



Employee Code of Conduct	
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Policy Administrator: Chief Human Resources Officer	Review Period: 5 Years
Recommended by: Service Council, upon recommendation from Deans' Council	
Associated Documents Conflict of Interest Disclosure Form	

PURPOSE

The purpose of this policy is to communicate Red Deer Polytechnic's commitment to its Values and to articulate its expectations with respect to the behaviour of its employees. This policy provides a framework to guide the conduct of employees in a way that upholds the integrity and reputation of the Polytechnic as well as the interests of the public it serves.

This policy defines Conflict of Interest and outlines the process for ensuring that such conflicts are adequately reported and addressed. The Polytechnic is a publicly funded institution and must ensure that it engages its mission with integrity and to a high ethical standard. Apparent or actual Conflicts of Interest have the potential to negatively affect the reputation and integrity of the employees involved and, potentially, the Polytechnic as a whole. It is the responsibility of the Polytechnic and its employees to guard against Conflicts of Interest that might interfere with the fulfilment of their obligations to the Polytechnic.

- **On campus:** On Polytechnic land and premises, either rented or owned, or using Polytechnic-owned or run property or equipment including, but not limited to, telephones, computers, computer networks and other technology.
- **Off campus:** An outside activity or event associated with the Polytechnic or where an employee is reasonably associated with or representing the Polytechnic. Examples of this may include: a Polytechnic course or organized class activity, a Polytechnic event (including athletics or performing arts), a Polytechnic business activity that has been defined as such, or social media used in connection with the Polytechnic and its professional reputation and/or brand.

SCOPE

This policy applies to all employees and applies to any activities on or off campus that could reasonably be associated with the learning environment or workplace, or in connection with or representation of the Polytechnic and its professional reputation and/or brand.

POLICY

1. As a publicly funded institution, Red Deer Polytechnic recognizes that the people of Alberta have a right to service which is conducted with impartiality and integrity. It is this special obligation to Albertans that demands that there not be, nor seem to be, any conflict between the private interests of employees and their duty to the public. At the same time, it is recognized that employees should enjoy the same rights in their private dealings as any other citizens, unless it can be demonstrated that a restriction is essential to the public interest.
2. The Polytechnic is responsible for the advancement and dissemination of knowledge. It encourages Polytechnic employees, in alignment with their role(s), to seek out and participate in approved research, to consult widely as appropriate in their paid employment and, where desired, to engage in non-Polytechnic activities so long as such activities do not interfere with their obligations to the Polytechnic.
3. The Polytechnic recognizes that these activities may benefit the participants, the Polytechnic and the public at large.
4. Many beneficial and productive developments and initiatives may, however, lead to an increase in Apparent or actual Conflicts of Interest.
5. The Polytechnic is committed to ensuring that these activities are conducted in a manner consistent with its interests and mission and in a manner that maintains the community's trust and confidence.
6. The existence of an Apparent or actual Conflict of Interest does not necessarily imply misconduct or wrongdoing on anyone's part. Conflicts can exist regardless of a person's character, intentions, and motivations and can arise through no fault of those involved.
7. As a publicly-funded institution, the Polytechnic expects its employees to conduct themselves in an ethical manner, upholding high standards of conduct and care in all aspects of their employment with the Polytechnic.
8. The Polytechnic expects its employees to conduct themselves with personal integrity, honesty, and diligence in performing their duties on behalf of the Polytechnic. Employees have a fundamental obligation to act in the best interests of the Polytechnic and not let personal interests or relationships interfere with, or appear to interfere with, the interests of the Polytechnic.
9. The Polytechnic encourages employees' involvement in the community and in outside professional activities compatible with the Polytechnic's mission, vision, and values as long as those activities do not conflict or interfere with their obligations to the Polytechnic.
10. An employee is expected to fully disclose Apparent or actual Conflicts of Interest in a timely manner so that the Polytechnic can assess if a conflict exists and, if so, how it may be eliminated or managed.
11. Reports and complaints regarding misconduct in research and scholarship are

addressed and managed under The Integrity in Research, Scholarly Activity, and Scholarship Policy.

Compliance with Laws and Standards

1. Employees fulfill their Polytechnic responsibilities in compliance with applicable laws, Polytechnic policies, procedures, and practices and in accordance with contractual commitments.
2. Employees conduct themselves in compliance with any and all applicable codes and standards that govern their specific profession or academic discipline.

Confidentiality

1. Employees protect information that is confidential, proprietary, or personal, using it only for the course of carrying out their Polytechnic responsibilities and in compliance with the *Freedom of Information and Protection of Privacy Act* and other legislation or Polytechnic policy that guides the collection, access, use, disclosure, and protection of the information.
2. Employees are responsible for protecting this information even after leaving the employment of the Polytechnic.

Impartiality

1. Employees will perform their duties and make decisions impartially, honestly, fairly and in good faith.

Furthering Private Interests

1. Employees must not take part in a decision in the course of carrying out their duties, knowing that the decision might further a private interest of the employee, a person directly associated with the employee, or the employee's minor or adult child.
2. Employees must not use their public role to influence or seek to influence a decision to be made by or on behalf of the Polytechnic which could further a private interest of the employee or to improperly further any other person's private interest.
3. Employees must not use or communicate information not available to the general public that was gained by the employee in the course of carrying out their duties, to further or seek to further a private interest of the employee or to improperly further any other person's private interest.

Conflict of Interest

1. Employees have a fundamental obligation to act in the best interests of the Polytechnic and not let outside activities interfere with that obligation. All employees are required to make their duties and responsibilities at the Polytechnic their prime obligation to the extent stated in their employment letter and to conduct any outside activity without encroachment upon or conflict with those responsibilities.

2. The Polytechnic supports employees in using their skills and expertise to benefit the community at large but recognizes that this may lead to opportunities for Apparent or actual Conflicts of Interest.
3. A power imbalance exists when one of the parties to a relationship has direct input or decision-making power over the other party's academic progress, or over the work performance, promotion, classification, or compensation of the other party to a relationship. Where consensual and intimate relationships, including those sexual in nature, with persons who are, or may become, associated with the Polytechnic (including employees and students) are entered into, exist, or previously existed, the employee must disclose the relationship or past relationship in accordance with this Policy. Steps must be taken to ensure the employee has no direct input or decision-making power over the student's academic progress or subordinate employee's work performance, promotion, classification, or compensation.
4. Employees who are absent from work due to illness or injury must not engage in outside employment without specific written authorization from a physician and consent from their Senior Administrator in consultation with the Chief Human Resources Officer.
5. Employees considering a new offer of appointment or employment must be aware of and manage any potential conflicts of interest between their current position and future circumstances and must remove themselves from any decisions affecting their appointment or employment.
6. Employees must not use information obtained in the performance of their official duties to take unfair advantage of their position in seeking other employment.
7. In situations where an Apparent or actual Conflict of Interest exists, the employee must disclose and address the conflict in a timely, open, forthright, constructive, and accountable manner.
8. If in doubt about whether a situation would, from the perspective of a reasonably well-informed, impartial observer, appear to be an Apparent or actual Conflict of Interest, the employee must seek guidance from their Senior Administrator.
9. The respective Senior Administrator reviews employee conflict of interest disclosures and works with the employee to resolve the conflict. Senior Administrators can obtain guidance on helping their employees avoid Conflicts of Interest or on avoiding their own conflicts, through the office of their respective Vice Presidents. The Polytechnic may seek external counsel or legal advice when an Apparent or actual Conflict of Interest exists.
10. Disclosures of actual or Apparent Conflicts of Interest are held in confidence and are only disclosed to those who are involved in the management of these issues.
11. Procedures regarding how to disclose and address apparent or actual conflicts comply with the *Freedom of Information and Protection of Privacy Act*, the *Alberta Human Rights Act*, and any other relevant legislation.

Concurrent Employment

1. Employees may take or hold supplementary employment, including self-employment, unless such employment
 - a. causes an Apparent or actual Conflict of Interest; or

- b. is performed in such a way as to appear to be an official act of the Polytechnic, or to represent the Polytechnic's opinion or policy; or
 - c. interferes through telephone calls, or otherwise, with regular duties; or
 - d. involves the use of the Polytechnic's premises, equipment, supplies, or assets, unless such use is otherwise authorized by the employee's Senior Administrator.
2. Prior to accepting or holding any supplementary employment, employees must notify their Senior Administrator about the nature of such supplementary employment. The Senior Administrator then reviews the supplementary employment for Conflicts of Interest, and if there is a Conflict of Interest, in writing, deny employment, allow employment, or put procedures in place to manage the conflict.
3. If there is disagreement on this authorization, a FARDC Member may apply to the FARDC Conflict of Interest Appeal Committee to provide recommendation to the President of the Polytechnic.
4. If there is disagreement on this authorization the employee (employees other than FARDC Members) may apply to the President of the Polytechnic for a final decision and approval.
5. Employees do not accept additional compensation for duties which they perform in the course of their duties with the Polytechnic.

Acceptance of Gifts

1. Employees will not accept cash or cash equivalents as gifts.
2. The value of a single tangible gift received by an Employee will not exceed \$100 and the cumulative limit of tangible gifts received from a single source by an employee in a calendar year is \$200.
3. For all Employees except the President and Vice Presidents, the value of a single event invitation will not exceed \$300 and the cumulative limit of event invitations accepted from a single source in a calendar year is \$400.
4. For the President and Vice Presidents, the value of a single event invitation from donors and friends of the institution will not exceed \$1000, and the cumulative limit of event invitations from a single donor or friend of the institution in a calendar year is \$1,500.
5. For invitations to conferences where admission and accommodation is paid, a gift of airfare, conference fees, and accommodation may be accepted up to \$1000. An invitation exceeding that amount may be accepted only with the concurrence of the employee's Senior Administrator.

Political Activity

1. Employees may exercise their rights as citizens to participate in political activities so long as it is clear that they are representing themselves as a private citizen and in no way represent the interests of the Polytechnic.
2. Employees must not use their position with the Polytechnic to seek contributions for a political party or activity from current or future clients or entities doing business with the Polytechnic.

3. Employees who run as candidates in a federal, provincial, or urban municipal council election must take a leave of absence without pay on the day after the writ for the election is issued or on the day that their candidacy is publicly announced, whichever is later. Until a leave of absence commences an employee cannot solicit funds for their own campaign.
4. An employee is required to resign if elected to federal, provincial, or municipal office.

Stewarding Polytechnic Resources

1. Employees steward Polytechnic Resources effectively, efficiently, and for their specified purpose.
2. Employees foster institutional autonomy and steward relationships to limit undue influence of external entities.

Respectful Environment

1. Employees cultivate an equitable, diverse, and inclusive working and learning environment, free from discrimination, harassment, and violence, including sexual violence. Employees are expected to:
 - a. Promote a high standard of respect for and treat all students, employees and the general community with courtesy and fairness.
 - b. Not discriminate against persons on any of the areas or grounds protected by relevant and associated legislation.
 - c. Not engage in behaviour which may reasonably be perceived as a violation of the Discrimination and Harassment Policy or the Sexual Violence Policy.
2. Employees conduct interactions in a mutually respectful manner, respecting the personal dignity of all, while not limiting the right of participants to challenge beliefs, views, and opinions and to engage in rational debate.
3. Employees protect and foster informed, meaningful, and inclusive participation in the operation of the Polytechnic, respecting requirements of legislation that allows for the expression of a diversity of views and opinions and debate.

Academic Freedom

1. Employees protect and foster academic freedom and the pursuit, discovery, integration, application, and dissemination of knowledge and understanding through independent thinking, expression, discussion, and debate.

Drugs and Alcohol

1. Employees do not use drugs or alcohol in a way that affects their performance and safety, the performance and safety of others (e.g. colleagues, students, visitors), or that negatively impacts the operations or reputation of the Polytechnic.

Requirements Specific to the President

1. The President of Red Deer Polytechnic is defined as a Senior Official under the *Conflicts of Interest Act* and must follow all restrictions set out for Senior Officials under Section 23.925 of the *Act* in addition to the obligations outlined in this Code.
2. The President of Red Deer Polytechnic is immediately bound by the provisions of the *Act* and this Code, including, but not limited to the following:
3. The President must not take part in a decision in the course of carrying out their office or powers knowing that the decision might further their own private interest, the private interest of their own minor or adult child, or the private interest of any person directly associated with them, pursuant to Section 23.925(1) of the *Conflicts of Interest Act*.
4. The President must not use their office or powers to influence or to seek to influence a decision to be made by or on behalf of the Crown or a public agency to further their own private interest, the private interest of their own minor child, or the private interest of any person directly associated with them, or to improperly further any other person's private interest, pursuant to Section 23.925(2) of the *Conflicts of Interest Act*.
5. The President must not use or communicate information not available to the general public that was gained by them in the course of carrying out their office or powers to further or seek to further a private interest of their own, or any other person's private interest pursuant to Section 23.925(3) of the *Conflicts of Interest Act*.
6. The President must not fail to appropriately and adequately disclose a real or apparent conflict of interest in the manner specified in this Code, pursuant to Section 23.925(4) of the *Conflicts of Interest Act*.
7. The President may not be involved in a concurrent appointment, business, undertaking, employment, or self-employment, other than their role as President of the Polytechnic, without the written approval of the Ethics Commissioner pursuant to Section 23.926 of the *Conflicts of Interest Act*. The President must first report the concurrent activity in accordance with Section 'E' and obtain a determination from the Chair of the Board of Governors of Red Deer Polytechnic that the activity is not a conflict, or is an allowed conflict, before applying to the Ethics Commissioner for approval. The President may not engage in the concurrent activity until written approval from the Ethics Commissioner is obtained.

Awareness and Compliance

1. Notice Period. This Polytechnic's Employee Code of Conduct policy was initially made public on April 15, 2019 and implemented effective April 30, 2019. Any changes to this Code will be given to the Ethics Commissioner for review and approval. Following the Ethics Commissioner's approval, changes to the Code will be approved by the President, made public, and will become effective thirty (30) calendar days after being made public.
2. The Polytechnic ensures that, upon hire, all employees read this policy and become aware of the Polytechnic's expectations with respect to their behaviour. On an annual basis, employees will be reminded of the expectations of the Code of Conduct Policy.
3. Senior Administration members are responsible for monitoring compliance with this policy.

Disclosing Conflicts

1. All employees are required to complete the Conflict of Interest Disclosure Form upon commencement of employment and submit the completed form to the appropriate member of Senior Administration. Thereafter, the form is to be completed at such time that an employee's Apparent or actual Conflict of Interest status changes.
2. A copy of the Disclosure Form is placed in the employee's personnel file. Disclosed information is subject to the *Freedom of Information and Protection of Privacy Act* and is held securely and confidentially
3. If an employee's Apparent or actual Conflict of Interest status changes, the employee must disclose that change of status as soon as possible by completing a form for submission to their Senior Administration member.

Filing Complaints of Misconduct

1. Individuals may report a complaint regarding alleged Misconduct through this policy and the Reporting and Investigating Safe Disclosures Guidebook.
2. A complaint may not proceed to formal investigation under this policy if:
 - a. The matter may be effectively resolved through an alternative, informal process with the agreement of all parties involved; or
 - b. The matter is more appropriately dealt with through another established Polytechnic policy or process; or
 - c. The matter is determined to be trivial, frivolous, vexatious, or an abuse of process. In such cases, the complainant may also be subject to discipline, up to and including termination of employment.

Investigating Formal Complaints of Misconduct

1. If the Chief Human Resources Officer determines that resolution of the complaint of Misconduct requires a formal investigation, the Chief Human Resources Officer either conducts the investigation or appoints a person or person(s) to an investigating team to conduct the investigation. The investigating team may include external experts, where considered appropriate by the Chief Human Resources Officer.
2. The individual or team conducting the investigation notifies the Respondent of the formal investigation within ten (10) working days of the appointment of the individual or team.
3. Prior to making a decision, the individual or team conducting the investigation advises the Respondent in sufficient detail of the evidence being considered and invites the Respondent and advisor, if desired, to meet with the individual or team and respond to that evidence orally and/or in writing.
4. When an investigation determines that an individual has engaged in Misconduct, that individual may be subject to discipline, up to and including termination of employment. The Chief Human Resources Officer determines and implements any discipline under this policy. If the Chief Human Resources Officer is the subject of the investigation and discipline is warranted, the action is taken by the President.
5. The discipline identified under this policy and the Reporting and Investigating Safe

Disclosures Guidebook is in addition to, and apart from, any other sanctions that maybe provided for by law. Any discipline arising under this policy is undertaken in accordance with relevant collective agreements and terms and conditions of employment.

6. For detailed procedures see the Reporting and Investigating Safe Disclosures Guidebook.

RELATED POLICIES

[Academic Freedom](#)

[Alcohol at College Events and Facilities](#)

[Cannabis on Campus](#)

[Harassment and Discrimination](#)

[Research Involving Humans](#)

[Information Access and Privacy](#)

[Integrity in Research, Scholarly Activity, and Scholarship](#)

[Safe Disclosure \(Whistleblower\)](#)

[Sexual Violence](#)

[Smoking and Tobacco Use](#)

[Social Media Manual](#)

[Student Rights and Responsibilities](#)

DEFINITIONS

Apparent Conflict of Interest: an Apparent Conflict of Interest exists if there is a reasonable perception, which a reasonably well-informed person could properly have, that the employee's ability to exercise their duties may have been affected by their private interest or activities.

Polytechnic Resources: the tangible and intangible assets of the Polytechnic.

Polytechnic Values: the five key values that reflect both the reality and the aspirations of the organization. These values are:

- **Agility:** Our decision-making is guided by evidence-based practice, building capacity for resiliency, and preparing our organization, our communities and our learners for adaptability. Our actions are guided by the needs of our diverse communities.
- **Bravery:** We are courageous to explore and embrace new ideas, new ways of thinking and encourage adaptive leadership. We create opportunities to act in the interest of equity, diversity and inclusion as well as empower individuals to share their voice, act with integrity and do the right thing.
- **Connection:** We are effective educators, communicators, brokers, and facilitators of enriched authentic and inclusive learning experiences for local and global communities. Our learners, faculty, staff and partners grow within our community and remain engaged as learners for life.
- **Discovery:** Driven by our culture of excellence, we take risks and try new things as role models of a growth mindset and creative thinking. We demonstrate diversity in action as we embrace opportunities to be researchers and problem-solvers, enabling invention, exploration, piloting and rapid change.
- **Empowerment:** Our faculty, staff and learners are informed decision makers, critical thinkers, and advocates. We embrace our responsibility to advance learning, diversity,

choice and equity for all.

Conflict of Interest: an Apparent or actual Conflict of Interest occurs when an employee is placed in a situation in which their personal or financial interests, or the interests of their immediate family or persons with whom the employee has a personal or business relationship, conflict or appear to conflict with their duties and responsibilities to the Polytechnic.

Employee: any individual who works under a contract of employment with the Polytechnic; includes the President and all members of Senior Administration.

Misconduct: unacceptable, improper, or unprofessional behaviour. Non-compliance with this Employee Code of Conduct Policy constitutes Misconduct.

Private Interest: does not include an interest:

- in a matter that is of general application,
- that affects a person as one of a broad class of the public,
- that affects the compensation or benefits of the employee, or
- that is trivial.