



Subject: Employee Code of Conduct
Policy No.: HR-11
Approval Date:
Authority: By-law 2024-
Revised Date:

1. PURPOSE

- 1.1. Employees of the Corporation of the Township of Lanark Highlands shall be committed to carrying out their duties in a manner that maintains and enhances public confidence and trust in the integrity, objectivity and impartiality of the Municipality. Trust and mutual respect are the cornerstones of a relationship between the public and municipal government. In serving the public interest, Employees are entrusted with access to a wide range of information, resources and responsibilities, and shall operate with a sense of honesty and accountability.

2. SCOPE

- 2.1. This policy applies to all Employees, including full-time, part-time, permanent and temporary employees, as well as volunteers, students, and interns (collectively referred to as “Employees”).

3. DEFINITIONS

In this policy,

- 3.1. **Business gifts and benefits** means any gift, payment, favour or any form of entertainment from a business associate offered to an employee and/or accepted by an employee.
- 3.2. **Chief Administrative Officer (CAO)** means the Township’s administrator or his or her designate.
- 3.3. **Employee or Employees** means direct employees of the Township of Lanark Highlands whether full-time, part-time, contract (including employees of staffing agencies) or casual (including students and volunteers), but does not include employees of local boards, subsidiaries of the Township, bodies which have independent corporate existence, or independent contractors and their employees. It also includes appointees to Township advisory boards and

committees, unless those boards and committees have separate corporate existence.

- 3.4. **Conflict and Conflict of Interest** means an interest or activity, financial or otherwise, which is incompatible with the proper discharge of the duties and responsibilities of an Employee. The definition includes “apparent” or “reasonably apparent” financial conflicts, and conflicts of interest of Relatives will be deemed to be conflicts of interest of the Employee. Specifically excluded from the definition are the items referred to in section 4 of the Municipal Conflict of Interest Act.
- 3.5. **Outside activities** are private activities which are not part of an Employee’s assigned work and are not part of his or her job.
- 3.6. **Township** means The Corporation of the Township of Lanark Highlands.
- 3.7. **Township Assets** includes real property (such as land or interests in land), equipment, software, financial, digital, information, and time resources owned and or leased by the Township.

4. ROLES AND RESPONSIBILITIES

- 4.1. All Employees are responsible for:
 - (a) Signing a document acknowledging they have read and understand the Code of Conduct, and they agree to comply with its provisions.
 - (b) Reviewing the policy annually.
 - (c) Seeking clarification from management or Human Resources if uncertain about any information contained in this Policy; and
 - (d) Adhering to the standards of behaviour outlined in this Policy.
- 4.2. Management is responsible for:
 - (a) Promoting an environment in which employees demonstrate standards of ethical and professional behaviour.
 - (b) Taking appropriate steps to ensure employees are aware of and act in compliance with this Code of Conduct and related policies.
 - (c) Demonstrating behaviours that are consistent with the Code of Conduct.
 - (d) Supporting staff members in adherence to the Code of Conduct.
 - (e) Establishing and maintaining adequate systems, procedures and controls for the organization which support compliance with this Code of Conduct.
 - (f) Investigating allegations immediately or as soon as possible after receiving a verbal or signed complaint in writing.
 - (g) Managing allegations of Code of Conduct violations in a fair and expeditious manner.
 - (h) Providing information and education relating to the Code of Conduct.
 - (i) Providing advice on matters that are related to the Code of Conduct.
 - (j) Determining the appropriate disciplinary action for confirmed breaches.

5. SPECIFIC DIRECTIVES

Personal Conduct

- 5.1. Employees must uphold all laws in the course of their duties and ensure their personal and professional conduct does not bring the Township into disrepute or damage public confidence.
- 5.2. Employees shall ensure that their personal and workplace conduct does not hinder their ability to perform duties, impede others' work, or undermine public trust in the Township and the integrity of the public sector.

Dealing with the Public

- 5.3. Employees shall treat the public with diplomacy, tact, and objectivity and shall recognize that such contacts affect the Township's public image. Employees will do everything within their role and responsibilities to assist members of the public to resolve any concerns brought forward to the Township.
- 5.4. Any employee complaints that arise from the media and/or public will be dealt with through the Complaint Policy.

Employee Wrongdoing

- 5.5. Employee misconduct in terms of business-related wrongdoings will not be tolerated and may be subject to disciplinary action, up to and including termination. Employee misconduct includes but is not limited to the following:
 - (a) Theft, embezzlement or misappropriation of funds, good and supplies, resources and other assets.
 - (b) Fraud.
 - (c) Misuse or abuse of authority in the context of purchasing supplies or services.
 - (d) The use of Township money, property, resources or authority for personal gain or other non-city business related purposes except as provided under Policy or approval.
 - (e) Conflict of interest (when personal interest influences the objective exercise of one's duties).
 - (f) Breach of confidentiality.
 - (g) Showing undue favour to a contractor or supplier of good/services.
 - (h) Breach of or failure to implement or comply with Township Policies or Procedures.
 - (i) Illegally obtaining money including solicitation and/or acceptance of bribes.
 - (j) Intentionally providing false or incomplete information including falsification of records.

Conflict of Interest

- 5.6. Employees shall avoid situations where they, or a family member, have a direct or indirect financial interest in Township-related matters, including contracts, if they are in a position to influence the Township's decisions on those matters.
- 5.7. Employees shall not influence or attempt to influence decisions made during the course of their duties, including the actions of decision-makers.
- 5.8. Employees shall disclose any potential conflict of interest arising from personal or family interests in Township-related matters to the CAO. The CAO will determine appropriate measures to manage the conflict. Employees uncertain about a potential conflict must seek guidance from the CAO, who will make a discretionary decision.
- 5.9. Employees shall not engage in private employment or provide services to individuals or businesses that have, or may have, dealings with the Township. Any such situation must be reported to the CAO for review.
- 5.10. Employees shall maintain neutrality and trust when dealing with the public and avoid any actions that could compromise public confidence or their professional responsibilities.
- 5.11. Employees wishing to engage as private citizens in matters related to Township decisions must notify the CAO (or Mayor), and appropriate actions will be taken to protect the Township's integrity.

Drug, Alcohol and Tobacco Use

- 5.12. Employees shall abide by applicable laws and regulations governing the possession or use of alcohol, drugs and tobacco. The illegal use of any restricted or controlled drug, narcotic or and other substance is prohibited and will result in discipline.
- 5.13. Employees who are required to take prescription medication shall do so as directed by their physician. Employees shall inform their supervisor if the use of prescription medication impairs their ability to perform their work.
- 5.14. No employee shall distribute, possess or use alcohol on any work sites occupied by the Township or any Township vehicle or other equipment except where the employee is required to possess or distribute alcohol as part of their duties at a licensed event or work site.
- 5.15. Township work sites and vehicles are deemed as smoke-free, and any employee found smoking or vaping outside the designated area on site or in vehicles will be subject to disciplinary action.

Use of Municipal Property and Assets

- 5.16. Employees shall use Township assets solely for official Township purposes and in the performance of their duties. Township assets must not be used for personal gain or benefit under any circumstances.
- 5.17. Employees shall not misuse Township assets in any way that could be considered offensive, inappropriate, or fraudulent.
- 5.18. Employees are responsible for ensuring that any Township assets in their care, including equipment, documents, and purchasing cards, are properly secured and protected at all times.
- 5.19. Employees are prohibited from using the Township's electronic networks for unacceptable or unlawful activities, such as accessing inappropriate content like pornographic or hate propaganda websites. Communications over the Township's networks are considered Township assets and should not be viewed as private.
- 5.20. Employees shall not engage in software piracy or use unlicensed software for Township purposes. Unauthorized use, sale, or transfer of Township intellectual property is prohibited unless authorized by the Township.
- 5.21. The Township retains exclusive intellectual property rights to any work produced by employees in the course of their employment. Employees may not transfer, sell, or authorize the use of such intellectual property without the Township's approval.
- 5.22. Employees shall return all Township property in their possession upon termination of employment, including drawings, documents, correspondence, and any other materials related to Township business. Employees may retain samples of their work that are in the public domain, but only with proper authorization from the Township.

Use of Township Owned Vehicles

- 5.23. Employees shall use Township vehicles exclusively for official Township business. Only authorized employees with valid driver's licenses may operate these vehicles. Personal use of Township vehicles is strictly prohibited unless specifically authorized under a Township policy or agreement.
- 5.24. Employees shall operate Township vehicles in a safe, responsible, and lawful manner at all times. This includes obeying traffic laws, using seat belts, and avoiding the use of mobile devices while driving.
- 5.25. Employees are responsible for ensuring that Township vehicles are properly maintained, reporting any damage, mechanical issues, or safety concerns to their supervisor immediately. Routine inspections must be performed to ensure

vehicles are in safe working condition.

- 5.26. Employees involved in an accident or incident with a Township vehicle must immediately report the situation to their supervisor and follow the proper procedures for documentation and resolution.
- 5.27. Employees are prohibited from using Township vehicles for personal errands, transporting unauthorized passengers, or carrying items unrelated to Township business. Additionally, the consumption of alcohol or illegal substances before or during the operation of Township vehicles is strictly forbidden.
- 5.28. Employees may take Township vehicles home if specifically authorized by their supervisor or as part of an approved operational requirement. In such cases, the vehicle must be parked securely and used only for commuting between the employee's home and work, without personal use.
- 5.29. Employees must return Township vehicles to the designated location at the end of the workday or upon completion of the task, unless authorized to take the vehicle home. Vehicles should be securely parked and not left unattended with keys inside.

Outside Business Activity (Moonlighting)

- 5.30. Employees shall not undertake outside business activity, including self-employment, if such employment:
 - (a) Causes a real or apparent conflict of interest.
 - (b) Is performed in such a way as to appear to be an official act of or to represent the Township.
 - (c) Interferes with regular duties in any way; or,
 - (d) Involves the use of Township sites, resources or equipment including but not limited to Township e-mail, telephones, cell phones, or supplies.
- 5.31. Where it appears that a conflict of interest might arise in accepting outside employment, employees must notify their supervisor in writing of the nature of such outside employment and receive written permission prior to the acceptance of such employment.

Political Involvement and Activity

- 5.32. Employees may participate in political activities at the federal, provincial and municipal levels providing such activities does not take place during work hours or utilize Township assets, resources or property.
- 5.33. Employees intending to run for federal, provincial or municipal office shall first seek a leave of absence to cover the campaign period, and, if elected, pursuant to Section 38(5) of the Municipal Act, they must resign from their position with the Township.

Gifts and Benefits

- 5.34. Employees shall not offer or accept any gifts, favors, hospitality, or entertainment that could reasonably be perceived as being given in anticipation of, or recognition for, "special consideration" by the Township.
- 5.35. Business gifts are discouraged, but nominal gifts with a value of \$50 or less may be accepted.
- 5.36. Gifts, payments, tickets or other items exceeding the nominal value should be returned to the sender with an acknowledgement referencing the Code of Conduct.
- 5.37. Employees who are uncertain about the appropriateness of a hospitality event or gift shall seek guidance from their supervisor or manager for clarification.

Nepotism

- 5.38. The Township shall avoid any practice that may give rise to Conflicts of Interest or difficulties for supervisors, co-workers, and subordinates when hiring Employees particularly as it relates to the employment of Relatives of Employees and Members of Council.
- 5.39. The Township shall take every measure to prevent conflicts of interest, favoritism, or undue influence when hiring relatives of Township employees or members of Council. To ensure fairness and transparency in the hiring process, the following safeguards shall be in place:
 - (a) the hiring of the Relative will not result in the situation where an Employee will be the direct supervisor of a Relative or the situation where an Employee is the functional supervisor of a Relative.
 - (b) an application has been received in the normal manner and the standard recruitment and selection process was followed.
 - (c) the candidate to be hired is, in the opinion of the interviewers, the best qualified with respect to the requirements of the position.
 - (d) there was no undue influence exerted on the interviewers.
 - (e) no potential Conflicts or other difficulties appear to exist; and,
 - (f) a Relative of the Employee to be hired did not take part in the selection process.
- 5.40. If persons become Relatives of one another after they have been hired in circumstances where one supervises the other, the circumstances will be reviewed by the CAO and the Manager on a case-by-case basis to determine what action, if any, can be taken to remove the reporting relationship.

Dress and Attire

- 5.41. Employees shall ensure their attire reflects professionalism and is appropriate for conducting municipal business, aligned with the expectations of their role within the Township.
- 5.42. Employees' clothing shall comply with the following specifications:
- (a) Employees' clothing must be clean and neat in appearance at the start of each workday. While some positions may result in clothing becoming soiled during the day, all employees are expected to begin their day with appropriate attire.
 - (b) Clothing should be suitable for the specific job duties and level of professionalism required by the position. For example, road maintenance workers will have different attire requirements than office staff.
 - (c) Employees must dress appropriately for their work schedule, considering any meetings with clients or stakeholders, whether in the office or the field.
 - (d) Personal safety shall be a priority when choosing clothing, minimizing the risk of accidents.
 - (e) At all times, employees are prohibited from wearing clothing displaying inappropriate messages, graphics, or expletive language.
- 5.43. Employees must wear footwear that is suitable for their work environment and duties, ensuring safety, professionalism, and functionality. For positions that involve physical labor or require specific safety precautions, employees shall adhere to the relevant safety footwear standards, such as wearing closed-toe, slip-resistant, or steel-toed shoes, as applicable.
- 5.44. Employees who are deemed to be dressed inappropriately may be required by their supervisor or designate to return home and change to meet the acceptable standards of dress and appearance.

Outside Business Activity

- 5.45. Employees must ensure that any outside work, activities, or business ventures do not negatively affect their ability to perform their duties effectively or violate Township policies and procedures.
- 5.46. Outside work, activity or business shall not:
- (a) Conflict with their hours of work for the Township or interfere with the efficient performance of their duties.
 - (b) Compete with Township services.
 - (c) Use the Township's time or resources, such as photocopiers, stationery, computers, email, internet, printers, vehicles, cellular phones, pagers or such, for the benefit of their second job or external activities; or
 - (d) Give employees a real or perceived financial or other personal interest or advantage that is derived from employment at the Township.

Reporting/Investigation

- 5.47. Employees shall report any reasonable belief of a violation of the Code of Conduct, either verbally or in writing, to their Manager, Direct Supervisor or CAO. Supervisors and management staff are responsible for taking all appropriate steps to prevent and address conflicts of interest or other violations that come to their attention.
- 5.48. Supervisory or management staff who are subject to, witness, or receive written complaints regarding a conflict of interest shall take action to resolve the issue. If resolution is not possible with available resources, they must report the matter to the CAO. For unionized staff, any action taken to investigate shall be in accordance with the applicable collective agreements, ensuring adherence to established protocols and processes.
- 5.49. The Township shall investigate all complaints of Code of Conduct violations and take appropriate corrective action as necessary.

Awareness of the Code of Conduct

- 5.50. The Code of Conduct shall be provided to all employees during orientation and made available on the Township’s website. Employees are required to acknowledge receipt and acceptance of the Code annually, or as necessary.

I, acknowledge that I have read and understand the Code of Conduct applicable to Township of Lanark Highlands Employees. I agree to adhere to this Code of Conduct. I understand that if I violate this Code of Conduct, I may face disciplinary action up to and including the termination of my employment, as well as any necessary legal action required or taken by the Township.

Name: _____

Signature: _____

Date: _____