

Code of Conduct FAQ

Updated March 29, 2019



1. Why do we have a Code of Conduct?

Alberta's *Conflicts of Interest Act* requires every public agency to have a Code of Conduct approved by the Office of the Ethics Commissioner. As an employee of a public agency, you are subject to the Code of Conduct and must not be in a real or perceived conflict of interest in relation to your employment with the Lethbridge College (the "College"). You must act impartially in carrying out your responsibilities as a College employee; you must not act in self-interest or further your own private interests by virtue of your position or through the carrying out of your duties.

2. What makes an activity a conflict of interest?

A real or perceived conflict of interest can be difficult to ascertain, so we have established three tests to help us make this evaluation.

1. *Does the activity in any way disadvantage or adversely impact the College?*

An activity may disadvantage or adversely impact the College if it (a) impedes your ability to do your job effectively (e.g. because you perform the activity during your work hours as a College employee or because it results in burnout or stress which makes it difficult for you to function effectively while doing College work), (b) uses College resources without compensating the College, or (c) negatively affects the College's reputation.

2. *Are you receiving a personal benefit or gain from this activity as a result of your affiliation with the College?*

A personal benefit or gain may include compensation, a stipend, an honourarium, benefits, influence, etc. The amount or dollar value is not typically important and the College usually does not require you to disclose the amount or dollar value.

3. *What is reasonable?*

The College assesses disclosure reasonably. The College is not concerned with the personal phone call you made last week on your work phone or the email you sent to your client about having a meeting next week. These are considered "reasonable" activities that contribute to a fair, positive work environment.

3. Do I need to disclose concurrent employment or a board or commission appointment if it is not a conflict of interest?

Yes. However, disclosing an activity does not mean that you are in a conflict of interest or that you are doing anything inappropriate. Disclosure allows the College to assist in making this determination.

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4. Why do I have to disclose? It feels like an invasion of my privacy.

The *Conflicts of Interest Act* gives the College the authority and the responsibility to collect disclosures. The College will treat your personal information with the same level of respect and confidentiality required by the *Freedom of Information and Protection of Privacy Act*.

5. What happens if I don't disclose or I refuse to sign the Declaration?

Every employee must sign a Declaration annually. If your Declaration is not received within the prescribed timeline, Human Resources will follow up with you and, if necessary, your supervisor. Not submitting a Declaration is a violation of this policy and may result in disciplinary action.

6. I forgot to disclose something OR I have something new to disclose since I last completed the Declaration. What do I do?

Please fill out the Code of Conduct Self-Disclosure form, available on the College website.

7. What if there is a concern with my disclosure?

Human Resources will contact you to ask further questions and get more details. We will work with you to figure out the best course of action to mitigate any perceived or real conflicts of interest. If a real or perceived conflict cannot be avoided, you will not be able to participate in the activity.

8. Do I need to disclose an external board or committee appointment if it is part of my role at the College?

Yes, please disclose it so that we can document it for your file and avoid any potential concerns. Remember, disclosure does not mean that a conflict of interest actually exists.

9. I am doing work that may benefit the College (such as sitting on an accreditation board) but it is not required by the College to do my job. Is this a conflict?

It may be a conflict (especially if you conduct the work during your College work hours or are being paid to do the work), so you must disclose it to the College. The College will work with you to attempt to eliminate the conflict. Potential solutions could involve:

- (a) taking vacation time for the time you spend doing the other work;
- (b) doing the other work during non-regular working hours;
- (c) not collecting compensation for the other work; or
- (d) submitting any compensation you receive for the other work to the College.

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10. Do I need to disclose the amount of money I receive from concurrent employment or a board or committee appointment?

Standard practice will not require you to disclose this information. However, you must disclose the value of any gifts and like payments that you receive, since there are limits on the value that an employee is allowed to receive in the form of gifts and like payments over the course of a calendar year.

11. What is the process to disclose when I have received monies from an external agency to cover travel expenses for a conference or other event?

If you receive more than \$500 from an external agency for this purpose, you must consult your supervisor who will determine whether the compensation is appropriate. If it is, the supervisor will document this in the employee's personnel file. If it is not (because it is excessive or amounts to "double dipping"), you and your supervisor will work together to determine a solution that will eliminate any real or perceived conflict of interest. If the conflict cannot be eliminated, you will not be able to attend the conference or event.

If you receive monies from an external agency (even if it's less than \$500) to cover travel expenses but you also receive reimbursement from the College, you must forward the monies from the external agency to the College so that you are not "double dipping". This also helps to offset the College's costs of reimbursing the employee.

12. What if my supervisor has told me that I can sit on a board or committee, get paid, and just make the time up later?

There are many instances where external work can contribute to professional development, create important professional networks, and generate knowledge useful for the College. However, disclosure is still required. The College will consider whether the proposed arrangement could negatively impact the College, whether it is reasonable, and whether it is properly documented when determining whether to approve a particular arrangement.

13. I am a faculty member. What can I do during my unassigned time?

Unassigned time is the 14 weeks during which faculty are not required to report to work. During this time, faculty must still disclose concurrent employment and any board or committee appointments, although a conflict is less likely to occur during this time because faculty are generally not as engaged in regular duties at the College.

14. The College's resources (equipment, tools, space, etc.) are better than my own. Why can't I use them?

It is not appropriate to use College resources for your own personal benefit or private gain. Those resources are owned by a public agency and are paid for with public funds; they are not intended for your personal use. This is not a reasonable use of College resources.

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15. I sometimes use my phone or computer to take a non-work-related call or email. Is this okay?

The College believes in being reasonable and will strive to create a fair, positive work environment. We trust our employees and expect them to use good judgment when conducting their day-to-day activities. The College does not consider this activity a conflict of interest as long as it is reasonable and does not interfere with your work duties.

16. Am I allowed to benefit from a reduced rate or special offer from a business because of my work at the College?

Yes. A reduced rate or special offer provided by a business exclusively to College employees does not impact the College in a negative or adverse way. Please enjoy this perk from a business supporter of our institution.

17. A colleague did not receive the email link to the Declaration. Can I forward them mine?

No. Each link is customized specifically for the recipient using the recipient's College email address. It is meant to be filled out by you and only you with the responses being automatically assigned to your profile.