

Code of Conduct

for the



January 2010

I. Preamble

The Code of Conduct (Code) for *the Seniors Advisory Council for Alberta* applies to all of the board members. Our Code reflects a commitment to the Seniors Advisory Council for Alberta's values and provides a framework to guide ethical conduct in a way that upholds the integrity and reputation of the Seniors Advisory Council for Alberta. We are expected to behave in a way that aligns with this Code. We understand that this Code does not cover every specific scenario. Therefore, we use the spirit and intent behind this Code to guide our conduct, and exercise care and diligence in the course of our work with the Seniors Advisory Council for Alberta.

To demonstrate commitment to transparency and accountability, this Code is available to the public on the Seniors Advisory Council for Alberta's webpage.

II. Core Values

- a. We act with impartiality and integrity.
- b. We demonstrate respect and accountability.

III. Guiding Principles

These principles guide our behaviour and decisions:

- a. Our actions and decisions are made to promote the public interest and to advance the mandate and long-term interests of the Seniors Advisory Council for Alberta.
- b. We are responsible stewards of public resources.
- c. To serve the public interest, we have a responsibility to uphold the Seniors Advisory Council for Alberta's mandate.
- d. We have a responsibility to act in good faith and to place the interests of the Seniors Advisory Council for Alberta above our own private interests.
- e. We behave in a way that demonstrates that our behaviour and actions are fair and reasonable in the circumstance.
- f. We enjoy the same rights in our private dealings as any other Albertan, unless it is demonstrated that a restriction is necessary in the public interest.

- g. When we, as an individual, are subject to more than one code of conduct, we must consider the expectations in all. We understand that this Code is not intended to conflict with other Codes of Conduct, and will discuss any potential conflicts with our manager or the Code Administrator.
- h. The Code applies to all of us unless a specific exemption is granted by the Code Administrator.
- i. We know that when we become aware of a real or apparent conflict of interest, we must at the first opportunity disclose this conflict to our manager or the Code Administrator.
- j. We understand that disclosure itself does not remove a conflict of interest.
- k. We encourage our colleagues to act fairly and ethically and know that we are able to raise concerns about a suspected breach by another to our manager or the Code Administrator without fear of reprisal.
- l. We know that breaches of this Code may result in disciplinary action, up to and including removal if we are a member.
- m. We know that if we have any questions about the Code, or are not sure how to apply these principles, we should consult with our manager or the Code Administrator.
- n. Each of us confirms [*on an annual basis*] our understanding of, and commitment to, the Code's expectations.

IV. Behavioural Standards

Behavioural standards help us make appropriate decisions when the issues we face involve ethical considerations. Behavioural standards cannot cover all scenarios but provide guidance in support of day-to-day decisions. All of us must adhere to the following standards:

- a. We must not engage in any criminal activity and comply with all relevant laws, regulations, policies and procedures.
- b. We must not use our status or position with the Seniors Advisory Council for Alberta to influence or gain a benefit or advantage for ourselves or others.

- c. Our conduct contributes to a safe and healthy workplace that is free from discrimination, harassment or violence.
- d. We must not use drugs or alcohol in a way that affects our performance and safety or the performance and safety of our colleagues, or that negatively impacts the reputation or operations of the Seniors Advisory Council for Alberta.
- e. We must act in a way that is consistent with the Seniors Advisory Council for Alberta's protocols on public comment.
- f. We must take reasonable steps to avoid situations where we may be placed in a real or apparent conflict between our private interests and the interests of the Seniors Advisory Council for Alberta. In other words, actions or decisions that we take on behalf of the Seniors Advisory Council for Alberta must not provide us with an opportunity to further the private interests of ourselves, our families, our business associates or others with whom we have a significant personal or business relationship.
 - 1. Confidential Information
We must respect and protect confidential information, use it only for the work of the Seniors Advisory Council for Alberta and do not use it for personal gain. We must comply with protocols that guide the collection, storage, use, transmission and disclosure of information.
 - 2. Gifts and Gratuities
We must not accept or receive gifts and gratuities other than the normal exchange of gifts between friends or business colleagues, tokens exchanged as part of protocol or the normal presentation of gifts to people participating in public functions.
 - 3. Outside Activities
We must avoid participating in outside activities that conflict with the interests and work of the Seniors Advisory Council for Alberta. For example:
 - i. Business Interests: We must not hold interests in a business directly or indirectly through a relative or friend that could benefit from, or influence, the decisions of the Seniors Advisory Council for Alberta.
 - ii. Employment: Those of us who are members must not take employment that affects our performance or impartiality with the Seniors Advisory Council for Alberta.

- iii. **Political Activity:** We may participate in political activities including membership in a political party, supporting a candidate for elected office or seeking elected office. In addition, any political activity must be clearly separated from activities related to the work for the Seniors Advisory Council for Alberta, must not be done while carrying out the work of the Seniors Advisory Council for Alberta and must not make use of the Seniors Advisory Council for Alberta facilities, equipment or resources in support of these activities.
- iv. **Volunteer Activity:** If we are involved in volunteer work, the activity must not influence or conflict with decisions relating to the Seniors Advisory Council for Alberta.

4. Pre-Separation

When considering a new offer of appointment or employment, we must be aware of and manage any potential conflicts of interest between our current position and our future circumstance, and must remove ourselves from any decisions affecting our new appointment or employment.

5. Post-Separation

Once we have left the Seniors Advisory Council for Alberta, we must not disclose confidential information that we became aware of during our time with the Seniors Advisory Council for Alberta and must not use our contacts with our former colleagues to gain an unfair advantage for our current circumstance.

6. Property

We may have limited use of the Seniors Advisory Council for Alberta's premises and equipment for authorized incidental purposes providing such use involves minimal additional expense to the Seniors Advisory Council for Alberta, must not be performed on our work time, must not interfere with the mission of the Seniors Advisory Council for Alberta and must not support a personal, private business.

7. Related Persons or Parties

We must avoid dealing with those in which the relationship between us might bring into question our impartiality.

V. Administrative Processes

Administrative processes help us manage ethical dilemmas, including any real or apparent conflict of interest concerns.

a. Administration

The Code Administrator for those of us who are members is the *Chair of the Council*.

The Code Administrator receives and ensures the confidentiality of all disclosures and ensures that any real or apparent conflict of interest is avoided or effectively managed. As well, the Code Administrator is responsible for providing advice and managing all concerns and complaints concerning potential breaches of the Code, including conflicts of interest within the Seniors Advisory Council for Alberta. Even though the Seniors Advisory Council for Alberta may have a delegated process for responding to and managing concerns, the Code Administrator is responsible for ensuring procedural fairness.

b. Disclosure

It is the responsibility of each of us to declare in writing to the Code Administrator those private interests and relationships that we think could be seen to impact the decisions or actions we take on behalf of the Seniors Advisory Council for Alberta. When there is a change in our responsibilities within the Seniors Advisory Council for Alberta or in our personal circumstance, we shall disclose in writing any relevant new or additional information about those interests as soon as possible. Where a real or apparent conflict of interest cannot be avoided, we must take the appropriate steps to manage the conflict.

We disclose these real or apparent conflicts of interest so that the Code Administrator is aware of situations that could be seen as influencing the decisions or actions we are making on behalf of the Seniors Advisory Council for Alberta. This provides us, following a review by the Code Administrator, an opportunity to take action to minimize or remove the conflict. To actively manage a conflict of interest, options include:

- removing ourselves from matters in which the conflict exists or is perceived to exist;
- giving up the particular private interest causing the conflict; and,
- In rare circumstances, resigning our position with the Seniors Advisory Council for Alberta.

- c. Reporting a Potential Breach by Another
We are encouraged to report in writing a potential breach of this Code by another to our Code Administrator. When reporting a potential breach in good faith and with reasonable grounds, we are protected from retaliation for such reporting.

- d. Responding to Potential Breach
Once a potential breach has been reported, the Seniors Advisory Council for Alberta's procedures for responding to and managing a potential breach will be promptly initiated. The Code Administrator will review the circumstance and details of the potential breach and will notify us if we are the alleged member. We, as the alleged member, have the right to complete information and the right to respond fully to the potential breach. The identity of the reporter will not be disclosed unless required by law or in a legal proceeding. The Code Administrator makes a decision and completes a report of the review in a timely manner. The decision may range from finding no potential breach to one that reveals suspected criminal conduct.

- e. Consequences of a Breach
Those of us who do not comply with the standards of behaviour identified in this Code including taking part in a decision or action that furthers our private interests may be subject to disciplinary action up to and including removal if we are a member.

- f. Review of a Decision
We can request in writing that the *Ethics Commissioner* review a decision that has been made by the Code Administrator about a real or apparent breach of the Code, including a conflict of interest involving us.

VI. Other Resources

a. Questions to Consider

When we are faced with a difficult situation, the following questions may help us decide the right course of action:

- Have I reflected on or consulted with the Code Administrator about whether I am compromising the Code's values, principles or behavioural standards?
- Have I considered the issue from a legal perspective?
- Have I investigated whether my behaviour aligns with a policy or procedure of the Seniors Advisory Council for Alberta?
- Could my private interests or relationships be viewed as impairing my objectivity?
- Could my decision or action be viewed as resulting in personal gain, financial or otherwise?
- Could my decisions or actions be perceived as granting or receiving preferential treatment?

VII. Affirmation

The Code of Conduct for *the Seniors Advisory Council for Alberta* was introduced on *December 10, 2009* and will be reaffirmed *every three years* by the Council to ensure it remains current and relevant.