



# **CODE OF CONDUCT and ETHICS**

**Saskatchewan  
Workers' Compensation Board**

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# **WCB CODE OF CONDUCT & ETHICS**

## **Statement of Principles**

The Saskatchewan Workers' Compensation Board is committed to serving injured workers and their employers.

The stakeholders of the WCB expect a high quality of service and professionalism. All employees should become familiar with The Code of Conduct and Ethics (the Code) and be fully committed to acting in an ethical manner when representing the Saskatchewan Workers' Compensation Board. The Code communicates WCB's expectations with regard to individual and organizational behaviour and is grounded in a respect for the law, appropriate business conduct, and the organization's policies and procedures.

WCB employees must act in ways that help the organization to achieve its mission/vision. Employees should demonstrate professionalism, courtesy, and ethical business practices when representing the Board. The Code is intended to protect WCB and its employees by helping to avoid or prevent activities that could impair our ability to perform our jobs or damage the reputation of the organization and its employees.

This document should be considered a framework to help guide employees since each employee is responsible and accountable for his/her actions and decisions. Failure to comply with the Code may lead to serious disciplinary action up to and including termination.

Although this document cannot possibly answer all situations or circumstances that may arise, it is a good resource.

## **Who is Responsible and Accountable to Follow the Code?**

### All WCB Employees:

Whether in-scope or out-of-scope, each employee is responsible and accountable to read, understand, and act in accordance with the Code and practice its underlying values.

Employees who engage consultants, health care professionals and/or service providers (collectively referred to as vendors), must ensure the vendors also act in a manner consistent with the WCB's Code. Employees who encounter a situation where a vendor may have breached the Code, should immediately bring this to the attention of their Supervisor/Manager. Contracts with vendors should explicitly state the vendor(s) must abide by all approved policies, including the Code. Failure to comply with the Code may lead to contractual termination.

WCB employees must read, understand, and follow all applicable policies and procedures – this includes the Code since it applies to all WCB employees. All employees are responsible to sign a declaration indicating they have read and understand the provisions within the Code. If an employee does not follow WCB's policies and procedures, including the Code, the employee could put himself/herself, a co-worker(s), and/or the organization at risk. This is not acceptable.

To learn more about the policies and procedures that apply see Appendix 1. If additional information is required, employees should ask their Manager/Team Leader, Human Resources, or an Executive Officer of WCB.

## **Who is Responsible and Accountable to Follow the Code?**

### Additional Responsibilities – WCB Management:

WCB Management (Supervisors, Managers, Team Leaders, Directors, Executive members), must demonstrate their commitment to the provisions of the Code. Employees who formally supervise other employees must ensure they have read and understand all elements of the Code.

As a member of the management team, it is also important to support employees who may have a question/concern. It is your role and responsibility to provide guidance and assistance and to follow-up as necessary. All instances of non-compliance to the Code should be formally documented and reported.

## **Guidelines for Decision-Making**

### **Acting with Integrity -**

As WCB employees, it is important to demonstrate our personal and professional values and that we act with integrity. Acting with integrity means that we act in an honest and ethical manner.

Employees may encounter an ethical dilemma where there is no easy answer or solution to resolving a situation. However, by understanding the Code, educating ourselves, and by talking to others, we are more able to act responsibly and make sound decisions.

## **Guidelines for Decision-Making (continued)**

### **Our Values**

Personal integrity and our corporate values are the standards by which our actions and decisions are considered and judged by others.

As well, our values guide our actions and decision-making. As such, it is important to know, understand and adhere to WCB's values. These are

1. Dignity – those we serve and those we work with are treated with respect and consideration.
2. Fair – those we serve and those we work with are treated equally and without prejudice or bias and in a timely manner.
3. Honest – those we serve and those we work with are treated truthfully.
4. Open – our programs and services are easy to access and to understand. Our decisions and actions are clear, reasonable and open to examination.

## ***Guidelines for Decision-Making (continued)***

### **Speaking on WCB's Behalf**

Unless authorized to do so as part of their job responsibilities, employees should exercise caution to ensure they are not perceived to be speaking on WCB's behalf.

Although employees are free to comment on public issues, they must ensure that, by doing so, they do not jeopardize the perception of impartiality in the performance of their duties. Care should be taken in making comments or entering into public debate regarding WCB's policies.

WCB's existing file disclosure policies do not permit the release of legal opinions prepared by legal counsel for the WCB without legal counsel's approval.

### **Service to the Public**

WCB employees provide service to the public in a manner that is courteous, professional, efficient and effective. Employees must be sensitive and responsive to the changing needs, expectations, and rights of a diverse public while respecting the legislative framework within which service is provided.



## **Community Service**

All WCB employees are encouraged to participate in a full range of community activities in the interests of advancing the cause of worthy organizations and endeavours. Employees must ensure, however, that these activities do not interfere with their job performance and that the organization incurs no cost, unless approved by WCB. Any lost time must be made up by the employee or approved by their Supervisor/Manager.

## **Political Activity**

WCB employees are free to participate in political activities; however, these activities must be clearly separated from activities related to their employment. Employees must be able to retain the perception of impartiality in relation to their duties and responsibilities. Employees must not engage in political activities during working hours or use the organization's facilities, equipment, or resources in support of these activities.

## **Use of WCB Assets/Information**

Employees may not use the organization's assets or information at any time for personal gain.

Employees should also familiarize themselves with the internet and e-mail policies.

## Guidelines for Decision-Making (continued)

### Take the Test –

Employees may encounter an ethical dilemma or situation where there is no easy answer or solution to resolving the situation. **However, before acting, test yourself and ask yourself the following questions:**

- ***The Values Test***

*Are you clear about the organizational values and are they reflected in your decision?*

- ***The Reasonable Person Test***

*Would a reasonable person in the community, having knowledge of all the facts, consider that you have acted fairly, honourably and rationally?*

- ***The Credit Test***

*If your action or decision became known to everyone, would it either bring credit or discredit to you and WCB?*

Solving your ethical dilemma may be as straightforward and simple as answering these three questions. If not, resources are always available if you need further guidance or help. Be assured that you have the support of the organization and your supervisor in resolving an ethical dilemma. If you are faced with a dilemma or difficult circumstance and you are uncertain how to act or proceed, please discuss the situation with others, including your supervisor. Through continuous discussion and sharing experiences, we educate ourselves and become aware of the options and their implications to help guide us to a sound decision.

## **Guidelines for Decision-Making (continued)**

### **Key Resources/Contacts**

It is always important to ask your direct Supervisor/Manager for help. However, in some cases, it may be more appropriate to direct your question to a specific area within WCB. For example: questions relating to *The Freedom of Information and Protection of Privacy Act* should be referred to the Corporate Solicitor - Legal Services since the individual in that role is both the Privacy and Freedom of Information Officer; queries regarding legal obligations or legal opinions should also be referred to Legal Services; personnel issues can be addressed with Human Resources; and potential internal-fraud activities can be addressed by Internal Audit.

We are more able to act responsibly and make sound decisions when we act with integrity, allow our values to guide our decision-making, understand the Code and other WCB policies/procedures, and when we talk to and seek the guidance of others.

## **Conflict of Interest**

The Board, Executive Members, employees and others associated with the Saskatchewan WCB have a responsibility to conduct themselves in a manner that is appropriate, where their integrity is above reproach.

Employees shall seek to uphold and enhance the standing of the Saskatchewan WCB by:

1. Maintaining a high standard of integrity in all internal and external relationships that relate to the WCB;
2. Fostering and maintaining the highest standards of professional conduct;
3. Optimizing the use of resources for which they are responsible in order to provide the maximum benefit to the WCB;
4. Complying with WCB policies and relevant legislation.

Employees of the Saskatchewan Workers' Compensation Board have a responsibility to avoid creating or being involved in, or perceived to be involved in, conflicts of interest. These are situations in which there is, or appears to be, a conflict between someone's personal interest and the WCB's interest.

Such conflicts can compromise or appear to compromise the WCB's business relationships or negatively affect organizational or individual reputations. As such, we must conduct ourselves in a manner that is appropriate and where our good faith and integrity are above reproach.

## **Conflict of Interest (continued)**

WCB defines conflict of interest to be any situation in which a person, either for himself/herself or for other person(s), attempts to (or appears to have attempted to) promote a private or personal interest or benefit, which results, or is perceived to result, in:

- 1) an interference with the objective exercise of his/her duties within the WCB; *and/or*
- 2) a gain or an advantage by virtue of his/her position at the WCB.

*It is important to remember that situations where there is conflict OR perceived conflict, must be avoided.*

### ***Conflict of Interest – Applicable Guidelines/Procedures:***

- A) *Confidentiality of Information:* Information received in the course of carrying out our normal duties must be respected and must not be used to further the interests of another person or business or benefit them in any way. This could include, but is not limited to: any employee, relative, friend, business or business associate. Employees should familiarize themselves with the confidentiality and conflict of interest provisions and talk to their Manager/Team Leader or Director for more clarification.
- B) *Declaration of Interest:* Any personal interest that may impinge on, or may reasonably be construed to show partiality in any manner relevant to one's duties/ responsibilities, must be disclosed & declared to the Director who will then advise the Executive Committee.

## **Conflict of Interest (continued)**

- C) *Impartiality:* Employees of WCB are to act impartially when performing duties. Employees shall not give preferential treatment to individuals or organizations, where the employee could give, or could be seen to be giving, a benefit based on the relationship.
  
- D) *Business Gifts & Hospitality:* Receiving or giving gifts, benefits or unusual hospitality that might influence or give the appearance of influencing, in any way, the performance of one's duties, shall be declined. Employees accepting any payment, gift, honorarium or gratuity in addition to their salary paid by the WCB, would be considered in conflict. When in doubt as to what is considered acceptable, the offer should be declined. Employees should check with their Manager/Team Leader or Director if they need clarification.
  
- E) *Outside Employment:* Outside employment is to be avoided if it might create a conflict of interest or if it intrudes upon the employee's work time or impedes employee's energies to fully attend to or concentrate on their duties with the WCB. Employees must declare any outside employment to their Director who will, in turn, determine if a conflict exists.
  
- F) Employees may not use the organization's assets or information at any time for personal gain.

## **Conflict of Interest – Additional Guidelines/Procedures –**

### Jobs and Affiliations of Relatives:

Work activities of close relatives may also create conflicts of interest. If you learn that a relative currently works, or will be working, for a vendor, consultant or service provider, you should notify your supervisor who, in turn, should notify the Director and Human Resources to determine if any action is necessary. Ideally, this should be done before the conflict exists i.e. prior to work being done or signing a contract. In general, relatives can work for a vendor; however, you and/or your staff must not be in position of influence or decision-making over any contractual or business arrangement. You must also be careful not to disclose any confidential information to a relative.

### Client Relationships and Employee's who become Injured Workers:

You must always maintain your integrity in developing professional working relationships with your clients. In the event you begin to care for a client or their guardian in a more personal way, or you have developed a personal relationship with a client, you will have placed yourself in a real or perceived conflict of interest. *You must immediately notify your Supervisor/Manager and ask to be removed from the file.*

In order to remain impartial and objective, employees who become injured workers must never have their files managed by the people on their team. Instead, the file should be managed by staff in an alternate location.

## **Conflict of Interest (continued)**

**In all cases, employees must disclose any situation that arises which is, or may become, a conflict of interest or a perceived conflict of interest.**

**Employees who find themselves in a conflict or potential conflict should report the matter immediately to their Manager/Team Leader and/or Director who will, in turn, discuss the situation with Human Resources and/or with an Executive member. Failure to report a conflict or potential conflict may give rise to disciplinary action up to and including termination.**



## **Confidentiality**

*As employees of WCB, we each have a responsibility to protect the reputation of the organization. As such confidential information must not be disclosed.*

Information obtained during the performance of your duties in any and all positions cannot be divulged to anyone not in the service of the WCB, unless expressly authorized to do so. Integrity and confidentiality are a condition of employment. As an employee of the Saskatchewan Workers' Compensation Board, you have agreed to conduct yourself in an honest and professional manner. Any breach of this trust may result in discipline up to and including termination of employment. Employees should talk with their Supervisor/Manager or Director for additional clarification.

WCB believes in respecting the confidentiality of our employees' personal information. This means that access to personal records should be limited to employees who have appropriate authorization and a clear business need for that information. Employees who have access to personal information must treat it appropriately and confidentially.

It is equally important to understand that, if you have legitimate concerns about anyone disclosing information inappropriately, you have a responsibility to bring forward these concerns to your Manager/Team Leader or Director.

In addition to the above, our commitment to employee confidentiality is not a license to engage in inappropriate personal activities at work. WCB computers, fax machines, cell phones, and other equipment, are intended for official use, not for outside business activities unless otherwise expressly authorized. WCB has the right to access and review all communications, records and information created at work or with company resources. This may include such things as intranet or internet activity, e-mail, voicemail and telephone conversations.

## **Complimentary Policies/Guidelines:**

### **a) Respecting Diversity**

WCB is committed to fostering a workplace that is safe and professional and that promotes teamwork, diversity, and trust. This includes the strongest commitment to providing equal employment opportunities for all persons. WCB recruits, hires, develops, promotes, disciplines, and provides other conditions of employment without regard to a person's race, colour, religion, sex, national origin, sexual orientation, disability, citizenship status, marital status, or any other legally protected status. This includes reasonable accommodation for employees' disabilities or religious beliefs and practices and other prohibited grounds of discrimination.

### **b) Respectful Workplace Policy**

WCB endeavours to provide a professional work environment supportive of productivity, personal goals, dignity and self-esteem for every employee. Having a professional work environment also means that WCB will not tolerate any form of harassment. Harassment can be verbal, physical or visual behaviour where the purpose or effect is to create an offensive, hostile or intimidating environment. Sexual harassment can include sexual advances; requests for sexual favours, unwanted physical contact or repeated and unwelcome sexual suggestions. Other prohibited conduct includes offensive racial, ethnic, religious, age-related, or sexual jokes or insults; distributing or displaying offensive pictures or cartoons; and using voicemail, e-mail, or other electronic devices to transmit derogatory or discriminatory information.

WCB strictly prohibits any form of retaliation against anyone making a good faith report. Employees should familiarize themselves with WCB's Respectful Workplace Policy.

## **Complimentary Policies/Guidelines (continued):**

### **c) Workplace Safety & Security**

WCB is committed to providing its employees with a safe and secure work environment. *A safe and healthy workplace should also be of the utmost concern to all WCB employees.*

A safe and secure workplace also means a workplace free from violence. Threats (whether implicit or explicit), intimidation and violence will not be tolerated.

Employees should be familiar with the Respectful Workplace Policy and WCB's Safety & Security Policy.

### **d) Drugs & Alcohol in the Workplace**

We are required to think clearly and react appropriately while at work. The safety of our fellow employees, our clients and the public depend on it. Being under the influence of alcohol or drugs, or improperly using medication, diminishes an employee's ability to perform at his or her best and may endanger other team members.

The abuse of drugs or alcohol on the part of our employees during working hours is strictly prohibited at WCB.

If you observe any drug or alcohol abuse during working hours, you should report it to your supervisor, Director, Manager of Employee Relations or the Director of Human Resources.

## **Raising Concerns – ‘Whistle Blowing’**

We all share the responsibility to raise concerns, bring forward issues, ask questions and seek advice. Any employee who fairly believes a fellow employee(s), or someone acting on behalf of WCB, is in contravention of the law, a danger to public health or safety, has inappropriately used funds or assets, or has breached this policy, is obligated to raise the issue, in confidence, with his/her Team Leader, Manager or Director. In turn, the Team Leader, Manager or Director will determine the substance of the complaint and consider what action should be taken.

Employees who act in good faith when raising a question or concern will not be subject to any retribution from the organization. Confidentiality will be maintained to the extent it may be in the best interest of the employee(s) involved, our stakeholders, the public and WCB’s obligation under the law. Employees who act in bad faith i.e. lodging a false accusation that intends to cause harm or discredit another will be subject to discipline.

## **Who to Contact**

If you have any questions or concerns about whether or not you are adhering to the Code and/or WCB’s related policies/procedures, it is important that you raise the issue BEFORE acting. However, if you believe you may have been involved in misconduct, it is also critical to bring this forward as soon as you become aware.

Although your supervisor is usually a good person to start with when asking questions or raising concerns about issues relating to the Code, you may also get internal advice from others including but not limited to:

- your Team Leader/Manager or Director
- Human Resources
- an Executive member of WCB

## Scenarios & Solutions –

**Q:** I am a female employee. A male co-worker frequently makes personal comments about my appearance and it makes me uncomfortable. I've asked him to stop but he won't. What can I do?

**A:** *You should contact your Supervisor, Mgr/Team Leader or the Director of Human Resources.*

**Q:** What should I do if I'm offered a gift?

**A:** *It depends on the nature and value of the gift. If the gift is intended or could be perceived as an attempt to influence your business judgment or if the gift is very valuable, you should turn it down graciously. You should contact your Manager/Team Leader or Director before making the decision.*

*Example #1 – An employee contracts with vendors to provide a product or service. One vendor offers a trip for two anywhere in Canada as a thank you for the business. Even though the vendor may not be directly trying to influence a specific outcome, the perception could be damaging to the organization. Example #2 – A claimant sends a \$500. gift certificate to the people who have provided assistance with managing the claimant's file. This amount would be considered excessive and it could be perceived the employee has been influenced by accepting the gift. In this case, the cheque should be returned. Example #3 – A vendor offers a \$25. ticket at their corporate table for a community fundraising activity. This would likely be considered acceptable; however, once again, these types of situations should first be discussed with the Mgr/Team Leader or Director before making the decision to attend.*

**Q:** One of my clients is impossible to deal with and I have to meet with him next week. I'm not looking forward to the meeting. I believe that if I point out that some of the decision rests with our Medical Services area, he may be less angry with me personally. What's the harm really?

**A:** *It's important that we each take ownership of work responsibilities and this includes making and communicating decisions based on WCB policies. All clients are entitled to the truthful reasons for the decisions we make. However, if the client becomes abusive or irrational, the behavior should be reported to the Team Leader. You are not required to take verbal abuse from clients.*

**Q:** I've received a letter of complaint from a client pointing out that the payments she has received are inaccurate. She is wrong in her assumption so the letter is meaningless really. Does this letter have to go on file?

**A:** *A communication from the client, no matter what the content, must go on the file to ensure the claim record is intact. If you disagree with the letter's content, you should respond in writing and rebut the allegations. Your response would also form part of the claim file.*

**Q:** I think one of my coworkers is doing something that may not be in accordance with the provisions in the Code of Conduct and Ethics. If I tell my Supervisor, she may be upset because she really favors this person. What should I do?

**A:** *It is critical that you raise the issue directly with your Supervisor. If you feel uncomfortable, there are other people for you to talk to as well e.g. Human Resources, your Director or others. Whether the issue is about a team member, supervisor, or someone in another department, it is imperative that you bring forward issues of concern.*

**Q:** What if the scenario is similar to that above; however, it's the Supervisor?

**A:** *It is critical that you raise the issue with your next-in-line Manager, Team Leader or Director. You can also talk to Human Resources or others in a position of authority.*

## Appendix 1

Additional policies you may reference include:

- Employee Handbook/WCB HR Policies on MyWCB
- Board Policy/Procedure Manual
- Executive Administrative Policy/Procedure
- *The Workers' Compensation Act 1979*
- Collective Agreement
- Respectful Workplace Policy



## CODE OF CONDUCT AND ETHICS

### ACKNOWLEDGEMENT & AGREEMENT

I, \_\_\_\_\_ have read the Saskatchewan Workers' Compensation Board Code of Conduct and Ethics (the "Code"). I understand all provisions within the Code and hereby agree to follow these provisions as an employee of the Saskatchewan Workers' Compensation Board. This includes, but is not limited to, conflict of interest and confidentiality. Further, I understand and agree that all information obtained during the performance of my duties in any and all positions held while in the employ of the Workers' Compensation Board, and all information contained within any WCB information system is confidential. I agree that I will not divulge or disclose any Board information of any nature whether collected or not in the course of my duties, unless I am expressly authorized to do so.

I understand that where my actions breach this agreement, disciplinary action may be taken, as outlined in the WCB discipline policy.

I confirm my understanding and acceptance of the Code of Conduct and Ethics, Saskatchewan Workers' Compensation Board, through my signature.

\_\_\_\_\_  
Employee Name (print and sign)

\_\_\_\_\_  
Date

\_\_\_\_\_  
Witness Name (print and sign)

\_\_\_\_\_  
Date

