



**Code of Conduct:
Employees' Obligations
Respecting Conflicts of Interest**

2019

Overview

Conflicts of Interest Amendment Act (Bill 27) came into effect December 2017. The Act requires all public agencies, including the U of A, to have a Code of Conduct governing all employees. The Code must address the following:

- A requirement to act impartially
- Restrictions on acting in self-interest
- Disclosure of real or apparent conflicts of interest
- Restrictions on the acceptance of gifts and event invitations
- Limitations on concurrent employment

The code must be approved by the Ethics Commissioner of Alberta

Process

During the past year, the Code of Conduct was developed using current policies, procedures & collective agreements.

- Hyperlinks to existing policies & procedures were not acceptable
- Cut & paste approach of current language was used verbatim to create a single document
- New language was developed only where gaps existed
 - Acceptance of Gifts and Concurrent Employment
- Some existing policies and collective agreement language for managing conflict didn't meet the Ethics Commissioner's expectations (ie requirement to seek prior approval for concurrent appointments or employment.)

Streamlining Administration

- We worked closely with the Ethics Commissioner and other PSIs to develop guiding principles that reduce the administrative burden for reporting.
 - For gifts and events - reasonable dollar limits and procedures
 - For concurrent employment and appointments - collective agreement provisions regarding supplementary professional activity govern where applicable.
 - Creation of pre-approved employment categories for special exemption.

Approval & Governance Process

The Employee Code of Conduct was approved by the Ethics Commissioner on January 17, 2019, with the understanding that it would then proceed through the University's formal governance approval process.

- Any changes at this point would require resubmission to the Ethics Commissioner for review/approval
- In accordance with the legislation, the Code must be posted publicly by April 30
- The Code will come into effect on July 1

Rollout

All employees must comply with the Code of Conduct.

- Human Resources is working on awareness and communication strategy - planned for spring
- Communication will be sent to all employees with a copy of the Code outlining their obligations
- Information Sessions and Webinars will be held
- Website will house the Code, FAQs and Disclosure Reports
- Guide for supervisors
- Support will be provided by HR