

The logo for the City of Edmonton, featuring the word "Edmonton" in a white, sans-serif font on a dark blue rectangular background.

# CODE OF CONDUCT

The City of Edmonton

*Effective May 2026*

## CONTENTS

<b>Why Have a Code of Conduct?</b>	3
<b>How Does the Code Affect Me?</b>	3
<b>Ethical Questions</b>	3
<b>Disclosure and Compliance Obligations</b>	5
<b>Role of Leaders</b>	5
<b>Guiding Principles and Themes</b>	6
<b>Part 1: Employee Behaviour</b>	7
Personal Conduct	8
Respectful Workplace	9
<b>Part 2: City Assets</b>	10
City Time and Assets	11
Access to Information and Protection of Privacy	14
<b>Part 3: Conflicts of Interest</b>	16
Gifts and Entertainment	18
Personal Gain, Benefit, or Favouritism	20
Other Employment	21
Appearances Before Council	22
Political Activity	23
Other Reference Documents	24

---

**Program Impacted:** Employee Experience and Safety

**Approved by:** City Manager, Eddie Robar

**Date of Approval:** May 2026

**Approval History:** June 2018; February 2021; May 2026

**Next Scheduled Review:** 2027

## Why Have a Code of Conduct?

Our Employee Code of Conduct explains the expected rules of behaviour as employees of the City. It states our values, provides guidance, and recommends action so all employees know exactly what is expected of them.

The Code of Conduct creates an environment that encourages a specific standard of behaviour, supports our Cultural Commitments and Leadership Competencies, lessens confusion, and promotes equality and respect within the workplace.

Harassment and discrimination in any form is not acceptable in the City workplace. Every employee has the right to a respectful workplace, free of harassment and discrimination.

As an employee, it's your responsibility to bring attention to any concerning behaviours without fear of threat, retaliation, discrimination or discipline. If you aren't able to address the unacceptable behaviour with your coworkers, ask your leader for help. If you are not able to do this consider contacting the Labour Relations Consultant for your area or the [Safe Disclosure Office](#).

When all employees are treated equitably – with dignity, respect, and trust – they feel valued and are more likely to perform well and to enjoy their jobs. This, in turn, enhances our effectiveness as City employees, and promotes public confidence in the integrity of City services.

The Code of Conduct is critical to both our success and our reputation. The information in this Code of Conduct is not new to you; it is

the foundation upon which this organization is built. This Code of Conduct is simply a reminder of the principles of conduct the City has always embraced. In addition to this Code of Conduct, all City employees are governed by and required to follow all City policies.

## How Does the Code Affect Me?

The City of Edmonton acknowledges it is only through the commitment of our employees that we are able to deliver quality service and maintain public trust. As our most valued asset, City employees must be above reproach in their professional dealings and must demonstrate the highest standards of behaviour. Being accountable means we are trusted and empowered to embrace our responsibility for our actions, decisions, and behaviours. This is because working together, aligned with Council's vision, we enable a better life for all Edmontonians. We are accountable to the City, City Council, and the citizens of Edmonton. It is with this in mind that every City employee is expected to be aware of, and comply with, the Code of Conduct, Respectful Workplace Policy, and other policies that govern employee behaviour.

## Ethical Questions

The Code of Conduct can't outline every example of inappropriate employee behaviour or every situation that might create an actual, potential, or perceived conflict of interest. Each of us must understand and apply basic ethical standards to ensure our behaviours and actions do not violate an employee's basic duty of loyalty to the City. Employees are also obligated to adhere to the City's existing policies and

procedures, including commitments to environmental stewardship. Rest assured that all of us, at some point, are faced with ethical dilemmas and struggle to find an answer to the question, "What is the right thing to do?" When in doubt, talk to your leader, and ask yourself these questions:

- + Will this result in a personal gain or benefit?
- + Could this action lead to fraud?
- + Could an outside person, co-worker or the media perceive this action as unethical?
- + Will I owe somebody something as a result of this action?
- + Was this gift/action intended to influence my decision?
- + Would I hesitate to take this action or to allow my employees to take this action in my own company?
- + Could this action put someone's health and safety at risk?
- + Could my comments on social media or in a public forum be considered negative, derogatory, discriminatory or be taken as a criticism of the City of Edmonton or a fellow City employee or reflect poorly on the City of Edmonton?

If you answered "yes" to any of these questions, you may have an ethical dilemma. Change your actions or seek advice. If you're still not sure, ASK again and keep ASKING until you get an answer. A simple rule may help - "if in doubt, don't." If you can't arrive at an answer or if your issue is too sensitive to discuss with a

peer, feel free to access the following City resources for advice:

- + Your leader
- + Your Director or Branch Manager
- + Any of the Deputy City Managers
- + City Manager
- + City Auditor
- + Labour Relations
- + On-Call City Chaplains
- + Corporate Access and Privacy (CAP) Office
- + Corporate Security
- + Employee and Family Assistance Program Provider
- + Code of Conduct/Conflict of Interest Specialist
- + Safe Disclosure Office

Employees always have the option of speaking to any of the leaders in the organization to get advice and guidance on the Code of Conduct. Find someone you are comfortable speaking with and get the information you need.

### **Professional Codes of Conduct**

Employees with professional affiliations – accountants, lawyers, engineers, auditors, safety officers, and social workers – may be subject to more than one code of conduct. If a situation arises that may cause conflict or confusion between the applicable codes, consult with your leader or your professional regulator for guidance. If additional support is required, please consult with one of the City resources listed above. Note that you are required to comply with all applicable codes of conduct at all times.

## **Disclosure and Compliance Obligations**

Each employee must read and understand the Code of Conduct and complete the mandatory training on the [Learning Management System \(LMS\)](#).

If you think you may be in violation of the Code of Conduct, address the situation and make full and prompt disclosure to your direct supervisor. In addition, if you have an actual, potential, or perceived conflict of interest you must disclose that to your Branch Manager and the Code of Conduct/Conflict of Interest Specialist using the [Conflict of Interest Disclosure Form](#). Based in the Legal Services Branch, the Code of Conduct/Conflict of Interest Specialist receives and retains disclosure forms and provides advice on addressing conflicts of interest. More detail on conflicts of interest is provided in Part 3.

Any suspected non-compliance with the Code of Conduct by another employee must also be promptly reported. Reports should be made to your direct supervisor, and in situations where that is not possible or comfortable, employees may report non-compliance to their Branch Manager or Labour Relations. Employees also have the option of reporting any non-compliance with the Code of Conduct through the City's [Fraud and Misconduct Hotline](#). Reports made through the hotline can be made anonymously.

Any employee that suspects a fraud may have occurred within the City must report the incident using the process prescribed in the [Fraud Reporting and Investigation Procedure](#). Concerns regarding harassment

or discrimination, or other respectful workplace issues, should be reported to your supervisor, or if you are not able, contact the [Safe Disclosure Office](#).

Whenever something doesn't seem right, the most important thing is to report it through the avenue you feel most comfortable. Recipients of reports that are more appropriately handled by another area have an obligation to ensure that it is redirected in a timely manner. For details regarding protections for whistleblowers, please see the [Whistleblower Protection Procedure](#).

Anyone who knowingly makes a false accusation about non-compliance, and anyone found to be in violation of the Code of Conduct may be subject to disciplinary action, up to and including dismissal.

## **Role of Leaders**

Leaders set the tone and expectations across our organization. In addition to adhering to the Code of Conduct as employees, leaders (which includes all supervisors, directors, managers, and Deputy City Managers) have an additional obligation to promote awareness of the Code of Conduct and be available to provide guidance regarding behaviour.

Any leader that receives a complaint or becomes aware of a potential violation of the Code of Conduct must report it to the appropriate City resource and take appropriate action based on the advice provided to them. Leaders must not independently investigate complaints or take disciplinary or retaliatory action in any circumstance.

Potential violations should be reported to:

- + Corporate Security (criminal or security threats)
- + Corporate Access and Privacy Office (privacy concerns)
- + Labour Relations (any misconduct)
- + City Auditor (any potential fraud)
- + Code of Conduct/Conflict of Interest Specialist, Legal Services (conflicts of interest)
- + Safe Disclosure Office (respectful workplace)
- + Workplace Safety and Employee Health (safety)

When in doubt, report wherever you feel most comfortable. Each of the areas listed above has a responsibility to redirect complaints to a more appropriate area if necessary.

If you as a leader become aware of a conflict of interest that has not been disclosed, ensure the employee is aware of their reporting obligations and assist them to complete the Conflict of Interest Disclosure form, with input from the Code of Conduct/Conflict of Interest Specialist if needed. Completed forms must be submitted to the employee's Branch Manager to ensure awareness of the conflict and support for the proposed mitigations, and then forwarded to the Code of Conduct/Conflict of Interest Specialist for retention.

Leaders involved in onboarding employees moving from one City position to another should ask employees about disclosure forms provided in their previous role and ensure copies are provided to their current Branch Manager and support the employee to implement any required mitigations in relation to their new role.

## **Guiding Principles and Themes**

There are nine key guiding principles, reflected in three themes, that guide different aspects of our conduct as City employees. They are:

### **Employee Behaviour**

- + Personal Conduct
- + Respectful Workplace

### **City Assets**

- + City Time and Assets
- + Access to Information and Protection of Privacy

### **Conflicts of Interest**

- + Gifts and Entertainment
- + Personal Gain, Benefit, or Favouritism
- + Other Employment
- + Political Activity
- + Appearances Before Council



# **EMPLOYEE BEHAVIOUR**

**Personal Conduct**

**Respectful Workplace**

## Personal Conduct

**Guiding Principle:** We will perform our duties with honesty and integrity in a manner that is helpful, responsive, and courteous.

### What Does This Mean?

Employees will do their jobs to the best of their ability, conduct themselves appropriately and will be considerate and helpful to all people, both internally and externally, whether working in a City workspace, or remotely as part of an approved Hybrid Work Arrangement.

### Why is This Important

It takes the effort of each and every employee to make Edmonton a great place to live, learn, work, and play. Employees must maintain awareness of their behaviours and treat others as they wish to be treated.

The public often sees us as ambassadors for the City and this is reflected in the Cultural Commitment – Accountable. We must be seen to be taking care of the City's assets and its citizens. As such, it is our responsibility to care for the community and to make sure Edmontonians get the best value for their tax dollars. This means working to maintain the public's confidence by acting courteously and responsibly and by providing the best possible level of service.

### Things To Do

Practice professional employee behaviour that contributes to a respectful workplace, and that models our Cultural Commitments of being Safe, Helpful, Accountable, Integrated and Excellent. Stay in the **Green Zone** when interacting with colleagues and the public.

## Frequently Asked Questions

- Q Do I have to follow the Code of Conduct when I'm off duty but still in my City uniform?**
- A** Yes. When you are in uniform, the public identifies you as a City employee and may assume you are performing City duties.
- Q Can I use social media venues or my personal blog to voice my opinions about Council decisions, fellow employees or my workplace?**
- A** Your personal social media accounts are part of your right to expression. However, if it is reasonable that you could be identified as a City employee, your comments on social media must accurately reflect the decisions of Council and Administration and must not weigh in on the opinions or political positions of elected officials. Posts to your private accounts must not undermine City Council or Administration's objectives, the City's reputation or relationships with its stakeholders. Comments should not discriminate, harass, or demonstrate disrespect toward any person. Engagement with members of the public, in any forum, that encourages respectful dialogue on relevant municipal issues is not a breach of the Code of Conduct provided that it is factual, appropriate, and does not conflict with Council direction and the City's other obligations, such as protecting privacy and maintaining confidentiality and a respectful workplace. Inappropriate content posted on personal social media may impact your employment with the City whether or not it was posted from a City device or during work hours.

**Q In my job, sometimes I deal with people who are frustrated and upset with the City. What can I do to create a more positive experience for both of us?**

**A** Members of the public sometimes express anger and frustration in our interactions with them and that is understandable. Start by actively listening to the person and acknowledging their feelings and concerns. Let the person know you want to help, ask questions to find the root cause of their concerns, and work together to solve the problem. If inappropriate behaviour continues, advise the person that maintaining a respectful conversation is important and necessary for the interaction to continue. In situations where your best attempt to address the concern is no longer effective, or you feel unsafe, a supervisor or support person can help you to remove yourself or the individual from the situation. Know your area's response plan and when to call Corporate Security. Visit the [Connected City](#) page for more information and resources.

**Q Can I use artificial intelligence tools to create work product as part of my job?**

**A** With approval of your leader and using a City-approved tool, artificial intelligence tools can assist employees to create their assigned work product. However, you are responsible for any content generated by AI tools and must ensure that it is factually correct, does not violate any intellectual property or moral rights belonging to another person, and complies with the Code of Conduct and all other City policies.

**Q Can I stop for a beer or wine on my way home from work if I'm wearing my City uniform?**

**A** No. Although you are on your own time, your uniform leads people to believe otherwise.

**Q Can I record conversations or meetings at work?**

**A** If you wish to record a conversation or meeting, advise participants of the purpose for recording and explain how you will use the recording. Covert or surreptitious recording is not permitted and if a participant objects, approval from labour relations or an appropriate supervisor should be obtained in advance of the recording. Recording members of the public for personal or outside of City-approved purposes is not permitted.

## **Respectful Workplace**

**Guiding Principle:** We will all do our part to ensure our workplaces are free from harassment and discrimination, and our fellow employees and those whom we serve are treated fairly.

The [Respectful Workplace Administrative Procedure](#) outlines how respectful workplace concerns will be addressed.

If you have a respectful workplace concern, you are encouraged to talk to the person with whom you have a concern, or with your supervisor. If you aren't able to speak with the individual or your supervisor about your concern, you can make an appointment with the [Safe Disclosure Office](#).

A large, semi-transparent, light blue number '2' is positioned on the left side of the page, serving as a background element. The text is located to its right.

## **CITY ASSETS**

**City Time and Assets**

**Access to Information  
and Protection of Privacy**

## City Time and Assets

**Guiding Principle:** We will safeguard and protect City assets, and only use information collected by the City for purposes consistent with the use for which it was collected. We will not use any City asset, including e-mail, internet services, or any other electronic communication devices, if the use could be offensive or inappropriate.

Employees must devote themselves exclusively to the performance of their employment duties during paid working hours. We will use and permit the use of City time and assets only for the performance of City duties or as approved by our supervisors.

### What Does This Mean?

City employees are required to care for City assets which includes all property, equipment, software, information, and time. City assets may only be used for City purposes or as approved by your supervisor.

### Why is this important?

The City, like any organization, cannot afford to waste time, money, or resources. We serve all the citizens of Edmonton and our work is paid for by their tax dollars. To do our jobs properly, we need to have all resources available at all times. Whether the asset in question is work time, a City vehicle, or a computer, it must be ready and available to do the assigned task.

## Things To Do

- + If you are participating in an approved **Hybrid Work Arrangement**, adhere to all requirements
- + Respect City assets and take proper care of them, whether using them at a City facility or at home for City purposes
- + Ensure multi-factor authentication is active on all City accounts you are responsible for
- + Use unique and complex passwords
- + Install software updates for operating systems and applications to ensure they remain up to date
- + Ensure that encryption is turned on when using your home wi-fi network for City purposes
- + Use only City-approved software, extensions, and web-based tools for City work
- + Use City assets only for City work
- + Reimburse the City promptly for any approved personal use that incurs costs (long distance calls, photocopying)
- + Obtain approval for exemptions

## Things Not To Do

- + Take home City assets for personal use without prior approval
- + Use a City vehicle for personal business
- + Install personal software or connect personal hardware to City computers without permission from your supervisor
- + Download software on City equipment, without prior approval including add-ons and extensions, without prior approval from the Vendor and Asset Enablement Team

- + Purchase any software or software licences on a Corporate Credit Card
- + Use City assets for storing or sharing non-work related or personal information, or grant personal accounts access to City assets
- + Use your City of Edmonton email address to subscribe to personal subscription services
- + Use City internet for non-work purposes
- + Connect to unknown wi-fi networks while using a City device
- + Abuse email, Internet connections, or any other electronic communication devices that could be used for content deemed as offensive or harassing, such as hate material, slurs based on someone's identity (e.g., race, ethnicity, gender, or sexual orientation), gambling and sexually explicit material
- + Accessing, creating, viewing, sending or downloading of inappropriate material will be dealt with severely
- + Prevent unauthorized access
- + Escort visitors to and from entry points
- + Do not prop secured doors open
- + Protect and secure all sensitive information. Devices and records should never be left unattended
- + Do not download City information to your personal phone or other device, or grant access to your City accounts to external accounts
- + Lock filing cabinets, portable devices, documents and computers before you leave
- + Do not respond to spam or phishing attempts
- + Have a good, strong password
- + Report crimes in progress to 911
- + If after the fact, call EPS at 780-423-4567 and Corporate Security at 780-496-8888

Any violation may result in discipline up to and including termination of employment.

### **Tips to Secure and Protect City Assets**

Security is everyone's business and we all have a role to play.

- + Keep your ID card secure and visible.
- + Safely engage strangers and visitors not wearing ID cards.
- + Use customer service skills to engage unknown persons, such as "How may I help you?" or "Let me take you to that person."

## Frequently Asked Questions

- Q** Can I photocopy my son's hockey schedule for him and his teammates?
- A** One or two copies is not an abuse of City assets. Multiple copies, or repeated use of City equipment, require supervisor approval and reimbursement to the City.
- Q** Can I help myself to things the office is throwing away or declaring surplus?
- A** No. Articles in the garbage are still considered City assets. If you are interested in purchasing an item that has been declared surplus, contact Corporate Procurement and Supply Services.
- Q** Is it appropriate to sell chocolates or raffle tickets or collect money for charitable associations at my work site during normal working hours?
- A** This is acceptable, subject to approval by your immediate supervisor or any branch specific procedures.
- Q** Can I access City assets for occasional personal use? What about infrequent phone calls? Can I call my child's daycare or make a medical appointment?
- A** Yes. Infrequent and incidental use of City assets for personal reasons is allowed as long as there is no negative impact on your performance, no abuse of paid work time or no added cost to the City. This includes telephone and cellular phone use.
- Q** I have to take a City vehicle home at night. If the grocery store is not out of my way, can I stop in the City vehicle?
- A** No. Employees who are provided with a vehicle for City work are expected to use the shortest route between their assigned work location and their residence, without stopping for private purposes.
- Q** Can I do personal work at my workstation during lunch hour?
- A** Incidental use of your work station is permissible as long as you are doing the work on your own time and there is no cost to the City.
- Q** What should I do if I receive chain letters or offensive jokes and pictures at my work email address?
- A** Delete them immediately and tell the sender to stop sending them to your City address. You should also consider informing your supervisor depending on the frequency or content of the emails. We are all responsible for ensuring the City's email and systems are used appropriately.
- Q** What should I do if I see an employee siphoning gas from a City vehicle?
- A** Report the incident to your supervisor or to Corporate Security.

## Access to Information and Protection of Privacy

**Guiding Principle:** We will respect our legal and ethical obligation to comply with the provincial *Protection of Privacy Act (POPA) and Access to Information Act (ATIA)* as a shared responsibility of all City employees. Every employee has a duty to respect the privacy of Edmontonians and fellow employees, to secure personal information, and support access to information.

### What Does This Mean?

Personal information (PI) includes, but is not limited to:

- + Name, home address, home telephone number
- + Race, ethnic origin
- + Age, sex, marital or family status
- + Medical history
- + Employment and financial history
- + Personal opinions about other identifiable individuals, such as an employee's opinion about another employee

POPA governs the purposes for which PI may be collected, used, or disclosed. PI is collected when it is gathered from an individual (such as signing someone up for a City service), PI is used when employees access PI in a City system, and PI is disclosed when City employees send or transmit PI to someone who does not work for the City of Edmonton (such as disclosure to the Edmonton Police Service).

Any individual has the right to make an access to information request for any record in the City's custody or control under ATIA. Employees have an obligation to maintain records in order to support access to information and to provide records when they are subject to a request.

### Why is This Important?

Information access and privacy are a means of ensuring the continued preservation of openness, fairness, transparency and respect for the privacy of Edmontonians and City employees.

### Things To Do

- + Keep personal information secure.
- + Collect, use and disclose personal information only for work purposes.
- + Access City systems only for work purposes.
- + Search for and provide responsive records to requests for access to information.
- + Verify authority for disclosure before disclosing personal information.
- + Contact Corporate Access and Privacy (CAP) in the Office of the City Clerk for assistance on your POPA responsibilities with how to use, collect and disclose personal information at [AccessAndPrivacy@edmonton.ca](mailto:AccessAndPrivacy@edmonton.ca) or 780-496-5222.

## Frequently Asked Questions

- Q One of my co-workers applied for a job in my unit. I don't think that my co-worker will be good at the job. Can I tell my boss?**
- A** No. Someone's application for a position and the processing of recruitment are confidential. You may only share information about your co-worker if your co-worker or the hiring manager asks you for a reference.
- Q What should be the default access permission for a document containing personal information in Google?**
- A** Records containing personal information should be shared only with those who need access to the document. Access should be reviewed periodically to ensure it remains limited to those that require access.
- Q I've been asked to search for records for an access to information (ATI) request. The records are potentially embarrassing to me. Do I have to give them to CAP?**
- A** Yes, you are required to provide records to CAP. CAP reviews all records before they are released, and it is an offence under ATIA to interfere with the processing of ATI requests.
- Q Are there any issues if I just start recording a meeting so I don't have to create written minutes?**
- A** Limit personal information collection to necessary data and think about whether a full recording is necessary. If a recording is done to assist with preparing minutes, the recording should be deleted as a transitory record as soon as the official meeting minutes are prepared.
- If recording is required, always notify attendees of the purpose, duration, and retention of the video recording and also give them a moment to turn off their cameras or adjust their background to minimize the personal information being recorded.
- Q I made a complaint about my neighbour's dog. Can I look up the status of the complaint in POSSE?**
- A** No. You have been provided access to POSSE for work purposes. You are not permitted to access POSSE for any reason other than work purposes.
- Q I handle the Human Resources files for my office and discovered my co-worker's 40th birthday is coming up. Can I plan a surprise party?**
- A** No. If you found out about the birthday through City records, the information is considered confidential and cannot be shared with colleagues or used to plan a party.
- Q A staff member has gone on medical leave. Can I send out an email to notify the team about this?**
- A** You may communicate that staff members are away from work, but you may not identify why they are away.



## **CONFLICTS OF INTEREST**

**Gifts and Entertainment**

**Personal Gain, Benefit,  
or Favouritism**

**Other Employment**

**Appearances Before Council**

**Political Activity**

## Conflicts of Interest

**Guiding Principle:** We will avoid or mitigate all conflicts of interest.

### What Does This Mean?

A conflict of interest involves a potential, perceived, or actual conflict between employees' duties and their private interests. It may occur in a situation where an employee has private interests that could improperly influence the performance of their official duties and responsibilities or where an employee uses their office for personal gain or in personal circumstances. Generally, conflicts of interest arise in one of five situations: gifts offered or received in the course of employment; using City employment for personal gain, benefit, or favoritism; other employment that may conflict with City employment; personal political activity; or personal appearances before Council.

Conflicts of interest may be actual, potential, or perceived:

**Actual conflict:** a situation in which an employee's personal or private interests improperly influence the performance of official duties and responsibilities or where a position is used for personal gain or in personal circumstances.

**Potential conflict:** a situation where an actual conflict could reasonably exist in the future if mitigation strategies are not followed.

**Perceived conflict:** a situation where no actual conflict exists, however, the situation could be perceived by a reasonable observer to be a conflict, whether or not it is the case.

The existence of a potential or perceived conflict is not a breach of this Code of Conduct as long as it is disclosed and mitigation measures are implemented and followed. In some cases, perceived conflicts can be a good thing and should be encouraged – for example, an employee that actively volunteers with a non-profit organization must disclose a conflict of interest if that organization is applying for City funding. Provided that the employee does not work in the area responsible for funding decisions and does not take any steps to attempt to influence the funding decision, this would be a perceived conflict – and a great example of how we as employees can improve the community around us. By having disclosed the perceived conflict, if a concern is raised in the future the City and the employee can take comfort knowing that the situation was disclosed and documented. The existence of a conflict will never automatically be considered to be a bad thing – only a failure to disclose the existence of a conflict or implement appropriate mitigations will be considered a violation of this Code of Conduct.

The appropriate mitigation measures for individual conflicts will vary based on the facts, and may include steps such as removing yourself from certain projects or situations, or having a peer review work before approval. If you need support developing appropriate mitigations you can contact the Code of Conduct/Conflict of Interest Specialist.

Actual conflicts, however, are a serious concern and may result in discipline. Any employee that becomes aware of an actual conflict must disclose it as outlined under Disclosure and Compliance Obligations.

## Things To Do

If you believe you have a conflict, whether it be actual, potential, or perceived, you must complete the [Conflict of Interest Disclosure Form](#). Completed forms must be submitted to your Branch Manager to ensure awareness of the conflict and support for the proposed mitigations, and then forwarded to the Code of Conduct/Conflict of Interest Specialist for retention. Branch Managers disclosing conflicts of interest must submit completed forms to their Deputy City Manager before forwarding to the Code of Conduct/Conflict of Interest Specialist. All disclosing employees, as well as their Branch Manager, will receive view access to their completed form for their records. Access to completed disclosure forms is strictly limited to the disclosing employee, their Branch Manager, and the Code of Conduct/Conflict of Interest Specialist. Confirmation that a form has been filed, details of the conflict, or copies of the form will only be shared further where necessary to respond to a complaint or investigation or, with confirmation from the Branch Manager, that the information is necessary for another employee to carry out their duties. Completed forms do not form part of an employee's labour relations file.

If you change positions within the City after disclosing a conflict of interest, you must provide a copy of the completed form to your new Branch Manager and continue to implement mitigations agreed to in the form.

If new information arises in relation to a declared conflict, you must update the form and resubmit the completed form to your Branch Manager and the Code of Conduct/Conflict of Interest Specialist.

In addition to the steps outlined in this Part, employees engaged in procurement must also comply with other conflict mitigations listed in the [Procurement Standard](#).

## Gifts and Entertainment

**Guiding Principle:** We will not accept or provide any gift, benefit, or favour in exchange for special consideration or influence, and we will mitigate any perceptions that may arise from courtesy or professional and community relationships.

### What Does This Mean?

Employees must not give or receive gifts in exchange for actual special consideration or favours, and if a gift might be perceived as this, it must be disclosed and align with City guidelines.

### Why is This Important?

Although most gifts come with no strings attached, there is always the chance that something is expected or perceived to be expected in return.

### Things To Do

- + Before accepting any gift or gratuity, consider how the acceptance of the gift would be perceived by the media, Council and a company's competitors.
- + Refuse all cash tips or cash gifts.
- + Decline gifts that are intended as an exchange for a favour.
- + Decline gifts from potential vendors or interested parties during or in anticipation of a purchasing or tendering process that you are involved in.
- + Decline the gift or ask your supervisor if you are unsure.
- + Disclose appropriate gifts in accordance with City guidelines.

## Frequently Asked Questions

- Q The City is in the process of awarding a contract and I am involved in the decision process. One of the bidders has offered to take me to an Oilers' game. Can I accept the invitation?**
- A** No. This is an actual conflict of interest as the bidder could be given special consideration or favours in return for the ticket(s).
- Q I'm a collector in Waste Management. Some of the seniors on my route like to give me a cash tip at Christmas. I don't want to be impolite by rejecting what is a kind and sincere gesture. How should I respond? Can I accept any gifts?**
- A** Politely explain that you appreciate the gesture but the City already compensates you. It is unacceptable to accept cash, but civic employees may accept:
- + Small holiday gifts showing appreciation (cards, cookies, chocolates)
  - + Advertising material (calendars, scratch pads, disposable pens, t-shirts, caps)
  - + Corporate discounts that are available to all City employees
  - + Protocol items (symbolic or ceremonial gifts, such as pens or ornamental objects)
- Q I have been asked to speak at a conference and the organizers offered an honorarium. Can I accept it?**
- A** No. As you are representing the City and are paid a salary, you may accept free attendance to the conference or a small token gift, but not an honorarium or gift card.

**Q** The City paid for me to attend a conference and I won a door prize. Can I accept it?

**A** You can accept the door prize but if the prize is of significant value, you should advise your supervisor and disclose it in accordance with City guidelines. You are not permitted to accept a cash honorarium. Items such as gift cards or other cash rewards should not be accepted but may be received and used for the benefit of a department, branch or group of employees, if the amount is reasonable and would be perceived as acceptable by members of the general public.

**Q** I am helping to organize my department's annual golf tournament. Can I solicit local merchants for prizes? Can I solicit other departments for prizes?

**A** Yes, with permission from your Deputy City Manager. You can solicit local merchants as long as you do not use a City vendor list. You can also approach other City departments for prizes; however, please be aware the departments are the stewards of the assets within their control and your request will be considered in the same way as one from an external person or organization.

## **Personal Gain, Benefit, or Favouritism**

**Guiding Principle:** We will remove ourselves from any decision process or work duty that may result in an actual, potential or perceived personal gain or benefit. We remove ourselves from situations where there is an actual, potential or perceived risk of favouritism. When we have access to confidential information relating to any competition open to the public, we are ineligible to compete.

### **What Does This Mean?**

Employees must remove themselves from any decision process that may result in actual, potential or perceived personal gain, favouritism, or benefit, and mitigate potential and perceived conflicts of interest by disclosing and mitigating conflict of interest situations.

Awarding of City tenders, employment opportunities, land sales, and disposal of surplus assets will be carried out impartially – without any advantage or favouritism to themselves or others.

### **Why is This Important?**

All City business must be conducted fairly and impartially. Employees are compensated for their services with tax dollars. A City employee should not benefit from their job beyond the compensation paid for the job.

### **Things To Do**

- + Remove yourself from any decision process that may result in actual, potential or perceived conflict by resulting in personal gain, benefit or

favouritism, or that may otherwise affect you personally as an individual

- + Disclose any situation where you have a personal or familial relationship with an external party doing business with or interacting with the City that may result in an actual, potential or perceived conflict of interest

## Frequently Asked Questions

### Q My sister just bid on a City contract in my work area. What should I do?

- A** You are obligated to disclose your relationship to your supervisor at the beginning of the process. If you are in a position to evaluate the bid, influence the selection of the successful bidder or manage the bidder's performance, there is an actual conflict of interest. Your supervisor must ensure you are not involved in the decision-making process and do not have access to information regarding the process that could be used to influence decision makers.

If you are not involved in the decision-making process, there may be a perceived or potential conflict of interest that must be disclosed, and you and your supervisor must agree to mitigation measures to ensure an actual conflict does not arise.

### Q In my job, I drive a City pickup truck that is being declared surplus. Can I buy it?

- A** Yes. Once the City has properly declared the truck surplus and it is available for sale to the public at large, you may make an offer to buy it. You will not get any greater consideration in the sale process than any other person offering

to purchase the vehicle through an open sale process.

### Q My brother-in-law is qualified for a job I directly supervise. Can he be hired for that position?

- A** No. According to the [Hiring Procedure](#), immediate family members may not work in the same section, branch or department where direct supervision would create a conflict. Furthermore, no one may be hired, transferred or promoted to a position in which a relative can be perceived to have influence over their promotion or supervision.

### Q I work in Financial and Corporate Services and my cousin has a consulting agreement with another department. What should I do?

- A** Nothing. Since you were not involved in the decision process that awarded the contract and do not have any involvement with that business, there is no conflict. But, if you are concerned that a conflict may be perceived, you should disclose the situation in accordance with the City's guidelines.

### Q I have started a romantic relationship with my supervisor. What should I do?

- A** The City discourages workplace relationships that can result in conflicts of interest, complaints of favouritism, claims of sexual harassment and other employee morale problems. In this situation, you and your supervisor must promptly disclose this relationship to the manager of your work area. The manager must take steps to address the supervisory-subordinate working relationship in order to remove actual

or perceived favouritism along with any other potential conflicts. This may include modifying the reporting relationship and/or a change in position for one or both employees involved.

## Other Employment

**Guiding Principle:** We will only engage in other employment that does not conflict with our City duties or the Code of Conduct or put us in competition with services provided by the City.

### What Does This Mean?

Other employment is permitted, but only with organizations not in direct competition with the City or that could potentially compromise City business, social, political interests and objectives or its reputation to the public.

### Why is This Important?

During paid working hours, your priority must be to City service, above all other financial interests. City employees are expected to be loyal to the City. You cannot have other employment that undermines your ability to perform your City duties effectively or conflicts with those duties.

### Things To Do

- + Refuse work from the City's direct competitors.
- + Get written approval from your Deputy City Manager or disability plan administrator before you accept outside employment during a leave of absence.

## Frequently Asked Questions

- Q** I'm off work and receiving disability benefits. I can't do the heavy, physical labour my City job demands but I can run my home-based bookkeeping business. Is this a violation?
- A** Yes. Your disability management consultant must approve all outside employment while you're on disability leave.
- Q** I work as a mechanic for the City of Edmonton and would like to get a part-time job as a mechanic. Is this permissible?
- A** Yes. You can take the job as long as the service is not in direct competition with the City and the service is not performed on City time or using City assets.

## Appearances Before Council

**Guiding Principle:** We will not, in our capacity as a City employee, appear before City Council, or its committees and boards, on matters affecting an external organization, where we have any involvement that could be considered a conflict of interest.

### What Does This Mean?

Employees who appear before City Council, or its committee or boards, in their official capacity must not provide advice or recommendations that benefits them personally, prioritizes their personal views or interests, or intentionally affects an external party adversely for personal gain. Any advice provided in an official capacity should be in the best interests of the City. Employees who appear before City Council, or its committees or boards, in their

personal capacity or on behalf of an outside organization must declare their involvement to the Office of the City Clerk as well as to their Branch Manager by completing a Conflict of Interest Disclosure Form, and must do so on their own time and not wearing clothing or other items that identify them as a City employee.

### Why is This Important

If you are in a position to advise City Council, or its committees or boards, on a matter that you are personally involved in, your involvement could be seen as favouritism or conflict of interest. It must be clear to everyone involved that your outside interests, volunteer work or other personal activities are not related to your position as a City representative, and that the advice you give considers only the best interests of the City.

### Things To Do

- + Let people in your community group know about the City's Code of Conduct and in particular, that you must be careful to ensure you avoid any possible conflict of interest with your duties as a City employee.
- + Advise the Office of the City Clerk as well as your Deputy City Manager of any appearance before Council that may cause conflict between your job duties and outside activities.

### Frequently Asked Questions

**Q I belong to a non-profit organization. May I appear before City Council on its behalf?**

**A** Yes. You have the right to appear, on your own time, before City Council, its committees and boards on behalf of

public groups, such as community leagues, athletic organizations and charitable organizations. You also have the right to appear as a taxpayer, elector or owner on issues specified in the Municipal Government Act, but must do so on your own time and not in a City uniform.

**Q May I appear before City Council on behalf of my private company?**

**A** Yes. However, you must appear on your own time and declare your involvement to the Office of the City Clerk as well as to your Branch Manager by completing a Conflict of Interest Disclosure Form prior to the appearance.

### Political Activity

**Guiding Principle:** We must not engage in any political activity or electioneering during normal working hours at our place of work without the written permission of our Deputy City Manager.

### What Does This Mean?

Political activities, such as canvassing, campaigning and fundraising, that aim to advance an individual's or group's political interests will not be permitted in the workplace during normal working hours. All employees have the right to take part in political activity and electioneering, but only on their own time and using personal resources. City assets must not be used for political activity at any time.

## Why is This Important?

The fact that we work for a municipal government presents a unique situation; our workplace is a highly political environment where opinions vary widely and strongly and can be a source of potential conflict. Furthermore, political discussions make many people uncomfortable. In order to respect all beliefs, political activity is not allowed in the workplace. Political views and activities are important to many employees, but the work environment and time should be devoted to City business.

## Things To Do

- + Get written permission from your Deputy City Manager before you engage in any political activity at your place of work.

## Frequently Asked Questions

- Q Can City employees run for political office?**
- A** Yes. Procedures for this situation are outlined in City Policies related to Leaves of Absence and the applicable election legislation.
- Q Can I campaign for a union position at my work site?**
- A** All political activity and elections in the workplace, including union elections, require the approval of your Deputy City Manager.
- Q Can I wear a badge with a political statement while I perform my City duties?**
- A** No. Political propaganda is not permitted at your place of work.

- Q My spouse is running for political office. Can I accept contributions to the campaign while I'm at work?**
- A** No. City employees are not permitted to raise or to contribute funds to political campaigns while at their place of work.

## Other Reference Documents

1. [Respectful Workplace Policy](#)
2. [Social Media Guidelines](#)
3. [Occupational Health and Safety Directive](#)
4. [Cit-e File Classification and Retention Schedule](#)
5. [Connected City Initiative](#)
6. [City of Edmonton Leadership Competencies and Cultural Commitments](#)
7. [Leave of Absence Without Pay Directive](#)

