



GNWT Public Service

CODE OF CONDUCT

Effective October 2022

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Deputy Minister's Message

The people of the Northwest Territories look to the territorial government to develop financial, economic, and social programs, policies, and services that preserve and strengthen the Northwest Territories. The service provided and decisions made are expected to be fair, honest, transparent, impartial and non-partisan. Each and every public servant plays a key role essential to protecting the reputation and integrity of this government and the work we do.

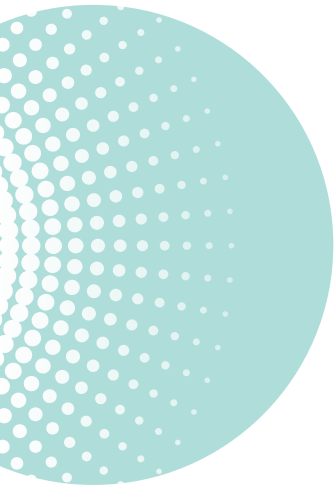
The Code of Conduct (Code) for the Government of the Northwest Territories (GNWT) Public Service serves as our commitment to our public servants and to the people of the Northwest Territories. The Code helps employees identify what is considered professional conduct for a public servant and guides them through difficult or unclear circumstances or decision-making. Our ability to adhere to a high standard of values and ethics is important to ensure public trust and confidence. While the Code cannot address every issue that may arise, it encourages a collaborative dialogue that supports sound decision-making.

The Code of Conduct for the GNWT Public Service applies to all employees of the Government of the Northwest Territories' Departments and Agencies, except the Northwest Territories Power Corporation, and it focuses on our government's four core values: Integrity, Accountability, Diversity, and Collaboration. These values lead our professional decisions, and personal conduct while fulfilling our duties as public servants.

Adherence to the values of the Code is considered a condition of employment, along with the signed *Oath of Office and Secrecy*. I ask every employee to familiarize themselves with the Code and ask that they speak to their supervisor if they require any clarification.

I look forward to working together as we use this Code to support an environment of service excellence and ethical leadership.


William Mackay
Deputy Minister, Finance



The Importance of the Code of Conduct

The GNWT is entrusted with the delivery of public services and the protection of the public interest. Therefore, it is essential public servants adhere to high ethical standards to foster and maintain public confidence. The Code is intended to create an environment that respects specific standards of behaviour. The Code identifies expected standards and principles of conduct and the related policies that are critical to both our accomplishments and reputation.

The Code's design is not exhaustive; but rather identifies the values and standards of conduct established for public servants. These values and standards serve to promote an equal, diverse and respectful workplace. The purpose of the Code is to clarify activities that may constitute a conflict of interest and identify standards of conduct that apply to public servants both during and after their employment with the GNWT, ensuring continued public confidence.



Employees should meet with their supervisor for help interpreting or applying the Code.

The Code does not, nor could it, address all forms of business conduct or employee activity. The intent of the Code is to guide employee decision-making by fostering an ethical values-based workplace culture, and to provide a process and a support system that will provide further clarification and opportunities for disclosure when needed. Please review the section *Thinking It Through* for helpful tips on the application of these values and help guide decision-making.

Application

All employees are governed by and required to follow GNWT policies and directives (including related procedures, guidelines, handbooks and manuals). Except where otherwise stated, the Code applies to all employees whose terms and conditions of employment are set out in accordance with the [Public Service Act](#) and its regulations, except employees of the Northwest Territories Power Corporation.

Generally speaking, GNWT public servants must serve the elected government of the day, impartially and effectively. Public servants are expected to balance their right to free expression with their obligation to be impartial and politically neutral while performing official duties.

This, along with the Code is based on the idea that an employer should be able to trust an employee both at work and outside the workplace, regardless of employment industry or position held.

The Code is a condition of employment and employees are expected to comply both on and off-duty. Employees who fail to do so may be subject to disciplinary action up to and including dismissal. Employees should meet with their supervisor for help interpreting or applying the Code.

Public Perception

There are two dimensions to a job in the public service. The first relates to the employee's tasks and performance; and the second applies to the perception held by the public. The public interest in both the actual and perceived impartiality of the public service dictates a general requirement of loyalty on the part of the employee to their employer, the GNWT.

Public servants are required to exercise a degree of restraint in their actions relating to criticism of government policy to ensure that the public service is perceived as impartial and effective in fulfilling its duties. The degree of restraint, which must be exercised, is relative to the position and visibility of the public servant.



Public servants are expected to remain true to the values contained in the Code of Conduct, while carrying out the decisions of leadership. Ministers are accountable to the Legislative Assembly and to the residents of the Northwest Territories, and they depend on public servants to deliver programs and implement policies in accordance with the direction they set.

Public servants develop expertise relating to a wide range of issues and must be able to provide information and advice based on that expertise in a manner that is impartial and politically neutral. Ministers, and all who serve them, depend on that information and advice and on the honesty and transparency of the public servants who provide it.

GNWT employees are expected to apply the values outlined in the Code in all scenarios where their comments and/or actions could be made public, including public comments at meetings and/or to the media, as well as comments made on social media. For more information, please refer to the 'Public Comments' Section of the Code. Furthermore, disclosures of wrongdoing that follow established processes for doing so are not considered a breach of the Code.

Public Good

The values of the GNWT identify the performance and behavioural expectations set for public servants, while *public good* shapes the overall organizational culture of the GNWT. This means *public good* is in the foundation of each of the GNWT's identified values. Public servants have an extraordinary opportunity to make real contributions to NWT communities and residents. The Code helps employees understand their role as a public servant as well as their responsibility to serve ethically. The GNWT operates using a consensus governance model, in which elected officials, unaffiliated with any political parties, create laws and policies that govern the Northwest Territories and its people. The people of the Northwest Territories expect their government and public servants employed by that government to be honest and professional.

Eight Steps to Ethical Decision-Making

- 1. Gather the facts:** Collect as much information as you can about what you know and what you do not know. Do not jump to conclusions.
- 2. Define the ethical issues:** What is the main ethical concern in this situation? Check with the Values and Expected Behaviours section of the Code of Conduct and identify the key organizational values that may be at stake.
- 3. Follow the rules:** Review directives, departmental and GNWT policies, guidelines, laws, and regulations to see what is relevant to the situation. Your decision must be legal and in line with the appropriate policies and legal authorities.
- 4. Determine who will be affected by your decision:** Seeing a situation through another person's eyes is an important skill. Identify the people or groups your decision affects and try to see their point of view (citizens, businesses, clients, colleagues, management, branch, department, minister, media, and others). Ask yourself, "Will everyone affected by this decision be treated with fairness and equity? Is this option in line with the public interest? What would taxpayers think?"
- 5. Identify your responsibilities and the consequences of your choices:** Think about your possible choices. What are the risks and impacts (short and long term) associated with each one? Ask yourself, "What message would I be sending or what perceptions could be created by whatever option I choose?" Consider your reaction if the action chosen should affect you.
- 6. Consider your character and integrity:** Are you comfortable with your decision, and can you be proud of it? Will your decision promote ethical behaviour within the organization? Is your decision worthy of public interest?
- 7. Confirm your decision:** Talk to your manager or supervisor to work through your concerns and the best course of action.
- 8. Commit to action:** Take action and be ready to stand by your decision. When the dilemma has been solved, it is a good idea to consider lessons learned for next time. Sharing your experience with colleagues is always a good way to begin a dialogue about ethics and values.



Supervisors as Role Models

Supervisors hold a position of influence and authority that gives them a responsibility to exemplify the values of the public service. Supervisors are expected to act and make decisions that reflect the values, moral standards, and ethical behaviours of the Code of Conduct.

Supervisors hold a certain amount of influence over an organization's workplace culture and must lead by example. By fostering an open environment and promoting awareness of the Code among team members, supervisors will encourage a values-based work environment and create a culture of ethical decision-making. In addition to creating an open environment, supervisors are expected to provide ethical advice to their team or to seek additional guidance when required. It is the duty of supervisors to ensure that employees are familiar with the Code of Conduct and with the Conflict of Interest Disclosure Process. Supervisors are also expected to guide employees through this process, if needed.

Employees want authentic leaders who treat them fairly and act responsibly. The behaviour modeled by a leader, can and often does influence employee conduct. Typically, employees will match positive behaviour when they feel their leaders prioritize and value ethical decision-making and conduct. The GNWT asks supervisors to stay connected, use empathy, be consistent and remain fair to their employees. This will support and increase employee commitment to workplace culture, investment in the work they do, and overall job satisfaction.

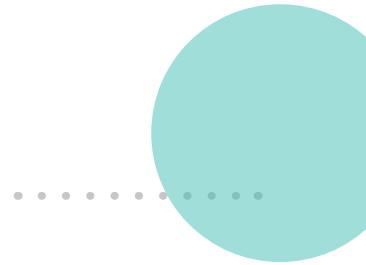
Penalties and Consequences

This Code is a condition of employment and employees are expected to comply both on and off-duty. Employees who fail to do so may be subject to disciplinary action up to and including dismissal.



Values and Expected Behaviours

GNWT public servants should perform their jobs to the best of their ability with professionalism and responsiveness. Striving to meet the highest expectations of NWT residents, employees know that the tasks they undertake are important and essential to the health, safety, and prosperity of the people they serve. Employees achieve their mandates by supporting the efforts of elected government officials to develop and implement public policy and programs using these four core values to guide their performance and decision-making: integrity, accountability, diversity, and collaboration. GNWT public servants should stand by these values and acknowledge that they play a vital role in sustaining a trusted, efficient and effective public service.



...employees know that the tasks they undertake are important and essential to the health, safety, and prosperity of the people they serve.

INTEGRITY

We serve the people of the Northwest Territories who have a right to an ethical public service.

ACCOUNTABILITY

We are responsible for our actions and for our contributions to the public service.

DIVERSITY

We treat all people with respect, dignity, and fairness. This is fundamental to our relationship with NWT residents and contributes to a safe and healthy work environment that promotes engagement, openness, and transparency.

COLLABORATION

We collaborate with team members, colleagues, and partners to build consensus, solve problems, and share responsibility.



Value: **INTEGRITY**

We serve the people of the Northwest Territories who have a right to an ethical public service.

Expected Behaviours

We enhance and preserve public confidence by providing honest, fair, open, impartial, and non-partisan service.

We do not use our official roles as public servants for personal gain or to disadvantage others.

We recognize that how we achieve our goals is as important as the achievements themselves.

We take all possible steps to prevent or resolve potential, apparent, or real conflicts of interest.

We maintain an environment where all employees can hold one another accountable for our conduct by providing internal resolution processes.

We act to maintain the trust and confidence of both our employer and the people of the Northwest Territories.

We ensure confidentiality and expect honesty.

We lead by example.

The Oath of Office and Secrecy

At the start of every GNWT employment contract, public servants must read and sign the Oath of Office and Secrecy. This Oath confirms employees' commitment to work as a public servant and to the protection of confidential information expected of every government employee. A public servant's duty to maintain information confidentiality and the Oath of Office and Secrecy continue to apply after their employment ends.

A current or former public servant must provide written notification to their Deputy Head (or to the current Deputy Head of their former department or agency) requesting clarification of their obligations, in cases in which the public servant:

- believes they have been asked or are being required to disclose confidential information that will breach their Oath of Office and Secrecy; and/or
- has, or may have, already breached their Oath of Office and Secrecy and/or disclosed confidential information.

For additional information, please review the [Oath or Affirmation of Office and Secrecy](#).

Confidential Information

Due to the nature of the public service, public servants regularly have access to confidential information. This may include information about GNWT employees, clients, and government business. Information obtained through employment cannot be discussed or disclosed, except as required for employment responsibilities. The [Access to Information and Protection of Privacy Act](#) governs how the GNWT uses, collects, and discloses information.

WHAT IS CONFIDENTIAL INFORMATION?

Information that is classified as Medium or High Security, in accordance with the [Information Security Classification Standard](#).

HIGH SECURITY

Could possibly be expected to cause extremely serious personal or enterprise injury, including financial, operational and/or personal harm.

This is normally information that is intended for access by named individuals or positions only.

MEDIUM SECURITY

Could possibly be expected to cause very high to moderate personal or enterprise injury, including financial, operational and/or personal harm.

This is normally information that is intended for access by a specific group only (i.e., a specific division, region, or department).

Some examples of confidential information include:

- Legal confidential information;
- Personal identifiable information;
- Proprietary information;
- Similarly sensitive or privileged information from another jurisdiction of organization;
- Trade secrets or intellectual property

For more information and examples, please review the [Information Security Classification Standard](#).





EXAMPLE: BREACH OF CONFIDENTIALITY

A public servant with access to medical information in the course of their duties uses that access to check the results of their spouse's medical tests.

To maintain public confidence, use of confidential information is limited to the purpose the information was obtained and public servants must not publicly disclose confidential information, for any purpose, without prior approval. Public servants must not use, or appear to use, confidential information or their ability to access such information, to create personal benefit for themselves or a family member, friend, business associate, or former business associate.

Public servants should handle all public records and information with appropriate safeguards in place to prevent inadvertent theft, loss, or disclosure.

Some examples of inadequate security measures include:

- government workstations in locations where the public has unsupervised access to them; and
- storing paper records in locations or equipment which is accessible to the public.

Having access to public records or information does not necessarily mean public servants have a right to view the information. Public servants should only access public records and information directly related to their current work or job-related activities.

Public servants should notify their supervisor if they find public records or information that does not have adequate security measures in place or if they become aware of any other security issues.

For additional information, please review the [Archives Act](#) and the Office of the Chief Information Officer's policy on [Information Security](#).

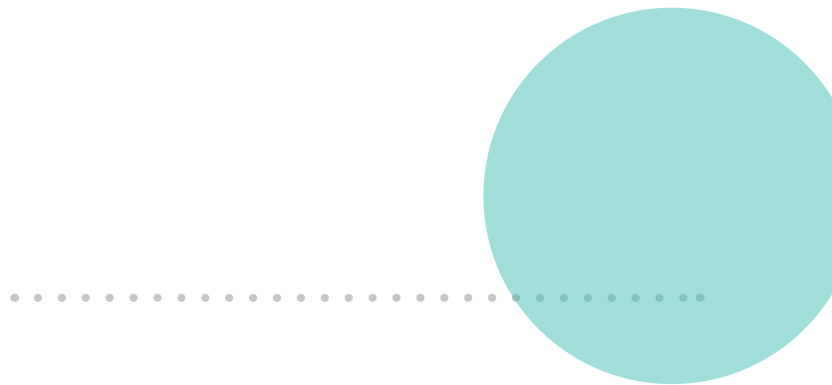
Public servants should consult with management about the use, collection, and/or disclosure of personal information if they have questions. For additional information, please review the [Information Security Classification Standard](#).



Ethical Decision-Making

Ethical decision-making means public servants should make decisions in line with a code or set of standards. To avoid potential solutions that do not align with ethical standards, employees ought to consider personal and professional conduct. Employees may find the following types of questions useful to guide decision-making:

- Can I justify this action?
- Are my actions legal? Ethical?
- Do my actions promote the public good? Are they the result of good business decisions?
- Do my actions align with the GNWT's core values?
- How would my actions appear if published on the front page of a newspaper?
- How would disclosure of my involvement in this situation affect my personal or professional life?



Public servants are expected to remain true to the values contained in the Code of Conduct, while carrying out the decisions of leadership.

WHAT IS FRAUD?



Activities undertaken by an individual that are dishonest and/or illegal and are designed to give an advantage to the perpetrator. Some examples of fraud are when an employee:

- takes leave that they are not entitled to;
- tries to obtain benefits that they are not entitled to (e.g., medical travel, extended health or dental insurance, corporate visa cards, gift cards for personal expenses); or,
- claims overtime, travel time and/or expenses that were not earned.

Fraudulent Behaviour

Public servants have been entrusted to use and care for public resources responsibly. Due to the nature of public service, public servants have a duty to act with integrity, to not only preserve an honest and open employment relationship, but because the actions of the public service should align with public good. The GNWT values the integrity of our public servants and recognizes that they have a key role to play in the prevention, reporting, and investigation of fraud.

Safe Disclosure

GNWT employees are expected to adhere to high ethical standards that foster and maintain public confidence.

The Safe Disclosure of Information (Safe Disclosure) process is intended to create an environment where employees who, in good faith, believe wrongdoing has occurred can bring forward freely and confidentially their concerns, protected from reprisal by the Employer. Examples of wrongdoing include the following: Illegal acts; gross mismanagement of public money or of a public asset; or causing substantial or specific danger to the health or safety of others or to the environment.

For further details on the Safe Disclosure process for employees who are members of the Union of Northern Workers, please see the [Safe Disclosure Memorandum of Agreement Guidelines](#).



Value: **Accountability**

We are responsible for our actions and for our contributions to the public service.

Expected Behaviours

We are objective, fair, and transparent.

We use transparent and fair processes.

We are duty-bound to work toward these core responsibilities: good governance, comprehensive planning, sound financial management and administration, and growing safe, healthy communities.

We use public resources efficiently and effectively.
We answer to the people of the NWT by explaining our decisions and actions.

We are guests on this land. We are committed to caring for the land and its resources out of respect for those who will inherit the outcome of our efforts.

We work to earn trust and respect from both our colleagues and the people of the Northwest Territories.

We rely on legislation and policies for guidance.

We create a complete and accurate record of our actions, transactions, advice, and decisions.
We correct our errors as soon as possible.

EXAMPLE: POTENTIAL CONFLICT OF INTEREST

A public servant is involved in the Request for Proposal (RFP) evaluation process in which their friend or family member has submitted a proposal.



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EXAMPLE: POTENTIAL CONFLICT OF INTEREST

On their own time, a supervisor, whose unit’s activities have an impact on the local community, attends a meeting of a community organization that is opposed to a project in their department. The supervisor speaks publicly at the meeting criticizing the project and encouraging the members to protest it.

Public Comments

Public servants are free to comment on public issues; however, they must not use their government position to lend weight to the public expression of their personal opinions. Public servants must not jeopardize the perception of impartiality in the performance of their duties; or release information that is not generally available to the public. It is important that public servants understand and apply ethical standards to ensure that any statements made, or opinions given, do not violate their ethical responsibilities to the GNWT.

The employer-employee relationship is based on a foundation of trust and respect maintained by both parties. For this reason, public servants wishing to make potentially critical or negative public comments about GNWT policies, directions, actions, or inactions that directly relate to their work, must first obtain written permission from the Deputy Head.

A “public comment” is any statement made outside the working context in any medium that is available to the public at large. This includes petitions and e-petitions, as well as comments spoken before a public audience, published, or made on social and other online media.



A “public comment” can include, but is not limited to:

- petitions and e-petitions;
- comments spoken before a public audience;
- published statements; or
- comments made on social and other online media.





SOCIAL MEDIA AND WORKPLACE HARASSMENT

The RCMP has defined cyber bullying as “the use of communication technologies such as the Internet, social networking sites, websites, email, text messaging and instant messaging to repeatedly intimidate or harass others.” Public Safety Canada has defined cyber bullying as, “willful and repeated harm inflicted through the use of computers, cell phones, and other electronic devices.”

Good to know:

- Public servants need to understand that no matter how personal the post, once posted publicly, it can't be withdrawn. Regardless of whether an employee maintains their own social media account, their words and/or actions can be captured in photos, videos, or screenshots, and distributed by others.
- Comments, photos or videos posted on social media have the potential to impact workplace relationships, and/or the reputation of the GNWT.
- In the event of allegations of harassment, communications with colleagues on social media can be considered part of the work environment, regardless of whether it is done during working hours.
- Regardless of a person's social media screen name, the employer can still trace cyber bullying to the public servant responsible for the account.
- Assigning nicknames or initials to a workplace, co-worker, manager, or client, will not prevent others from identifying the subject.

Public servants may be subject to discipline or dismissal for bullying, harassment, or breach of confidentiality. Some of the issues that can lead to negative consequences include:

- defaming the employer, co-workers, or clients on social media;
- engaging with co-workers or others in online harassment;
- posting or sharing racist, sexist, or other discriminatory remarks or images; and
- violating confidentiality.

For additional information, please review the GNWT's [Harassment Free and Respectful Workplace Policy](#).



**EXAMPLE:
POTENTIAL CONFLICT
OF INTEREST**

A public servant notices a conversation on social media that is critical of the Minister of their department and decides to take part in the conversation.

Use of Government Equipment and Property

The GNWT acknowledges that public servants may wish to have reasonable use of government equipment such as phones, e-mail, and internet access for personal use, provided it does not negatively affect work responsibilities. Public servants are expected to use the GNWT's network and resources responsibly and appropriately. Public servants are prohibited from using other GNWT property, equipment, supplies or services for personal gain. If you are unsure whether some actions are appropriate, ask your supervisor for clarification.





WHAT IS GNWT PROPERTY?

Government property includes, but is not limited to:

- public records and information held by the Department or Agency, including information created by employees in the course of their duties;
- buildings, vehicles, facilities, files and documents, office equipment and supplies, computers, laptops, USB memory sticks, printers, photocopiers, telephones and mobile devices, electronic networks, software, video equipment, data banks, ID Cards, intellectual property, taxi chits, telephone calling cards, negotiable instrument, and government credit cards.

For additional information please review the Office of the Chief Information Officer’s policies on [Internet Use](#), [Email Use](#), [Mobile Handheld Devices](#) and [Recorded Information Management](#).

For additional information, please review the [Access to Information and Protection of Privacy Act](#) and the Department of Justice’s [Access to Information and Protection of Privacy General Awareness Course](#).

For additional information, please review the [Archives Act](#) and records and [information management guidelines and procedures](#).

NETWORK USE

WHAT IS ACCEPTABLE PERSONAL USE?

Examples of acceptable personal use include:

- Brief email message to a family member or friend; and
- Reading an online news item during a break, or before/after work.

WHAT IS UNACCEPTABLE NETWORK USE?

Examples of unacceptable network use include but are not limited to:

- Using someone else's password;
- Sending or circulating abusive, sexist, homophobic, racist, or other discriminatory messages;
- Representing personal opinions as those held by the Department or Agency;
- Using the network, or accessing network information, for private business, personal gain, personal curiosity, profit, or political activity;
- Accessing or downloading content from GNWT networks and systems which is not directly related to current work or job-related activities;
- Abusing network bandwidth – watching movies, Facebook, YouTube, music online as these have the ability to impact legitimate government business;
- Making inappropriate public criticisms of government policy; and
- Viewing, possessing, downloading, or distributing pornographic and/or other illicit or inappropriate material.

WHAT ARE UNLAWFUL NETWORK ACTIVITIES?

Examples of unlawful network activities include, but are not limited to:

- Viewing, possessing, downloading, or distributing child pornography;
- Copyright infringement;
- Defamation;
- Hacking and other crimes related to computer security; and
- Destroying, altering, or encrypting data without authorization and with intent to make it inaccessible to others who have a lawful need to access it.

If you become aware of any of these unacceptable or unlawful network activities, please contact your department's Security Incident Handler to report the incident or event. For more information, review the [Incident Handling Directive](#).



Value: **Diversity**

We treat all people with respect, dignity, and fairness. This is fundamental to our relationship with NWT residents and contributes to a safe and healthy work environment that promotes engagement, openness, and transparency.

Expected Behaviours

We are responsible for a work environment where the dignity of all employees, clients and visitors is respected.

We follow our policies, guidelines, and legislation, and provide training to increase awareness and understanding.



We support diversity and inclusion in the workplace by respecting all people.

We serve all NWT residents regardless of race, culture, gender, age, spiritual belief, sexual orientation, national origin, parental or marital status, mental or physical ability, or any other personal characteristic.



We maintain a workplace where diversity, in all forms, is encouraged and recognized for its contributions of strength, creativity, and knowledge to the public service.

We create an environment and a workplace culture in which differences are valued and respected. We do so by implementing the *Harassment Free and Respectful Workplace and the Duty to Accommodate* policies.



We provide an environment of equal opportunity, free from discrimination, for existing and prospective employees.

We do our best to remove any barriers that may impede full access to the benefits and conditions of employment, as well as the delivery of services to NWT residents.

We strive to provide service in the official language appropriate to our audience



Official Languages

A government's ability to communicate in the official languages of the public it serves is an important part of the operation of good government and is the responsibility of all GNWT departments and agencies. The GNWT is committed to providing services in the eleven official languages of the Northwest Territories as set out in legislation, Cabinet-approved policies, and legally binding agreements. This will enhance and support community efforts to maintain and develop these languages. Public servants, who are required to provide services in a language other than English as a part of their job, are recognized and fairly compensated for their ability to do so. Staffing positions with individuals who meet specific language requirements is done in accordance with GNWT policies and procedures.

A Safe and Respectful Workplace

All GNWT employees are expected to be aware of and familiar with, their responsibilities in accordance with the following policies:

- i. [Occupational Health and Safety](#);
- ii. [Harassment Free and Respectful Workplace](#);
- iii. [Duty to Accommodate Injury and Disability](#).

GNWT managers and supervisors are responsible for promoting safe work practices and a respectful workplace for their employees. To foster an environment of collaboration and mutual respect, it is important to address all issues related to these policies in a timely manner.

GNWT employees who discover workplace hazards, or witness unsafe work practices and/or behaviours inconsistent with the Occupational Health and Safety, Harassment Free Respectful Workplace and Duty to Accommodate policies, are expected to report them to their immediate supervisor and/or follow the procedure outlined in the appropriate policy.

Occupational Health and Safety

Corporate Occupational Health and Safety (OHS) provides advice and guidance to all government departments and agencies and works collaboratively to keep GNWT workplaces safe. The GNWT OHS Program provides staff with health and safety orientations, training, hazard management, emergency response plans, and incident management. Each GNWT department and agency is responsible for ensuring their workplaces comply with health and safety requirements. Each department and agency is also required to establish their own OHS committee and to identify OHS coordinators.



The *Occupational Health and Safety Policy* applies to all GNWT employees, except employees of the Northwest Territories Power Corporation. It also applies to contractors, volunteers, clients, and members of the public when they are present in any GNWT workplace.

Harassment Free and Respectful Workplace

The GNWT is committed to providing a respectful workplace that is free of harassment, where individuals are treated with fairness, dignity, and respect. Every employee plays a role in building and supporting a working environment in which the dignity of all employees, clients, and visitors is respected.

For additional information, please review the [Harassment Free and Respectful Workplace Policy](#) and the [Guide to Applying the Harassment Free Respectful Workplace Policy](#).

Duty to Accommodate

The GNWT recognizes that in order to prevent or reduce discrimination, it has a legal and moral obligation to accommodate its employees. The GNWT's [Duty to Accommodate Injury and Disability Policy](#) promotes the full workplace participation of persons with disabilities, including those with medical conditions and mental illness, and to ensure that the workplace is accessible, non-discriminatory, and inclusive.

For additional information, please review the [Duty to Accommodate Injury and Disability Policy](#) and the [Application of the Duty to Accommodate Injury and Disability Policy Guidelines](#).





Value: **Collaboration**

We collaborate with team members, colleagues, and partners to build consensus, solve problems, and share responsibility.

Expected Behaviours

We value the concerns, knowledge, and insight of NWT residents.

We share our skills and knowledge with other GNWT employees.

We believe Departmental policy and service delivery activities are most successful through positive collaboration with each other.

We believe the diversity of our people and the ideas they generate are the source of our innovation.

We listen to the concerns of NWT residents.

We engage and consult with community members as appropriate.

Public Engagement

The GNWT recognizes that the opinions and experiences of NWT residents must be at the heart of any government decision that affects them. We understand that by providing meaningful opportunities for public input, we can help earn the trust of NWT residents and improve government decision-making. Our people are our greatest resource. Leveraging the voices of our people will help build a collaborative, trusted government and improve territory-wide government decision-making.

expertise of an engaged public and make better decisions that will serve all NWT residents. Public engagement also plays a key role in the democratic process. Through a well-structured dialogue and deliberation process, parties who disagree may come to understand why others hold certain beliefs. This greatly helps in the long journey toward common ground or compromise.

The GNWT recognizes the importance of engaging residents on a wide range of public policy issues, and we value the results of collaborative decision-making. The public is more connected, educated, and informed than ever before, and they expect to participate in government decision-making processes. The GNWT can benefit from the

EXAMPLE: POTENTIAL CONFLICT OF INTEREST

An employee has a family member as a supervisor, who can make decisions that will affect their job responsibilities, salary, and/or promotions.



Public engagement, as defined in the [GNWT Public Engagement Employee Guide](#), is different than the GNWT’s constitutional or legal duty to consult Indigenous governments and organizations when a proposed GNWT decision or action has the potential to adversely impact an asserted or established Indigenous and/or Treaty right. While Indigenous consultation (and, where appropriate, accommodation) and public engagement activities may be similar and may occur simultaneously, it is essential to maintain the distinction between these two processes.

The [Open Government Policy](#) commits the GNWT to creating more coordinated and consistent public engagement practices; while the [GNWT Public Engagement Employee Guide](#) establishes guidelines providing a common approach and resources that support public engagement planning, implementation, reporting, and evaluation.

Working Relationships

Public servants involved in personal relationships that could compromise objectivity, or the perception of objectivity, should avoid direct report relationships. It is generally not appropriate for an employee to supervise a member of their immediate family or be in the direct chain of command over a family member. Employees should not have influence, input, or decision-making power over another employee’s performance evaluation, salary, social permissions, work conditions, and/or similar matters where the employee is an immediate family member. The Deputy Head can approve an exemption after consulting with the Deputy Minister responsible for the [Public Service Act](#). The Deputy Head must provide sufficient safeguards to ensure that the GNWT’s interests are not compromised.

EXAMPLE: POTENTIAL CONFLICT OF INTEREST

Two public servants were married but are now divorced. One of the public servants was promoted and is now in a direct report position over their ex-spouse.



Conflict of Interest

Conflicts of interest can arise as a result of many circumstances and at many different times over the course of a public servant's career. A conflict of interest may exist where there is a potential, perceived, or actual incompatibility between a public servant's duties and their personal interests, or those of their immediate family or a friend. These interests can include, but are not limited to, financial interests including investments and business involvements; illegal activity; outside employment; service, either voluntary or paid, on a board, council, committee or other organization; as well as personal relationships, including those with immediate family and friends. Public servants are expected to evaluate their potential conflicts of interest on a regular basis.

While the GNWT recognizes the right of public servants to be involved in activities as private citizens, conflict must not exist between an employee's private interests and their public service duties. Public servants, who find themselves in an actual, perceived, or potential conflict of interest, including pursuing, participating in, or in any way assisting with the pursuit of Government contracts and other procurement opportunities, must disclose the matter to their Deputy Head.

**Public servants
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regular basis.**



To maintain public confidence and trust in the GNWT, public servants are expected to avoid placing themselves in a position of conflict of interest. They must ensure that their responsibility to act in the public interest is not impaired, nor perceived to be impaired; and they must remove themselves from decision-making that might benefit their own interests or the interests of their family.

Employees must not engage in outside activities where a conflict of duties exists or may develop between the employee’s regular work and the outside activity or interest. Employees must obtain written approval from their Deputy Head before engaging in any outside activity. If permission is denied, written rationale will be provided to the employee.

Until written permission has been received from the Deputy Head, employees may not participate in the outside activity.

EXAMPLE: POTENTIAL CONFLICT OF INTEREST

A public servant chooses to allow a friend or family member to violate sustainable hunting quotas.

Where a Deputy Head denies an employee’s request for Outside Activity, the employee has the right to request a decision review from the Deputy Minister responsible for the [Public Service Act](#). In the case of public servants employed under the Deputy Minister responsible for the [Public Service Act](#), a review request can be made to the Secretary to Cabinet.

Should an employee not agree with decisions or actions taken, they can pursue the grievance process outlined in the appropriate collective agreement or the [Public Service Act](#).

For additional information, please review the [Declaration of Outside Activity Form](#).

Outside Activity

What is Outside Activity?

Outside activity includes outside employment, self-employment, service with or without remuneration on for-profit or not-for-profit boards, councils, committees, commissions, and the like. Outside activity also includes pursuing, participating in, or in any way assisting with the pursuit of Government contracts and other procurement opportunities, whether that be in the role of principal, shareholder, partner, partial owner, agent, consultant, or volunteer.

Post-Employment

The GNWT respects the movement of public servants between the public and private sector and believes it is in the public’s best interest to facilitate the movement of skills and knowledge **between these sectors**. While the GNWT must protect the integrity of the public service, it is committed to ensuring that former public servants are not excessively restricted from using the knowledge and expertise gained through employment with the GNWT. Former public servants continue to be held accountable to their Oath of Office and Secrecy commitment post-employment with the GNWT. Confidential information obtained through the course of an employee’s career with the GNWT should not be disclosed at any time, including after the employee stops working for the GNWT. Confidential GNWT information must not be used for personal gain or commercial advantage. As outlined in the Senior Managers’ Handbook, GNWT Senior Managers are held to a stricter expectation of post-employment activity. The GNWT may seek damages from a former employee and/or any organization that misuses confidential GNWT information.

Acceptance of Gifts and Benefits

Public servants must not give or receive gifts and benefits in exchange for actual or perceived special consideration, favours, or rewards. Although most gifts do not come with a condition attached, there is always the chance that something is expected or perceived to be expected in return.

In circumstances where it is not clear whether an employee may keep a gift or benefit, the employee will obtain approval from management before accepting and/or retaining the gift or benefit. If permission is denied, written rationale will be provided to the employee.

For additional information, please review the [Financial Administration Manual](#). Should a public servant have concerns they should consult with management.

EXAMPLE: POTENTIAL CONFLICT OF INTEREST

A purchasing manager receives and accepts gifts and benefits from a vendor.



Political Activity

Within the constraints established in the [Public Service Act](#) and this Code, public servants are free to participate in political activities, including belonging to a political party, attending political meetings, and contributing money to a political party or candidate.

When engaging in political activities that may conflict with employment duties or compromise the interests of the GNWT, whether it is real or perceived, public servants must submit a written disclosure to their Deputy Head.

In circumstances when it is not clear if a public servant may engage in a political activity, they must submit a written request for approval from their Deputy Head, explaining the intended political activity. If permission is withheld, the public servant will be notified with written rationale.

During scheduled working hours, employees are expected to refrain from any political activity for or on behalf of a political party or candidate.

Public servants wishing to run for a publicly elected, non-full-time position must receive Deputy Head approval *before* running to ensure there is no actual or perceived conflict of interest. Public servants running for a full-time publicly elected position must take leave without pay during the campaign period.

Public servants elected as a member of a territorial or provincial legislative assembly, as a Member of Parliament, or to a full-time position with a municipal or Indigenous government or an Indigenous organization may be required to immediately cease employment with the GNWT. Public servants who fail to be elected are entitled to return to the same or similar employment, effective the day after the election.

Restricted Employees

Restricted employees often occupy positions of influence within the GNWT, including members of senior management, or employees in the Human Resources or Executive branches (other than secretarial staff, clerical staff, or executive assistants to elected Ministers. The full definition of restricted employees can be found in the [Public Service Act Regulations](#).

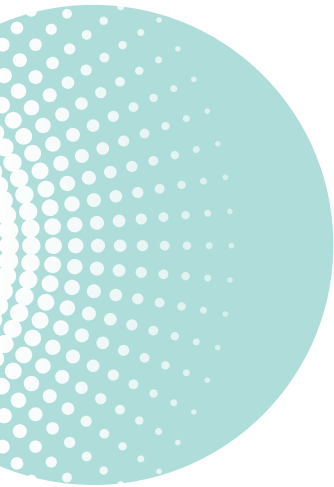
Restricted employees are subject to the limitations placed on all GNWT employees. Where a public servant falls into this category additional restrictions on political activity apply. Notably, these employees are not permitted to publicly participate in or to speak publicly about a political candidate or party's campaign or platform.

If employees are unsure of whether they fall into the category of a restricted employee or whether a specific political activity is restricted under this Code, they are encouraged to speak with their supervisors for clarification.

Summary of Restrictions on Political Activity for GNWT Employees

✓ shall ✗ shall not

Activity	Employees	Restricted Employees
Personal solicitation of funds for a territorial political party or candidate.	✗	✗
Engage in any political activity other than voting in a public election during working hours.	✗	✗
Use GNWT premises, equipment, or supplies for any political activity.	✗	✗
Display or distribute campaign literature or other political promotional materials in a GNWT worksite.	✗	✗
Be a candidate in an Indigenous, mayoral, territorial, provincial or federal government election unless on a leave of absence granted for such purpose.	✗	✗
Serve as an official agent for a candidate.	✗	✗
Serve as an executive officer of a territorial political party or territorial riding association.	✗	✗
Use their employment position to affect the political activity of another person.	✗	✗
Publicly criticize any policy of the GNWT about which the employee acquired information by virtue of their position, or that directly relates to the duties of the employee.	✗	✗
Speak in public or express views in writing for distribution to the public on any matter that forms part of the platform of a candidate or political party, including criticism of candidates, position, or policies.	✓	✗
Attend any meeting of a territorial or federal political party as a voting delegate.	✓	✗
Serve as executive officer of a federal political party, riding or association.	✓	✗
Campaign on behalf or actively work in support of a candidate or political party.	✓	✗
Attend political meetings.	✓	✓
Be a member of a political party.	✓	✓
Contribute money to a political party or candidate.	✓	✓



Disclosing a Conflict of Interest

All public servants share the responsibility of maintaining a high level of integrity in the public service; and the GNWT must foster an environment where employees feel comfortable discussing conflict of interest issues or concerns without fear of reprisal.

All public servants share the responsibility of maintaining a high level of integrity in the public service...

Duty to Disclose

A public servant who believes that any work-related or private business, commercial, personal, or other interests might be perceived to conflict with their duties must disclose such interests, in writing, to their Deputy Head at the first opportunity after the conflict comes to their attention.

If a public servant believes another GNWT employee may be in an actual or perceived conflict of interest, they must advise their Deputy Head, the Deputy Minister responsible for the [*Public Service Act*](#), or the Secretary to Cabinet. This is not a violation of either the Code or an employee's Oath of Office and Secrecy.

No public servant will be disciplined or face reprisal for identifying an actual or potential conflict of interest unless, after a thorough investigation, the report was found to be vexatious and/or malicious. An employee who reports a conflict of interest or other breach of this Code for vexatious and/or malicious reasons may be subject to disciplinary action up to and including dismissal.

Alleged Illegal Activity

Public servants must provide written notification to their immediate supervisor, who will then inform the Deputy Head, of any involvement in an investigation or charges for alleged illegal activity, whether on or off-duty, which would impede their ability to maintain a condition of their employment. Such as possessing a valid Driver's License or satisfactory Criminal Record Check or which occurred during work hours, at a GNWT worksite or at any other time and place where the public servant is acting in the capacity of a GNWT employee. This notification should occur without delay after the investigation or charges come to their attention.

As much as reasonably possible, disclosure statements regarding investigations or charges provided to a Deputy Head will be kept confidential and inaccessible to any other person unless required by law, this Code or other applicable GNWT policy, such as the [Criminal Records Check Policy](#).

Financial Interests

An employee must immediately provide written disclosure of involvement in a government activity or decision that directly relates to or affects a private financial interest of the employee. Further, where an employee knows, or ought to know, that any work-related or private financial interests might be construed as being in conflict with their duties, that employee must also immediately disclose those interests to their Deputy Head.

Conflict of Interest Disclosure Process

Disclosure of Possible Conflict by Employee

1

Identification

- Employee believes they may be in potential, perceived or real conflict of interest.
- Employee must report the potential conflict to their manager as soon as possible after becoming aware of the potential, perceived or real conflict.

2

Confirmation

- In a straight forward situation, the manager may take steps to help the public servant resolve or mitigate the conflict.
- In a complex situation, the manager may require the public servant to submit a formal disclosure in writing or complete the Outside Activity Form.

3

Disclosure

- Submitting a formal disclosure ensures all information related to the conflict is disclosed in writing and allows for additional review by the Deputy Head.



Assessment and Resolution by the Employer

4

Review

- Following a disclosure of a possible conflict of interest, it is the Deputy Head's responsibility to address the conflict by assessing the employee's interests against the need to serve the public interest.
- Deputy Head identifies work duties, government interests and relevant private interests of the employee.

5

Analysis

- Employee believes they may be in potential, perceived or real conflict of interest.
- Employee must report the potential conflict to their manager as soon as possible after becoming aware of the potential, perceived or real conflict.

6

Resolution

- Deputy Head decides if the conflict requires action by the employer and considers possible resolutions to mitigate the conflict so it does not pose risk to government or public interest.

7

Communication

- The Deputy Head documents the final decision in writing placing one copy on the employee's personnel file and an additional copy is sent to the employee.



Thinking it Through

Serving NWT residents through civil service is a great privilege. Although the Code cannot outline every potential conflict of interest situation or circumstance, public servants must understand and apply ethical standards ensuring that their behaviour and actions do not violate an employee's duties and responsibilities to the GNWT. At some point, each public servant is faced with an ethical dilemma and must find an answer to the question: "What is the right thing to do?" The guide below will help ensure employee behaviour meets the Code of Conduct standards.

Identify and assess the situation

- Is my behaviour in line with the Code?
- Is my behaviour in line with the code of ethics of a professional organization that I am member of?
- What is difficult about this situation?
- Are my actions honest and fair?
- What are the legal issues I should consider?
- Who else is involved and how does my behaviour affect them?

Look at the situation from a public sector standpoint

- What are my duties as a public servant?
- Is there a standard practice, relevant guideline, or policy?
- Do my actions respect my colleagues, clients, partners, and the communities we serve?
- How would I feel if I was on the other side of my actions?
- Who do I need to involve?

Would your behaviour stand up to scrutiny by the public?

(This is sometimes called the family or newspaper test):

- What would my family, colleagues, or supervisor say if my actions were reported on the front page of the newspaper?
- Would others see me as using my employment and resources for personal benefit?
- Do my personal interests conflict with the public interest?

Identify and consider the options

- Is there an alternative solution and what would the results of that solution be?
- How would the public view the alternative solutions?
- Do I need expert financial or human resources advice?



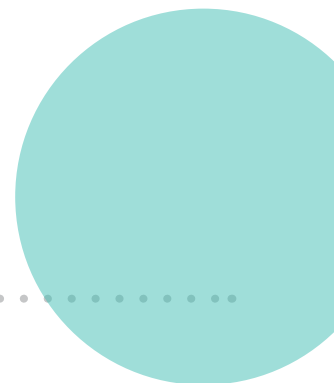
Choose your course of action

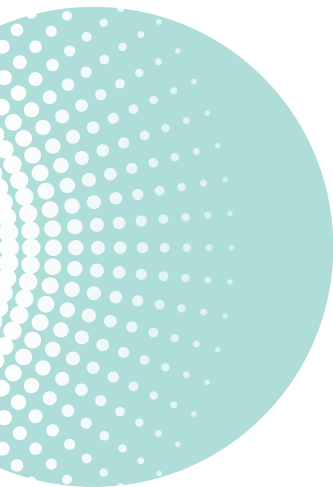
- Is your choice of action within existing legislation, policies, and guidelines?
- Does your behavior support the public sector's objectives and standards intentions?
- Are you able to justify your course of action?

When in doubt, talk to your supervisor to gain clarity on the situation.

Professional Codes of Conduct and Ethics

The GNWT Code of Conduct does not prevent employees who are members of professional organizations from upholding the organization's code of conduct and ethics in the performance of their duties with the GNWT. In cases where complying with the professional code of conduct and ethics could be considered a breach of the GNWT Code, the employee should discuss the matter with their Deputy Head.





Appendix A - Glossary

Conflict of Interest – a situation where the public servant has private interests that could improperly influence the performance of their official duties and responsibilities, or in which the public servant uses their position for personal gain.

Perceived Conflict of Interest – occurs where it could reasonably be perceived, or give the appearance, that a competing interest could improperly influence the public servant’s performance of their official duties and responsibilities, or that the public servant uses their position for personal gain. It is not necessary for an actual conflict of interest to be identified in order for the appearance or the public perception of the conflict to negatively impact the public service.

Deputy Head – Deputy Ministers, Superintendents of Education Authorities and Chief Executive Officers of GNWT public service Departments, Boards and Agencies pursuant to the [Public Service Act](#).

Employee – a person employed in the GNWT public service, except employees of the Northwest Territories Power Corporation.

Employer – The GNWT as represented by the Minister Responsible for the Public Service or designate.

Family (Member) – includes the following relatives of the employee or of the employee’s spouse:

- parent or step-parent;
- brother or sister;
- spouse;
- child, step-child, foster child or adopted child;
- in-laws;
- grandparents; and
- any relative in the employee’s household or with whom the employee presently resides.

Financial Interest – any direct or indirect interest concerning or involving money or goods.

Spouse – any person, regardless of gender, who:

- is married to the employee unless the employee and that person are separated and no longer living in a spousal relationship;

- together with the employee, entered in good faith into a marriage that is invalid, unless the employee and that person are separated;
- is cohabiting outside marriage with the employee, if
- the person and the employee have cohabited for a period of at least 2 years;
- the person and the employee have cohabited in a relationship of some permanence and are together the natural or adoptive parents of a child; or
- the employee represents the person as their spouse.

Supervisor – person in the position that the employee reports to either directly or indirectly.

