



POLICY No. 2024-XX

Employee Code of Conduct

Originating Department	Human Resources	
SMT Approval:	2024-10-10	
Council in Committee:	2024-11-19	Recommendation #:
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1. Policy Statement

Haldimand County recognizes its responsibility for transparency and accountability to the public, as members of the local public service. The principles set out in the Code of Conduct are intended to foster a culture of integrity, professionalism, respect, transparency and accountability toward Council, fellow Haldimand County employees, Volunteers, Contractors, Volunteer Firefighters and Haldimand residents. It is intended to promote and demonstrate standards of excellence in public service, which in turn, promotes public confidence and trust.

2. Definitions

Chief Administrative Officer: meaning holds the position for Haldimand County.

Contractor: a person who undertakes a project for an owner and includes an owner who undertakes all or part of a project by himself or by more than one employer.

Council: the Council of the Corporation of Haldimand County.

Immediate Family: a person's parents, siblings, spouse and children including "in-law".

Off-Duty Conduct: refers to an employee's behavior and actions outside of their work hours and the workplace.

Representatives: a person who has an identified role within the municipality and therefore can be perceived as having specific knowledge or alignment with the county and can reasonably be perceived as representing Haldimand's views or values. For the purpose of this policy, representatives include Haldimand County employees, Volunteer firefighters and Haldimand County Volunteers.

Volunteer: a person who is not an employee of Haldimand County, and who donated his or her work and acts at the direction of and within the scope of duties determined by Haldimand County, and is not paid a fee, salary or other compensation by Haldimand County or anyone else for their work.

Volunteer Firefighter: those who to perform fire services, emergency services, and non-emergency duties for a Haldimand County.

3. Purpose

This Code of Conduct forms a key, foundational piece of Haldimand County as an organization, by outlining the core competencies and expectations of its employees.

It is recognized that no set of guidelines can address every ethical question. The examples referenced in this policy are not intended to be exhaustive. Employees should apply the principles detailed in section 1 of this policy to assist in all matters of conduct and decision-making in order to serve the public in a manner beyond reproach.

4. Scope

This policy applies to all Haldimand County employees, Volunteer Firefighters and Haldimand Volunteers.

It does not apply to Haldimand County Library Board employees, County Councillors or Board Appointees, as they are covered by the their own Code of Conduct.

Nothing in this Code is intended to conflict with Haldimand County's obligations to its employees under its various collective agreements or employment contracts, or contracts with contractors.

Similarly, some employees (such as nurses, engineers, accountants) may have professional obligations and should seek clarification from both their manager and their professional associations in the case of perceived conflict.

As Representatives of Haldimand County, this is our Code.

5. Application of our Code:

The Code of Conduct does not outline every situation that may occur. Rather, it is designed to promote ethical decision-making and behaviour, through clear expectations and guiding principles. To apply the code, ask yourself questions such as:

- Am I putting my own interests before Haldimand County's?
- Would I make the same decision if my manager, the public or the media were watching me?
- Will I feel obligated to someone if I do this?
- Would I be offered this if I weren't a Haldimand County employee?
- Is my treatment of others, the way I want to be treated?

Keep asking yourself these questions until you get an answer, however if you have further questions or are seeking guidance, talk to your supervisor.

6. Ethical Behaviour and Professionalism

Our code of conduct, at its core, requires behaviour that is respectful, ethical, professional and transparent in all interactions and decision-making.

This includes but is not limited to a requirement that conflicts of interest as defined in Appendix A must be avoided through the procedures detailed in that Appendix.

The following competencies reflect the shared values that guide Haldimand County employees in providing excellent public service, that preserve the integrity of the municipal corporation and instill public trust in the corporation and its employees.

6.1. Impartiality

As public servants, we are expected to do our jobs with the municipality's best interests in mind. We must perform our duties with sound, neutral judgement and without allowing outside interests to conflict with work decisions.

Impartiality is demonstrated through our commitment to:

- **Avoiding Conflicts of Interest**

As a fundamental principle of ethical behaviour, recognizing and declaring a real or potential conflict of interest is imperative in maintaining public confidence. Procedures related to Conflicts of Interest can be found in Appendix A.

- **Fair and Nepotism-Free Employment Decisions**

All hiring, promotions, performance appraisals and discipline are undertaken in an impartial manner, ensuring fairness and meeting collective agreement obligations.

Employees should not be involved in the hiring decision where they are unable to do so impartially. Haldimand does not allow direct supervision, or supervision by the next higher level, of an Immediate Family member.

In rare cases that employees become related during their course of employment, all parties will work together to remove the conflict, and where not possible, put measures in place to avoid, a conflict of interest.

Additional information related to employment matters is outlined in Haldimand County's recruitment policy (policy 2001-14).

- **Mindful Outside Activities**

Haldimand County encourages staff to become involved in their community, through local organizations and associations. However, it is possible that some outside activities can interfere with our ability to do our jobs or may undermine the position of Haldimand County. It is our shared responsibility to prevent this type of conflict.

Employees should consult with their manager and the applicable sections of The Municipal Act and the Municipal Elections Act before becoming involved with a local agency, Board or Commission and should only do so when involvement will not affect their ability to remain impartial in carrying out their role within Haldimand.

Examples of what we do, to demonstrate impartiality:

- Make work decisions without consideration of our personal interest or those of our family, friends, groups or associations we participate in.
- When buying goods or services, comply with Haldimand County's procurement by-laws and policies.

- Ensure that our outside activities do not conflict with our job.
- Disclose a real or potential conflict of interest, in writing, to our manager and/or Human Resources, and remove ourselves from the decision-making process.

Examples of what we do not do...

- Participate in decisions that benefit ourselves or our friends, family or affiliated interest groups.
- Supervise members of our Immediate Family or make decisions that affect their employment.
- Accept gifts, hospitality or entertainment from people who do, or want to do, business with Haldimand.
- Take on work or responsibilities that interfere with job performance, conflict with Haldimand County's core hours, or compete with Haldimand services, even when working remotely.

It is recognized that concepts above take a broad approach to defining impartiality and there may be scenarios that require clearer expectations or definitions. Detailed procedures, restrictions, exceptions and disclosures of Conflict of Interest are outlined in Appendix A of this policy.

6.2. Trust and Integrity

Employees are responsible for delivering a wide range of public services and may have control over public funds and/or access to publicly owned resources. We are accountable to the public to be honest and use good judgment when carrying out our duties, maintaining public trust.

Trust and Integrity is demonstrated through our commitment to:

- **Knowing What is Confidential, and Maintaining its Privacy**

Haldimand's values transparency and open government, however not all records are authorized to share. Confidential information is information that is not publicly available, not known or meant to be known by the general population and is reasonably protected. Employees have a fundamental responsibility to maintain confidentiality, in order to safeguard personal or unauthorized information as well as protect the integrity of the organization. This means, not accessing, or permitting access to, information that is confidential unless required to carry out your duties. This also means handling sensitive and confidential information with care and disclose only in accordance with the Municipal Freedom of Information and Privacy Act ("MFIPPA") and other applicable Haldimand policies and by-laws.

- **Public Funds**

Some County employees, in the course of performing their duties, may receive or handle public funds. It is imperative that all financial reporting policies and procedures are strictly adhered to whenever such funds are received or managed.

- **Proper Use of Haldimand Property and Assets**

Public property, such as vehicles, equipment and materials, technology infrastructure and solutions are made available to employees for the purpose of carrying out their public services in an efficient and effective manner. Personal use of Haldimand property must be limited to instances that are authorized through Haldimand policy or written approval from your manager. Property is exclusively owned by the Corporation of Haldimand County and is subject to inspection at any time. Employees are expected to use good judgement and care in their use and protection of Haldimand property and assets.

Additional information related specifically to activities using technology assets, infrastructure and solutions is outlined in the Information Technology Acceptable Usage Policy (policy 2001-08).

Examples of what we do, to demonstrate trust and integrity...

- Keep confidential data, in the strictest confidence, and share only with those who need the information in the performance of their duties.
- Ensure all property (including cash, cheques, documents, vehicles and equipment) in our care as part of our job is properly secured and protected at all times in accordance with Haldimand policy.
- Devote ourselves to our jobs during working hours and do not allow our personal activities to interfere with our work

Examples of what we do not do...

- Disclose private information, such as property tax details or enforcement matters, in a manner differently than outlined by MFIPPA.
- Access, distribute or display inappropriate material (including sexually explicit, discriminatory, abusive, defamatory or obscene material) using Haldimand property, including Haldimand County's computer network.
- Manipulate, falsify, alter or amend documents, information or records for fraudulent purposes.

6.3. Professionalism

Employee actions and behaviours reflect on our co-workers and define our workplace culture. A professional approach fosters a positive work environment, where employees can feel comfortable and work collaboratively. Further, professional conduct helps in maintaining a positive public image which promotes community engagement and support.

Professionalism is demonstrated through our commitment to:

- **Treating Others with Dignity and Respect**

Haldimand County represents a diverse community of communities, and everyone – whether that be coworkers, members of Council or the public – deserves to be treated fairly and with respect, free from discrimination or harassment. Employees are expected to abide by Haldimand County's Respect in the Workplace Policy (2001-18) when interacting with one another. When serving the public, we are committed to following the principles within the Haldimand County Customer Service Strategy such as providing consistent, accessible and responsive customer service.

- **Ensuring Fit for Duty**

Haldimand is committed to ensuring the health, safety, and well-being of its employees and the public. Haldimand has a zero-tolerance policy for the possession or being under the influence of: alcohol, recreational cannabis, drugs, or illicit substances while on duty.

Employee wellness is also guided by a number of internal health and safety policies, guidelines and procedures listed in section 9 below. We are committed to following all federal and provincial laws regarding alcohol and drugs and recognize that infractions could result in immediate dismissal of employment.

- **Aligning Off Duty Conduct**

Employees of Haldimand County hold positions of great responsibility and are accountable to the public and to Haldimand as employer. Employees are Representatives of Haldimand even while off duty. Accordingly, employees are held accountable for their actions anytime it harms Haldimand's interests, such as when: the conduct harms Haldimand's reputation; it impacts the employee's ability to perform their duties fairly and impartially; and/or, it affects the rights of other employees.

- **Dressing Appropriately**

Haldimand strives to maintain a professional, yet comfortable atmosphere that projects a good first impression. As Representatives of Haldimand, all employees dress in job appropriate attire that reflects Haldimand County's image. Employees are expected to use common sense regarding their clothing and appearance in the workplace.

Employees who are issued uniforms are committed to wearing them in a safe, clean and appropriate manner as outlined for their position.

Examples of what we do, to demonstrate professionalism...

- We recognize that we are the public face of local government, so we dress appropriately. We are encouraged to participate in special events / occasions, such as casual Fridays or wellness days, however, we are mindful of our planned work and how our appearance may need alteration depending on our work schedule.
- We foster an atmosphere of collegiality and support our coworkers in their work.
- We attend work fit for duty, and refrain from using substances which can impair performance while at work.

Examples of what we do not do...

- Act negatively or disrespectfully towards others, or make disparaging remarks, even when off duty.
- Wear clothing that is ripped, overly casual (such as athletic attire) or featuring distasteful slogans or graphics.

6.4. Political Acumen

Public service, and the nature of politics, can be complex and often unpredictable. Employees are expected to use insight and good judgement when communicating on Haldimand business and direction of Council. Likewise, municipal employees may naturally find themselves passionate about local government issues and may even have political aspirations of their own. Employees must distinguish between personal opinions and professional opinions related to their roles within Haldimand and act in a neutral and non-political manner that does not imply a connection between personal opinion and the position of Haldimand County.

Political Acumen is demonstrated through our commitment to:

- **Positive Media Relations**

Media plays an important role in disseminating information and promoting transparency in local government. Haldimand encourages strong, positive relationships with media based on conveying factual and objective Haldimand information.

To streamline media inquiries and avoid inconsistent responses, Haldimand adopted a protocol for communicating with the media, as outlined in Haldimand County's Media Relations Policy (policy 2003-12). All employees must adhere to this policy.

- **Honouring the Duty of Loyalty**

As the elected voice of the residents of Haldimand County, Council members set the policy and direction of the municipality. Employees must be committed to carrying out the will and decisions of Council, even if it conflicts with their own personal opinions.

Employees must distinguish between personal comments and professional opinion related to their role within Haldimand. Making personal comments using Haldimand resources (letterhead, email, etc.) is unacceptable. Employees must refrain from any public or private criticism of Haldimand, including their co-workers and/or members of Council, and consider how their personal comments may affect the public perception of Haldimand.

- **Responsible Support of Political Activity**

Employees may choose to run for political office at any level of government. Depending on the office sought, it may be necessary to request a leave of absence while campaigning. If elected, the employee must follow the provisions of the Municipal Act and Municipal Elects Act relating their employment with Haldimand County. Employees may campaign on behalf of candidates running for political office provided that it does not interfere with the performance of their normal duties, and it is done without reference to the fact that the employee is employed by the Corporation of Haldimand County. Employees are encouraged to exercise good judgement in considering whether to assist with a Haldimand County election campaign.

Examples of what we do, to demonstrate political acumen...

- If authorized, provide factual and objective information to the media, in accordance with the Media Relations Policy.
- Consult the appropriate legislation relative to the office to which election is being sought, and ensure compliance with those requirements.

Examples of what we do not do...

- Claim to speak on behalf of Haldimand, unless we have been authorized to do so.
- Speak on a Haldimand topic that is not within your area of expertise or that you may not have all available or accurate information.
- Publicly disparage Haldimand County, our co-workers or members of Council.

6.5. Corporate Competencies

In addition to the core values outlined in this policy, Haldimand County envisions all Haldimand staff to possess a high degree of credibility, flexibility & adaptability, empathy & compassion, entrepreneurship, and customer service.

7. Accountability / Responsibilities

This Code of Conduct sets out the principles, which guide employee's behaviour. Ensuring we operate in keeping with the values set out in this policy will enable us to take responsibility for our actions and

decisions. All parties play a role in holding employees of Haldimand County accountable to the commitments herein.

7.1. Staff

- Know the code of conduct and comply with its principles, seek clarification where needed.
- Use good judgement to guide your actions and take responsibility for your behaviour and your decisions.
- If you find yourself in a situation that is inconsistent with this code, or any situation that could raise a concern with your conduct, you should disclose it to your manager immediately.
- Report violations of the code, by a co-worker, to your manager immediately. No employee will be disciplined for making a report in good faith about a violation of this Code of Conduct.
- Fully cooperate with investigations into alleged wrongdoing.
- Recognize that breaches of this code of conduct may be subject to disciplinary action, up to and including termination.

7.2. Supervisors, including managers, general managers and CAO

- Ensure, to the best of your ability, that this Code of Conduct is followed by all individuals employed within the area of your responsibility. Noting that there may be other related, yet more specific requirements under legislation or other Haldimand policies or by-laws as it relates to supervisors' roles in managing conduct.
- Bring information related to real or potential breach of this policy, immediately to the attention of the employee and Manager, Human Resources.
- Hold your employees accountable for their actions, including breaches or misalignments with this policy. This may include carrying out disciplinary measures where warranted.
- Seek advice from Manager of HR where uncertain with respect to the application of this policy.

7.3. Members of the Public

- Anyone may bring forward a concern about an Haldimand County representative's conduct, so long as it is done in good faith. Members of the public can submit a concern related to a real or suspected breach of this code by a Haldimand County representative, using the established Municipal Complaints Procedure, made available on Haldimand County's website.

8. References

- Council Code of Conduct
- Customer Service Strategy
- [Election Protocol](#) (policy 2003-07)
- [Health and Safety Policy](#) (policy 2024--01)
- [Information Technology Acceptable Usage Policy](#) (policy 2001-08).
- [Media Relations Policy](#) (policy 2003-12).
- [Municipal Act](#)
- [Municipal Freedom of Information and Protection of Privacy Act](#)
- [Procurement Policy](#) (policy 2023-02)
- [Recruitment Policy](#) (2001-14)
- Respectful Conduct Policy
- [Social Media Policy](#) (policy 2015-03)

- [Staff-Council Relations Policy](#) (policy 2004-02)

Revision History					
Report	CIC		Council		Details
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	Date	Rec#	Date	Res#	
	Date	Rec#	Date	Res#	
	Date	Rec#	Date	Res#	

Appendix A: Conflict of Interest Procedures

A conflict of Interest means a conflict between an Employee's public duties arising from his/her employment with the county and the private interests, including financial interests, of the Employee, a Family Member, a Close Associate or an Associated Organization as defined as follows:

- **Associated Organization** means any organization for which the Employee works as an employee or Contractor, any Service Organization of which the Employee is a member or any corporation or partnership in which the Employee has a voting or financial interest.
- **Close Associate** means any person who is not a Family Member as defined below with whom the Employee has a sufficiently close relationship so as to impair the ability of the Employee to make objective and impartial decisions respecting the person.
- **Employee** means a full-time, part-time or contract Employee of Haldimand County, and includes a volunteer firefighter.
- **Family Member** means an Employee's spouse, parent, grandparent, child, grandchild and sibling, and includes step, common-law, in-law and same-sex relationships.

A. Procedures

- i. When a County Employee believes that a Conflict of Interest may exist, the County Employee shall report such potential conflict to his/her Manager. If the potential conflict relates to a Manager, the report shall be to the applicable General Manager. If the potential conflict relates to a General Manager, the report shall be to the CAO. If the potential conflict relates to the CAO, the report shall be to the Mayor.
- ii. If an Employee is uncertain about whether a Conflict of Interest exists, or whether a person falls within the definition of Close Associate or Associated Organization, the Employee shall report the issue in accordance with 3(a) above.
- iii. In making any report under 3(a) or 3(b) above, the Employee shall make full disclosure of the issue, including the Employee's private interests in the issue, and the nature of the relationship with the person who is a Family Member, or who might be considered a Close Associate or an Associated Organization, as applicable.
- iv. Where it is determined that a Conflict of Interest exists, the Manager, General Manager, CAO, or Mayor, as the case may be, shall ensure that the Employee has no direct or indirect input into any decision relating to the issue.
- v. The Chief Administrative Officer, General Managers, Managers and Supervisors shall, to the best of their ability, ensure that this Code is followed by individuals employed in their area of responsibility.
- vi. A General Manager, Manager or Supervisor having knowledge of a breach of this Code of Conduct by an employee shall bring such information immediately to the attention of the employee and the Chief Administrative Officer.
- vii. Any employee who has reason to believe that a General Manager, Manager or Supervisor is committing a breach of the Code shall approach the Chief Administrative Officer in confidence.
- viii. Should a situation arise which appears to be in contravention of this policy, the Chief Administrative Officer shall immediately convene a Committee, comprised of members of Senior Management Team (except any SMT member(s) directly related to the contravention in question) to determine if, in the committee's judgement, immediate suspension with or without pay, or any other action, is warranted.

B. Restrictions

Except as specifically provided in Section C, no Employee shall:

- i. engage in any business or transaction or have a financial or other private interest which is in conflict with the discharge of his/her public duties;
- ii. engage in any outside work, activity or business undertaking:
 - a) that interferes or appears to interfere with the Employee's duties,
 - b) in which the Employee has an advantage or appears to have an advantage derived from employment with the County,
 - c) in a professional capacity that will or might appear to influence or affect the carrying out of duties as a County Employee;
- iii. place him/herself in a position where he/she is under obligation to any person who might benefit from special consideration or favour on their part or who might seek preferential treatment, in any way;
- iv. place him/herself in a position where he/she could derive any direct or indirect benefit or interest from any contracts about which the Employee can influence decisions;
- v. benefit from the use of information acquired during the course of official duties which is not generally available to the public;
- vi. participate in any decision, promotion or make any recommendation to his/her supervisor, Committee or Council, in which the Employee, or his/her Family Member, Close Associate or Associated Organization has any financial interest except as a resident of Haldimand County;
- vii. solicit or accept any gift, present or favour; the acceptance of which shall place or appear to place the Employee under an obligation to the donor in the County in a compromising situation;
- viii. accept a specific gesture without determining with his/her supervisor whether or not it constitutes normal hospitality among persons doing business in accordance with (c) below.

C. Exceptions

- i. A County Employee, Family Member, Close Associate or Associated Organization may engage in a business transaction with the County if the dollar value of the transaction is anticipated to be \$5,000.00 or less, provided that:
 - a) the transaction does not relate to the Employee's department at the County;
 - b) full disclosure of the conflict has been made by the Employee;
 - c) the Employee has no direct or indirect input into any decision relating to the transaction;
 - d) the Direct Purchase Criteria of section 4.01 of the County's Procurement Policy are satisfied (copy attached).
- ii. A County Employee may bid on County contracts exceeding \$5,000.00 in accordance with the County's Procurement Policy provided that:
 - a) the transaction does not relate to the Employee's department at the County;
 - b) full disclosure of the conflict has been made by the Employee;
 - c) the Employee has no direct or indirect input into any decision relating to the transaction.
- iii. A Family Member, Close Associate or Associated Organization may bid on County contracts exceeding \$5,000.00 provided that the Family Member, Close Associate, or Associated

- Organization makes full disclosure of the relationship with the County Employee which may give rise to a conflict in accordance with the terms of the bid document in question.
- iv. In any case of a Family Member, Close Associate or Associated Organization bidding on a County contract exceeding \$5,000.00, if the Employee is aware of the transaction, the Employee shall:
 - a) make full disclosure of the conflict to his/her Manager,
 - b) not have direct or indirect input into any decision respecting the bid.
 - v. Employees may accept gestures, gifts, presents or favors from an individual or organization provided that the gesture, gift, present or favor constitutes normal hospitality among persons doing business and provided further that if the anticipated benefit to the County Employee is anticipated to exceed \$100.00 in value, the Employee shall report the matter in accordance with 3(a) or (b) above and shall abide by the direction of the appropriate supervisor.

D. Disclosure

Whenever an employee considers he or she could be involved in a conflict of interest as prohibited by this policy, the employee shall disclose the situation to his/her Manager, General Manager or the Chief Administrative Officer, and shall abide by the advice given.

Once an employee has disclosed an interest it is understood that he/she will be removed from the decision - making process relative to the interest that has been disclosed.