

# Halton District School Board

## ***Policy***

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**NUMBER:** *to be determined*

**TOPIC:** **Code of Ethics**

**EFFECTIVE:** **January 2014**

**CROSS-REFERENCE:** **BPS Procurement Directive**  
**Mileage and Expenses Policy / Admin Procedures**  
**Hospitality Procedure**  
**Purchasing Administrative Procedures**  
**Trustee Code of Conduct**  
**[Acceptable Use of Information and Communication Technology Procedure](#)**

**REVISION DATE:** **September 2016**

**RESPONSIBILITY:** **Executive Officer of Human Resources**

**POLICY STATEMENT:**

Employees of the Halton District School Board occupy positions of public trust and confidence. They are expected to discharge their duties and responsibilities with integrity in a professional and impartial manner.

It is imperative that employees of the Board be, and be seen to be acting with honesty, care and due-diligence, in the best interests of the public they serve. Respect must be demonstrated for each other and for the environment. Without limiting the generality of the foregoing, employees would compromise themselves in the discharge of their duties by being in or being perceived to be in a conflict of interest, by contravening any law, by disclosing confidential business, personnel or student information and/or by misappropriating board resources.

Any employee of the board who contravenes the Code of Ethics and accompanying Procedures may be subject to disciplinary action up to and including termination, where appropriate.

## **I. CONFLICT OF INTEREST**

### **Definition**

A conflict of interest exists when the decisions and/or actions of employees during the course of exercising their employment duties are affected by or perceived by another party or person to be affected by the employee's personal, financial or business interests or the personal, financial or business interests of a relative, friend, and/or business associate of the employee.

### **Expectations**

1. Every employee is responsible and accountable for exercising good judgment and avoiding situations that might present a conflict of interest or be perceived as a conflict of interest.
2. Employees shall not use their position, authority or influence for personal, financial or material gain or personal business purposes or for the personal, financial or material gain or business purposes of a relative, friend and/or business associate. Every employee shall uphold and enhance all Board business operations by:
  - Maintaining an unimpeachable standard of integrity in all business relationships, both inside and outside the Board;
  - Carrying out all activities, in particular contracting and purchasing activities in a fair, transparent manner with a view to obtaining the best value for the Board's money and ensuring that resources are used in a responsible, efficient and effective manner;
  - Fostering the highest standard of professional competence amongst those for whom they are responsible, and for themselves, striving always to improve procedures, knowledge levels and skill and sharing leading practices;
  - Complying with and being seen to be complying with the letter and spirit of:
    - The laws of Canada and the Province of Ontario
    - Contractual obligations applicable to the individual and the Board;
  - Rejecting and denouncing any business practice that is improper or inappropriate or may appear to be improper or inappropriate.
3. An employee must not engage or participate in any outside employment, business or commercial undertaking (paid or volunteer) that interferes with the performance of his or her duties as an employee of the Board, or from which an economic, financial or commercial advantage may be derived by the employee, a relative, friend and/or business associate of the employee as a result of confidential business, financial or commercial information gained by the employee from employment with the Board.
4. An employee shall not use his or her position, authority or influence to give any person or organization special treatment that might, or might be perceived to advance the interests of the employee, or the interests of a relative, friend and/or business associate of the employee. This includes providing preferential treatment or publicly endorsing suppliers or products.

5. An employee must not participate in any decision or recommendation in which he or she, or a relative, friend or business associate may have a financial, commercial or business interest.

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## **Disclosure**

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The Director of Education shall disclose a conflict of interest or potential conflict of interest to the Chair of the Board. The Associate Director shall disclose a conflict of interest or potential conflict of interest to the Director of Education. Superintendents shall disclose a conflict of interest or potential conflict of interest to the Associate Director or Director to whom they report. All other employees shall disclose a conflict of interest or potential conflict of interest to their immediate Supervisor. Conflicts of interest involving vendor relationships shall be disclosed to the Manager of Purchasing in accordance with the Code of Ethics Administrative Procedure.

## **II. COMPLYING WITH THE LAW**

1. All employees will and will be seen to comply with the letter and spirit of all of the laws of Canada and the Province of Ontario and any contractual obligations resulting from the employees' duties, employment or employment duties and/or any contractual obligations of the Board.
2. When acting on behalf of the Board, no employee shall at any time take any action that he or she knows or reasonably should know violates any applicable law or regulation.
3. It is every employee's responsibility to ensure that all information he or she communicates in the course of his or her employment duties is accurate and complete. No employee shall withhold information or willfully mislead members of the Board, officers, supervisors, parents/guardians, students or the public.
4. It is the responsibility of all employees to familiarize themselves with their duties and any requirements of them as prescribed by the Education Act, and Regulations, the Municipal Freedom of Information and Protection of Privacy Act and Regulations and any other Act or Regulation that may be applicable to the employee's employment duties, from time to time.
5. All employees are responsible for immediately reporting to an appropriate supervisor any suspected illegal behaviour or behaviour that contravenes this or any policy of the Board.

## **III. CONFIDENTIALITY**

1. All employees acknowledge that, as part of their duties to the Board, they may be exposed to private and confidential financial, business and/or commercial information belonging to the Board that may provide a financial, business, commercial or competitive advantage, and that they may be exposed to private and confidential student and personnel information.

2. Except as required by the law, all employees and former employees agree not to use, directly or indirectly, for the employee's benefit or for the benefit of any person, organization, firm, or other entity, the Board's proprietary or confidential information disclosed or entrusted to that employee or developed or generated by the employee during the performance of his or her duties for the Board. Such information may include, but is not limited to, information relating to the Board's organizational structure, operations, business plans, technical projects, business costs, research data results, inventions, trade secrets or other work produced, developed by or for the Board.
3. Except as required by law, and in accordance with the Education Act and Municipal Freedom of Information and Protection of Privacy Act, all employees agree not to use or disclose the personal and/or educational information of students and their families in the Board's possession, or which may come to the attention of such employee during the course of his or her duties with the Board.
4. Except as required by law, and in accordance with the Municipal Freedom of Information and Protection of Privacy Act, all employees agree not to use or disclose the personal and/or employment information of Board employees and their families in the Board's possession or which may come to the attention of an employee during the course of his or her duties with the Board.

#### **IV. BOARD RESOURCES**

1. No employee shall use Board resources for personal gain. No employee shall permit relatives, friends and/or business associates to use Board resources for personal gain.
2. All employees shall abide by Board Policies and Administrative Procedures regarding the use of Board resources including information technology resources.
3. All employees acknowledge that works of authorship commissioned, assigned, or paid for by the Board, which may include, but are not limited to books, articles, pamphlets, course materials, inventions, improvements, discoveries, computer software, and documentation, created by the employees on Board time, in the course of their employment, are the sole property of the Board. Employees who have created works of authorship in the course of their employment shall have no propriety or moral rights to their creation or invention.