CUSA Code of Ethical Conduct

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<tr>
<th>Authority: CUSA Board</th>
<th>Date Ratified:</th>
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<tr>
<td>Previous Amendments:</td>
<td>Date Review: March 2022</td>
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<tr>
<td>Review Committees:</td>
<td>Next Review Date: January 2026</td>
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<th>Delegates:</th>
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<td>CUSA Board</td>
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<td>CUSA Council</td>
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<td>CUSA Executive Director</td>
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<td>CUSA President/CEO</td>
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<td>CUSA Director of Human Resources</td>
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Foreword

Carleton University Students Association (CUSA) Code of Ethical Conduct (The Code) consolidates CUSA’s ethics, core values and professional conduct that guide our work on a daily basis. It also includes guidelines concerning conflicts of interest and sexual exploitation and abuse in a student-environment context and possible resolution when such situations arise. CUSA is equally committed to providing a work environment in which all individuals are treated with respect and dignity, free of harassment, violence and discrimination. This philosophy supports our values and ensures that CUSA is meeting the human rights and occupational health and safety legislation where employees, Board and committee members are free from harassment and promotes equal opportunities.

Both the Code and the Harassment Policy attach a great deal of importance on two-way communication at all levels. All employees and individuals representing CUSA are expected to openly discuss the issues described in this document (or those referred to) with their direct Supervisor, Director, Executive or the Human Resources department. As part of the standards of practice at CUSA, The Code and the Harassment Policy will be an integrated part of CUSA’s overall Health & Wellness Strategy.

Introduction

Purpose

CUSA’s Code of Ethical Conduct sets out the expectations that guide and support the behaviour of CUSA employees and representatives of CUSA in their official activities. It will serve to promote and maintain a professional work environment and preserve the trust of people and organizations with
whom CUSA interacts. CUSA’s integrity and reputation for ethical practices are part of its most valued asset, are essential elements to its sustainability and ultimately depend on individual actions of each employee and representative of CUSA.

**Who does it apply to?**

This Code applies to all persons working for CUSA and those who are representing CUSA in an official or unofficial capacity. CUSA employees to whom it pertains include full-time, part-time, casual and fellows or interns assigned for either a fixed or indeterminate period; based in Canada or abroad. By definition, CUSA is a non-profit, non-governmental association representing a membership body.

1. Our Board of Directors is exclusively comprised of current Carleton Undergraduate students;
2. We develop policies and positions that represent the interests and priorities of Carleton Undergraduate students.
3. We enable dialogue between students, the university administration, and governments;
4. We deliver programs and services and represent our members and partners in order to serve the students; and
5. We are accountable for our actions and outcomes to our Board of Directors, who in turn are selected by CUSA Council (our membership).

Employees and representatives of CUSA must think about their conduct not just as employees or representatives of the organization, but as servants. In an education setting, CUSA employees and representatives not only represent their organization but Carleton University as a whole. Our credibility as a strong voice for our members will be enhanced and protected by a strong service philosophy. The five Values below should assist employees and representatives in interpreting CUSA’s Code of Ethical Conduct and Conflict of Interest guidelines through a public service lens:

**CUSA’s Values:**

1. **SERVICE** - We will facilitate the various ambitions of our members through diverse and innovative services. Employees and representatives of CUSA, in fulfilling their official duties and responsibilities, shall provide advice and make decisions in the student interest. Employees and representatives of CUSA shall conduct themselves in a way our members’ and partners’ confidence and trust in the integrity, objectivity and impartiality of CUSA are preserved and enhanced. If a conflict should arise between the private interests and the official duties of employees or representatives of CUSA, the conflict shall be resolved in favour of CUSA and the student interest.

2. **ACCOUNTABILITY** - Employees and representatives of CUSA shall give honest and impartial advice and make all relevant information available to the Board of Directors and the Management Team.

3. **DEVELOPMENT**

4. **DIVERSITY**
5. COMMUNITY

CUS A Human Resources Values

CUS A employees and representatives are guided in their work and professional conduct by following values. Our Human Resources Values, live in our collective approach, habits, and reinforce how things should be accomplished. What you do everyday matters.

<table>
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<tr>
<th>Our Values</th>
<th>How we achieve it</th>
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<tr>
<td><strong>Make a Difference</strong></td>
<td>● We are focused, we are driven by evidence and results, and we are passionate about our ideals and the achievement of our goals.</td>
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<td>We act decisively to achieve results for our communities, our cities, and our workplace.</td>
<td>● We are stewards, dedicated to our communities, to sustainability, and to our work environment.</td>
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<td>● We empower communities to be economically sound, socially inclusive, and environmentally responsible.</td>
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<td>● We foster a work environment that enables professional fulfillment, personal well being, and a healthy and satisfying work-life balance.</td>
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<td><strong>Listen and Engage</strong></td>
<td>● We listen, include, and respond to the needs, advice, and expertise of our members, colleagues, and stakeholders.</td>
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<td>We aspire to be an open, inclusive and empowering organization. We are transformed by our conversations and our partnerships.</td>
<td>● We engage diverse audiences.</td>
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<td>● We are as transparent as possible and communicate the rationale for our decisions in a timely fashion, as appropriate.</td>
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<td><strong>Collaborate and Unite</strong></td>
<td>● We collaborate across the organization and beyond, respecting each other’s diverse expertise and experience, to achieve common goals.</td>
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<td>We are committed to building a diverse and strong team. We work collaboratively and respectfully to achieve our goals.</td>
<td>● We welcome new relationships and build partnerships that increase our reach and our impact.</td>
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<td>● We are accountable to our members, our partners, our stakeholders, and to each other.</td>
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EXPECTED CONDUCT

Professional Conduct:

Perform work with competence, excellence, efficiency, objectivity and impartiality.

- All CUSA employees and representatives of the organization, regardless of their position or experience, shall endeavour to attain high standards of conduct, competence, excellence and integrity in their work.
- CUSA employees and representatives shall comply with the law.
- CUSA employees and representatives shall ensure the appropriate, effective and efficient use of all funds and resources (see Finance Policies on CUSA’s website or request for a copy from HR).
- The services provided by CUSA are based on the expertise of employees and representatives in areas that require specialized knowledge or specific skills. Appropriate use of this expertise is essential.
- The professional conduct of CUSA employees and representatives shall be above reproach at all times. Unsatisfactory behavior reflects negatively on their work and their ability to perform their duties.

Ethical Conduct:

Act in such a way that preserves the trust of our colleagues, members and partners.

- CUSA employees and representatives are required to perform their official duties and organize their personal business in such a way that preserves the trust of our members and partners in terms of the integrity, independence, objectivity and impartiality of CUSA.
- Integrity is an essential quality for all employees and representatives of CUSA.

Conduct When Dealing with Others:

Demonstrate respect, fairness and courtesy with colleagues, members and other stakeholders.

- The exercise of authority and responsibility shall always be inspired by respect for human dignity and acknowledgement of each person’s value.
- Openness, communication and respect for diversity are fundamental values for CUSA employees and representatives of CUSA.
CUSU Code of Ethical Conduct

To never directly or indirectly use CUSA resources, including rented, leased or borrowed properties, or allow them to be used for purposes other than for performing CUSA work.

Outside activities or employment

An employee’s professional responsibility is first and foremost, to CUSA. This responsibility takes precedence over all other work relationships.

An employee may have a job or participate in activities outside of CUSA, but only on the condition that the job or activities do not give rise to a conflict of interest. As well, outside activities should be scheduled when they will not negatively impact the fulfilment of duties at CUSA.

Employees can not accept outside employment or activities that directly result in any matter contributing to a proposal or contract which may require CUSA consideration or approval whether of a financial nature or otherwise.

While employed with CUSA, involvement in outside activities must be pre-approved if they could have a real or perceived conflict of interest with CUSA. Failing to obtain pre-approval may result in disciplinary action up to and including termination of employment. When an employee has received permission to take a secondary assignment or job on behalf of CUSA, he or she cannot receive payment from a third party for services rendered, for example, participating in an event or a speaking engagement.

Employees shall submit to the Director Human Resources a confidential written memo on any job and/or outside activities that may subject them to demands incompatible with their official duties at CUSA. If their ability to objectively fulfill their duties risks being jeopardized, the same process must be followed, and a confidential written memo must be provided to the Director Human Resources and or Executive Director. In consultation with the HR Director, Department Director and the Executive Director may require the employee to reduce, modify or abandon these activities if it is determined that there is a real, apparent or potential risk of conflict of interest.

Gifts, tokens of hospitality and other benefits

Employees or representatives shall not accept or solicit any personal gift, commission, reward, advantage or benefit of any value from any person, firm or corporation which is interested directly or indirectly in any manner of business dealings with CUSA, if they are not currently a service provider. Employees or representatives shall not accept or solicit any gift, token of hospitality or other benefit that:

- is likely to have a real or apparent influence on the objectivity and impartiality of the employee in the performance of official duties; or
- that places the employee in a situation of obligation toward the donor(s).

It will however be deemed acceptable to receive a gift, token of hospitality or other benefit if:
The value is incidental (inexpensive promotional items, light meals, souvenirs of no monetary value);

- The offer occurs during an activity or event related to the performance of the official duties of the employee or representative in question;
- It complies with the rules or practices of courtesy, hospitality or protocol;
- It does not compromise or seem to compromise in any way the integrity of the employee or representative concerned or CUSA.

Examples of acceptable gifts include occasional meals, tickets to events, gift baskets or candy. Repeated offers of gifts or offers of relatively substantial gifts shall be reported to the Department Director, Director HR and to the ED.

When an employee or representative feels it is impossible to refuse a gift, token of hospitality or other benefit that does not meet the aforementioned acceptability criteria, the employee or representative shall consult with his or her Director. The employee will be notified if the item should be kept by CUSA, donated, or whether it will be possible for the employee to retain.

Within the context of raising funds for charitable organizations on behalf of CUSA, employees shall first obtain permission from the Director HR, the Finance Director or Executive Director, in order to solicit donations, prizes or contributions in kind from outside organizations or individuals. The activity may be required to be reduced, modified or abandoned if it is determined there is a risk of a conflict of interest or create a situation that imposes an obligation towards the donor(s).

**Political activities**

The *Canadian Charter of Rights and Freedoms* guarantees the right to freedom of expression for each and every individual. However, it is important for CUSA to remain politically neutral. Therefore, it is important that CUSA employees or representatives consider the repercussions of planned political activity on their ability to perform their duties for CUSA with complete impartiality and the perception of impartiality whether federal, provincial, municipal or any other tier of government in the country of operation.

An important factor in the determination of acceptable political activity is whether the performance of specific duties on behalf of CUSA could be affected by judgment influenced by political considerations. The higher an employee or representative’s position or the closer the employee or representative works with the CUSA Board of Directors and Executive or Management, the more care must be taken with political activities.

Any political affiliation may be perceived as incompatible with the fulfillment of CUSA’s mandate, therefore advice from the Executive Director should always be sought prior to engaging in any political activity.

An employee who intends to run as a candidate in federal, provincial or municipal elections must inform their immediate Director. Depending on the nature of the employee’s position, he or she may be asked to resign their current position, take a leave of absence or inform CUSA of the status of their candidacy.
The employee’s Director must also be notified if they are appointed to an elected position. The Director must subsequently notify the Director HR. Generally speaking, the higher and more visible an employee’s position, the more restricted they are in terms of political activities.

**Nepotism**

No employee can participate in the hiring, supervision, performance evaluation, or compensation decision for any person who is a member of their family or household, or with whom they are in an intimate relationship. No family members, members of the same household or individuals in an intimate relationship, may report directly or indirectly to each other. Family includes spouse, mother, father, mother-in-law, father-in-law, child, step-children, grandparents, siblings, aunts, uncles and cousins.

**Refusal to grant preferential treatment**

During the recruitment process, employees shall ensure they do not unduly influence the selection committee or grant any preferential treatment toward the hiring decision of members of their family, household or their friends.

During the decision-making process related to the awarding of financial benefits to outside parties, employees shall ensure that they do not grant preferential treatment to members of their family, former CUSA colleagues or to friends. Before signing any CUSA contract, the employee creating the contract and the contracting individual have a shared responsibility to disclose the existence of direct or indirect shared personal interests.

Conveying information that is easily accessible to the general public to family, friends or entities in which employees or their families have an interest is not considered preferential treatment.

**Code of Ethical Conduct Purpose**

This section of the Code of Ethical Conduct is intended to outline clear and specific expectations of conduct for anyone conducting business for or on behalf of CUSA. This Policy applies in situations that have been either known to have occurred, or is at the risk of occurring and would jeopardize CUSA’s integrity.

This Policy applies to offices and project locations. CUSA will evaluate the behaviours of employees and representatives based on this Policy even if the local legislation in the field or project office location does not consider the behaviour to be unlawful. However, where the provisions of the local law provides for a higher ethical standards than outlined in this Policy, this Policy will comply with the local law.

**Who does it apply to?**

This section applies to all employees, interns, volunteers, members, consultants, and any other individual who is traveling to a location on behalf of CUSA and/or is reasonably considered a representative of CUSA. All such individuals are herein referred to as Representatives.
Sexual exploitation and abuse:

All Representatives of CUSA are strictly prohibited from engaging in any of the following actions, behaviours or activities. In addition, if any Representative is aware of any such actions, behaviours or activities occurring on the part of another Representative, they are required to immediately report the information to CUSA’s Human Resources.

• Never exploit the vulnerability of a target group such as women and children or allow an individual or other Representative to be put in a compromising situation.
• In line with international standards and Canadian legislation, never engage in sexual activity with persons under the age of 18, regardless of local legislation regarding the age of majority or consent. A lack of knowledge of the child’s actual age cannot be used as a defense.
• Never exchange money, employment, goods, or services for sex, including sexual favours. All forms of humiliating, degrading, or exploitative behaviour are unacceptable.
• Not engage in sexual relations with beneficiaries. It is prohibited because it is based on unequal power dynamics and such relationships undermine the credibility and integrity of the work of CUSA. This applies both during and outside working hours.
• Ensure that all confidential information, including reports of violations of these standards by Representatives obtained from beneficiaries or other Representatives is handled properly and with the utmost confidentiality.
• Ensure that reports of violations of these standards are immediately provided to Human Resources. Those who receive these reports will investigate immediately.

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Professional conduct:

Representatives while on duty or while representing the organization, must maintain a level of conduct that will not reflect negatively on themselves or on the credentials of CUSA and that will not compromise the security and well-being of others.

• Representatives are required to comply with national laws and regulations, and shall not knowingly undertake, facilitate or benefit from illegal transactions or activities. Any Representative who is charged and convicted of an indictable offense must immediately notify Human Resources.
• Representatives must ensure the appropriate, effective and efficient use of all funds and resources associated with the project. Furthermore, representatives must act against any form of corruption and not offer, promise, give or accept any bribes.
• The use of illegal drugs and the abuse of other controlled substances in the workplace or while representing CUSA is inconsistent with the conduct that CUSA expects from its Representatives at all times. If the law is violated, any and all legal costs incurred will be the responsibility of the individual Representative.
• Representatives shall comply with security guidelines and be pro-active in informing management of potential threats. In addition, Representatives must behave in such a way as to avoid any unnecessary risk to the safety, health and welfare of themselves and others.
Representatives are encouraged to use social media to promote project activities, however, must take appropriate measures to prevent misuse or misconduct that could inadvertently harm the reputation of CUSA or relationships with stakeholders, members or partners (in accordance with CUSA’s Social Media Policy). Any online presence and behavior must be consistent with the Code of Ethical Conduct, and should not speak on behalf of CUSA unless explicitly permitted to do so (in accordance with CUSA’s Communication Policy and/or CUSA’s Media Spokesperson Policy).

**Reporting:**

Representatives should report any concerns to their immediate supervisor or CUSA Human Resources regarding suspect behaviours related to the honesty and integrity of CUSA Representatives, suppliers, or other third parties involved directly or indirectly in negotiations with their respective programs or organization. This means reporting any situation in which they believe in good faith, that the aforementioned parties have breached or are about to break a law or regulation.

**RESPONSIBILITY FOR INTERPRETING THE CODE**

The Director Human Resources shall assume the responsibility of interpreting the Code of Ethical Conduct and receiving and reviewing formal complaints.

**RESPONSIBILITY AND AUTHORITY**

**Responsibilities of CUSA employees and representatives of CUSA:**

All CUSA activities shall comply with this Code. For all questions related to the compliance of activities, employees and Representatives of CUSA will refer to their supervisor, to the CUSA Code of Ethical Conduct

Compliance with CUSA’s internal policies and with this Code is part of CUSA’s conditions of employment. At the time of signing an offer of employment, CUSA employees acknowledge their conditions of employment, which also include the requirement to respect the confidentiality of internal documents, information and communications. A Representative of CUSA will be asked to acknowledge the conditions as outlined in this Code on an annual basis or at the time of signing their contracts or terms of reference (TOR).

It is the responsibility of all CUSA employees and Representatives of CUSA to comply with this Code in the performance of their duties and in particular, to embody the Core Values of CUSA in their actions and behaviour.

**Responsibility of the President/CEO, Executive Director and the Director or Human Resources:**

The President/CEO & Executive Director shall preserve the trust of the members, partners and employees in the overall management and operations of CUSA.
The Senior Leadership Team shall embody the behaviour expected by living the Core Values set out in this Code. It is their responsibility to integrate this behaviour into all aspects of their work at CUSA. They shall also see that these expectations are fairly and objectively applied to all employees.

More specifically, the Director of Human Resources shall ensure that the following are in place:

- the offer of employment, the consultancy agreement, the memorandum of understanding or any other binding legal engagement contract contains the following information: “You agree to comply with CUSA Policies and Procedures, including the Employee Code of Ethical Conduct, applicable to your employment status. The policies and the Code form part of the terms and conditions of employment.”
- the Human Resources department is able to assist CUSA employees resolve issues resulting from application of this policy.

POSSIBLE SOLUTIONS OR RECOURSE

All employees and Representatives may clarify issues related to this Code with their supervisor, Executive Director or the Director Human Resources. The Human Resources department will be responsible for making amendments as necessary. Direct supervisors of employees in collaboration with Director HR, are responsible for ensuring employees adhere to the Code of Ethical Conduct.

Any employee or Representative who witnesses a wrongful act at work or who has information concerning such an act may submit the issue to the Human Resources department confidentially and without fear of reprisal. An employee or Representative who feels that they are being required to act in a manner incompatible with CUSA's Core Values and/or Code of Ethical Conduct may communicate the problem in complete confidence and without fear of reprisal to the Human Resources department.

If the problem has not been appropriately investigated at this reporting level, or if the employee or Representative feels that the departure from this Code cannot be divulged in confidence to the Human Resources department, the problem may be referred in complete confidence to a member of the Executive or Senior Leadership Team. If the problem is related to the Executive Director, the employee or Representative may contact the CUSA President and Chair of the CUSA Board. If an allegation involves a Human Resources employee, it must be submitted to the Executive Director for handling. Those responsible for interpreting the Code may use any external legal resource deemed relevant to carry out the task.

If an employee or Representative is not in agreement with the decision on an issue in regard to the Code of Ethical Conduct made by the first reporting level then a request can be made in writing to the Executive Director and the problem will be brought to the Senior Leadership Team who will be the final deciding body. In the case of Executive Officers, the additional accountability mechanism under the Executive Officer Accountability and Discipline Policy & Procedure may also be followed, especially if the alleged actions could conceivably lead to removal from office.

Consequences
Employees and Representatives who do not comply with the provisions of this Code are liable to disciplinary action up to and including termination of employment. The level of disciplinary action is based on the severity of the issue and will be determined either by the Director Human Resources and the Executive Director and/or by the process outlined in the Executive Officer Accountability and Discipline Policy & Procedure.

Requests for information

All questions with respect to the Code of Ethical Conduct should be submitted to the Human Resources department.

REPORTING PROCEDURES

CUSA is committed to maintaining the highest standards of ethical conduct. It is the responsibility of each employee and Representative to immediately report any alleged ethical misconduct or fraud. If an employee or Representative is victim or witness of an alleged breach of this Code by a staff member or a Representative of CUSA, they are required to report it to the Human Resources department by doing the following:

1. In the event of a failure to comply with the Code, a written complaint must be submitted to the Human Resources department.
2. The complaint must include the following information:
   a. the identity person in violation of the code or a description of the violation to the date or time period during which the violation occurred
   b. copy of all documents that support the allegations
3. Any situation in the field that could be interpreted as harassment must be reported to the CUSA’s Offices in Ottawa.
   a. If a complaint is deemed valid, the person involved shall be notified of the complaint, its contents, its allegations and the related investigation.
   b. Within ten (10) business days of the lodging of the complaint, or within ten (10) business days of acknowledgement of the related facts, a report of the findings shall be submitted to the Executive Director by the Human Resources department; the person charged with interpreting the Code will recommend any measures deemed appropriate to take. Those involved shall be notified of any measures taken that affect them.
4. During the investigation, the Human Resources department shall be in charge of gathering all the necessary information. If the allegation involves a Human Resources employee, said allegation shall be submitted directly to the ED. If the allegation involves the ED, said allegation shall be submitted to CUSA’s President & the Chair of the CUSA Board. The President & Chair of the CUSA Board may then call upon the Human Resources department to take charge of gathering information, studying the documents pertaining to the investigation and meeting with anyone who is involved or implicated in the alleged breach, provided Director of Human Resources is not the complainant or involved in or implicated in the alleged breach.
5. If a situation requires immediate intervention or if serious misconduct is alleged, the employee or Representative could be relieved of his or her duties while the investigation is under way.

CONFIDENTIALITY

All complaints shall be handled with diligence and complete discretion. The identity of anyone who makes a complaint or claim or who provides information shall remain confidential, except where the law or the court stipulates otherwise.

No action shall be taken against anyone who invokes the complaints management procedure in good faith, even if it is determined that the complaint is unfounded.