

AU0100 - STANDARDS OF CONDUCT FOR INTERIOR HEALTH EMPLOYEES

Interior Health would like to recognize and acknowledge the traditional, ancestral, and unceded territories of the Dākelh Dené, Ktunaxa, Nlaka'pamux, Secwépemc, St'át'imc, Syilx, and Tšilhqot'in Nations, where we live, learn, collaborate and work together.

Interior Health recognizes that diversity in the workplace shapes values, attitudes, expectations, perception of self and others and in turn impacts behaviors in the workplace. The dimensions of a diverse workplace includes the protected characteristics under the human rights code of: race, color, ancestry, place of origin, political belief, religion, marital status, family status, physical disability, mental disability, sex, sexual orientation, gender identity or expression, age, criminal or summary conviction unrelated to employment.

1.0 PURPOSE

To provide standards of conduct for all employees of Interior Health (IH).

2.0 DEFINITIONS

TERM	DEFINITION
Cultural Safety	The desired outcome and can only be defined by the Aboriginal person receiving care in a manner that is safe and does not profile or discriminate against the person but is experienced as respectful, safe and allows meaningful communication and service. It is a physically, socially, emotionally and spiritually safe environment, without challenge, ignorance or denial of an individual's identity. To be culturally safe requires positive anti-racism stances, tools and approaches and the continuous practice of cultural humility.
Diversity	Array of identities, abilities, backgrounds, cultures, skills, perspectives, and experiences that are representative of an organization's current and evolving workforce.
Hazard	Situations, conditions, or things with the potential to cause harm.

3.0 POLICY

IH believes that the highest standards of conduct on the part of its employees are essential to maintain and enhance the public's trust and confidence, and to ensure superior service to those who we serve.

This Policy describes the standards of conduct required of all employees. This Policy is not intended to abridge the statutory rights of IH or any person, or the rights of any employee under the terms of a Collective Agreement.

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3.1 Compliance with Standards

The requirement to comply with these standards of conduct is a condition of employment. Employees who fail to comply with these standards may be subject to disciplinary action up to and including dismissal. Employees should contact Human Resources (HR) for advice and assistance on the interpretation or application of this Policy.

3.2 Loyalty

- IH employees have a duty of loyalty to IH as their employer. The duty of loyalty requires employees to serve IH honestly, faithfully and to the best of their ability.
- The conduct of IH employees should instill confidence and trust and not bring IH into disrepute.

3.3 Confidentiality

- Confidential information that employees receive through their employment must not be divulged to anyone other than persons who are authorized to receive the information. Employees who are in doubt as to whether certain information is confidential must ask the appropriate authority before disclosing it. Caution and discretion in handling confidential information extends to disclosure made inside and outside of IH and continues to apply after the employment relationship ceases.
- Confidential information that employees receive through their employment must not be used by an employee for the purpose of furthering any private interest, or as a means of making personal gains. See *3.7 Conflicts of Interest* section of this Policy for details.

3.4 Public Comments or Endorsements

- IH employees are free to comment on public issues but must exercise caution to ensure, that by doing so, they do not jeopardize the perception of impartiality in the performance of their duties. For this reason, care should be taken in making comments or entering into public debate regarding IH policies.
- Employees must not use their position as an employee of IH to lend weight to the public expression of their personal opinions including endorsements.
- Employees must exercise caution to ensure that they are not perceived as speaking on behalf of IH unless they are authorized to do so as part of their job duties.

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3.5 Service to the Public

Employees must provide service to the public in a manner that is respectful, courteous, professional, caring, culturally safe, equitable, efficient and effective such that the dignity of patients, clients and the people we serve is maintained at all times. Employees must be sensitive, caring and responsive to the changing needs, expectations and rights of a diverse public, while respecting the framework within which service to the public is provided. Employee behavior that is contrary represents a failure in the discharge of service to the public and will not be tolerated.

3.6 Workplace Behavior

- The behavior, conduct and language of IH employees in the workplace must be consistent with Provincial and Federal legislation (including the Criminal Code of Canada, the BC Human Rights Code, the BC Worker's Compensation Act and the general policies and regulations of WorkSafeBC [WSBC] Criminal Code of Canada).
- Employees' conduct, actions and demeanor must meet acceptable social standards and must contribute to a positive work environment. An employee's conduct must not compromise the integrity of IH.
- In commitment to a safe and healthy workplace where diversity is welcomed and valued. Employees are to treat each other with respect and dignity and must not engage in behavior that contravenes the legislation set out above or IH's policies (including but not limited to the *Workplace Environment Policy AU1000* and the *Theft, Fraud and Corruption Policy AU4000*).

3.7 Conflict of Interest

- A conflict of interest occurs when an employee's private affairs or financial interests are in conflict, or could result in a perception of conflict, with the employee's duties or responsibilities in such a way that:
 - the employee's ability to act in the public interest could be impaired; or
 - the employee's actions or conduct could undermine or compromise the public's confidence in the employee's ability to discharge work responsibilities, or the trust that the public places in IH.
- All employees are encouraged to participate in a full range of community organizations and services. However, when doing so, employees must arrange their private affairs in a manner that will prevent conflicts of interest, or the perception of conflicts of interest, from arising.
- If employees have any questions regarding whether they may be in a conflict or perceived conflict, they should contact HR to discuss the matter. Employees who find themselves in an actual, perceived or potential conflict of interest

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must disclose the matter to HR and their supervisor or manager and complete the [Disclosure of Real or Apparent or Potential Conflicts of Interest form](#).

- The following employees are required to complete a conflict of interest disclosure form on an annual basis.
 - Senior Executive Team;
 - Executive Medical Directors;
 - Medical Health Officers;
 - Executive Directors Clinical Operations and Corporate Directors
 - Directors Clinical Operations and Directors
 - Network Directors;
 - Excluded Managers;
 - Employees with significant signing authority;
 - Controller.

A reminder will be sent out from HR when the process begins each year.

- Examples of conflicts of interest include, but are not limited to, the following:
 - an employee uses IH property or the employee's position, office or IH affiliation to pursue personal interests;
 - an employee is in a situation where the employee is under obligation to a person who might benefit from or seek to gain special consideration or favor;
 - an employee, in the performance of official duties, gives preferential treatment to an individual, corporation or organization, including a non-profit organization, in which the employee, related persons or relationships, has an interest, financial or otherwise;
 - an employee benefits from, or is reasonably perceived by the public to have benefited from, the use of information acquired solely by reason of the employee's employment;
 - an employee benefits from, or is reasonably perceived by the public to have benefited from, an IH transaction over which the employee can influence decisions (for example, investments, purchases, borrowing, grants, contracts, appointments);
 - an employee requests or accepts from an individual, corporation organization, directly or indirectly, a personal gift or benefit that rises out of their employment (see 3.8 *Entertainment, Gifts and Favors*).

3.8 Entertainment, Gifts and Favors

It is essential to efficient business practices that all those who associate with IH as suppliers, contractors or directors, have access to IH on equal terms.

- Employees and related persons or relationships should not accept entertainment, gifts or favors that create or appear to create a favored position

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for doing business with IH. Any firm offering such inducement shall be asked to cease. A sustained business relationship will be conditional on compliance with this Policy;

- Similarly, no employee may offer or solicit gifts or favors in order to secure preferential treatment for themselves or IH;
- An employee may accept modest discounts on a personal purchase of a supplier's or customer's products only if such discounts do not affect IH's purchase or selling price and are generally offered to any employee of IH;
- Under no circumstances may employees offer or receive cash, preferred loans, securities, or secret commissions in exchange for preferential treatment. Any employee experiencing or witnessing such an offer must report the incident immediately;
- Gifts and entertainment may only be accepted or offered by an employee in the normal hospitality and protocol exchanges common to established business relationships, persons participating in public functions, or the normal exchange of gifts between friends. An exchange of such gifts shall create no sense of obligation;
- Inappropriate gifts received by an employee should be returned to the donor and may be accompanied by a copy of this Policy.

3.9 Use of Corporate Property

- An employee requires IH's approval to use property owned by IH for personal purposes, or to purchase property from IH unless the purchase is made through the usual channels also available to the public;
- Even then, an employee must not purchase property owned by IH if they are involved in an official capacity in some aspect of the sale or purchase;
- Employees may be entrusted with the care, management and cost-effective use of IH property and should not make significant use of these resources for their own personal benefit or purposes;
- Employees should ensure all IH property which may be assigned to them is maintained in good condition and should be able to account for such property;
- Employees may not dispose of IH property except in accordance with the guidelines established by IH;
- Employees shall return all property belonging to IH upon termination of employment;
- IH computer system and issued mobile phones (as well as other mobile devices such as laptops, iPads, and USB keys) are provided to users for the primary purpose of business functions. A limited amount of personal use is permitted, on the following understanding:

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- The computer, mobile phones and other mobile computing devices, and all data contained on them including email, text messages, photos, etc. are the property of IH, and as such are subject to auditing, monitoring, Freedom of Information (FOI) Access requests and may be disclosed as required by law (e.g. court order or reportable conditions) as well as internally to authorized IH Employees);
- Employees must sign up for payroll deductions of a nominal amount if they intend to use their IH supplied mobile phone for regular personal communications. See policy [AR0500 Email & Text Messaging](#).
- IH vehicles are intended for work related business only. Unauthorized or personal use of a fleet vehicle constitutes a breach of this policy and could result in disciplinary action up to and including termination. Exceptions for limited personal use are for:
 - Incidental use while on travel status;
 - Travel during off-duty hours authorized by collective agreements; or
 - Travel between and employee's home and workplace when this is a condition of employment. See Policy [AQ1101 Responsibility Code For Use of Interior Health Fleet Vehicles](#).

3.10 Allegations of Wrongdoing

- Employees have a duty to report any situation that they believe contravenes the law, misuses public funds or assets, or represents a danger to public health and safety or a significant danger to the environment.
- Employees can expect such matters to be treated in confidence, unless disclosure of information is authorized or required by law (for example, the FOI and Protection of Privacy Act). Employees will not be subject to discipline or reprisal for bringing forward to Management and/or HR, in good faith, allegations of wrongdoing in accordance with this Policy.
- Employees must report their allegations or concerns in writing to their manager or HR who will investigate the matter and will respond in writing, advising how the matter is being, or will be dealt with.

Where an allegation involves the employee's immediate manager, the employee must forward the allegation to the next level of management and/or HR.

- Employees must report a safety hazard or unsafe condition or act in accordance with the provisions of Division 3, Section 116 and Part 3, Section 3.12 of the WSBC Occupational Health and Safety (OHS) Regulation.
- Where an employee believes that the matter has not been resolved by management, the employee may then refer the allegation to the Board which may address the allegation at its discretion.

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NOTE: an employee can report an allegation of wrongdoing under this policy to an authority independent of management in special circumstances where the employee has sound reason to believe that the existing processes are not appropriate or have failed to deal with the concerns expressed as set out in the Board Policy section [3.15 - Safe Reporting](#).

3.11 Employment Disputes

Employees are reminded that disputes over employment-related matters are to be addressed through the dispute resolution processes available through their Collective Agreements and/or Terms and Conditions of Employment for Excluded Employees, as the case may be.

3.12 Legal Proceedings

This section has been replaced by the Legal Court Documents and Proceedings [Policy AL0500](#).

3.13 Personal Relationships in the Workplace

- Conflicts of interest arising out of close personal relationships in the workplace must be avoided. Close personal relationships include but may not be limited to:
 - Spouses
 - Other intimate relationships
 - Parent/guardian/caregiver and child
 - Siblings
 - Mothers, fathers, brothers and sisters-in-law
 - Cousins, aunts, uncles, nephews and nieces
 - Close personal friends
- Employees must never have influence, input or decision-making over: the hiring, salary, premiums, special permissions, conditions of work, evaluation of performance or promotion of anyone with whom they have a close personal relationship. This includes influence over the hiring, evaluation or retention of contractors.
- Employees are to disqualify themselves as participants in personnel decisions when their objectivity is compromised (or may be perceived to be compromised) for any reason; or if a benefit or perceived benefit could accrue to them by notifying their immediate manager.
- Sometimes, a close personal relationship develops between two employees in a reporting line, or in other circumstances that may result in an actual or apparent conflict of interest. When that happens, both employees must report the existence of the relationship immediately to their manager. Failure to report the relationship promptly may result in corrective action that could include termination of employment.

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- When advised of a close personal relationship that could give rise to an actual or apparent conflict of interest, IH will work with the individuals to address the conflict.
- Restrictions on Personal Relationships in the Workplace may be waived provided the Vice President (VP) HR and the portfolio VP are satisfied that the interests of IH are not compromised because of any real, perceived or actual conflict of interest.

3.14 Outside Employment and Volunteer Work

Employees may engage in remunerative employment with another employer, carry on a private business, receive remuneration from public funds for activities outside their position or engage in volunteer activities provided it does not:

- interfere with the performance of their duties as an IH employee
- bring IH into disrepute
- represent a conflict of interest or create the reasonable perception of a conflict of interest
- appear to be an official act or to represent IH opinion or Policy
- involve the unauthorized use of work time or IH premises, services, equipment or supplies (to which they have access by virtue of their employment); in pursuit or promotion of those outside employment or volunteer activities
- involve soliciting clients for a business or partnership they are personally involved with, or for a business operated by a family member, close friend, associate, a corporation in which they or a family member has controlling interest, or for a person or a person's business to whom they owe an obligation
- gain an advantage that is derived from their employment

3.15 Political Involvement

- Employees of IH may participate in political activities including membership in a political party, supporting a candidate for elected office, or seeking elected office. Employees' political activities must be clearly separated from activities related to their employment.
- If engaging in political activities, employees must remain impartial and retain the perception of impartiality in relation to their duties and responsibilities. Employees must not engage in political activities during working hours or use IH facilities, equipment or resources in support of these activities.
- Partisan politics are not to be introduced into the workplace; however, informal private discussions among co-workers are acceptable.

4.0 POST-EMPLOYEE RESTRICTIONS

Post-employment restrictions for the Chief Executive Officer (CEO), senior executives and other employees (hereinafter referred to as "These Individuals") with the authority

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to issue contracts or influence the outcome of contractual arrangements between IH and its vendors, service providers or contractors follow:

4.1 Before leaving employment with IH the following conditions of employment apply:

- a. These Individuals must not allow themselves to be influenced in carrying out their employment responsibilities by prospects for or an offer of:
 - employment as an employee of an outside entity, or
 - remuneration or other reward from an outside entity for doing anything for it in a capacity other than as an employee of the outside entity;
- b. These individuals must immediately disclose to their direct supervisor, or in the case of the CEO the Board Chair:
 - any offer described in paragraph (a.) above, if the offer does or could place These Individuals in a conflict of interest situation; or
 - These Individuals' personal acceptance of any offer described in paragraph above.

4.2 After leaving employment with IH, the following conditions of employment apply:

- a. After the employment relationship ends, These Individuals must not disclose confidential information that was obtained through the employment relationship;
- b. If These Individuals had substantial involvement in dealings with an outside entity at any time during the year immediately preceding the end of the employment relationship; then, for a period of no less than **one-year** after the end of the employment relationship, These Individuals must not:
 - accept an offer of employment, an appointment to a board of directors or enter into a contract to provide service to that outside entity;
 - lobby or otherwise make representations for that outside entity to IH; or
 - give counsel to that outside entity, for its commercial purposes, concerning the programs or policies of IH; or any public sector organization as defined by Section 1 of the Public Sector Act for which These Individuals would have had specialized knowledge of or previous dealings with in their capacity with IH.
- c. Until no less than one-year after the employment relationship ends These Individuals:
 - **must not** lobby or otherwise make representations for any outside entity to any IH Department, Program or Service; or

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- act for an outside entity in connection with any ongoing proceedings, transactions, negotiation or case in which the outside entity and IH are involved;
 - i. if These Individuals in their former employment with IH, acted for or advised IH concerning the proceedings, transactions, negotiation or case; and
 - ii. acting for the outside entity in that connection would result in the receipt by the outside entity of a private or commercial benefit or of any benefit not for general application.

4.3 The CEO in consultation with the Board Chair may reduce the one-year restriction upon application. If the request comes from a Senior Executive or other employees with the authority to issue contracts or influence the outcome of contractual arrangements between IH and its vendors, service providers or contractors the CEO will make the determination. If the request comes from the CEO, the Board Chair will make the determination.

In making the determination consideration will be given to the following:

- Circumstances under which employment ended;
- General employment prospects;
- Significance to IH of information possessed by the individual by virtue of their position with the organization;
- The desirability of a rapid transfer of skills to an employer other than IH;
- The degree to which the new employer might gain unfair commercial advantage by hiring the individual;
- The authority and influence possessed while employed at IH; and
- The disposition of other cases.

5.0 PROCEDURES

5.1 Executive Management personnel are responsible for:

- ensuring that the provisions of this Policy directive are met;
- ensuring that employees are advised of the required standards of conduct and understand the consequences of non-compliance;
- designating contacts for matters related to standards of conduct;
- ensuring that all possible breaches of the Policy directive are thoroughly investigated;
- based on the results of an investigation, ensuring that appropriate action is taken;
- ensuring that confidential information is handled with caution and discretion;
- waiving the provision on working relationships under the circumstances indicated; and
- delegating authority and responsibility, where applicable, to apply this Policy within their organization.

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5.2 Supervisors and managers are responsible for:

- applying this Policy within their portfolios;
- advising Employees on standards of conduct issues;
- ensuring that confidential information is handled with caution and discretion; and
- assisting Employees in the resolution of conflicts of interest.

5.3 Employees are responsible for:

- fulfilling their assigned duties and responsibilities under this Policy;
- disclosing and resolving conflicts of interest situations in which they find themselves;
- maintaining appropriate workplace behavior; and
- checking with their supervisor, manager or HR when they are uncertain about any aspect of this Policy, including: the appropriateness of receiving outside remuneration, potential, perceived or actual conflicts of interest, and releasing any information that may be confidential.

6.0 REFERENCES

6.1 Legislative Authorities

1. Human Rights Code
2. Freedom of Information and Protection of Privacy Act
3. Workers Compensation Act
4. Occupational Health and Safety Regulations

6.2 Other Authorities and References

1. Health Services and Support (Facilities Subsector Agreement) 2022-2025
2. Health Services and Support (Community Subsector Agreement) 2022-2025
3. Provincial Nurse's Collective Agreement 2019 – 2022
4. Health Science Professional Bargaining Association Collective Agreement 2022-2025
5. BC Government Public Service Employee Relations Commission: Standards of Conduct for Public Service Employees Policy Directive 5.4.
6. Interior Health Board Manual – Section 3.15: [Safe Reporting](#)
7. [Policy AU4000](#) – Theft, Fraud, and Corruption
8. [Policy AU1000](#) – Workplace Environment

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