



Code of Ethics

A SERVICE of
GATEWAY
Increasing Individuals Independence

MAIN OFFICE

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GATEWAY MISSION:

Supporting individuals with disabilities and other barriers in their home, community, and workplace.

GATEWAY VISION:

Vision: Inclusion and independence for everyone, every day, everywhere.

This agency shall undertake such revenue generating and program activities as necessary to achieve its mission and ensure the self-sufficiency of its operation.

The board of directors, administrator and staff of GateWay recognize the need to make efficient and effective use of funds and other resources provided by the community and the local, state, and federal governments to account for such support as appropriate and to exemplify sound, fair and ethical business practices in its daily affairs.

This Code of Ethics shall represent the principles to which GateWay agrees to adhere in carrying out its mission, guiding staff/ board members in their treatment of those served, in business/ financial practices and in marketing.

Each new staff/ board member will be required to review and sign the code of ethics statement, indicating knowledge of it. Any staff person who violates one of the agency's Codes of Ethics may face corrective action. Board action may be taken with any board member who violates the Code of Ethics. For management to be aware of any real or potential conflicts of interest in conducting business, conflict of interest statements will be completed by board, middle and upper management staff on an annual basis.

CORE VALUES:

The Core Values that serve as roots for our Code of Ethics are:

1. Quality: Meeting or exceeding the expectations of all those we serve.
2. Integrity: Living with honesty, consistency, transparency and sound practices.
3. Respect: Viewing and treating all people as having value and worth.
4. Teamwork: Communicating and working together to achieve the mission.

S.T.A.R. STANDARDS:

GateWay staff/ board members must adhere to the S.T.A.R. Standards (Service, Teamwork, Attitude, Reliability)

SELF-DETERMINATION:

Gateway Staff and Volunteers respect and promote self-determination and assist clients in their efforts to identify and clarify their goals.

Staff and Volunteers of Gateway may only limit a client's right to Self-Determination when, in the individual's professional judgment, a clients' actions or potential actions pose a serious, foreseeable, and imminent risk to themselves or others.

CODE OF ETHICS- PARTICIPANTS:

GateWay will continually strive to achieve service quality based on excellence, relevancy, rehabilitation integrity and commitment to purpose.

In all planning, program development and operations, GateWay shall give first consideration to the needs of those served.

GateWay shall make no prescription of services or assignment of work without reviewing appropriate medical, psychological, or other pertinent diagnostic information.

Participants are entitled to an individualized plan which is realistic, relevant to their specific needs and interests and which seeks their input and ongoing participation.

Participants shall be entitled to access to their files, in a timely fashion upon request.

Participants are entitled to options in vocational and life skill programming with choices based on their expressed interests, needs, and abilities.

GateWay is committed to the development and promotion of a broad diversity in production and program activity to allow participants to achieve challenging and varied rehabilitation opportunities.

The organization will provide a process to assure maximum opportunity for the upward mobility of participants. In the hiring of staff, full consideration shall be given to qualified individuals with disabilities.

GateWay believes in the concept of full inclusion and must provide programming that both facilitates and promotes activities tied to expectations of the community and society.

The organization believes in the concept of self-empowerment and will both promote and facilitate such throughout programming for participants. Access to self-help, legal, and advocacy services will be facilitated as requested.

GateWay shall develop and maintain a comprehensive education program to promote understanding of the needs and capabilities of individuals with disabilities and to encourage their acceptance in the community.

Participants give up no legal rights when they receive service from Gateway. Hence, an individual's legal rights must be respected at all times.

Confidentiality of personal information for participants shall be protected at all times.

Participants are entitled to privacy and freedom from abuse, financial or other exploitation, retaliation, humiliation, and neglect.

Participants shall be entitled to informed consent or refusal regarding service delivery, release of information, concurrent service, and composition of the service delivery team or involvement in research projects.

In all instances where staff is asked to witness personal documents of participants, these matters need to be referred to management to determine if it is appropriate for this agency to perform that function. If appropriate the Executive Director will sign such documents on behalf of the agency.

Participants will be provided with storage bins for personal property. In the participant handbook participants are encouraged not to bring personal items of any value to GateWay that may be exposed to theft. The agency will not be responsible for any personal items that may become missing because they were not secured.

GateWay shall provide a formal process for investigation and resolution of alleged infringements of rights of participant. Any infringements of rights of participants will not result in retaliation or a barrier to future services with GateWay.

GateWay shall provide a formal process for objectively hearing grievances or complaints from participants and a protocol for appeal of decisions regarding services. Talking about a concern, or filing out a complaint will not result in retaliation or a barrier to future services with Gateway.

Staff and Volunteers of Gateway will not use derogatory language in their written or verbal communications to or about clients and will use accurate and respectful language in all communications to and about clients.

Staff and Volunteers of Gateway will avoid accepting goods or services from clients as payment for professional services.

When Staff and Volunteers of Gateway act on behalf of clients who lack the capacity to make informed decisions, Staff and Volunteers of Gateway will take reasonable steps to safeguard the interests and rights of those clients.

Staff and Volunteers of Gateway will make reasonable efforts to ensure continuity of services in the event that services are interrupted by factors such as unavailability, relocation, illness, disability, or death.

Staff and Volunteers of Gateway should terminate services to clients and professional relationships with them when such services and relationships are no longer required or no longer serve the clients' needs or interests.

Staff and Volunteers of Gateway should take reasonable steps to avoid abandoning clients who are still in need of services.

WAGE PAYMENTS FOR PARTICIPANTS:

In work programs in which the goods or services are produced by participants, the participants shall receive remuneration in an amount which is commensurate with productivity to that of a non-disabled worker, and is based on wages paid for similar work in the local area. GateWay will comply with all appropriate state and federal laws regarding wage payments.

GateWay shall utilize the piece rate method rather than an hourly rate method of wage payment, whenever feasible, in order to provide incentive and to recognize individual productive capacity differences.

CODE OF ETHICS- STAFF MEMBERS:

Gateway Staff, Board Members and Volunteers primary responsibility is to promote the well-being of clients.

In general, clients' interests are primary. However, responsibility to the larger society or specific legal obligations may on limited occasions supersede the loyalty owed clients, and clients should be so advised. (Examples include when a Gateway Employee is required by law to report that a client has abused a child or has threatened to harm self or others.)

Will do their best to see that GateWay meets the need of participants

Staff members will respect the value and dignity of all individuals.

Will do their best to create/ maintain a climate of loyalty, trust and mutual respect.

Staff members will support a work atmosphere where the work of each individual is respected as important.

Will recognize excellent work done by other staff and participants

Will strive to speak to everyone in a friendly, positive, enthusiastic, and courteous way

Will support a work atmosphere that is open and non-secretive while being mindful of the need for confidentiality

Staff members will support the decisions of management. Staff may state their position, but ultimately must follow management's decision

Staff members will be loyal to the agency. They will refrain from doing anything that might bring discredit to the agency

Staff acknowledge that enthusiasm and positive attitude always make for a better work place

Will uphold all applicable laws and regulations, going beyond the letter of the law to protect and/or enhance GateWay's ability to meet its mission

Will be responsible steward of GateWay's resources

Will strive for personal and professional growth to improve effectiveness

Will carefully consider the public perception of personal and professional actions, and the effect their actions could have on GateWay's reputation in the community and elsewhere

Personal fundraising for the benefit of the individual or their family will not be allowed to occur. This could put undue pressure on co-workers and participants and also create a conflict with agency fundraising activities for the agency's benefit.

Staff has work desks and offices where personal items can be stored, but may not be secure. In the personnel handbook staff are encouraged not to bring personal items of any value to work that may be exposed to theft. The agency will not be responsible for any personal items that may become missing because they were not secured.

The agency expects staff and participants to maintain professional relationships at all times. Personnel policies discourage relationships between staff supervisors and their subordinates and all personal socialization between participants and staff is prohibited.

Staff and Volunteers of Gateway will not sexually harass clients. Sexual harassment includes sexual advances, sexual solicitation, requests for sexual favors, and other verbal or physical conduct of a sexual nature.

Staff and Volunteers of Gateway will not engage in physical contact with clients when there is a possibility of psychological harm to the client as a result of the contact (such as cradling or caressing clients). Staff and Volunteers of Gateway who engage in appropriate physical contact with clients are responsible for setting clear, appropriate, and culturally sensitive boundaries that govern such physical contact.

Staff and Volunteers of Gateway are responsible for undergoing annual training to enhance their understanding of culture and its function in human behavior and society, recognizing the strengths that exist in all cultures.

Staff and Volunteers of Gateway should have a knowledge base of their clients' cultures and be able to demonstrate competence in the provision of services that are sensitive to clients' cultures and to differences among people and cultural groups.

Staff and Volunteers of Gateway should obtain education about and seek to understand the nature of social diversity and oppression with respect to race, ethnicity, national origin, color, sex, sexual orientation, gender identity or expression, age, marital status, political belief, religion, immigration status, and mental or physical disability.

CODE OF ETHICS- ADMINISTRATION:

The Executive Director shall set the tone for the agency values and codes of ethics for other staff and shall demonstrate his/ her commitment to these codes in the performance of his/ her duties.

The Executive Director, operating under authority of the board of directors shall execute policies and standards of performance designed to assure quality services to participants.

The Executive Director shall develop and maintain an annual operating budget and program plan which seeks maximum use of funds available from a variety of sources to support the services provided to participants. The plan shall be based on sound financial principles providing separate identification of services and the work program.

The Executive Director shall recruit, hire and develop qualified individuals to provide technical, professional and supervisory services to people with disabilities. Salaries and benefits shall be comparable to those paid in similar organization in the area.

The Executive Director shall periodically report on program and financial operations to the board of directors and as needed to the supporting agencies.

CODE OF ETHICS- BOARD OF DIRECTORS:

Will do their best to see that GateWay is operated in a manner that upholds the agency's integrity and merits the trust and support of the public

Will strive to uphold all applicable laws and regulations, going beyond the letter of the law to protect and/ or enhance GateWay's ability to accomplish its mission

Will treat others with respect, doing for and to others as they would have done for and to themselves in similar circumstances

Will be responsible steward to GateWay's resources

Will take no actions that could benefit themselves personally at the unwarranted expense of GateWay, avoiding even the appearance of a conflict of interest

Will carefully consider the public perception of their personal and professional actions, and the effect their actions could have, positively or negatively, on GateWay's reputation in the community and elsewhere

Will strive for personal and professional growth to improve my effectiveness as GateWay Board Member

Board members will refrain from unwarranted intrusion into the responsibility of GateWay's operational management. Will hire the Executive Director and delegate responsibility to him/her for the day to day operations of the agency.

Will serve as a Board Member without pay or monetary gain for such participation

Will regularly attend and participate in board meetings and be responsible for establishing policies, objectives and long range plans.

Will be accountable to the community, the appropriate authority, and the profession for the general operation of the agency

CODE OF ETHICS- FINANCIAL OPERATIONS:

All financial practices of GateWay shall be handled in accordance with the applicable federal, state, and local laws

All financial matters shall be conducted within the standards of commonly accepted, sound financial management practices

All financial matters that fall within the purview of the agency's financial management policies shall comply with those policies

All financial matters covered by the agency's bylaws shall be handled in accordance with those bylaws

All financial records shall be audited at least annually by a certified public accountant

All financial impacts shall be provided to the board of directors at board meetings and as needed to supporting agencies

CODE OF ETHICS- BUSINESS PRACTICES:

Marketing activities are part of GateWay's accountability to the public

Marketing activities/ efforts shall always respect the dignity and privacy rights of those served. GateWay shall make certain that services and commodities are advertised and presented in a manner which assures that the participant is not exploited

Marketing activities will never knowingly mislead/ misinform the public or misrepresent GateWay

Marketing activities will uphold the integrity of GateWay so as to merit the continued support and trust of the public

In establishing prices or bidding on contracts for services or commodities, GateWay shall represent fairly the direct and indirect costs of producing the commodity or services

GateWay shall assure that prices quoted on bids submitted reflect an adequate allowance for payment of wages commensurate with the productivity of the participants comparable to the prevailing rate for work of similar quality in the community

Commodities and services produced by GateWay shall meet applicable industrial or government standards.

GateWay shall not knowingly bid for work, in a manner which provides unfair advantage, or constitutes unfair competition against another Community Rehabilitation Program (CRP). GateWay shall not underprice another CRP on a contract that the other CRP holds without prior consultation and due justification.

GateWay shall recognize the rights of all workers to bargain collectively and shall not knowingly accept work involved in a labor dispute.

To avoid any question of inappropriate business practices, exchange of gifts (valued at over \$25.00), money and gratuities between staff, participants, customers and vendors will not be allowed.

GateWay shall make a concerted effort to develop new prime products that will assist in our financial independence from governmental support.

CODE OF ETHICS- PHYSICAL PLANT AND EQUIPMENT:

Public areas of all locations of GateWay will be accessible to people with disabilities.

Buildings shall be adequately lighted, heated, and ventilated in accordance with generally accepted standards and applicable state and federal laws concerning health safety.

GateWay shall make maximum feasible utilization of equipment modifications, and industrial and rehabilitation engineering technologies to maximize the productive capacities of participants. Power tools and machinery shall have appropriate guards and other protective devices to assure the safe operation by disabled workers. Participants shall be instructed in the safe operation of power tools and equipment prior to operation by participant.

INVESTIGATION OF VIOLATIONS:

Any violation or accusation of a violation will be investigated by the Executive Director and/ or Human Resource Manager when staff is involved, or the Board Chair if board members or the Executive Director are involved. The investigation will commence within fifteen days of the accusation being made and conducted in a timely fashion. Based on the outcome of the investigation, if an individual is found to have violated GateWay code of ethics, disciplinary action will be taken, for staff, up to and including terminations, and for board members, up to and including removal from the board. Any conduct that violates state or federal laws will be turned over to the appropriate legal authorities.

WHISTLEBLOWER PROTECTION:

Gateway VRO requires directors, officers and employees to observe high standards of business, clinical and personal ethics in the conduct of their duties and responsibilities. As employees and representatives of Gateway, we must practice honesty and integrity in fulfilling our responsibilities and comply with all applicable laws and regulations.

Reporting Responsibility

This Whistleblower Policy is intended to encourage and enable employees and others to raise serious concerns internally so that Gateway can address and correct inappropriate conduct and actions. It is the responsibility of all board members, officers, employees and volunteers to report concerns about violations of Gateway's code of ethics or suspected violations of law or regulations that govern Gateway's operations.

No Retaliation

It is contrary to the values of Gateway VRO for anyone to retaliate against any board member, officer, employee, or volunteer who in good faith reports an ethics violation, or a suspected violation of law, such as a complaint of discrimination, or suspected fraud, or suspected violation of any regulation governing the operations of Gateway. An employee who retaliates against someone who has reported a violation in good faith is subject to discipline up to and including termination of employment.

RECEIPT ACKNOWLEDGEMENT FORM:

I have read and understood the Code of Ethics. I understand that should I have any questions or concerns regarding best practices at GateWay I should ask my Manager or any manager within the company. You may be notified by E-mail of changes to the code of ethics.

Staff/ Board Member Signature

Date