

## Acceptance of Gifts

**Revised October 2021**

Previous Revision: August 2016

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### Policy

It is CommuniCare Therapy policy to apply the CommuniCare Code of Ethics to quality improvement, patient safety, a healthy work culture and the provision of quality services. CommuniCare's Code of Ethics requires that all employees and independent practitioners demonstrate our commitment to treating all people and organizations, with whom we come into contact or conduct business, impartially and that they demonstrate the highest standards of ethics and conduct. Acceptance of gifts, entertainment, travel and services for personal use from individuals or companies who are patients of, or do business with CommuniCare may impede the objectivity of employees and independent practitioners and/or influence the therapeutic relationship. It is important to note that the perception of conflict of interest is as damaging as an actual conflict of interest.

As one effort to demonstrate CommuniCare's commitment to these standards and behaviour the following guidelines will form CommuniCare's Policy on acceptance of gifts or gratuities:

1. The acceptance of gifts of money from patients / companies by CommuniCare employees and independent practitioners is **STRICTLY** forbidden. Independent practitioners are not to accept direct payment for services delivered on behalf of CommuniCare Therapy. Patients / companies are to be notified that the business office of CommuniCare Therapy will generate invoices and accept payment for any private-pay services rendered or to explain that the services are funding by the Ontario Health Care System.
2. Gifts of small monetary value ( $\leq$  twenty-five dollars, tokens of appreciation, end of year gifts, etc.) may be accepted at the discretion of the individual. Small gifts may include Gift Cards, handmade items and crafts.
3. Gifts of significant monetary or potential personal value are **NOT** to be accepted by independent practitioners / employees. In the event a gift is offered a report must be made by the individual who was offered the gift to a manager or owner. (See procedure section)

### Gift Policy Exemptions:

1. Cards, thank you notes, certificates or other written forms of thanks and recognition.
2. Food and beverages provided as part of a 'working' meeting or session to benefit or advance positive working relationships.
3. Vendor or supplier test samples to be made available for distribution by independent practitioners for the benefit of patients and their families.
4. Food gifts during the holidays which will be shared with the entire staff.

### Communication:

It is policy that employees and independent practitioners are required to professionally inform vendors, potential vendors and others of this gift policy, and the reasons the company has adopted the policy.



To this end, it is CommuniCare's policy that independent practitioners / employees are expected to use good judgement in these instances. It is also policy that gifts exceeding what is deemed reasonable within this policy be reported and reviewed within the organization.

Any exceptions to the gift policy may be made only with the permission of CommuniCare's Executive Director or President.

It is also CommuniCare Therapy's policy for Managers within the organization to consistently consider the ethical implications of a situation and to report and document all identified ethical issues and their resolutions as per the Ethics Program and Decision-Making Framework. This process may include engagement of the members of the Ethics Committee to complete a review and recommendations. The CommuniCare manager or member of the Ethics Committee is responsible to respond to identified ethical issues in a timely manner.

### **Procedure**

If an employee or independent practitioner is offered a gift exceeding what is deemed reasonable within this policy the following must be completed:

1. Decline the gift and reference this policy.
2. Report the gift offer to CommuniCare Management
3. If individual was unable to successfully decline the gift (or not given the opportunity) management will contact the gift giver (if necessary) to communicate this policy and work out a reasonable solution for the patient which may include:
  - a. If it is feasible the gift is returned.
  - b. If it is not feasible to return the gift an alternate use for the gift will be determined (e.g., donation to a charity, raffle with proceeds to charity, display of flowers in lobby for all to enjoy) and communicated to the gift giver.
4. Report the incident to the Ethics Committee

If any employee or independent practitioner has questions and/or needs clarification of any aspect of this policy, they should check with their manager. If the manager is uncertain, the Executive Director or President will be the arbiters of the gift policy to ensure consistent staff treatment across the organization.

If any employee or independent practitioner is found to have breached this policy this may result in disciplinary action including a possible report to the regulatory College as applicable.

### **Related Documents:**

Ethics Program and Decision-Making Framework  
CommuniCare Credo and Corporate Code of Ethics  
CommuniCare Mission Vision and Values Statement  
Conflict of Interest Policy



CommuniCare Code of Conduct

Professional Regulatory Colleges Codes of Ethics

Professional Regulatory Colleges Professional Relationships and Boundaries Position Statements