

Standards of Conduct

1. Introduction

The Provincial Health Services Authority and its programs and services (hereafter collectively referred to as PHSA) delivers health and social services with skill, care and courtesy while creating an environment and workplace that treats all individuals with dignity and respect. PHSA expects all [Staff](#) to inspire public confidence and trust by acting with the highest standards of personal and professional integrity and conduct and to avoid real, perceived, and potential conflicts of interest in the course of their association with PHSA.

Conflicts of interest occur when there is a potential divergence between a Staff member's personal interests and their professional obligations to PHSA such that if an independent observer was informed of these interests, they may question whether financial or personal gain influenced the Staff's PHSA duties or professional judgment. This includes, but is not limited to, clinical practice, leadership, research, investment or procurement selection, or business and administrative decisions performed by that Staff.

PHSA recognizes the distinct [Cultures](#), [Self-determination](#) and the individual and collective Rights of [Indigenous](#) Peoples, as well as the distinct Rights and Title of First Nations peoples on the lands that the Provincial Health Services Authority (PHSA) is situated and serves. As part of the British Columbia (B.C.) health care system, PHSA acknowledges that the roots of historic and ongoing [Settler Colonialism](#), [White Supremacy](#) and [Indigenous-specific Racism](#) and [Discrimination](#) are embedded in PHSA policies, practices, procedures and decision-making processes. From a [Distinctions-Based Approach](#), PHSA is committed to the application of Indigenous-specific Anti-Racism and [Cultural Humility](#) in all policies, practices and procedures to eradicate systemic Indigenous-specific Racism and Discrimination, create a [Zero-tolerance Environment](#) for Indigenous-specific Racism and Discrimination, promote ['Speak-up' Culture](#), and hardwire [Indigenous Cultural Safety](#) throughout PHSA.

PHSA is responsible for implementing the foundational commitments in First Nations Health transformation, and the [United Nations Declaration on the Rights of Indigenous Peoples \(UNDRIP\)](#), the B.C. [Declaration on the Rights of Indigenous Peoples Act](#) (Declaration Act) and the [Declaration Act Action Plan](#). These foundational documents affirm the Rights of Indigenous Peoples to Self-determination and inclusion in meaningful decision-making and establish and define universal Indigenous Rights and Indigenous Human Rights, including the Indigenous Right to Health. This requires ensuring the inclusion of [Wise Practices](#), such as diverse Indigenous knowledge and health practices that contribute to sustainable, equitable and just conditions, are given equitable space and weight with [Best Practices](#), a Western evidence-based approach.

1.1. Purpose

The purpose of this Policy is to:

- Provide guidance on appropriate conduct that is aligned with PHSA’s purpose, vision, values and gifted Coast Salish teachings¹, in addition to any other professional code of ethics or standards of practice to which Staff are bound;
- Identify conflicts of interest and outline responsibilities to appropriately manage conflicts in accordance with legal requirements and the goals of professional integrity, accountability and transparency in PHSA’s operations;
- Outline the responsibilities of those identified as in scope for adhering to the Policy; and
- Identify who is responsible for monitoring compliance and potential outcomes for non-compliance with the Policy.

1.2. Scope

This Policy applies to all Staff (including medical staff) across PHSA, including its programs and services. The word “Staff” in this document includes the PHSA Board of Directors. Should there be a conflict between this PHSA-wide Policy and a program-specific or service-specific policy, this PHSA-wide Policy will prevail.

2. Policy

2.1 Integrity and Conduct

PHSA expects Staff to adhere to the highest standards of conduct with respect to ethical, legal, and professional behaviour amongst themselves and with clients, patients, residents, and other members of the public.

PHSA fosters an environment where Staff shall maintain knowledge of and always comply with the letter and intent of all applicable laws, rules, and regulations of any government, governmental agency, and regulatory organization governing professional activities and honour the Coast Salish Teachings that have been gifted to PHSA. All Staff will uphold the standards of conduct found in this policy and [Related Policies](#) including the following:

2.1.1 [Indigenous-specific Anti-Racism](#)

PHSA will address and eliminate inequities and barriers impacting Indigenous People’s Right to a workplace that is free from Racism and Discrimination. PHSA will have zero-tolerance for acts of Indigenous-specific Racism, Discrimination, stereotyping and/or harassment and promote a ‘Speak-up’ Culture throughout PHSA. The eradication of Indigenous-specific Racism and Discrimination and the hardwiring of Indigenous Cultural Safety and Humility be understood, embraced, and practiced at all levels of PHSA including governance, programs, and services and within individual professional practice. This Policy must be applied with all related procedures and guides.

See the [Indigenous-specific Racism and Discrimination for PHSA Staff Policy](#), which supersedes this Policy in the event of any conflict or inconsistency.

¹ More information about the Coast Salish teachings gifted to PHSA by Coast Salish Knowledge Keeper Sulkun (Shane Pointe) can be found here: <https://pod.phsa.ca/our-phsa/vision/teachings>.

2.1.2 Anti-Racism, Diversity, Equity, and Inclusion

PHSA is steadfast in pursuing mechanisms to provide greater opportunities, awareness and better outcomes for people who have been marginalized by systems of oppression. PHSA is committed to creating policies that decrease inequities, address systemic Discrimination and Racism, eliminate barriers, and provide an inclusive environment that is fair, equitable, just, and respectful. PHSA is committed to fostering a ‘Speak Up’ Culture, where Staff feel safe to raise issues, concerns, and suggestions without fear of retaliation or any other kind of harm resulting from speaking up.

See the Anti-Racism Policy (under development), which supersedes this Policy in the event of any conflict or inconsistency.

2.1.3 Harm to Business or Reputation

Staff must refrain from engaging in conduct that jeopardizes the trust and reputation of PHSA, its staff, patients/residents/clients or the health care profession. Such conduct may include, but is not limited to:

- (i) Publicly criticizing PHSA, its management or its Staff; or
- (ii) Engaging in criminal conduct or other conduct that could harm PHSA’s operations or reputation.

2.2 Confidentiality and Privacy

PHSA is responsible for the management of all [Personal Information](#) and other confidential information within its possession and control in accordance with the *Freedom of Information and Protection of Privacy Act of British Columbia (FIPPA)* and the *E-Health (Personal Health Information Access and Protection of Privacy) Act*. PHSA will also ensure that all Personal Information in its custody or control is kept secure and accessed in accordance with established access protocols.

Staff must only collect, access, use, disclose or dispose Personal Information and other confidential information as necessary to fulfill the terms and requirements of their duties and as authorized by PHSA policies. All Staff will adhere to PHSA’s policies and procedures regarding the privacy, confidentiality, and security of information. See [Privacy and Confidentiality Policy](#) and [Managing Privacy and Confidentiality Breaches Policy](#). In the event of any conflict or inconsistency between these policies and the PHSA Standards of Conduct Policy, the former policies will supersede the Standards of Conduct Policy.

2.3 Internet Usage

Staff shall manage their access to the internet, instant messaging, and email services appropriately. Staff will use these tools in a manner that is consistent with standard PHSA business practices, policies, and ethics, as well as federal and provincial laws. Staff will work to minimize disruptions, prevent misuse that could cause damage to PHSA, and avert security and privacy breaches. Internet usage must be able to survive public scrutiny and/or disclosure. Users

must avoid accessing sites that might bring the public services into disrepute, such as those that carry offensive material.

To keep informed of PHSA important updates, all PHSA Staff will receive a PHSA email account and are to access their account when they are at work at least once per week. Staff should notify their manager where they do not receive a minimum of 15 minutes of access to a computer during work time.

See the [Information Security Policy](#). In the event of any conflict or inconsistency between this policy and the PHSA Standards of Conduct Policy, the former policy will supersede the Standards of Conduct Policy.

2.4 Conflicts of Interest

A conflict of interest must be disclosed when a Staff's personal interests or activities conflict with their PHSA duties and responsibilities in such a way that:

- Their ability to act in the interest of PHSA could be impaired;
- Their ability to discharge work responsibilities could be impaired; and/or
- Their actions undermine or compromise the trust that members of the public have in PHSA or Staff members.

Conflicts of interest must also be disclosed when a Staff member has a personal interest in an [Individual or Industry](#) with whom PHSA has had, has, or may have a [Business Relationship](#).

Guidance must be sought from a manager before engaging in an activity that may result in a real, perceived and/or potential conflict of interest. Staff must disclose any conflicts of interest or potential conflicts of interest situations to a manager as soon as they become aware of the conflict, including all [Financial Interests](#) and [External Interests](#).

All researchers and research staff members who conduct research at or under the auspices of any of PHSA's hospitals, health centers, programs, or their affiliated research institutes are also subject to PHSA's [Research Conflict of Interest Policy](#). In the event of any conflict or inconsistency between this policy and the PHSA Standards of Conduct Policy, the former policy will supersede the Standards of Conduct Policy.

2.4.1 [Gifts](#)

PHSA supports an environment free from undue business influence. For this reason, [Gifts](#), favors, or services directly or indirectly from any client, Individual or Industry must not be demanded, solicited, or accepted unless it:

- Has no more than nominal value;
- Is a normal exchange of hospitality between those doing business together;
- Is a token exchanged as part of a protocol;
- Is the normal presentation of a Gift to a Staff participating in a public function, presentation, workshop, or conference; or
- Is a normal exchange of Gifts between friends.

Any fee or honorarium received at a function held or sponsored by an outside Individual or Industry must be reported to a manager or respective Human Resources business partner. PHSA will require the Staff to return the fee or honorarium or to remit the sum to PHSA if, in PHSA's sole discretion, retention of the fee or honorarium would present a real, perceived and/or potential conflict of interest.

This limit on Gifts does not apply to reasonable expenses related to travel, accommodations, and meals paid for by non-profit organizations or the public sector for the Staff in relation to affiliated meetings, conferences, and award ceremonies that are of fair market value and are not extravagant. See the [Travel and Business Expense Policy](#). In the event of any conflict or inconsistency between this policy and the PHSA Standards of Conduct Policy, the former policy will supersede the Standards of Conduct Policy.

2.4.2 Events

Staff who attend events that are part of an important networking opportunity or is sponsored by an Individual or Industry will pay their own costs affiliated with attending the event, except where meals are offered to all attendees at an event and if the estimated cost of any refreshments provided is nominal.

2.4.3 Use/Misuse of Property, Services, and Information

Usage of PHSA services, facilities and other resources must not create a conflict of interest.

Staff must not use or authorize the use of property, facilities, equipment, supplies, or other resources belonging to PHSA for any other purpose than fulfilling their duties to PHSA. Staff will not engage in acts of dishonesty or commit theft, fraud, assault, or willful destruction of PHSA property, or property of a client, resident, or patient.

Personal use of PHSA equipment, including phones and laptops, is governed by Section 3 of the [Network Acceptable Use Policy](#). In the event of any conflict or inconsistency between this policy and the PHSA Standards of Conduct Policy, the former policy will supersede the Standards of Conduct Policy.

2.4.4 Preferential Treatment

Staff shall not accord preferential treatment in relation to any official matter involving PHSA to [Related Person\(s\)](#) or to Individuals or Industry in which the Staff, or their Related Person(s), has an interest. Staff shall not owe a real, perceived, and/or potential obligation or favor to an Individual or Industry due to their employment or relationship with PHSA.

2.4.5 Working Relationships

Staff who are direct relatives, have close personal relationships or who permanently reside together may not be employed in situations where:

- A managerial or reporting relationship exists where one person has influence, input or decision-making power over the other person's employee's performance evaluation, salary, premiums, special permissions, conditions of work and similar matters: or
- The working relationship affords an opportunity for collusion between the two persons that would have a detrimental effect on PHSA's interests.

When hiring, assigning, transferring, or promoting a Staff member within PHSA, consideration will be given to whether a relationship between Staff who are direct relatives creates a real, perceived and/or potential conflict of interest. PHSA reserves the right to transfer Staff to another department or Program as a means of resolving a work situation where two persons are direct relatives and are in a reporting relationship with one another.

The above restrictions shall be waived if the appropriate People & Culture (HR) Director and Program Leader, President or Corporate Services Leader is satisfied that sufficient safeguards are in place to ensure PHSA's interests are not compromised. When approval for such an exception is granted, written authorization is required.

2.4.6 Outside Remuneration and Volunteer Work

Staff can hold jobs outside PHSA, carry on a 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;
- Bring PHSA into disrepute;
- Represent a conflict of interest or an apparent conflict of interest;
- Create the appearance that the Staff is acting on behalf of PHSA;
- Involve the unauthorized use of work time or PHSA premises, services, equipment, or supplies; or
- Gain an advantage that is derived from their employment as a PHSA Staff member.

2.4.7 Political Activity and Social Media

Staff must ensure that any [Political Activity](#) undertaken is clearly separated from activities related to their employment. Staff must not engage in Political Activities during working hours or use PHSA facilities, equipment, or resources in support of these activities. Staff must not use the PHSA network to broadcast unsolicited personal views on social, political, union or other non-business related matters as per Section 3 of the [Network Acceptable Use policy](#).

Staff's personal use of [Social Media](#) should never jeopardize the trust and reputation of PHSA, its staff, patients/residents/clients or the health care profession. For more information, refer to the [Personal Use of Social Media guideline](#).

2.4.8 Procurement

Staff must not participate in the procurement evaluation or decision making relating to potential vendors of goods or services to PHSA where the Staff member has a real, perceived and/or potential conflict of interest with any of the potential vendors.

Staff asked to participate in the evaluation or decision-making process associated with any procurement must declare to the procurement project lead any real, perceived and/or potential conflict of interest relating to potential vendors involved in the procurement. If the procurement project lead determines that a real, perceived and/or potential conflict of interest exists, the relevant Staff member will not be eligible to participate in the evaluation or decision-making process relating to that procurement.

See [Procurement Policy](#), [Signing Authority Policy](#), and [Contracting Authority Policy](#). In the event of any conflict or inconsistency between these policies and the PHSA Standards of Conduct Policy, the former policies will supersede the Standards of Conduct Policy.

2.4.9 Conflict of Interest Disclosures

This Policy requires the disclosure of any conflicts of interest a Staff member has. All Staff must also disclose any conflicts of interests of Related Person(s).

Disclosures shall be made in writing to the Staff's direct manager. Managers must document the resolution of all real, perceived, and/or potential conflicts of interest situations. People & Culture (Human Resources) is also available to provide clarification/guidance on any matter related to this Policy.

All Researchers must also follow the [Research Conflict of Interest Protocol](#).

2.5 Reporting of Conduct Violations

Staff must report any violation of this Policy they are aware of to their manager or respective Human Resources business partner. Depending on the nature and materiality of the violation, PHSA People & Culture (Human Resources) may consult or report the violation to other areas.

In the circumstances where there is a fear of reprisal, alternate avenues for reporting confidentially or anonymously will be provided. PHSA is committed to creating a workplace environment in which everyone feels they can report their legitimate concerns without risk of discrimination or other adverse employment actions. PHSA is an open and accountable organization which encourages a culture of discussion, and which provides channels of communication for Staff to convey their concerns. If all other processes are insufficient, or Staff wish to remain anonymous, they may utilize the [Safe Reporting Policy](#).

In any case where such a report has been made, the report will be treated confidentially to the extent possible and consistent with PHSA's responsibility to address the issue raised. No Staff will be subject to retaliation for reporting in good faith a violation of this Policy.

2.6 Post Employment Restrictions

All Staff are prohibited from disclosing confidential PHSA information following the end of their employment/engagement with PHSA.

In addition, Senior Leaders (Directors, Executive Directors, and Executives) are subject to the following restrictions in their involvement with entities outside the public sector for a period of one year following the end of their employment with PHSA:

- They cannot lobby or otherwise make representations to PHSA on behalf of such entities;
- They cannot accept an offer of employment, an appointment to the board of directors or a contract to provide services to any such entity with which they had substantial involvement or dealings during the year preceding the end of their employment;
- They cannot advise for commercial purposes, in relation to the programs or policies of PHSA, any such entity with which they had substantial involvement or dealings during the year preceding the end of their employment; and
- They cannot act for any such entity in relation to any ongoing proceedings, transaction, negotiation, or case in which the entity and PHSA are involved if:
 - During their employment with PHSA, they acted for or advised PHSA concerning the proceedings, transaction, negotiation, or case; and/or
 - Acting for the entity in that capacity would confer private or commercial benefit for that entity.

3. Responsibilities

3.1 Staff

Staff will:

- Practice modelling behaviour in accordance with the principles of this Policy and ensure the public's confidence and trust in the integrity, objectivity, and impartiality of PHSA and its Staff;
- Foster a workplace environment that actively promotes Indigenous-specific Anti-Racism and Indigenous Cultural Safety and Humility;
- Foster a work environment that contributes to an Anti-Racist and equitable organization;
- Cultivate and support a work environment where health and safety, including mental health and well-being, are promoted and protected;
- Complete mandatory training and education, and attend opportunities for continued training and education pertaining to their personal and professional development;
- Understand and comply with PHSA policies and other applicable guidelines, regulations and directives that govern Staff activities and behaviour;
- Ensure Personal Information and other confidential information is not collected, accessed, used, disclosed, or disposed for personal use or gain, or for any purpose not expressly authorized by PHSA;

- Arrange their private affairs in a manner that will prevent conflicts of interest, or the perception of conflicts of interest, from arising;
- Disclose in writing to their manager any conflicts of interest or potential conflicts of interest situations as soon as they become aware of the conflict;
- Follow any directions from their manager to prevent or manage a conflict, including direction to divest themselves of Financial Interests in a timely manner or to immediately discontinue, curtail or modify involvement in External Interests;
- Participate fully in any assessments, investigations, and remedies undertaken;
- Check with their manager when uncertain about any aspect of this Policy; and
- Report any violations of this Policy to a manager or through an alternative reporting method.

3.2 Managers and Leaders

Managers and leaders will:

- Lead by example through modelling behaviour in accordance with the principles of this Policy;
- Foster a workplace environment that actively promotes Indigenous-specific Anti-Racism and Indigenous Cultural Safety and Humility;
- Foster a work environment that contributes to an Anti-Racist and equitable organization;
- Cultivate and support a work environment where health and safety, including mental health and well-being, are promoted and protected;
- Complete mandatory training and education, and attend opportunities for continued training and education pertaining to their personal and professional development;
- Ensure Staff complete mandatory training and education;
- Advise Staff on standard of conduct issues and engage the appropriate contact as needed;
- Receive Staff disclosure of complaints, and support and direct Staff to appropriate complaints resolution pathways;
- Collaborate with Indigenous Health on standards of conduct disclosure, complaints or issues involving Indigenous Staff;
- Receive Staff disclosure of conflicts of interest and respond appropriately within the scope of their responsibility, which can include:
 - Determining no conflict exists;
 - Requesting advice from their respective Human Resources business partner; or
 - Determining what action should be taken to mitigate the conflict, and recording this, including:
 - Requesting Staff to immediately discontinue, curtail, or modify their involvement in the External Interest; and/or
 - Requesting the Staff to divest themselves of any conflicting Financial Interests in question in a timely and orderly manner.
- Keep records of all conflict-of-interest documentation and resolution, and provide copies to Employee Records and Benefits for inclusion in the Staff's file.

3.3 People & Culture (Human Resources)

- Lead by example through modelling behaviour in accordance with the principles of this Policy that fosters respect and dignity for all;
- Foster a workplace environment that actively promotes Indigenous-specific Anti-Racism and Indigenous Cultural Safety and Humility;
- Foster a work environment that contributes to an Anti-Racist and equitable organization;
- Receive Staff disclosure of complaints, and support and direct Staff to appropriate complaints resolution pathways;
- Collaborate with Indigenous Health on standards of conduct disclosure, complaints or issues involving Indigenous Staff; and
- Assist, advise and provide guidance to managers and leaders in consistent application and compliance of the Policy.

4. Compliance

Staff who fail to comply with any provision of this Policy may be subject to disciplinary action up to and including termination of employment, severance of the contractual relationship, or termination of admission privileges. A violation of certain provisions of this Policy may also be a violation of law and may subject the Staff involved and/or PHSA to criminal prosecution or civil liability.

5. Supporting Documents

5.1 Related Policies

- Anti-Racism (under development)
- [Contracting Authority](#)
- [Digital Communication Channels](#)
- [Fostering a Culture of Respect](#)
- [Indigenous-specific Racism and Discrimination for PHSA Staff Policy](#)
- [Information Security](#)
- [Managing Privacy and Confidentiality Breaches](#)
- [Network Acceptable Use](#)
- [Privacy and Confidentiality](#)
- [Procurement](#)
- [Public Interest Disclosure](#)
- [Research Conflict of Interest](#)
- [Safe Reporting](#)
- [Signing Authority](#)
- [Substance Use, Abuse and Dependence](#)
- [Theft, Fraud, and Corruption](#)
- [Travel and Business Expense](#)

5.2 Related Resources

- Anti-Racism Guide (under development)

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- [Code of Conduct and Conflict of Interest Guidelines](#)
- [Personal Use of Social Media Guidelines](#)

6. Definitions

“Anti-racism” is the practice of actively identifying, challenging, preventing, eliminating and changing the values, structures, policies, programs, practices and behaviours that perpetuate racism. It is more than just being “not racist” but involves taking action to create conditions of greater inclusion, equality and justice.

“Best Practices” means a practice that has been shown by research and experience to produce optimal results and that is established or proposed as a standard suitable for widespread adoption.

“Business Relationship” is any understanding, procedure, course of dealing, or arrangement between PHSA and a non-PHSA Individual or Industry in connection with the sale or purchase of goods or services or the financing thereof. Business Relationships include those that PHSA has had, has, or may have. Goods and services include, but are not limited to, pharmaceuticals, equipment, devices, and those Individuals and Industries that have a contractual obligation to provide services to PHSA.

“Culture” is a social system of meaning and custom that is developed by a group of people to assure its adaptation and survival. Cultural groups are distinguished by a set of unspoken rules that shape values, beliefs, and habits, patterns of thinking, behaviours and styles of communication.

“Cultural Humility” is a life-long process of self-reflection and self-critique. It is foundational to achieving a culturally safe environment. Cultural humility begins with an in-depth examination of our own assumptions, beliefs and privilege embedded our own understanding and practice.

“Discrimination” is targeting an individual or group of people for negative treatment because of specific characteristics such as race, religion, sex, gender identity, sexual orientation, disability, or other protected characteristics.

“Distinctions-Based Approach” means that our work with First Nations and Métis people and Inuit will be conducted in a manner that acknowledges the specific rights, interests, priorities and concerns of each, while respecting and acknowledging these distinct Peoples with unique cultures, histories, rights, laws, and governments.

“External Interests” means outside interest or activity. This includes, but is not limited to, any external relationship, any self-employment, any participation in business partnerships, or any employment or consulting arrangements which may involve acting as a board member, director, officer, sole owner, partner, employee, agent, consultant, advisor, volunteer, other association involvement, or in any other governance position.

“Financial Interest” means anything of monetary value provided by a non-PHSA entity. This includes, but is not limited to: (1) compensation; (2) equity interests (including common or preferred stocks, stock options, partnership units, warrants, and other convertible security); and (3) revenue and royalties from intellectual property rights (including patents, copyrights, and trademarks). Staff do not need to declare equity interests that are held through publicly-trade mutual funds, pensions, or other institutional investment funds over which they and their Related Person(s) exercise no control.

“Gift” means something voluntarily transferred by one individual to another without any or sufficient compensation, including but are not limited to: money, excessive compensation, non-commercial loans, food, travel, hotel accommodations, entertainment, payment for attending a meeting, electronics, products, services, gift certificates, promotional items, and textbooks.

“Indigenous” in Canada is an overarching term that includes First Nations, Inuit and Métis peoples, either collectively or separately. It is the term many Indigenous people in Canada prefer and is part of the title in the *United Nations Declaration on the Rights of Indigenous Peoples*. One should ask Indigenous individuals which term they prefer to be acknowledged by.

“Indigenous Cultural Safety” is the process of making spaces, services and organizations safer and more equitable for Indigenous people by considering colonial history and seeking to eliminate structural Racism and Discrimination. Cultural safety is also an ‘outcome’ based on respectful engagement that recognizes and strives to address power imbalances inherent in the healthcare system; it is when Indigenous people feel safe when receiving Health Care.

“Indigenous-specific Racism” is the unique nature of stereotyping, bias, and prejudice about Indigenous peoples in Canada that is rooted in the history of settler colonialism. It is the ongoing race-based discrimination, negative stereotyping and injustice experienced by Indigenous peoples that perpetuates power imbalances, systemic discrimination, and inequitable outcomes stemming from the colonial policies and practices.

“Individual and Industry” includes individuals, sole proprietorships, partnerships, associations, joint ventures, corporations, firms, franchises, holding companies, joint stock companies, receiverships, businesses, trusts, and other organizations or entities that are used to carry on trade or business, including subsidiaries and parent organizations.

“Personal Information” means any information about an identifiable individual (including, but not limited to patients, clients, residents, volunteers, students, staff, physicians or members of the public), but it does not include business contact information (business contact information is information such as a person’s title, business telephone number, business address, email or facsimile number).

“Political Activity” means any act or practice conducted for the purpose of influencing public opinion with respect to legislative, administrative or electoral matters or with respect to any controversial issue of public importance. For clarity, this does not include Staff participation in municipal, provincial and federal elections.

“Racism” is a belief that racialized groups are inferior to their non-racialized counterparts because of their race, religion, culture, or spirituality. The outcome of racism can include discriminatory behaviours and policies that endorse the notion of racialized groups being “less than” in comparison to their non-racialized counterparts.

“Related Person” means an individual connected to a Staff member by marriage, common-law partnership, adoption, and is a member of their immediate family (e.g., spouse, partner, sibling, parent, child, mother-in-law, father-in-law, daughter-in-law, son-in-law, brother-in-law, sister-in-law, grandparent, or grandchild), including step relations of the kind described herein; an individual residing in the same household as the Staff, an individual with whom the Staff has a close personal

relationship, platonic or romantic, or an Individual or Industry to whom the Staff has a direct or indirect financial or other interest.

“Self-Determination” refers to the international (United Nations) recognition that Indigenous peoples have the right to self-determination. By virtue of that right Indigenous peoples may freely determine their political status and freely pursue their economic, social and cultural development.

“Settler Colonialism” is a specific social and political formation that is continuous and involves processes of invasion, dispossession and settlement that are ongoing.

“Social Media” mostly refers to external online networks, forums and blogs such as, but not limited to, Twitter, Facebook, Instagram, YouTube, LinkedIn, TikTok, Twitch, blogs and podcasts.

“‘Speak-Up’ Culture” refers a safe space for people to speak up and speak out, where they can feel emboldened to point out both challenging areas and opportunities for new disruptions and innovations.

“Staff” means all unionized and non-contract employees (including management and leadership), medical staff members (including physicians, midwives and dentists, nurse practitioners), residents, fellows and trainees, health care professionals, students, university faculty and support staff who work at PHSA facilities, volunteers, contractors, researchers and other service providers engaged by PHSA.

“Systemic Racism” refers to the arrangements and practices that maintain racial hierarchies and racial inequality. It comprises policies, behaviours and practices that are part of the social, cultural or administrative elements of an organization or system and which produce or maintain positions of disadvantage for individuals who are Indigenous, Black and People of Colour (IBPOC).

“White Supremacy” is the idea (ideology) that White people and the ideas, thoughts, beliefs, and actions of White people are superior to Indigenous and Black People and People of Colour and their ideas, thoughts, beliefs, and actions. The term “White supremacy” also refers to a political or socio-economic system where White people enjoy structural advantage and rights that other racial and ethnic groups do not, both at a collective and an individual level.

“Wise Practices” are effective and culturally appropriate actions, tools, principles or decisions that contribute significantly to the development of sustainable and equitable conditions and practices and, in doing so, produce optimal results for Indigenous Peoples. This form of Indigenous Knowledge represents care practices that have been handed down from one generation to another since time immemorial. Wise practices must be given equal space and weight with best practices.

“Zero-tolerance Environment” is a work space that responds to an action with a specific consequence (or range of consequences) and consistently applies that consequence without deviation.

7. References

7.1 Secondary Sources

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7.1 Legislation

Anti-Racism Data Act, SBC 2022, c. 18.

Declaration on the Rights of Indigenous Peoples Act, SBC 2019, c. 44

E-Health (Personal Health Information Access and Protection of Privacy) Act, SBC 2008, c. 38.

Freedom of Information and Protection of Privacy Act, RSBC 1996, c. 165.

Human Rights Code, RSBC 1996, c. 210.

Public Interest Disclosure Act, SBC 2018, c. 22.

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	9.0	25-FEB-2019	SHOP number added, AB 610 removed	
	10.0	30-DEC-2019	Housekeeping changes	HR Services and Policy
	11.0	18-FEB-2021	No changes.	HR Services and Policy
	12.0	16-FEB-2022	No changes	HR Services and Policy
	13.0	20-APR-2023	Combined Code of Ethics and Working with Family Members into revised Policy. Introduced DEI and ICS concepts.	HR Services
14.0	29-FEB-2024	Strengthened language around conflicts of interest and social media.	HR Services	

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