



# Code of Conduct

*Being our best at all times*

Effective February 4, 2022

**MESSAGE FROM PRESIDENT/CEO**

As president and CEO, I value each and every one of you as you work to uphold the mission, vision and values of Middlesex Health. The actions we take every day are a reflection of our organization. The communities we serve expect us to do our best, and your co-workers and colleagues expect the same.

This document speaks to our Employee Code of Conduct, ethical behavior and the laws, rules and regulations of how we conduct business.

Our mission, vision and values do not merely create a set of statements, but rather they define what we aspire to uphold as an organization and as employees.



Patient safety, high-quality patient care and providing the best experience possible are what we should come to work ready to deliver – every day. Our values speak to our principles and standards of behavior, and we are all responsible for maintaining these values.

In addition, strong performance is critical to our success. But just as important is how we go about achieving results. We do so with honesty and respect and by operating ethically and with integrity in all that we do. Our code of conduct helps to guide our standards for conduct and compliance, and it helps us to avoid conflicts of interest.

The following pages cover many different aspects of how our values relate to our day-to-day operations. There is a lot of information to review, but it is very important.

All Middlesex Health employees are expected to abide by our code of conduct. We share in this responsibility, and I thank you for doing your part to make Middlesex Health an outstanding organization.

Sincerely,

A handwritten signature in black ink that reads "Vincent Capece, Jr." The signature is written in a cursive, flowing style.

Vincent G. Capece, Jr.  
President/CEO

## Table of Contents

<b>Who We Are</b>	<b>3</b>
Our Mission, Vision and Core Values	
<b>How We Can Be Our Best</b>	<b>3</b>
Employee Behavior	
Diversity, Equity and Inclusion	

Corporate Compliance Program	
<b>Our Code of Conduct</b>	<b>5</b>
Purpose of the Code of Conduct	
Knowing Your Responsibilities	
Speaking Up Without Fear	
Where to Go for Help	
<b>Promoting an Ethical Workplace</b>	<b>7</b>
Respecting Others	
Professionalism at All Times	
Promoting a Safe Workplace	
Research and Grants	
<b>Our Responsibilities to Others</b>	<b>9</b>
Keeping Information Private	
Compliance with Laws and Regulations	
<b>Doing the Right Thing</b>	<b>11</b>
Never Bribe	
Management of Donated Funds	
Rules About Personal Gifts	
Referrals	
Political Contributions	
Keeping Accurate Records	
<b>Safeguarding Our Health System</b>	<b>13</b>
Avoiding Conflicts of Interest	
Protecting Our Assets	
Information Security	
<b>Employee Conduct</b>	<b>15</b>
Equal Opportunities	
Prohibitions Against Disruptive or Abusive Behavior	
Timekeeping	
Substance Abuse	
Excluded Individuals	
<b>Additional Resources</b>	<b>16</b>

## Who We Are

### Mission Statement

Middlesex Health exists to provide the safest, highest-quality health care, and the best experience possible for our community.

### Vision Statement

To be the clear, first choice for medical care.

### Core Values

- Pursue Excellence
- Uphold Honesty
- Cooperate and Collaborate
- Support Innovation
- Deliver Compassionate Care

## How We Can Be Our Best

### Employee Behavior

As an employee of Middlesex Health, you are expected to work safely, be considerate of your colleagues and contribute to a collaborative, positive and healthy environment in which we can all succeed. Specifically:

- **Be supportive of your colleagues, both proactively and responsively.** Offer to help if you see someone struggling or otherwise in need of assistance.
- **Be inclusive.** Go out of your way and across cultures to include others in appropriate activities. Be an ally and an advocate for your teammates.
- **Be collaborative.** Share ideas, and ask for feedback often.
- **Be generous in both giving and accepting feedback.** Good feedback is kind, respectful, clear and constructive, and it focuses on goals and values rather than personal preferences.
- **Be kind.** Be polite and friendly in all forms of communication, especially when you are working remotely. When you work remotely and are not talking to someone in person, there are greater opportunities for misunderstanding.
- **Take care of each other.** If you ever witness or hear someone being targeted with hate speech, or something is being done that seems like it isn't aligned with our values or these standards, speak up. If necessary, raise the issue with your supervisor, and support the person who was impacted.

### Diversity, Equity and Inclusion

Middlesex Health is dedicated to creating a workplace that respects people's differences, embraces their strengths and allows all staff members to reach their full potential. Diversity is defined as the range of human differences. This includes protected classes, such as race, color, national origin, religion, gender, sexual orientation, age or disability. It also includes other elements, such as education, life experience, marital status, immigration status and much more.

At Middlesex Health, diversity, equity and inclusion work is carried out by the employee-led DRIVE Change Committee. Its mission is to advance organizational change to sustain a more equitable and inclusive Middlesex Health by achieving health equity and improved health outcomes for the communities it serves, advancing professional development and career opportunities for staff and assuring fairness and belonging are promoted and supported by protocols, policies and environment.

By valuing diversity and promoting inclusion, we can create a workplace where we learn from one another and recognize the unique contributions that each of us can make. This means that all employees are entitled to work in an environment that is free of harassment, bullying and discrimination. Click [here](#) to learn more about DRIVE Change.

Harassment, bullying and discrimination take many forms, including:

- Unwelcome remarks
- Gestures or physical contact
- The display or circulation of offensive, derogatory or inflammatory pictures or other materials, including by email and on the Internet
- Offensive or derogatory jokes or comments (explicit or by innuendo)
- Verbal or physical abuse or threats

No form of harassment or discrimination, whether directed at employees, patients or others, will be tolerated. Each allegation of harassment or discrimination will be promptly investigated in accordance with applicable Human Resources' policies. For more information, please review our [Harassment or Threatening Behavior Policy](#).

## Corporate Compliance Program

Our Corporate Compliance Program means more than just complying with state and federal regulations that address safeguarding protected health information (PHI). It also means serving patients while upholding our values, as compliance is the responsibility of all of us – collectively and individually.

Middlesex Health's Corporate Compliance Office is responsible for implementing, maintaining and reviewing the Corporate Compliance Program. The office also:

- Reviews, revises and formulates appropriate policies and procedures to guide Middlesex Health and the operations of the Corporate Compliance Office
- Reviews and approves training materials and educational programs that encompass general compliance, billing compliance, and privacy compliance
- Maintains, reviews and oversees all matters reported to Middlesex Health
- Promotes the need to safeguard PHI so that it is managed with the highest levels of compassion and integrity
- Reviews laws, regulations, statutes, policies and guidelines that relate to compliance issues and conducts routine auditing and monitoring to foster compliance
- Conducts or oversees reviews and investigations that relate to potential compliance concerns

## Our Code of Conduct

### Purpose of the Code of Conduct

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The purpose of this Code of Conduct is to reinforce Middlesex Health's corporate values and to serve as a guide for moral, ethical and legal behavior. Adherence to the Code of Conduct promotes Middlesex Health's reputation for integrity and honesty in the community and also ensures that Middlesex Health is compliant with applicable laws, rules and regulations.

## Knowing Your Responsibilities

All employees of Middlesex Health are expected to act in a manner that will merit public trust and confidence in all matters.

We are all responsible not only for complying with the Code of Conduct, but also for reporting any activity that we in good faith believe may be a violation of such policies.

The standards set forth in our Code are mandatory and must be followed. All Middlesex Health employees will be held accountable for behaviors and actions inconsistent with the Code. Any violation of our Code may result in disciplinary actions, up to and including termination.

## Speaking Up Without Fear

Reporting violations is required, and failure to report a known or suspected violation can itself be a cause for discipline. No employee who in good faith reports a suspected violation will suffer any adverse employment consequences. For more information, please review our [Anti-Retaliation Policy](#).

Middlesex Health's policy requires that we maintain open lines of communication for employees throughout all stages of their employment. We have several methods in place for employees to make **confidential reports** or to raise concerns about anything that they consider to be questionable. Human Resources and all levels of management also are available to assist. If anonymity is desired, employees may call the internal Compliance Hotline, or the external confidential reporting service. Reports can also be made to the chair of the Audit Committee of our Board of Directors. Contact information for all of these options is listed below.

We offer departing employees the opportunity to complete an exit survey, or to participate in an exit interview, to obtain valuable feedback about Middlesex Health's operations and culture. This feedback is instrumental in identifying potential compliance and legal-related concerns within the organization.

## Where to Go for Help

There are several ways to report issues of non-compliance:

- Linda Jo Sanborn, Corporate Compliance Officer @ **860-358-6602** or [lindajo.sanborn@midhosp.org](mailto:lindajo.sanborn@midhosp.org)
- Internal Compliance Hotline @ **860-358-6045**
- Internal Compliance Form @ <https://sites.google.com/a/midhospintra.org/corporate-compliance/>

- External Compliance Hotline @ **1-866-654-7902** or visiting [middlesexhealth.ethicspoint.com](http://middlesexhealth.ethicspoint.com)
- Susan Martin, VP, Finance/CFO @ [susan.martin@midhosp.org](mailto:susan.martin@midhosp.org)
- Vin Capece, President/CEO @ [vin.capece@midhosp.org](mailto:vin.capece@midhosp.org)
- Jean D'Aquila (Chair, Audit Committee of the Board of Directors) @ **860-550-3918** or [jean.daquila@midhosp.org](mailto:jean.daquila@midhosp.org)
- Corporate Compliance Office, Middlesex Health, 28 Crescent Street, Middletown, CT 06457

When contacting the Corporate Compliance Office, you may choose to remain anonymous. Middlesex Health maintains, to the full extent of the law, the confidentiality of any individual who reports concerns or possible misconduct.

Resources regarding the Code of Conduct are available on the Corporate Compliance Office intranet page. If you have further questions about the Code of Conduct, you can contact the following:

- Your direct manager or supervisor
- Administration: **860-358-6110**
- Human Resources: **860-358-6580**

Our Corporate Compliance team is responsible for reviewing compliance-related concerns that are detected or reported using the above reporting mechanisms.

***Some examples of issues that may be investigated by our team include:***

- Charging for services not provided to patients
- Upcoding, which is knowingly assigning an inaccurate billing code that will result in higher reimbursement
- Attending physicians not following federal and state regulations regarding supervision of resident physicians in training
- Procedures being performed that are not medically necessary
- Falsifying documentation

***Not Sure? Ask Yourself:***



- Does it reflect our values?
- Is it good for Middlesex Health and our patients?
- Would I feel okay if everyone knew about it?

If you can answer “yes” to all of these questions, it’s probably safe to proceed. But when answering a “no” or “not sure” to any of these questions, it is always best to ask for guidance before proceeding.

## **Promoting an Ethical Workplace**

### **Respecting Others**

Middlesex Health values diversity, equity and inclusion and works to create a culture of excellence in which all persons are valued, connected, treated with fairness and where differences are both respected and supported. Middlesex Health will not tolerate conduct that is disrespectful, hostile or intimidating or behavior that involves bullying or harassment.

### **Professionalism at All Times**

We display and promote the highest standards of professional and ethical conduct. We act with the competence, skill and integrity expected of our professions. We behave with dignity and courtesy toward our patients, coworkers, students, volunteers

and others in business-related activities. We are honest, fair, reasonable and objective in our professional relationships.

## Promoting a Safe Workplace

Middlesex Health maintains a drug-free workplace. We should not use or possess illegal or non-prescribed drugs or alcohol while conducting business, while on health system property or while operating Middlesex vehicles.

As employees, we must report workplace injuries or unsafe conditions in accordance with Middlesex Health's policy and procedure. No individual will be subjected to retaliation for reporting a workplace injury or unsafe environment. If you have something to report, please click [here](#).

Middlesex Health is committed to providing and maintaining a healthy, safe and secure environment. We are to comply with applicable laws and regulations relating to the environment, including those that relate to the handling, storage, use and disposal of pollutants, hazardous materials and infectious wastes that may be used or generated in the course of Middlesex Health operations.

It is Middlesex Health's policy to provide and require the use of appropriate protective equipment and measures, and insist that all work be performed in a safe and responsible manner. All employees are required to become familiar with emergency and safety plans. Safety Data Sheets (SDSs), which contain information about hazardous chemicals, are available to all employees and are located [here](#).



### ***Employees who work with hazardous chemicals must:***

- Know which hazardous chemicals are used in the work area
- Know where the SDSs are located on their unit
- Know how to read the SDSs
- Read all relevant SDSs before starting a job that may require the use of hazardous chemical
- Read product labels carefully, follow all instructions and read all warnings
- Attend all hazardous chemical training sessions
- Contact your manager for more information

## Research and Grants

Middlesex Health is committed to observing the highest ethical standards relating to research, and it ensures compliance with all federal, state and local laws and regulations, as well as relevant Middlesex Health policies and procedures. All proposed research involving human subjects must be submitted to the Institutional Review Board (IRB) for review and approval. All research and grant proposals must conform to IRB standards and to Middlesex Health's informed consent policies. Research misconduct will not be tolerated. Research misconduct includes fabricating, changing or falsifying results of studies. Additionally, a patient's refusal to participate in a research study will not compromise their access to care and services. Middlesex Health only submits true, accurate and complete costs related to research grants.

## Our Responsibilities to Others

### Keeping Information Private

Protecting confidential information is our priority. Confidential information includes health information about our patients, information included in employee records and proprietary information about Middlesex Health business.

We are required to follow Middlesex Health's privacy and security policies and state and federal privacy laws. We are also committed to informing patients about their rights with regard to their PHI. Through business associate agreements, we protect the PHI shared with our business partners in accordance with HIPAA.

Our patients expect us to safeguard their PHI and respect their confidentiality by using PHI only when it is necessary to serve the patient or as permitted or required by law. Patients have certain rights regarding their PHI.

Middlesex Health's policies and procedures and Notices of Privacy Practices are located [here](#). The Middlesex Health Privacy Officer is available at 860-358-4630 if you have questions or need further guidance related to HIPAA or any other privacy laws. HIPAA policies are located on the intranet in "Computer Systems" under "PolicyStat."

#### **What is PHI?**

Protected Health Information includes any individually identifiable information that relates to past, present or future medical or behavioral conditions, treatment or payment that may identify a patient. It can be found in many places, including in medical records and financial information.



#### **Helpful Tips:**

Let's say your friend or colleague is in the hospital, and you are curious to see why they are in the hospital. If you're not involved in their care, or if it's not a part of your job, you cannot access their PHI. Any violation of patient privacy must be reported to the Middlesex Health Privacy Officer.

Security audits are conducted for any inappropriate access within our electronic health record, and any employee who violates HIPAA policies, may face disciplinary actions up to, and including, termination.

## Compliance with Laws and Regulations

Middlesex Health's business is highly regulated and must be conducted in accordance with laws and regulations. Many laws and regulations pertain to patient referrals, physician relationships, billing and payment practices, vendor contracts, lobbying, environmental health, payor relationships and employment practices. Since health care delivery is so highly regulated and some of these laws are very complex, it is important that you attend training regularly. The Corporate Compliance Office is also available to assist you in interpreting laws that apply to our business.

Several laws describe activities that may constitute fraud, waste and abuse, including but not limited to, the False Claims Act, the Anti-Kickback Statute and the Physician Self-Referral Law called the Stark Law. These laws generally prohibit the following:

- Submitting inaccurate or misleading claims for services provided
- Submitting claims for services not provided
- Submitting claims for medically unnecessary services not covered by the payor
- Submitting reports to any federal or state agency with inaccurate or untimely information
- Making false statements or representations to obtain payment for services or to gain participation in a health care program
- Concealing, or improperly avoiding, an obligation to repay a health care program
- Offering money, gifts, goods, services or anything of value to encourage or reward the referral of patients to a health care provider



### ***What is the False Claims Act?***

This is a federal law that makes it a crime for any person or organization to "knowingly" make a false record, or to file a false claim for payment, under any federal or state health care program. "Knowingly" means having actual knowledge that a claim is false, or acting in deliberate ignorance or with "reckless disregard" as to whether a claim is false.

## Doing the Right Thing

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## Never Bribe

A bribe can be something other than cash, which would gain an advantage. Offering, giving, favoring, soliciting or receiving any form of bribe or other improper payment is prohibited.

## Management of Donated Funds

Middlesex Health, as a nonprofit organization, raises funds from individuals and business foundations, and seeks grants to support critical programs. The Department of Philanthropy has the responsibility to raise, manage, and administer these donated funds. We have been entrusted with these funds to support our mission, and have a responsibility to our donors to acknowledge their generosity. We do this by adhering to the highest standards in the solicitation, acceptance and recording the use of donated funds.

## Rules About Personal Gifts

We may not accept or offer any direct or indirect compensation (including the giving or receiving of gifts valued over \$50) from or to any current or potential vendors, suppliers or customers, and should avoid any other relationship that might compromise or appear to compromise the integrity of our working relationship with any other person or entity.

It is important that we also exercise good judgment in relationships with representatives of government agencies. It would be improper for an employee or agent to offer any gift, loan, favor or special service to a government official or other representative.

We don't want to eliminate all participation in business-related functions and activities, such as lunches, dinners and entertainment, provided such activities are not contrary to applicable law or governmental regulations. They must also be reported under standard expense account procedures. Please feel free to contact our Corporate Compliance Office with any questions regarding gifts, entertainment and business courtesies.



### **Helpful Tip:**

You may receive certain perishable or consumable gifts given to a group or a department (e.g., flowers, candy) from a grateful patient or patient's family. These are considered items of nominal value. Under no circumstances may you solicit gifts from patients or their families.

## Referrals

We do not pay for referrals. Patient referrals and hospital admissions are based solely on an individual's medical needs and our ability to render the needed services. No one at Middlesex Health is allowed to pay or offer payment to anyone for the referral of patients.

We do not accept payments for referrals and no one at Middlesex Health is permitted to solicit or receive anything of value, directly or indirectly, in exchange for the referral of patients to Middlesex Health. We do not take into account the value or volume of referrals made to us when entering into financial arrangements with other health care providers.

## Political Contributions

As a tax-exempt corporation, Middlesex Health must follow regulations restricting its political activities. Middlesex Health funds or resources may not be used to contribute to political campaigns or for gifts or payments to any political party or any of their affiliated organizations. This includes non-financial donations, such as using work time or a Middlesex Health telephone to solicit for a political cause or candidate. You may not loan Middlesex Health property for use in a political campaign. The conduct of any political action committee is to be consistent with relevant laws and regulations.

It is important to separate personal and business political activities in order to comply with the appropriate rules and regulations related to lobbying or attempting to influence government officials. Subject to applicable campaign finance rules, you may, of course, participate in the political process on your own time and at your own expense. While you are doing so, it is important not to give the impression that you are speaking on behalf of, or representing, Middlesex Health or any of its affiliates in these activities. You cannot seek to be reimbursed by Middlesex Health for any personal political contributions.

## Keeping Accurate Records

We share the responsibility for maintaining honest, accurate and complete financial and other records for complying with required internal controls and for reporting any suspected breach of those controls.



- We do not sign another person's name to documents or share each other's passwords.
- We amend a medical record only in accordance with Middlesex Health's policy and applicable law.
- We do not fabricate, falsify or plagiarize when proposing, conducting or reporting research.
- Our financial records conform to applicable accounting principles.

## Safeguarding Our Health System

We should always remember that our patients place a tremendous amount of trust in us. Safeguarding their PHI, while a matter of law, is also an ethical obligation, and it is one way that we clearly demonstrate our cardinal value to honor the dignity and worth of each person.

### Avoiding Conflicts of Interest

In the course of conducting Middlesex Health business, we are expected to put Middlesex Health interests ahead of any outside business, commercial or personal interests. You should avoid situations in which a conflict of interest, or the appearance of a conflict, could arise.

Because it is impossible to describe every potential conflict of interest scenario, Middlesex Health relies on your commitment to exercise sound judgment, to seek advice when appropriate and to adhere to the highest ethical standards in the conduct of your professional and personal interactions. Anyone who believes they have a conflict of interest, or the appearance of a conflict of interest, should immediately report it to their supervisor, department manager, or the Corporate Compliance Office.

Designated employees, members of the Medical Staff, officers, agents and board members of Middlesex Health are required annually to disclose situations where there is an actual and/or potential conflict of interest. Middlesex Health has a conflict of interest form that you are required to submit. Any questions about whether an outside activity might be a conflict of interest should be directed to the Corporate Compliance Office.

### Protecting Our Assets

Our assets include everything that Middlesex Health owns or uses to conduct business. Each of us is entrusted with the care of these assets. We must be proactive in safeguarding them from issues, such as loss, damage, theft, waste and improper use.

## Information Security

We are expected to follow all Middlesex Health information security policies and procedures, including using and maintaining each of our own log-in credentials and system passwords in a responsible and confidential manner. We are also expected to use our individual badges to identify ourselves as a Middlesex Health staff member.



- Use strong passwords (at least eight characters that contain upper and lower case characters, numbers and special characters).
- Make sure to log off, or lock, your computer with a password protected screensaver.
- Never leave mobile devices containing PHI unattended or not secured.
- Sending PHI or confidential business information via email must be encrypted by using (^) in the subject line.
- Lock cabinets or rooms with PHI.
- Shred paper waste.

**To help do your part in keeping our systems and patients safe from cyber attacks, please remember:**

- Be wary of **EXTERNAL** email. Do not click links or attachments for emails that you weren't expecting, raise any sort of suspicion or are from contacts not already in your contact list. (Even when checking on your cell phone.)
- On the Internet, do not click links that are suspicious or promise something too good to be true (they usually are).
- Do not share your password with anyone. No one will ever call you and ask for your password. If someone does, don't give it to them.
- If something seems suspicious on your computer, such as files no longer being accessible, **report it immediately by calling the helpdesk at x4040.**

## Employee Conduct

Middlesex Health expects employees to comply with its general policies regarding their personal conduct, performance and behavior, as outlined in its Human Resources policy database.

Middlesex Health also requires integrity, candor and honesty from individuals in the performance of their responsibilities and in communication with our counsel auditors and regulating bodies. No employee should make false or misleading statements to any patient, person or entity doing business on behalf of Middlesex Health about

other patients, people or entities doing business or competing with Middlesex Health, or about the products or services of Middlesex Health or its competitors.

## Equal Opportunities

Fair and equitable treatment of employees, patients and other people is critical to fulfilling Middlesex Health's vision and goals. It is the policy of Middlesex Health to recruit, hire, train, promote, assign, transfer, layoff and terminate employees based on their own ability, achievement, experience and conduct without regard to personal characteristics including gender, race, color, age, religion, ethnic origin, disability, marital status, sexual orientation or any other classification prohibited by law. For more information see our [Equal Employment Opportunity Policy](#).

## Prohibitions Against Disruptive or Abusive Behavior

Middlesex Health prohibits any conduct or behavior that is abusive or disruptive to the work environment or the patient care environment. This includes but is not limited to loud, hostile, abusive or threatening conduct of a verbal or physical nature on the part of employees, contractors, patients, visitors and anyone else on any Middlesex Health premises. Any instances of such behavior should be reported to management or to Human Resources for further investigation and corrective action as appropriate. You can also file an anonymous report by calling Security's Workplace Violence Hotline at **860-358-6325**.

## Timekeeping

Time worked is to be reported in a timely and accurate manner as required by Middlesex Health policy. Only the true and actual hours worked are to be reported as such. Hours not worked for which pay is received, such as vacation or sick leave, are to be properly characterized. Fraudulent timekeeping is considered theft of time and will not be tolerated. For more information, please review our [Time and Attendance Policy](#).

## Substance Abuse

Middlesex Health maintains a drug-free workplace. Employees may not use or possess illegal or non-prescribed drugs or alcohol while they are performing their job responsibilities, conducting Middlesex Health business, on our property or while they are operating a vehicle owned or leased by Middlesex Health. For more information, please review our policy, [Substance/Drug Abuse Policy Drugs in the Workplace/ Fitness to Work](#).

## Excluded Individuals

A number of federal agencies have exclusion authorities that disallow clinicians, institutions and contractors from submitting claims to the government for reimbursement. Reasons for exclusion include fraud, patient abuse or neglect, felony convictions related to fraud or financial misconduct or felony convictions for unlawful

handling of controlled substances. The Corporate Compliance Office monitors published lists of excluded individuals to ensure that we abide by the law.

## Additional Resources

While this Code of Conduct provides overall general guidance, there are additional guiding resources with respect to our Corporate Compliance Program available to you. They include Middlesex Health-wide and department specific policies and procedures, Medical Staff Bylaws, as well as consultation with individuals within your chain of command, beginning with your immediate supervisor. Additional resources include periodic informational newsletters and other similar advisory memoranda.

For more information on the Corporate Compliance Program, call the Corporate Compliance Office at **860-358-6045**. Specific institutional policies and procedures can be found in our policy database.

*As the delivery of health care changes, this Code may be modified at any time. There may be other Middlesex Health policies that apply to matters covered by this Code, including but not limited to, Medical Staff policies, privacy and security policies and Human Resources policies. In the event that more than one policy applies to a situation, all such policies will be applied to the fullest extent possible. If there is a conflict or gap in the individual policy provisions, the provision of the policy that is most consistent with the values of Middlesex Health and compliance with the law will be applied.*