



Staff Report

Administration – Human Resources

Report To: COW- Admin, Corp and Finance, SI, Comm. Services
Meeting Date: June 30, 2025
Report Number: ADM.25.027
Title: Employee Code of Conduct
Prepared by: Sarah Traynor, Manager of Human Resources

A. Recommendations

THAT Council receive Staff Report ADM.025.027, entitled “Employee Code of Conduct”;

AND THAT Council approve the new Corporate Policy entitled “Employee Code of Conduct, POL.COR.25.XX” and accompanying Complaint and Investigation Procedure as attached to this report.

B. Overview

This report seeks Council approval of a new Employee Code of Conduct and accompanying Employee Code of Conduct Complaint Investigation Procedure.

C. Background

At the May 12, 2025, Council meeting, Council provided the following direction to staff:

THAT Council receive Staff Report ADM.25.029, entitled “Council Direction, Council Code of Conduct and Employee Code of Conduct”;

AND THAT Council direct staff to provide an updated Employee Code of Conduct, integrating the feedback received from the Accountability and Transparency Committee, the Town’s Solicitor, Integrity Commissioner and Council by the June 30, 2025, Committee of the Whole meeting for Council’s consideration and enactment;

AND THAT following enactment of the Employee Code of Conduct, Council direct staff to continue the review of the “Council Code of Conduct, Policy No. POL.COR.21.06” in coordination with the Town’s Integrity Commissioner, Town’s Solicitor, and the Accountability and Transparency Committee as directed at the December 16, 2024 Council Meeting;

AND THAT following enactment of the new Council Code of Conduct, Council direct staff to continue the review and update of the “Council Staff Relationship Protocol, Policy No. POL.COR.19.02”, as directed at the December 16, 2024, Council Meeting.

The motion is Carried.

Following Council approval of the Employee Code of Conduct, staff will bring forward a Whistleblower policy, as directed by Council through the following motion from the [January 27, 2025, Council Meeting](#):

THAT Council of the Town of The Blue Mountains receives for information and consideration, the following recommendation from the Accountability and Transparency Committee dated December 20, 2024:

THAT the Accountability and Transparency Committee acknowledges that they have provided comments to Sarah Traynor in response to the Employee Whistleblower Policy.

AND THAT the Accountability and Transparency Committee requests Council to direct staff to pause work on the Employee Whistleblower Policy until the Staff Code of Conduct Policy has been approved, CARRIED

AND THAT Council direct staff to pause work on the Employee Whistleblower Policy until the Staff Code of Conduct Policy has been approved.

The motion is Carried.

When the draft Whistleblower policy is brought forward to Council for approval, the Employee Code of Conduct and Complaint Investigation Procedure will also be updated to incorporate the newly available anonymous reporting tool for staff. These revisions, along with the Whistleblower Policy, will be presented for Council approval.

D. Analysis

The proposed Employee Code of Conduct outlines clear behavioural and performance expectations for all Town employees, covering everyone from frontline workers to the Chief Administrative Officer. This policy aims to promote a workplace established in trust and integrity, reinforcing both staff and Council’s collective commitment to maintaining the Town’s reputation and the public's confidence in our governance.

An Employee Code of Conduct provides employees with clear guidelines for their behaviour and performance and assists prospective employees in assessing their compatibility with the organization. It also functions as an important resource for current employees, guiding them in navigating ethical dilemmas, avoiding potential conflicts of interest, and upholding public trust.

Although the Town has several policies that define expected standards and behaviours for employees, it has not yet instituted an Employee Code of Conduct. The draft Code consolidates

existing expectations and procedures for Town employees and includes the following rules and expectations:

1. Employee Standards:
 - a. Respect
 - b. Integrity
2. Stewardship
 - a. Confidentiality
3. Conflict of Interest
4. Accountability
5. Impairment
6. Gifts
7. Responsibilities
 - a. Management
 - b. All Employees
8. Oversight
9. Reporting & Investigation
10. No Retaliation
11. Remedial Action
12. Annual Reporting

The proposed Employee Code of Conduct is closely aligned with the City of Vaughan's Employee Code of Conduct, used as a best practice example and incorporates recommendations from the Collingwood Judicial Inquiry, reinforcing accountability, transparency, and openness as key principles of good governance to enhance public trust. Furthermore, the draft policy integrates feedback from both Council and the Accountability and Transparency Committee, ensuring it effectively addresses stakeholder concerns through a collaborative development process.

Upon Council approval of the Employee Code of Conduct and the accompanying Complaint and Investigation Procedure, these documents will be published on the Town's website, and appropriate review and sign-off for all staff will commence. As outlined in the draft policy, compliance with the Code of Conduct is a condition of employment for all Town employees. At the time of hiring, new employees will sign an acknowledgment certifying that they have read, understood, and will comply with the Code.

To ensure a comprehensive understanding and adherence to the Code, training sessions and resources such as FAQs and quick reference sheets will be made available to employees. Training on the Code will also be included in the orientation for new employees. Annually,

employees will complete an online acknowledgment certifying they have read, understood, and will continue to comply with the Code.

E. Strategic Priorities

1. Communication and Engagement

We will enhance communications and engagement between Town Staff, Town residents and stakeholders.

2. Organizational Excellence

We will continually seek out ways to improve the internal organization of Town Staff and the management of Town assets.

3. Community

We will protect and enhance the community feel and the character of the Town, while ensuring the responsible use of resources and restoration of nature.

4. Quality of Life

We will foster a high quality of life for full-time and part-time residents of all ages and stages, while welcoming visitors.

F. Environmental Impacts

N/A

G. Financial Impacts

The total legal fees incurred to date for the review and revisions to the Employee Code of Conduct and complaint investigation procedure amount to \$3,835. This expense covers all activities associated with ensuring that these documents comply with current statutory requirements and reflect best practices.

Oversight, training, and enforcement of the Code of Conduct will be managed through current staff programs. While additional costs may arise for external investigations, these can be covered by existing budgets.

H. In Consultation With

Jen Patton, HR/Health & Safety Advisor

Senior Management Team

Service Area Managers

I. Public Engagement

The topic of this Staff Report has not been the subject of a Public Meeting and/or a Public Information Centre as neither a Public Meeting nor a Public Information Centre are required. However, any comments regarding this report should be submitted to Sarah Traynor, Manager of Human Resources hr@thebluemountains.ca.

J. Attached

1. Draft Employee Code of Conduct POL.COR.25.XX
2. Draft Appendix A - Employee Code of Conduct Complaint Investigation Procedure

Respectfully submitted,

Sarah Traynor
Manager of Human Resources

For more information, please contact:
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Report Approval Details

Document Title:	ADM.25.027 Employee Code of Conduct.docx
Attachments:	- Attachment-1-Draft-Employee-Code-of-Conduct-POL-COR-25-XX.pdf - Attachment-2-Draft-Appendix-A-Employee-Code-of-Conduct-Complaint-Investigation-Procedure.pdf
Final Approval Date:	Jun 19, 2025

This report and all of its attachments were approved and signed as outlined below:

Sarah Traynor - Jun 19, 2025 - 10:04 AM

Adam Smith - Jun 19, 2025 - 10:49 PM