DO THE RIGHT THING

THE DOUGLAS COLLEGE CODE OF CONDUCT
FOR EMPLOYEES AND CONTRACTORS
Douglas College has a long history of providing high-quality post-secondary education to students who vary in their interests and abilities but share a common goal of acquiring an education. In recent years, the College has grown in size, scope, and complexity, offering a wider variety of programs and services to meet the needs of a diverse student population. The larger and more complex the organization gets, the more important it is to ensure everyone who works at or for Douglas is aware of the policies that govern the organization.

As a public institution, Douglas College is required to have a Code of Conduct and a prescribed set of policies. As providers of post-secondary education, college employees may be perceived as role-models, which is why it is especially important for us to show our students, and all our stakeholders that we, as a college, are doing the right thing.

We have written our Code of Conduct using common language with links to specific policies where employees can obtain more detailed information. We expect employees to abide by all College policies and we have used the Code of Conduct to communicate that expectation.

Please read this document carefully. If you have suggestions about how it can be improved, please pass that information on to your responsible administrator. Each year the Code of Conduct will be reviewed to ensure it is current and effective.

John Evans, Board Chair
Kathy Denton, President
If you are reading this for the first time, welcome to Douglas College. If you are reading it as a refresher, thank you for taking a moment to reflect on appropriate conduct and what it means to be an employee or contractor at Douglas.

SO, WHAT DOES IT MEAN? SIMPLY PUT: WE DO THE RIGHT THING.

That may sound simple, and it is easy to say, but knowing what is right and doing the right thing is often very difficult. Sometimes, the pathway isn’t entirely clear. But having the integrity to stand up for what’s right goes to the heart of Douglas College’s values. As a public institution of higher learning, Douglas College has a duty, both to do the right thing, as well as to be seen doing the right thing. We are a role model in the community. Maintaining and enhancing the trust of our students, stakeholders and citizens of the province is an important part of what we do.

This Code of Conduct provides general guidance on the standards of conduct expected of all College employees, and outlines general principles to help guide ethical behaviour and decision-making. You may already be aware of the many ethical-conduct policies already in place at the College. The Code of Conduct is designed to be an overarching framework, to help you understand the context of these policies and put them in a more meaningful light. In this way, we can all support each other in our efforts to ensure that we are acting with honesty, integrity, and being mindful of our responsibilities to our students, partners, suppliers, the citizens of British Columbia, and each other.

Because of its importance, all employees are required to read the Code and respond to the prompt at the end of it to register their agreement to abide by college policies.

INTRODUCTION

TO WHOM DOES THIS CODE OF CONDUCT APPLY?
All full-time, part-time, temporary and contract employees.

IS IT MANDATORY?
Your agreement to abide by college policies is a condition of employment.

HOW OFTEN MUST IT BE REVIEWED?
Before starting to work at Douglas. After that, at least annually, as the content may change from time to time and it is in all our best interests to be reminded of the Code’s importance.

WILL THERE BE TRAINING ON THE CODE?
Yes, training modules have been developed and are offered regularly.

WHO DO I SEE IF I HAVE QUESTIONS?
Questions may be answered by your administrator or Human Resources advisor.

WHAT ARE THE CONSEQUENCES IF SOMEONE BREACHES THE CODE?
The Code is a document that provides a context for college policies. College policies provide specific information about the consequences of breaching them. For some policies, the consequences may include disciplinary action, even termination.

COMMON QUESTIONS

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RESPONSIBILITIES

ALL EMPLOYEES:
As an employee of Douglas College, we commit to doing the right thing. This means that we act with honesty and integrity in all that we do, including: abiding by college policies and acting in accordance with all applicable laws and regulations. It also means that we have a duty to report breaches to the policies referenced in the Code of Conduct that are not otherwise being addressed through appropriate channels. This must be done responsibly and in good faith.

Sometimes it isn’t clear whether you should report something or not. If you find yourself in that position, speak with your manager or supervisor for advice. If, for whatever reason, this makes you uncomfortable, you can turn to more senior levels of management. On the rare occasion that none of these options is appropriate, we have a Protected Disclosure (Whistleblower) Policy – use it. The Protected Disclosure Policy is designed to be used in co-ordination with the Code to protect those who come forward to report violations.

LEADERS:
Those in leadership positions at Douglas – including managers, deans, directors, senior administrators and others – have certain additional responsibilities when it comes to the Code. As leaders, we represent the College and are responsible for upholding our values and doing our best to ensure that breaches are dealt with fairly, effectively, and in a timely fashion.
ETHICAL DECISION MAKING

Behaving ethically at work and in our working relationships is an underlying principle of the Code of Conduct. We are all responsible to ensure that our behaviours are appropriate, respectful and legal. The Code of Conduct is designed to help raise awareness of our ethical responsibilities and to draw attention to relevant college policies. The Code is not a substitute for the details provided in college policies.

Sometimes situations may arise when it is difficult to know whether an action violates college policy. When faced with an ethical dilemma or problem in the workplace, it may be helpful to consider the following:

FIRST, review the content of the Code of Conduct to determine if the content of the dilemma falls within it.

SECOND, consider if the issue could be addressed through one of the college policies referenced in the Code. If so, review the specific policy to find more information about its scope, purpose, and procedures.

FINALLY, if you are still uncertain about how to act, talk to your responsible administrator or Human Resources advisor.
CONFLICT OF INTEREST

A conflict of interest simply refers to any situation which may create, or be perceived by others to create, a conflict between your personal interests and those of the College. To do the right thing, avoid conflicts of interest and address perceived conflicts of interest by taking appropriate steps to ensure that you are able to maintain impartiality in all College affairs.

If you find yourself in a potential conflict of interest, disclose the situation to your responsible administrator or Human Resources advisor so that appropriate steps may be taken to evaluate and resolve the potential conflict.

WHAT KINDS OF THINGS ARE CONSIDERED CONFLICTS OF INTEREST?

Bribes and Kickbacks
Accepting or offering bribes or kickbacks (such as money, favours or gifts) in explicit exchange for any sort of preferential treatment at the College is perhaps the most obvious conflict of interest and is strictly prohibited.

Accepting Gifts, Entertainment or Favourites
Accepting gifts, entertainment or favours may create a conflict of interest, especially if the gift or favour is of significant value (over $500). This does not include:
- Gifts between friends
- Normal token courtesy or protocol gifts for business purposes
- Gifts for participating in public functions

Sometimes, for cultural or ceremonial purposes, gifts may be offered which could create the perception of rudeness if declined. In such cases, ask your responsible administrator or Human Resources advisor for written direction on the best course of action.

For all other gifts, the most important question to ask is: “Would this acceptance of this gift or favour be perceived to compromise my objectivity in the performance of my duties at the College?” If the answer is yes, then the right thing to do is to politely turn down the offer.

Travel or Reward Points
Travel or reward points are not considered a gift. Provided that there are no additional costs to the College, employees travelling on College business can join loyalty programs and retain benefits offered by the travel industry for business or personal use.

Such privilege is conditional upon the use of College approved services and products, and compliance with College policies.

Personal Relationships
People with close, personal relationships may be employed together at the College. However, the relationship could lead to situations that may create the perception of preferential treatment – which would be a conflict of interest. For example, it would be inappropriate for an employee to have influence over the hiring, promotion, payment or evaluation of someone with whom he or she has a direct personal relationship. Such relationships must always be disclosed to Human Resources immediately to avoid a conflict of interest.

If you are unsure, ask yourself, “Would this relationship negatively impact my reputation or my perceived ability to do my job objectively or carry out my responsibilities at the College?” If the answer is yes, then you have a potential conflict of interest and it should be disclosed.

Outside Employment and Interests
College employees have a wide range of outside interests and activities, some are even employed elsewhere, which is fine as long as these activities do not compromise or appear to compromise your ability to fulfill your role and uphold your commitments and responsibilities at Douglas, or create a conflict of interest. If you are unsure about whether your outside activities create conflicts of interest or commitment, then you should discuss them with your Human Resources advisor or administrator.

Ask yourself, “Would this activity affect my commitments or job performance or be perceived by others to interfere with my ability to perform my duties and responsibilities at the College?” If the answer is yes, then you have a potential conflict of interest and it should be addressed and disclosed.

Future Employment

Thinking of taking on a new challenge in your career outside Douglas? It’s an exciting time! But there could be the potential for a conflict of interest, depending on your role at Douglas College, your new role, and your new employer.

Those in leadership positions at the College must be particularly mindful of their responsibilities to the College and the citizens of the Province. Senior executives are required to immediately disclose any employment offers from companies or organizations with which the College has a business relationship. Senior executives are also required to comply with a 12-month post-employment period restricting their acceptance of work for certain employers.

For others, the question to ask is if, in your duties at Douglas, you have had a relationship with or connection to your potential new employer that could be seen to have compromised your objectivity, possibly in exchange for the employment offer. Even if the new employment offer was entirely coincidental, there is the possibility of perceived conflict.

When in doubt, ask Human Resources. They are here to help guide you in such cases.

For more specific information on any of the above issues, see our Conflict of Interest policy.
PERSONAL CONDUCT
As a public institution of higher learning, Douglas College is expected to be a leader when it comes to workplace conduct. We take this responsibility seriously and are committed to providing a workplace that is free of harassment, which includes many forms of offensive and discriminatory behaviour, including sexual harassment, bullying and workplace or sexual violence.

For employees and contractors, this means we are expected to contribute to a workplace environment that makes us all feel safe, valued, respected and proud. Inappropriate behaviour, bullying or harassment of any kind is simply not acceptable, whether it is in person, on the phone, by email, through social media, or through any other communications channel within the community.

Douglas College takes issues of bullying, discrimination, harassment, and workplace violence very seriously. Allegations of such behaviours will be addressed promptly in a fair and unbiased manner, and in accordance with collective agreements and College policies. The College will take appropriate disciplinary measures, including potential dismissal, for any employee or contractor who is found to have engaged in such behaviours.

ILLEGAL SUBSTANCES AND ALCOHOL
Doing the right thing means abiding by laws and regulations to ensure we keep each other safe. Using, possessing, manufacturing or distributing illegal drugs, or using alcohol or drugs on College property or during College-sponsored activities is thus prohibited, except in areas licensed and designated for such purposes in accordance with liquor license regulations. Douglas College takes drug and alcohol violations seriously and will take necessary disciplinary action where appropriate.

For more information about personal conduct, see the following Administration Policies:
• Accommodation of Employees
• Human Rights
• Impairment Policy for Employees
• Bullying and Harassment Prevention and Response
• Sexual Violence and Misconduct Prevention and Response
• Violence Prevention and Response

PROTECTION OF PRIVACY
Douglas College respects the privacy of all members of our community, including students, employees, parents, members of the Board and other stakeholders. As part of normal business processes at Douglas College, some employees or contractors may have access to private or confidential information. We all have a duty to safeguard such information against inappropriate use, as it has been entrusted to us only for legitimate College business. Report any loss, disclosure breach or unauthorized access of such information immediately.

PROTECTION OF COLLEGE INFORMATION
Some employees or contractors may also have access to privileged or confidential College business information. This information is to be securely stored in an appropriate access-restricted fashion and used only for legitimate College business purposes. It is not to be accessed, used, discussed or disclosed in any unauthorized way, either during or after employment at Douglas. Report any loss, theft or unauthorized access to College business information immediately.

For more information about privacy and confidentiality, see our Administration Policies:
• Information Security Policy
• Privacy Policy
• Records and Information Management Policy

APPROPRIATE USE OF COLLEGE RESOURCES
Douglas College is a public institution, accountable to the provincial government and the citizens of British Columbia. This means we must be mindful and honest in how we use College time, funds and resources. We are all responsible to ensure that we use our time wisely and towards the good of the College and our students. Likewise, the resources provided to us are made available for the purpose of fulfilling our duties. As such, they should be used primarily for business purposes, protected from damage and unauthorized use, and returned upon leaving the College.

For more information, see our Acceptable Use of Computer and Information Technology policy.

□ I have read the Code of Conduct and agree to abide by College policies.