

<i>Policy Category</i> <i>Administrative</i>	<i>Name of Policy</i> <i>Code of Ethics / Conflict of Interest</i>
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Policy Owner	Corporate Administration, Office of the Chief Administrative Officer
Approval Body	Regional Council
Approval Date	
Effective Date	
Review by Date	

1. Policy

The Niagara Region (Region) is committed to maintaining excellent ethical conduct and high integrity. Employees are expected to perform their duties in a manner that maintains public trust and confidence trust. Employees should avoid conflicts of interest and unethical behaviour.

2. Purpose

The purpose of this policy is to outline acceptable standards of behaviour and related responsibilities and procedures for Region employees.

This policy is intended as a guide to employees in their dealings on behalf of the Region, and to assist them in identifying and properly responding to potential conflicts of interest. This policy should be applied in conjunction with all applicable collective agreement and contractual provisions, legislative requirements, and/or professional standards, where applicable.

3. Scope

This policy applies to all union and non-union employees, including regular, temporary/contract, and/or paid student/co-op/intern staff with the Region. Employees are encouraged to direct any questions or concerns regarding the policy to their Manager, Director, Commissioner, or Chief Administrative Officer (CAO) (as appropriate).

Serious breaches of this policy must be reported in accordance with the Region's Whistleblower Policy and Procedure. Employees who report such breaches in good faith will be protected from reprisal in accordance with the terms of that policy.

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3.1. Roles and Responsibilities

3.1.1. Disclosure of Confidential or Personal Information

Employees may not use or disclose confidential, privileged, or personal information belonging to or in the custody or control of the Region except as necessary to perform their duties in accordance with the Region's policies and procedures, and in accordance with the provisions of the *Municipal Freedom of Information and Protection of Privacy Act* and *Personal Health Information Protection Act*, or as otherwise required by law. Where an employee is uncertain whether information may be used or disclosed, they are to seek guidance from their Manager, Director, Commissioner or CAO (as appropriate).

3.1.2. Professionalism and Adherence to Core Values

As ambassadors and representatives of the Region, employees are expected to conduct themselves professionally in all of their interactions with clients, community agencies, contractors, suppliers, and the public.

Employees should conduct themselves in a manner consistent with the Region's core values:

Respect: We treat everyone equitably with compassion, sensitivity, and respect.

Serve: We serve Niagara with pride, care, and excellence.

Honesty: We value honest, integrity, and trust.

Choice: We believe in social, environmental and economic choices that support our diverse community.

Partnerships: We foster collaboration and value partnerships.

3.1.3. Respect, Truth, Honesty and Integrity

1. Employees shall respect the values of truth, honesty and integrity in all Region matters, issues, and activities.
2. Employees shall not impose their personal, moral or religious standards on others, as every person is an individual with specific rights, values beliefs, and personality traits to be respected at all times.

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3. Employees should respect the right to confidentiality and privacy of all clients, volunteers and employees and be aware of their responsibilities under relevant legislation, corporate and departmental policies, ethical standards, and, where appropriate, professional standards. No discussion regarding clients, volunteers or employees will be conducted other than with authorized persons in accordance with corporate and department policy.

3.1.4. Excellence

1. Employees shall act in the best interest of the community, in a responsible manner, and be held accountable for their actions.
2. Employees shall strive to achieve the highest standards of ethical conduct.
3. Employees shall be cognizant of their position within the Region and the trust and influence that may be afforded these positions by the public, including and not necessarily limited to clients, community agencies, etc. Employees shall ensure that they are performing their duties in a manner that does not violate trust relationships or abuses the power of their position.

3.1.5. Conflict of Interest

Employees shall not use their position within the Region to gain any particular interest, personal or family advantage or benefit in utilizing any service provided by the Region or in conducting any business on behalf of the Region.

1. Employees shall not be involved as an official of the Region in judging, inspecting or making a decision on any matter in which they have a personal or familial interest. Any employee involved in such a matter shall declare a conflict of interest as soon as such conflict is identified.
2. Employees of the Region shall not use their position within the Region to gain any particular personal, business, educational, financial or political advantage; this includes a prohibition that employees not use any Region property, assets, resources, tools, materials, staff, etc., for personal matters.

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3. Employees of the Region who choose to become personally involved in any community board, agency, association or political body must clearly declare that such involvement is not as a representative of the Region. Employees who are requested / required to participate on a committee / board / association or political body as a representative of the Region shall identify themselves as such to the committee / board / association or political body.

3.1.6. Disclosure Process

1. If a potential or real conflict of interest exists because of an employee's personal or familial interests in a matter involving a service provided by the Region, a business dealing with the Region, or similar circumstances, the employee must notify in writing of the situation, detailing their conflict, to their Manager or Director or Commissioner or CAO (as appropriate). The Manager or Director or Commissioner or CAO (as appropriate) will then ensure that someone who is not personally involved in the situation makes the judgment, inspection, or decision using the same objective criteria that would be used for that situation if a non-employee client were using the particular service or involved in the business dealing.
2. If a potential or real conflict of interest exists because an employee is promoting a service or a product in an independent capacity but customers may perceive the employee as a representative of the Region, the employee will notify in writing of the situation to their Manager or Director or Commissioner or CAO (as appropriate). The employee will inform each customer that they are acting in an independent business capacity rather than as an employee or representative of the Region.
3. Whenever an employee considers that he or she could be involved or appear to be involved in a conflict of interest, the employee shall immediately disclose the situation in writing to the Director or Commissioner or CAO (as appropriate).

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3.1.7. Acceptance of Gifts, Favours and Entertainment

Employees shall not seek or accept any gifts, entertainment, payments for services, valuable privileges, etc., or other favours from any external person or business organization except as provided below:

- i) acceptance of promotional items at a nominal dollar value;
- ii) attendance at social events where:
 - a. the event is attended by a broad range of the sponsoring organization's customers or professional association members and does not specifically cater to the Region;
 - b. there is no actual, potential or apparent conflict of interest, and;
 - c. permission to attend has been granted by the department Commissioner
- iii) charitable donations or fundraising for the benefit of the community; and;
- iv) sponsored community/professional events e.g. educational days.

Gifts that do not meet the criteria in (i) above (i.e. entertainment tickets / vouchers) that are given directly to Niagara Region employees for personal use should be returned to sender or redirected with the sender's approval to a charity or non-profit community association of their choice. Employees should communicate the sensitivity of public perception to these individuals. Suppliers should be informed of this policy.

Failure or refusal to adhere to the terms of this policy may result in discipline up to and including dismissal.

4. References and Related Documents

4.1. Legislation, By-Laws and/or Directives

4.2. Procedures

5. Related Policies

- Whistleblower C-xx-xxx

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6. Document Control

The electronic version of this document is recognized as the only valid version.

Approval History

Approver(s)	Approved Date	Effective Date

Revision History

Revision No.	Date	Summary of Change(s)	Changed by