or appear to influence the recipient's judgment or conduct at the recipient's business.

No employee may solicit or accept any gift, gratuity, favor, entertainment, reward or any other item of monetary value unless it is of nominal value (less than \$100), is customary in the industry, will not violate any laws and will not influence or appear to influence the employee's judgment or conduct at the School.

Gifts accepted from a vendor with a value exceeding \$100 must be documented and/or disclosed in your Conflicts of Interest statement. If you are not required to file an annual statement or the gift is a perishable or consumable gift shared with others, the individual receiving the gift must document and maintain the information for a period of two (2) years from the date of receipt.

Infrequent meals of modest value may be accepted by individual employees in connection with education or business presentations or discussions. Generally, offers of entertainment should not be accepted. If entertainment is offered in conjunction with business discussions, both parties must be present and the offer should be infrequent, of modest value and in a setting conducive to discussing business – such as a business dinner in a restaurant and not a sporting event.

School employees may accept invitations to attend a School foundation-sponsored charity events exclusive to the School only if the ticket-giver or sponsor understands it will not influence purchasing decisions. All funds raised at the event must benefit a Providence ministry. At these events, employees are encouraged to make a donation to the School charity event equal to the value of the ticket, although doing so is not required. If you accept such an invitation you must complete a Conflicts of Interest statement or add the invitation to your existing statement.

The School's reputation is based on its commitment to integrity in the delivery of quality education and other services. For this reason, School employees are expected to keep relationships with students and their family members, vendors and other third parties impartial, and avoid accepting gifts or other items of value including:

- Meals
- Discounts or free services
- Tickets to events
- Tips and gratuities
- Special favors or loans
- Paid travel for spouses

Cash or cash equivalents (exceeding \$100), such as gift certificates or gift cards, *may only be accepted when given to you by the School or a fellow employee*. Gift certificates and gift cards are taxable income regardless of their cash value when paid for by the School. You may never accept cash or cash equivalents from anyone outside of the School for activities related to your work at the School. You may direct anyone offering a gift to our Advancement Office.

Any gift, regardless of value, may not be accepted if the gift is given to you in an attempt to influence your behavior or decision-making.

You may accept an occasional gift of nominal value\* from a vendor, such as consumable gifts, if shared among employees within your department or unit. Common examples might include a fruit basket or box of chocolates.

## Questions to ask before accepting a gift from a non-Providence High School entity or person

- Is this a personal gift?
- Is this a cash gift? A gift card? A gift certificate? In excess of \$100?
- Would I feel uncomfortable disclosing acceptance of this gift to other School employees, students, friends or family members?
- Is this gift being offered to me because my job at the School might influence a decision in favor of the donor?

If you answered “yes” to any of the above questions, the gift likely does not meet the School's ethical standards, our Code of Conduct or legal requirements and should not be accepted. Contact the Compliance Office for questions on gifts.

## Conflicts of Interest

Conflicts of interest occur when personal interests or activities influence or appear to influence our actions and decisions. They also occur when you allow another interest to become more influential in your decisions than the interests of the School and its faculty, staff, students, parents and customers.

\*Generally, nominal value means the item or service has little or no real value to anyone.

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As School employees, we must avoid activities and relationships that may impair our independent judgment and decision-making. We do not use our positions for personal gain or advantage or to assist others, including family members, in profiting in any way at the expense of the School.

Employees may not partake in any activity or association that creates or appears to create a conflict between the employee's personal interests and the School's interests. In addition, an employee must not allow any situation or personal interest to interfere with the exercise of the employee's independent judgment or with the employee's ability to act in the best interests of the School. If an employee has any question whether an action or association would violate this policy, the employee must contact his or her supervisor to obtain advice on the issue.

Conflicts of interest may arise from many sources including, but not limited to, your financial interests or those of a family member; service, employment or consulting arrangements with a competitor; the receipt of gifts from vendors or others with whom we do business; or the use of resources to benefit an outside interest or your own personal interests.

The School's Conflicts of Interest policy provides additional guidance to faculty, directors, officers, senior managers, researchers and other key employees. These individuals are required to complete and submit a Conflicts of Interest Statement annually. Other employees are required to disclose — to their immediate supervisors, to the Compliance Office or administration — any real or potential conflicts of interest prior to making any decision or taking any action that is or may be affected by the conflict. The interest must also be disclosed in writing by submitting a conflicts of interest form.

Potential conflicts of interest are reviewed and acted on as required. Contact the Compliance Office if you have a question about a conflict of interest.





# WORKPLACE ENVIRONMENT STANDARDS

We strive to care wisely for our people, our resources and our earth.



**PROVIDENCE HIGH SCHOOL REPORTING OPTIONS:**

- 1** Immediate Supervisor
- 2** Director of Human Resources
- 3** Head of School or Principal
- 4** Compliance Rep
- 5** Integrity Hotline at (888) 294-8455.

## Employee Information

During the hiring process, the School collects personal information about employees. To protect our employees' personal information and right to privacy, the School will:

- Take measures to safeguard personal information.
- Protect the confidentiality of personal information when dealing with third parties.
- Restrict access to such information to the employee and those with a legitimate business or legal need.

## Discrimination, Harassment/Sexual Harassment and Workplace Violence

Providence High School does not discriminate on the basis of race, color, national or ethnic origin, religion, sex, marital status, sexual orientation, disability or any other protected characteristic in accordance with applicable law. This applies to all terms and conditions of employment, including but not limited to, hiring, placement, promotion, termination, layoff, recall, transfer, leaves of absence, compensation and training.

**Sexual harassment** is a form of discrimination and is defined as: (1) unwelcome conduct, (2) based on a protected class, which (3) either creates a hostile environment or is a condition of working. "Unwelcome" conduct is verbal or physical behavior that one did not willingly invite or engage in and that one finds unwanted or offensive. Intimidating statements, gestures with sexual overtones, even jokes that others find offensive are forms of harassment if they are based on a person's membership in a protected class.

**Harassment** includes unsolicited remarks, gestures or physical contact, displays or circulation of written materials or pictures derogatory to any protected group (i.e., based on gender, race, ethnicity, religion, sexual orientation, disability, etc.). This list is not all-inclusive.

**Bullying** is the process of intimidating or mistreating someone weaker or in a more vulnerable situation.

Employees may not act violently. **Violence in the workplace** means a single behavior or series of behaviors that constitute actual or potential assault, battery, harassment, intimidation, threats or destruction to person or property that occurs while using School resources, at the School work location or while engaged in the School's business. The School does not prohibit an employee from exercising the legal right to defend one's self, another or property.

No form of harassment or workplace violence will be tolerated. Any such conduct is prohibited and will result in disciplinary action, up to and including dismissal.

If an employee experiences, witnesses or learns of unlawful discrimination, harassment, workplace violence, bullying or other abusive conduct at the School, the employee must immediately report it to School administration or Providence Integrity Hotline. The School will investigate all complaints of discrimination. The School will keep the complaint, investigation and resolution as private and confidential as is reasonable and practical under the circumstances.

For further information or notice of non-discrimination, visit <http://wdcrobcop01.ed.gov/CFAPPS/OCR/contactus.cfm> for the address and phone number of the office that serves your area, or call 1-800-421-3481.

## Child Abuse

Every teacher/staff member is required to complete VIRTUS training presented by the National Catholic Risk Retention Group Inc., as well as read any pamphlets provided by the School through the Los Angeles Archdiocese. Every teacher/staff member, as per California law, is a mandated reporter and is responsible for reading the pamphlet.

The telephone number of the Child Abuse Hotline is 800-540-4000.

## Health and Safety

Providence High School complies with government regulations. Our policies and practices also promote the protection of workplace health and safety. We share a responsibility in understanding how these policies and practices apply to our job



responsibilities and we seek advice when we have a question or concern. Additionally, Providence High School is committed to ensuring the health and safety of the children entrusted to its care.

Our policies and practices promote the protection of workplace health and safety. We share a responsibility in understanding how these policies and practices apply to our job responsibilities and we seek advice when we have a question or concern.

We have an obligation to report any serious workplace injury or any situation presenting a danger of injury, so timely corrective action may be taken to resolve the issue. Employees are required to report injuries.

Weapons of any kind are prohibited on campus whether or not a permit is held. This includes, but is not limited to, knives, guns and explosive devices.

## Reporting Accident or Injury

Employees must immediately report to their supervisors all work-related injuries to person or property and complete all paperwork requested by the School. Reports must be made within 12 hours of the incident to the office of the Director of Human Resources.

Employees must report all emergencies by calling 9-911 if using the School's phone system and 911 if using other phones.

## Stewardship of Providence High School Resources

The School is committed to effective stewardship of its resources in support of its academic and other organizational goals. Our assets should be used only for legitimate business purposes. Incidental and minor personal use of computers is permitted, provided such use is not for personal financial benefit or gain, and does not interfere with your job or the ability of others to do their jobs. If you have a question about use of School resources, contact your supervisor for guidance.



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# BUSINESS AND FINANCIAL INFORMATION

We strive to transform conditions for a better tomorrow while serving the needs of today.



## Style Guide/Brand Standards

The approved Providence High School brand covers all representations that identify the School, including its official titles, logo, trademarks, slogans, business names, seals, mascots and domain names. Use of this brand is protected and must be approved by the School administration as well as Providence St. Joseph Health. All use of the brand must follow the guidelines set by the official Style Guide.

Branding that introduces a new visual identifier (for example, logo, color or domain name) outside the specifications of the Style Guide is not allowable unless approved in accordance with this Code of Conduct and by Providence St. Joseph Health Marketing and Communications.

Creation of “other brands,” regardless of whether the crest or other traditional School visual identifiers are incorporated, potentially detracts from the impact and recognition of the School’s approved brand. Such use is not allowable without approval by Administration.

## Security, Confidential Information and Electronic Media Use

In addition to safeguarding a student’s information, employees have a responsibility to protect all confidential information. Confidential information includes sensitive internal documents, records or data that could damage the School if that information were lost or made public. Examples of confidential information include student information, financial information, Social Security numbers, advancement/development data and information subject to federal and state notification laws.

This information is so valuable that loss of this kind of data could harm our students and our ability to do business. Data losses also have a negative effect on the School’s reputation in the community.

Any confidential information removed from a work location increases our risk. Unless it is part of your job, confidential information should never be removed from the School grounds without prior authorization from your supervisor. If you are authorized to remove such information, you are responsible for following the security procedures required by the School. Confidential information may never be copied onto a personal or non-School computer. If you use a mobile device, such as an iPad or smartphone, contact your Information Services group for security instructions.

Employees agree to follow the School’s Acceptable Use of Information & Information Systems policy and other security policies and standards. Users of the School email have no right or expectation of privacy. Providence reserves the right to monitor and access any School information system or account. If you have a security-related concern, talk with your supervisor.

**Nothing in this Code of Conduct is intended to restrict employees from discussion, transmission or disclosure of wages, hours and working conditions in accordance with applicable federal and state laws.**

## Technology Resources

Employees must use the Internet, email and all technology resources in an appropriate, ethical and professional manner. This includes but is not limited to, complying with the Providence High School Campus Computer Network policy located on the campus information portal.

## Social Media Use

Social media (such as Facebook, Twitter, Instagram, Snap Chat, You Tube, blogs, etc.) bridge both the professional and personal lives of employees and thus, some crossover and conflict of responsibilities may occur. The School’s interest is in defining the educational and work-related contexts of social media, for the protection of employees, students and the School community as a whole.

In essence, interacting online with colleagues, students, parents and alumni is no different from interacting with these individuals or groups face-to-face. We are required to maintain the principles of respect, dignity, prudence and professionalism and concern for the safety and protection of children in all interactions.

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## Security Best Practices

Keep your computer and voice mail passwords private and secure. Change your password if you think it has been compromised.

- Lock your personal computer (PC) when unattended using Ctrl-Alt-Delete | Enter or other key combinations that will lock your PC.
- Install a privacy guard or use automatic timeout to prevent others from seeing your computer screen.
- Employees should never download confidential information onto a home or non-School PC or personal devices.
- Store shared portable devices and electronic media in a secure location and use a sign-in/sign-out procedure.
- Maintain physical control of laptops and other devices at all times when outside of a secure facility – a locked location within the School and your locked residence are considered secure facilities.
- Shut down your laptop so that encryption can protect confidential data if your laptop is lost or stolen.
- Use secure email when sending confidential information to an external email address.
- Beware of phishing attempts and review emails before responding or clicking on links. If you believe it is phishing, delete it and inform the School's IT Director.
- School employees and other workforce members must report all known or suspected security incidents within 48 hours of occurrence. Report any incidents to our IT Department.

## Records Accuracy and Retention

We prepare and maintain accurate and complete documents and records. We do this to comply with regulatory and legal requirements and to support our business practices and actions. Records include financial reports, employee time sheets, student records and expense-related forms and other types of records, whether in paper or electronic formats.

We do not alter or falsify records and do not destroy records to deny governmental authorities information that may be relevant to a government investigation.

We comply with Providence's Record Retention policy to support the appropriate retention, protection, maintenance and disposition of all records, regardless of their format or media.

If you have questions about records retention, contact the Human Resources or Administration office.

# FOR MORE INFORMATION

## Providence High School

HUMAN RESOURCE OFFICE: 818-846-8141 ext. 14502

## Providence St. Joseph Health

RISK AND INTEGRITY SERVICES REGIONAL COMPLIANCE AND PRIVACY OFFICE: 818-847-3140

RISK AND INTEGRITY SERVICES SYSTEM COMPLIANCE AND PRIVACY OFFICE: 425-525-3022

DEPARTMENT OF LEGAL AFFAIRS: 714-262-8879

INFORMATION SERVICES HELP DESK: 818-846-8141 ext. 14299

INTEGRITY HOTLINE: 888-294-8455 (toll free)



# GLOSSARY OF TERMS

<b>compliance</b>	Acting in accordance with accepted standards and policies, including laws, rules and regulations.
<b>confidentiality</b>	A set of rules or a promise that limits access or places restrictions on certain types of information. Example: medical information about a student or financial information about the School.
<b>conflicts of interest</b>	A situation in which someone in a position of trust has competing professional or personal interests. Such competing interests can make it difficult to fulfill his or her duties impartially. Even if there is no evidence of improper actions, a conflict of interest can create an appearance of impropriety that can undermine confidence in the ability of that person to act properly in his/her position.
<b>High School</b>	Providence High School.
<b>employee</b>	Anyone employed by the High School.
<b>ethical behavior</b>	Doing what is right; acting on the basis of Providence's Mission, values and promise, such as acting with integrity and setting the highest standards for ourselves and for our ministry.
<b>fraud</b>	Fraud is distinguished from abuse in that, in the case of fraudulent acts, there is clear evidence that the acts were committed knowingly, willfully and intentionally or with reckless disregard.
<b>integrity</b>	Honesty in words and actions.
<b>personally identifiable information (Authority: 20 U.S.C. 1232g)</b>	Personally Identifiable Information (PII): PII is any piece of information that could be used to uniquely identify, contact or locate an individual. Under FERPA the term includes, but is not limited to: <ol style="list-style-type: none"><li>The student's name;</li><li>The name of the student's parent or other family members;</li><li>The address of the student or student's family;</li><li>A personal identifier, such as the student's social security number, student number or biometric record;</li><li>Other indirect identifiers, such as the student's date of birth, place of birth and mother's maiden name;</li><li>Other information that, alone or in combination, is linked or linkable to a specific student that would allow a reasonable person in the School community, who does not have personal knowledge of the relevant circumstances, to identify the student with reasonable certainty; or</li><li>Information requested by a person who the educational agency or institution reasonably believes knows the identity of the student to whom the education record relates.</li></ol>
<b>retaliation</b>	Any action that negatively affects an employee because he or she raised a concern or assisted in the investigation of a concern.
<b>regulations</b>	Rules enacted by a government agency that must be followed by businesses providing the services covered by the rules.
<b>standards and policies</b>	Requirements for expected behaviors or actions by Providence employees.
<b>system compliance</b>	A unit within Risk and Integrity Services responsible for establishing and monitoring the effectiveness of Providence St. Joseph Health's Compliance Program.
<b>workforce members</b>	Are caregivers/employees, members of our system, board of regents, volunteers, trainees, independent contractors, and others under the direct control of Providence.