

# Compliance and Business Ethics Program

June 6, 2019

## Purpose

As part of the Audit and Finance Committee's Terms of Reference, an annual review of the organization's compliance and business ethics program is required. This report provides a summary of activities that demonstrate Covenant Health's compliance with this requirement.

This report is presented for information and discussion.

## Updates

The Terms of Reference for the Audit and Finance Committee states:

"Discuss with management the Corporation's policies and procedures designed to ensure an effective compliance and business ethics program, including the Corporation's business code of ethics."

For the purpose of this report, "compliance" is interpreted broadly in terms of our accountability to both legislation and other corporate compliance best practices (for example, as promoted by the [Society of Corporate Compliance and Ethics](#), of which Covenant Health is a member), as well as our fidelity to the Catholic social justice and moral tradition. We are equally required to be compliant with canon law as with civil law, including our obligations to our foundational ethics resource, the *Health Ethics Guide*. Additionally Covenant Health has engaged with the two other Canadian recipients of the Ethisphere designation, and has joined the [Business Ethics Leadership Alliance \(BELA\)](#) community as part of our involvement with the Ethisphere Institute.

Therefore, this report weaves together a sampling of key policies, organizational ethics discernments, generative discussions, formation programs and other educational initiatives, as well as advocacy and community outreach activity established or underway of development that demonstrates Covenant Health's compliance with the core business focus, or ministry, of Catholic health care.

### **Corporate Policies:**

Covenant Health's [Summary Resource Document and Position Statement](#), in Compliance with the *Conflicts of Interest Act (Alberta)*

The purpose of this Resource Document is to provide direction and ensure compliance with requirements for Covenant Health contained in the *Conflicts of Interest Act (Alberta)*. The Act

establishes conflicts of interest rules for Members of the Legislative Assembly of Alberta and political staff, and has now been extended to public agencies, of which Covenant Health has been named for the purposes of this Act.

The document summarizes key principles and obligations as defined under the Act, as well as Covenant Health policies such as *Conflict of Interest* (III-15) and *Relationships with Industry* (III-20). Some highlights of this change in the regulatory framework include provisions around gifting and receiving gifts as well as new provisions in place for the CEO and the Board Chair. The provisions are based around:

- Decisions furthering private interests
- Concurrent employment
- Restriction on holdings
- Disclosure statements
- Returns relating to persons directly associated
- Post-employment restrictions

The Ethics Commissioner has accepted Covenant Health's Summary Resource Document and Position Statement and they were implemented April 30, 2019. Educational resources including an FAQ document and in-person sessions, with key departments in which gifting issues have historically been a focus of concern (e.g. pharmacy, facilities and capital management, rural health etc.), about the changes and impact on teams have been implemented.

Specifically, as far as newly established gifting thresholds, the Summary Resource Document and supporting Covenant Health documents stipulate that:

- Covenant Health personnel shall not accept fees, gifts or other benefits that are connected directly or indirectly with the performance of their office or duties, from any individual or organization (excluding receipt of tangible gifts as stipulated below).
- Acceptance of cash or cash equivalents as a gift is strictly prohibited.
- The value of a single tangible gift permitted by this section shall not exceed \$100. The cumulative maximum cash value limit for tangible gifts permitted by this section from a single source vendor in a calendar year is \$200.
- The value of a single event invitation permitted by this section shall not exceed \$500. The cumulative maximum cash value limit for event invitations permitted by this section from a single source in a calendar year is \$1000.

### *The Cannabis Act Bill C-45*

New federal legislation governing recreational use of cannabis came into effect in October of 2018. A guideline document had already been developed and implemented to provide direction in responding to increased requests from patients and residents around the use of their own previously prescribed medical cannabis. The document aligns with the Access to

Cannabis for Medical Purposes Regulations (ACMPR) legislation that allows approved individuals to use cannabis for medical purposes.

With the implementation of this new legislation and uncertainties surrounding it, a page was created on Covenant Health's internal website CompassionNET to further inform and support staff, volunteers and physicians about legislative, health, legal, safety, and other general information to provide guidance and support.

Given the unprecedented change of this legislation, and the organizational and reputational risks with potential increased public complaints, occupational health and safety obligations to our staff to ensure a safe work environment, and clinical issues associated with recreational cannabis issue, this document and the educational roll-out support was a key contributor to our compliance and business ethics program

### Revised Policies

The following selection of compliance and business ethics related policies were recently reviewed and revised as per the automatic Covenant Health 3-year policy review cycle:

#### *Conflict of Interest, III-15*

This revised policy ensures compliance with requirements for Covenant Health contained in the *Conflicts of Interest Act* (Alberta). This revision incorporates the newly established gifting thresholds as well as an updated Code of Conduct – Our Commitment to Ethical Integrity Personnel Declaration Form to ensure compliance with the *Conflicts of Interest Act*.

#### *Relationships with Industry, III-20*

This revised policy is used hand in hand with the aforementioned Conflict of Interest Policy and its accompanying Code of Conduct document, and also updated with the new gifting thresholds. It provides direction and an ethical framework for managing relationships with industry to ensure integrity of professional and clinical decision-making.

#### *Responding to Requests for Medical Assistance in Dying (MAID), Vii-B-440*

Working closely with Alberta Health and Alberta Health Services, and with input from our operational leaders, clinicians, impacted families, and other patient and family advisors Covenant revised its MAID policy within the month, as we publicly committed to do. We then shared our lessons learned and revised policy with Catholic Health Alliance of Canada colleagues across the country as well as with a delegation from Catholic Health Australia to prevent similar adverse events from occurring. Our CEO also addressed commonly voiced issues through a series of videos posted to our website to help clarify Covenant Health's position with both internal and external audiences.

Throughout this process, Covenant Health remained responsive to media and public queries, and despite mischaracterization and unfounded statements by some journalists, we were able to manage through this period and uphold our commitment to ethical integrity. As an example, Covenant successfully advocated with government to revise the provincial *Record of Request* form to better reflect the principles of informed consent. This led to system improvements overall, which was also shared with by our Deputy Minister with his counterparts.

Together, our response to this adverse event improved our processes and communication, and demonstrated our commitment and continued leadership in balancing the rights of patients, clinicians, and our institutional values alike.

#### *Disclosure of Wrongdoing and Protection of Persons who Disclose Wrongdoing, III-70*

As a key component of our Compliance and Business Ethics Program, this policy was amended in 2018 to bring it in alignment with the recent amendment to the *Public Interest Disclosure (Whistleblower Protection) Act*. The policy aims to maintain a positive working environment for its personnel and upholding the integrity of its business and clinical operations. Covenant Health will take action in an objective manner to address allegations of wrongdoing without retribution to personnel who report wrongdoings in good faith.

#### *Financial Assistance to Uninsured Patients, IV-10*

This policy provides for a transparent and equitable process when patients or their families request Covenant Health to write-off, in whole or in part, clinical services provided to them in the absence of any or insufficient medical insurance.

Covenant Health is committed to ensuring that patients receive the immediate medical care that they need, regardless of their ability to pay for services. When patients/families do not have insurance coverage or sufficient means, Covenant Health works with the patient/family to negotiate a repayment system consistent with their ability to pay, and in keeping with the principles of fundamental justice.

#### *Interpretive Services, VII-B-20*

In response to the growing diversity of our patient population, this policy provides direction facilitating interpretive services for non-English speaking, limited English proficiency or deaf patients/residents/clients and their families, to ensure they are able to communicate and participate in meaningful dialogue with health care providers, and to make fully informed choices about treatment decisions and goals of care.

#### *Abuse of Patients, Residents or Clients, III-75*

Covenant Health has a legal and ethical duty to protect patients from abuse and maintain a reasonable level of safety for them. This policy upholds Covenant Health's commitment to an abuse free environment and provides instruction to staff when they

encounter a patient, resident, or client who has been abused – or when they suspect a patient may have been abused.

The policy also confirms that anyone reporting an incident of abuse or gives evidence in good faith (for example: for incidents of suspected abuse) will not be penalized for doing so.

### Board Policies

A comprehensive suite of key Board policies were reviewed during the past year to ensure fiduciary oversight, while upholding the ethical integrity and reputation of our organization as a model corporate body. Collectively, they demonstrate the Board's compliance with both civil and canon law requirements, and other leading governance best practices.

- 2.1 *Mission and Vision*
- 2.2 *Values*
- 2.3 *Strategic Directions*
- 3.1 *Governing Instruments*
- 3.2 *Accountability of the Board*
- 3.4 *Board Committees*
- 3.6 *Role of Board Chair*
- 3.7 *Role of Vice Chair*
- 4.2 *Code of Conduct*
- 4.3 *Board Meetings*
- 4.5 *Board Communication*
- 4.6 *Board and Committee Evaluation*
- 4.7 *Board and Committee Member Recruitment*
- 4.8 *Board Learning and Development*
- 4.10 *Policy Development and Review*
- 4.14 *President and CEO Performance Management*
- 5.11 *Asset Protection*
- 5.15 *President and CEO Succession*

### Educational Strategies

#### *Indigenous Awareness and Sensitivity Modules*

Through a collaborative arrangement with Alberta Health Services, Covenant Health has been granted access to a suite of eight (8) modules on [Indigenous Health and Safety](#) to an overwhelmingly positive response from staff and physicians. In the spirit of reconciliation Covenant Health has strongly encouraged staff, volunteers, and physicians to complete, at minimum, the introductory module of this suite. It provides important information regarding Indigenous Peoples' history, social determinants of health, and strategies to help increase culturally safe care when caring for this population. It is one way in which Covenant Health

responds to the Calls to Action identified under the Truth and Reconciliation Commission of Canada report, in providing cultural competency training for all health care professions.

### *Public Interest Disclosure (Whistleblower Protection) Act Annual Report*

As per our obligations under Alberta legislation, Covenant Health's annual report detailing our disclosure activity has been submitted to the Office of the Public Interest Commissioner in April 2019. A copy of the report can be found [here](#).

Covenant Health's whistleblower hotline is tested regularly and any disclosures or general queries are acknowledged and acted on within the prescribed time frames, as stipulated under our policy and provincial legislation.

## It's ok to speak up



Have you been asked to do something that's wrong?  
Do you believe something wrong has happened in the workplace?  
If so, please speak with your manager.

Or, you can email [PublicInterestDisclosure@covenanthealth.ca](mailto:PublicInterestDisclosure@covenanthealth.ca), or the Alberta Public Interest Commissioner's office at [info@pic.alberta.ca](mailto:info@pic.alberta.ca).

An educational poster has been developed to further educate staff about their options when wanting to submit a disclosure or report; including the option of disclosing directly with the Alberta Public Interest Commissioner's Office. To assist with education and support for Covenant Health leaders and their roles, a Leaders Link article was widely communicated by email and app, to help leaders familiarize themselves with the policy, processes and requirements under the Public Interest Disclosure Act.

### *Compliance and Business Ethics Course – Leadership Pathway Curriculum*

The Compliance and Business Ethics *e-Learning* CLiC module reinforces key policies that require compliance to legislative, regulatory and other organizational norms. It has been revised and integrated with our essential education ethics program to make it more accessible and available to all staff through a successful roll out.

For example, the revised module continues to highlight compliance practices concerning criminal records checks, delegation of financial authority, just culture, disclosure of wrongdoing, and the foundational role of the *Health Ethics Guide* at Covenant.

### *Generative Discussions*

Covenant Health's capacity for deepening ethical reflection and discernment is evident with the growing practice of facilitated generative discussions at both senior leadership and Board tables, often addressing complex value-laden, social justice issues. In that regard, they are both educational in nature, as well as formative, prompting in some instances a strategy or policy response.

For example, during the past year, we explored opportunities to advance the *Truth and Reconciliation Calls to Action*. Beginning with a presentation to the Senior Leadership Team by a member of the Indigenous community addressing First Nations, Inuit, and Métis Spirituality, including Aboriginal Relations. The Board was also introduced to the Indigenous Peoples Educational module, exploring the history, cultural diversity, and unique health needs of the Indigenous, Métis and Inuit people we serve. We have also looked at opportunities to incorporate an Indigenous Healing Centre in functional designs for a new chapel at the Misericordia Hospital.

Other generative discussions explored risks and opportunities around current sponsorship models and their implications for the future of Catholic health care. We looked at our experience with the formation of Covenant Health as a model to create similar efficiencies and success through a pan-Canadian or western-Canadian sponsorship structure.

### **Advocacy**

To support the Alberta bishops with timely, informed, and coordinated key messaging on risks and opportunities impacting the Catholic Church, as well as to advance thoughtful, engaged social commentary and advocacy, the *Mission Collaboration Initiative* strategy developed. As our experience with MAID was shown, earlier, proactive response to emerging issues has better supported Catholic health care in navigating the complex legal, political and moral issues the legislation has introduced, while at the same time, providing an opportunity for the Alberta bishops to exercise leadership, both provincially and nationally.

An oversight committee and working group have since been convened, drawing on robust environmental scanning and key subject matter experts from legal, theology, ethics, communications, etc. to facilitate comprehensive discernment on issues. The goal of the MCI is to help the bishops reclaim and exercise their voice as a credible moral authority and advocate for social justice, in keeping with the New Evangelism initiative of the Church.

At the Board Meeting in June 2018, Covenant Health confirmed its advocacy priorities following an extensive internal and external consultation process as summarized in [Our Commitment to Social Justice](#). Comprehensive strategies have been developed to provide leadership, and to invite partnership with others in transforming the health system and supporting the health and wellbeing of these populations:

- Addictions and Mental Health
- Seniors

- Palliative Care and End of Life
- Underserved Rural Communities

Covenant continues to advocate to promote greater awareness of our Catholic ministries in the Calgary diocese, as well as our value-add, historic contribution to the health and social service needs of Canadian in preparation for the launch of the National Catholic Health Care Week (October 6-12, 2019). Further collaboration with the Edmonton Catholic Agencies Network (ECAN) has advanced public perception research of Catholic ministries to better inform our future advocacy efforts, as well as exploring proposals for a micro-influencer campaign.

### **Mission Discernments**

Two major mission discernments were conducted the past year, reinforcing our commitment to deepen capacity for ethical reflection and discernment, in keeping with our *People and Culture Strategy*. As in past years, the process of mission discernment helps our organization address significant ethical issues from a Catholic social justice and moral tradition, framed around our six core values. Covenant Health's Mission Discernment Tool is recognized as a Leading Practice by Accreditation Canada in helping facilitate such thought leadership.

As with all discernment activity, the ultimate pragmatic goal is to clarify organizational clarity to support morally defensible decisions vis-à-vis our funder, sponsor and the public we serve, including a framework to develop any resulting policies, priorities, and other key public statements.

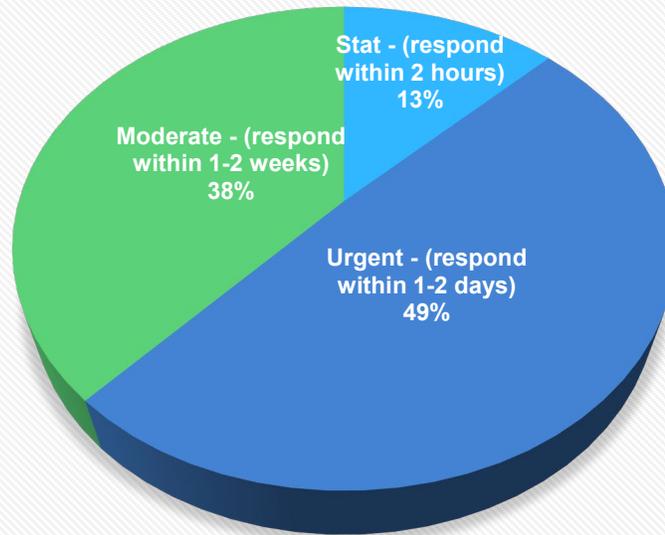
- Mixed gender room assignments
- Determining the timing around notification of individuals impacted by an information privacy breach

### **Ethics Centre**

The Covenant Health Ethics Centre continues to respond to consult requests (92 total for this fiscal year compared to 93 total for 2017-2018, and 70 total for 2016-2017).

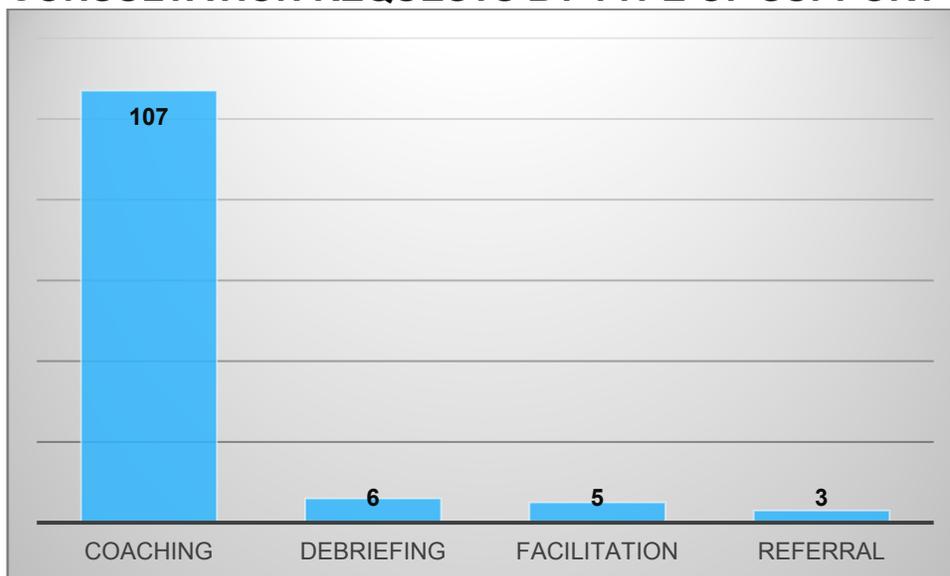
This trend highlights the importance of the work of the Ethics Centre, including quality improvement efforts facilitated by the Ethisphere benchmarking process, staff and board education (e.g., the Rural Leaders Ethics Forum), expansion of province-wide ethics committees, and collaboration and input with policy development and organizational processes. Tools and resources, including this report, are also made available on its Business Ethics page.

## Consultation request by urgency



■ Stat - (respond within 2 hours)      ■ Urgent - (respond within 1-2 days)  
■ Moderate - (respond within 1-2 weeks)

## CONSULTATION REQUESTS BY TYPE OF SUPPORT PROVIDED



Covenant Health has been proactively addressing ethically challenging issues and scenarios; in some cases leading the work ahead of other healthcare organizations internationally. As a result of this commitment and influence, and in anticipation of the imminent retiring of 46% of ethicists from Catholic health care over the next several years (Catholic Health Alliance of Canada *Ethics Capacity Study and Report 2019*), Covenant Health is committed to expanding the scope and exposure of the Ethics Centre to a newly constituted *Ethics and Discernment Centre*. This will include the following:

- Re-structure existing Ethics Centre resources and service offerings (ethics analysis/articulation, ethics issue resolution facilitation, policy development and review, education);
- Enhanced focus on organizational decision-making, leadership development (executive coaching & mentoring) and organizational culture formation (mission and values alignment);
- Rebranding of the Ethics Centre and increase ease of access and availability of online resources;
- Targeted promotion, marketing and partnering to expand networks and sphere of influence external to the organization, with potential revenue stream opportunity.

Covenant Health has already committed to enhance our capacity for ethical reflection and discernment. For example, as part of The Leadership Challenge program, *Enhancing Ethical Reflection and Discernment* has been selected as one of the five Action Learning Projects that a subgroup of participants will be tasked this year to develop recommendations and solutions.

### **Ethisphere – 2019 Ethics Quotient (EQ™) Benchmarking Report**

For the fourth consecutive year, Covenant Health was designated by the Ethisphere® Institute as one of the 2019 World's Most Ethical Companies®. Our voluntary participation in this comprehensive third-party assessment of its ethical practices against other leading international organizations provides Covenant Health with an analytical scorecard and benchmarking report. With input and oversight provided by Covenant's Risk Assessment and our Senior Leadership Team, a quality improvement plan is then developed that identifies areas of strength and opportunity to help drive continual quality improvement of ethics performance.

Highlights of this quality improvement plan include a focus on the delivery and measurement to determine effectiveness of Compliance and Business Ethics training as well as training in general; particularly around policies. Additionally, we will concentrate on developing and launching the organization's refreshed Diversity and Inclusion strategy, workplan, and communications rollout. One of the many components of this work will require developing a variety of educational and support services for teams who grapple and face sensitive Diversity and Inclusion related scenarios in the workplace. Also, the Board has expressed interest in exploring strategies to diversify the Board with future appointments in order to better represent the communities that we serve.

Covenant Health has engaged with the two other Canadian recipients of the Ethisphere designation, and has joined the Business Ethics Leadership Alliance (BELA) community as part of our involvement with the Ethisphere® Institute. Key benefits of being part of the BELA community include:

- Peer and Mentor Networking allowing connections with other industry leaders, experts, data and resources, including peer insights, presentations, research and podcasts. Benchmarking against Ethisphere’s dataset of leading practices from other designated organizations
- Access to events at global summits and local roundtables showcasing industry best practices

Further, in keeping with our commitment to deepen capacity for ethical reflection and discernment, an educational toolkit on Ethisphere has been provided to leaders, as well as targeted staff education sessions, webinars, and brown-bag lunches. As part of this toolkit, an [Ethical Culture video](#) highlighting various staff across the organization that present their perspective on working in an organization that values ethical integrity. Experts of the video will be used on the Covenant Health recruitment page to attract new employees.

### **Health Ethics Guide Modules**

To support our strategic objective to deepen capacity for ethical reflection and discernment under Covenant’s *People and Culture Strategy*, members of the Senior Leadership Team participated in the creation of the online [Health Ethics Guide interactive board formation and education module](#). SLT members were interviewed on camera, discussing key articles in the *Guide* that have been formative of their own leadership experience, and how the *Guide* continues to provide practice guidance in their day-to-day decision-making. A similar online module was created for all Covenant staff, underscoring our organizational commitment and shared ownership to ethics, including ethical governance and administration.



The Board module was subsequently expanded to incorporate interviews of other members of the Catholic Health Alliance of Canada governing council and staff, and developed into an app version that can be downloaded for free from the App Store. The Alliance and Covenant Health is now actively promoting its use nationally and even internationally, again demonstrating the influence of Covenant’s leadership in ethics and intentional use of the *Health Ethics Guide* as a key resource for all our clinical, administrative and operational decision-making.

### **Mission Formation, and the Mission and Culture Survey**

Beginning as early as 2009, Covenant Health used an annual Mission Formation process (formerly known as Mission Assessment) to help evaluate how teams are achieving,

advancing, and aligning current operations and decision-making with our mission. The process required teams to evaluate their mission performance against tailored-made indicators developed by, and for, Covenant Health leaders and staff, and to identify two mission targets to focus on quality improvement initiatives for the coming year. A subset of the indicators included questions that probed team's use of values based decision-making and their compliance with the *Health Ethics Guide*, as well as our ethical obligations regarding disclosure, clinical quality and safety improvements, advocacy, responsible stewardship of resources, and communications, etc.

Mission Formation serves to integrate the data gathering accountability component (to test for compliance) with the educational opportunity (to leverage shared ownership), helping to instill a mission-inspired culture and capacity for ethical decision-making and discernment.

Over the past year, 32 teams participated in this formative exercise including 20 operational programs and 12 corporate teams (down from 38 teams – 22 operations/16 corporate in 2017-18 due to leadership changes and competing priorities).

In the 2018-19 Mission Formation Report, the top two standards selected as mission targets for operations focused on patient/resident/family participation in care planning, as well as committing to the development of current and future leaders. Corporate Services also highlighted committing to the development of current and future leaders as their number one mission target, as well as a second place three-way tie between enhancing a just workplace and culture, improving the delivery of services based on integration and evidence; and, exercising responsible stewardship.

The Mission Formation cycle of 2018/19, however, marks the final chapter of this process. Feedback from staff pointed out that the Mission Formation process and the Employee Engagement, although distinct in nature, have some significant overlap with two separate action plans that try to accomplish similar results.

A refreshed process was thus recently implemented after an exercise earlier this year in integrating employee engagement and mission formation questions into one survey: *The Mission and Culture Survey*. This allows for streamlined and more efficient processes in the integration of Employee Engagement and Mission Formation under the general title of *Mission-Inspired Culture*, again featuring specific self-assessment questions that will test for staff, physician and volunteer commitment to ethical integrity.

Associated with this new process is the *Culture Ambassador* Initiative which saw over 200 employees participate in a one day *Culture Ambassador* training event, who will in turn help model and create shared ownership of our mission-inspired and discerning culture.

### **Internal Controls and Internal Audit**

In the past fiscal year, Internal and External Auditors have validated and closed three internal control recommendations and issued three new recommendations; thereby, leaving 24 recommendations outstanding as of March 31<sup>st</sup>. Subsequent to year end, a net of three payroll recommendations have been validated and closed by Internal Audit, which leaves 21

recommendations outstanding as of this reporting date. The majority of the 21 outstanding recommendations will be implemented over the coming year to enhance the equipment and inventory management, patient concerns resolution, privacy, information technology and financial processes.

As part of the current financial reporting process, Finance performs internal controls to ensure that the financial information is reliable and accurate. Covenant Health is developing an Internal Controls Framework (ICF) to formally document the business processes and key controls that are relied upon to effectively mitigate risks. The initial implementation is concentrating on the external reporting and is in the final stages of completion.

Over the past year, Management worked with Internal and External Audit on a long term assurance strategy given that the Risk Management and Internal Controls department is implementing an ICF and Covenant Health relies on Alberta Health Services to provide shared services for information technology, payroll and portions of our procure to pay processes. We will continue the discussion on a go forward basis to ensure an integrated and risk-based approach.

### **Corporate Social Responsibility**

#### *Human Trafficking*

Work on Human Trafficking education, intervention, and advocacy has continued this year. Targeted questions were added to the screening tool for violence used in Covenant Health Emergency Department sites. Three online learning modules were also developed and launched on the CLiC learning platform that focus on the recognition of victims, appropriate response, and community resources, and is available to all Covenant Health staff and sites. Additionally, informational posters are under development for distribution throughout Covenant to identify Covenant Health as a safe site for trafficking victims.

Other departments may unknowingly encounter potential human trafficking victims. For this reason, presentations were made with: Child Health, Maternal Health, and in coordination with the RCMP human trafficking unit to 2<sup>nd</sup> year medical students.

Our organization continues to participate in the Prevent Alcohol and Risk-Related Trauma in Youth (P.A.R.T.Y.) program, a weekly program aimed at Grade 9 students from across the City of Edmonton and surrounding area. Part of the enhanced education a Covenant Health ethicist provides includes the risk of trafficking and how students can protect themselves. A learning video has been prepared for the P.A.R.T.Y. program and the RCMP have approached Covenant requesting use of this video for their own educational purposes.

Furthermore, Covenant continues to work with *ACT Alberta* - the Action Coalition on Human Trafficking Alberta to schedule general introduction sessions while developing clinician specific education materials for our staff.

#### *Other Preventative Ethics Strategies*

At a local level, Covenant continues to support grassroots charitable initiatives led by our staff, such as clothing and food hamper drives, or voluntary medical missions abroad. This is complemented by corporate-led initiatives such as: financial assistance to the non/uninsured, social justice initiatives like our Angel Cradle newborn safe havens, and school lunch program, many of which are routinely featured on our Communication and social media sites.

In keeping with our preventative ethics strategy, Covenant also invests time and resources to advocate for staff well-being, including our Mental Health First Aid programs, Employee and Family Assistance, Critical Incident Stress Management, as well as spiritual care support. There has been a focus on moral distress workshops for staff and physicians, complementing our array of resources that provide early intervention for teams in crisis and distress.

Covenant Health's newborn safe haven program continues to regularly attract national media attention, providing an advocacy and partnership opportunity to support and educate other health care organizations wishing to implement similar programs. In fact, the aforementioned P.A.R.T.Y program has recently started providing Angel Cradle Brochures to all attendees in an effort to increase awareness in this vital newborn safe haven program which has already safely received an infant.

The program provides another accessible way of educating and socializing the Catholic community about the principles and ethical justification of harm reduction practices, in which newborn safe havens are ultimately based, that at times are still greeted with moral reservation. Advocacy is as much about changing the conversation and attitudes as it is about new programming, which the Angel Cradle continues to provide.

## Summary

The information in this report gives an overview of how Covenant Health is committed to enhance competency and capacity for ethical decision making and discernment. It is because of this commitment that we continuously devote efforts and resources to ethical reflection, and provide leadership in the community so we can continuously learn and grow, and serve our patients and residents with respectful and quality care.

The challenges and issues that we face as an organization are often complex and emotional, however we have demonstrated our willingness to take risks and address difficult topics that often require a moral and ethical lens in their approach. We look to our *Health Ethics Guide* as one of many guiding documents in carrying out the legacy of our Founding Sisters, and we rely on the day to day commitment to ethical integrity of our exceptional staff, physicians and volunteers to deepen the culture of ethics at Covenant Health. Being an organization that is recognized internationally for our ethical performance comes with the challenge to continually live up to that standard. It is a challenge that we welcome and embrace.