

Standards of Conduct

Purpose

The Standards of Conduct helps all of us who work at or are associated with LABC conduct ourselves in a way that reflects our Vision, Mission, and Core Beliefs. The Standards of Conduct aims to:

- promote integrity, respect, confidentiality, public responsibility, cultural competence, and disclosure of wrongdoing.
- assure the public that LABC employees fulfill their duties honestly and impartially.
- set out how LABC will embody its Vision, Mission, and Core beliefs.

Application

The Standards of Conduct complements legislation, LABC policies and procedures, collective agreements, terms and conditions of employment, and professional codes with which employees must comply.

The Standards of Conduct applies to all Legal Aid BC employees, local agents, and contractors¹.

Reference to “you”, “we”, “us” or “our” refers to any LABC employee as well as those who have agreed to follow the Standards of Conduct.

Throughout this document, you’ll find links or references to supplementary requirements and information. Once you read the general policy in this Standards of Conduct, follow the links to find the extra information or details you need to do your job. It’s our responsibility to follow the Standards of Conduct in its spirit and intent.

Roles and Responsibilities

Policy Owner: Vice President Corporate Services & Chief Financial Officer

Responsible Person: Manager, Human Resources.

Questions to: Your immediate supervisor, Human Resources Advisor, or Manager, Human Resources. Supervisors and managers may also contact the General Counsel and Corporate Secretary for advice.

¹ “Contractors” means any contractor, consultant or supplier who has a contract with LABC in which adherence to this policy is included as a term of the contract.

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1. We will comply with the law, this Standards of Conduct, and LABC policies and procedures. The Manager, Human Resources has the responsibility to ensure every employee reviews and agrees to the Standards of Conduct and related policies. Every employee, supervisor, manager and executive has the responsibility to create and maintain a workplace where employees can comply with these Standards and take responsible action should any breach of these Standards come to their attention. We will disclose, in good faith, information concerning any breach of these Standards and/or wrongdoing at LABC².
2. We will provide services in a way that protects the health and safety of everyone.³
3. We are committed to creating an environment where everyone is treated with dignity and respect, and is free from violence, bullying and harassment.
4. We will comply with the information access and protection of privacy requirements established in B.C.'s [Freedom of Information and Protection of Privacy Act \(FIPPA\)](#). This includes protection and maintenance of the confidentiality of any sensitive or confidential information received through our employment with LABC. We will protect LABC's assets (including data) and use them responsibly for LABC purposes.
5. LABC is dedicated to cultivating a workplace culture that prioritizes accessible and inclusive communication across all LABC channels, client interactions, and collaborative efforts. We will communicate professionally and constructively, aligning with the sensitivity and confidentiality requirements of the information, relevant to LABC's business and our individual roles. LABC channels include but are not limited to in-person and virtual meetings, application software, and content online and in print, including newsletters, blog posts, and bulletins.
6. We will avoid conflicts between our personal interests and our role at LABC. We will conduct business lawfully and ethically, establishing honest dealings in all relationships. We expect the same of those with whom LABC has relationships.
7. We will not accept money or other transfers of economic benefit from individuals or other organizations during LABC work or LABC work-related activities, other than incidental gifts, customary hospitality, honorariums, or other benefits of nominal value (\$100 or less).
8. We will attend work regularly, consistently, and punctually. We will communicate and (where required) obtain approval from supervisors to vary work schedules and otherwise to adhere to LABC *Leave and Flexible Workplace* policies. We will work in an environmentally responsible manner.
9. We agree to review and follow the Standards of Conduct when we first join LABC and refresh our knowledge of it at least once a year.

² Public Interest Disclosure Act Policy

³ (Clients, colleagues (internal and external), lawyers, contractors)

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We will provide services in a way that protects the health and safety of everyone.

Safe work environment

You have the right to expect and the responsibility to create a workplace where everyone is safe. LABC has an occupational health and safety program with established procedures. We provide training for all employees and contractors and ensure they understand how to do their work safely.

Bullying and discrimination

LABC is committed to providing all employees with a workplace where everyone is treated with dignity and respect and is free from bullying, harassment, discrimination and offensive conduct and remarks. LABC abides by the [BC Human Rights Code](#) which prohibits discrimination based on certain “personal or protected characteristics” or “grounds of discrimination”.

LABC aims to foster a workplace culture that is respectful, productive, and collaborative. We encourage employees to help identify and eliminate discriminatory, bullying, harassment, or offensive practices.

***Discrimination** occurs when an individual or a group of people are denied opportunities and rights because of a personal characteristic, such as race or sex. Bullying and harassment are particular types of discrimination and include insulting and abusive treatment of people because of a personal characteristic.*

Violence in the workplace prevention

Violence in the workplace is unacceptable and will not be tolerated. LABC will:

- Take necessary action to prevent acts of workplace violence, including domestic violence
- Investigate reported incidents of violence in a prompt, objective, and sensitive manner
- Take necessary corrective action
- Provide appropriate support for victims

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Violence in the workplace response

LABC will ensure that all violent incidents are reported, and handled promptly and safely, in a manner that respects the needs of LABC employees.

No individual is disciplined in any way for making a complaint or giving evidence in an investigation regarding violence, including domestic violence, unless the charge proves to be without foundation and malicious.

LABC's Violence in the Workplace: [Prevention](#) and [Response](#) Procedures can be found here.

***Violence** includes any attempted or actual exercise by any person, including a co-worker, of any physical force so as to cause injury to an employee, and includes any express threat of violence.*

We will protect and maintain the confidentiality of any sensitive or confidential information received through our employment with LABC. We will protect LABC's assets (including data) and use them responsibly for LABC purposes⁴.

All LABC data and information is the property of LABC. We consider confidential information to be LABC data or information not publicly available. This includes information relating to LABC's operations, employees, clients, PLCs, contractual relationships, technology, day-to-day events and so on both during and after employment with LABC, employees:

- will treat client information as privileged and must not disclose it to anyone inside or outside the organization except on a need-to-know basis in accordance with the [Freedom of Information and Protection of Privacy Act \(FIPPA\)](#), and the [Lawyers Code of Professional Conduct, as applicable](#);
- are responsible for maintaining the confidentiality of all LABC information not known to the general public;
- will not knowingly take advantage of, or benefit from, or use in any way, information obtained during the course of their duties that has not been made available to the public;

Contractors hired to do work for LABC:

- must sign a contract that includes a confidentiality provision.
- must ensure confidentiality obligations are in place with their employees and any sub-contractors who may have access to LABC's confidential information.

All Employees and Contractors must read and abide by LABC's Confidentiality Policy.

Information Management and Freedom of Information and Protection of Privacy

LABC and each of its employees is required to comply with the information access and protection of privacy requirements established in B.C.'s [FIPPA](#). Employees should always keep in mind that the

⁴ See [Privacy Management Policy](#) and related policies for further guidance.

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personal information of applicants, clients, and employees is subject to [FIPPA](#) (as well as the requirements of the *LSS Act* in some cases), and access and use can be restricted by legislation, collective agreements, policy requirements and other terms and conditions in force at LABC.

Employees must not collect, access, use or disclose to third parties any personal information, including personal information relating to applicants, clients, employees, or former employees without authorization. Information about employees is subject to [FIPPA](#) and access to it is restricted by collective agreements and terms of conditions in force at LABC.

LABC records may be subject to an access to information request. Refer all such requests to the Privacy Officer/General Counsel.

Records management

Information is a valuable asset, and we are all responsible for protecting and managing that information in a reasonable, responsible and knowledgeable fashion. We create and collect a large number of records, information and data during our work. We may be required to keep these records and information by law or for other important business purposes.

We use records and information management practices and controls that enable us to meet our legal, regulatory, and operational requirements. We must comply with procedures and rules describing what records and information we must keep and for how long and how we must dispose of them, as well as the technologies and systems we use to store records and information. We must also comply with our commitment to an environmentally responsible workplace, including the costs of storing data in cloud-based systems, and of digitizing paper records.

Please contact the Privacy Officer for more details.

Protection and use of LABC data

All LABC hardware, computing and communications systems or devices including cloud-based systems, mobile phones, and other technologies, should be used in a responsible manner and in compliance with LABC's requirements.

LABC's computing, communication or electronic systems or devices are provided to employees to facilitate the performance of their duties. While employees are permitted some personal use those systems and devices in accordance with our policies, employees should not have an expectation of privacy on any LABC computing, communication or electronic system. Personal information created, stored or communicated on LABC systems or devices may be accessed as a result of operations necessary for the management of operations or employment, such as system maintenance, security checks, troubleshooting, or investigations. LABC will only collect personal information where it is relevant to management of employment, in accordance with our Freedom of Information and Protection of Privacy Policy.

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Use of LABC property

As LABC employees we're entrusted with the care, management, and cost-effective use of LABC property and resources, including the use of LABC's name and logos.

We are all responsible for the appropriate care and protection of all LABC software and hardware including exercising reasonable safeguards to prevent theft, misuse, abuse, negligence and/or improper storage.

We should use LABC property properly, safely, efficiently, and only for LABC purposes. Property includes physical and information assets essential to the operation of LABC.

You may use LABC equipment, email and internet access for brief personal purposes providing this does not interfere with your duties and you do so responsibly and securely.

Intellectual property and proprietary interests

Any work product produced within the scope of your employment belongs exclusively to LABC, whether or not the work product was produced while actually at work. Work product includes research results, work methods, computer programs, technical processes, inventions, research methods, know-how, reports or articles and any other form of innovation or development. Intellectual property rights related to any work product, including patents, copyrights, trademarks, industrial designs or trade secrets, must be assigned to LABC.

Return of property and information—post-employment

On or before our last day of appointment or employment with LABC, you must return any LABC property, including documents, corporate property, work product, and other materials in your possession. This includes all written or electronic LABC non-public information or third-party confidential information.

We communicate in an open and constructive manner through LABC channels.

LABC is dedicated to cultivating a workplace culture that prioritizes accessible and inclusive communication, being responsive to client needs, and collaboration. We understand that accessible and inclusive communication is fundamental to our mission to provide high-quality legal aid services to our clients, collaboration with our colleagues, service providers, and legal professionals. Our commitment extends to ensuring the smooth and efficient flow of internal communication at all levels of the organization. We value the importance of communication between leaders, between management and employees, among colleagues, teams, and departments, and across the entirety of LABC. We will utilize LABC's established communication channels to relay information, updates, and insights to facilitate clear and effective communication, fostering a collaborative environment where everyone can thrive. Our common goal is to serve the best interests of our clients, promote teamwork, and maintain the integrity of LABC's services.

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We will avoid conflicts between our personal interests and our role at LABC.

We're responsible for making business decisions fairly, honestly and in the best interests of our clients and LABC. We must act with integrity and honesty and be aware of our behaviour and the way it is perceived by others. Actual or apparent conflicts of interest raise doubts about LABC's integrity and the objectivity of our decisions and actions. We must avoid any situation that may give rise to an actual or apparent conflict of interest.

Could my actions or conduct undermine the public's confidence in my ability to do my work or compromise the trust that the public places in LABC?

Could someone perceive that I'm using my employment with LABC to gain a personal benefit from a third party?

Do I, or my friends or relatives, stand to gain anything through my relationship with a third-party doing business with LABC?

Could my personal interests affect a decision I might have to make at LABC?

Do I feel under any obligation to a third party that does business with LABC due to my relationship with that third party?

Conflict of interest includes obtaining a benefit that advances or protects interests, even though the benefit may not be measurable in money. Examples of such conflicts include:

- Denying or failing to provide a service for personal reasons.
- Referring a contract or a client to a friend, relative or associate.
- Participating in the hiring of a friend or relative.

Some conflicts are quite clear, but others are less obvious. LABC recognizes that employees have legitimate outside interests. However, there may be situations which could be perceived as a conflict of interest no matter how innocent the intentions of the employee.

We must avoid situations where someone could reasonably perceive that there is a conflict between their personal interests and their role as an LABC employee even though there is no intention of acting unfairly, dishonestly or for personal gain.

We will not exploit a work relationship for private advantage or benefit. We will arrange our private affairs to prevent real, potential, or apparent conflicts of interest from arising in our work.

We must advise our supervisors of any private interest that could give rise to a conflict of interest or the appearance of conflict of interest. For example, when a family member is applying for legal aid.

We must disclose the names of any relative, or person with whom we have a close personal relationship, that we know receives remuneration from LABC. Those receiving remuneration from LABC include LABC employees, local agents, contract bar lawyers, contractors, and other service providers such as interpreters or court reports/transcript providers. Employees may not hold a

An actual conflict of interest arises when our impartiality and ability to act in LABC's best interests are or could be influenced by our personal interests or by our duties and obligations to others including external parties.

A potential conflict of interest occurs when others may reasonably perceive that our objectivity and ability to act in LABC's best interests could be influenced by our personal interests or by our duties and obligations to others, including external parties, even when no actual conflict of interest exists.

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significant financial interest, either directly or through a family member or associate, in an organization that has a relationship with LABC unless that interest is disclosed to LABC and is approved by LABC.

Disclosure must be made in writing to your supervisor who will inform the Manager, Human Resources, and the General Counsel and Corporate Secretary.

Outside employment and volunteerism

Many of us become involved in outside organizations in our personal time. Our involvement in businesses, charities, foundations, professional associations, non-profit societies, and other organizations can result in an actual or potential conflict between our duty to act in the best interests of LABC and the interests of the outside organization. Take care to ensure your involvement in outside organizations does not and will not result in an actual or potential conflict of interest.

For example, you should not participate in an outside organization if you can benefit that organization by influencing the decisions or actions of LABC.

You can hold outside jobs (including volunteerism, or board appointments) or engage in self-employment activities on your own time provided:

- you use your own tools and resources; and
- the outside work doesn't negatively affect or appear to affect your performance or objectivity; and
- you do not accept money or other payment in addition to your regular salary or expenses for duties that you perform during your regular LABC employment; and
- you do not use LABC property such as phones, computers, printers, or copiers or your LABC email for outside employment; and
- the outside work does not affect LABC's reputation.

You must disclose in writing all outside jobs or self-employment activities, including appointments to the board of a non-profit society or a professional association, to your manager and/or the Manager, Human Resources so that LABC can determine whether there is a conflict of interest.

Political participation

You can participate in the democratic process at any level, including campaigning in elections and running for or holding public office. However, this should be done on your own time, in accordance with your Collective Agreements, and with care to ensure separation between your personal activities and your association with LABC. You cannot use LABC property such as phones, computers, printers, copiers, or your LABC email for political activities.

Media (including social media)

Only authorized employees can speak to the media or address matters of public debate on behalf of LABC. Employees will clearly state whether they are speaking personally or on behalf of LABC when

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making public statements. Please refer to the Media Relations and Corporate Communications Policy for detailed policy guidance.

Hiring relatives (includes persons with whom staff have a close personal relationship)

LABC follows standard recruitment procedures in all hiring processes. We cannot have influence over the hiring, supervision, evaluation, or promotion of anyone with whom we have a close personal relationship. This includes influence over contractors' hiring, evaluation, retention, or management.

LABC may employ relatives of existing employees provided the individuals concerned are not in a supervisory relationship with each other, and there is no conflict of interest or appearance of a conflict of interest. Anyone in doubt as to whether a close personal relationship falls within this policy should seek advice from a supervisor, The Manager, Human Resources, or the General Counsel and Corporate Secretary.

If relatives of LABC staff are found to be in a conflicting reporting relationship, and there is an actual or potential conflict of interest, LABC will attempt to transfer one of the affected employees to a suitable position within the organization. If this is not possible, one of the employees will be required to resign.

If LABC has hired or will hire a relative of an existing employee, that employee must tell their supervisor and the Manager, Human Resources about the relationship.

If any actual or appearance of a conflict of interest arises, an employee must tell their supervisor and the Manager, Human Resources about the conflict. The Manager, Human Resources may refer to the matter to General Counsel and Corporate Secretary.

Future employment restrictions

Except with the consent of the Board of Directors, until one year after the end of employment:

- an LABC Executive or the Chief Executive Officer must not lobby or otherwise make representations for any private sector organizations to LABC; and
- an LABC Executive or the Chief Executive Officer who has the discretion to make decisions or recommendations that materially affect the business interests of any private sector employer with whom the Executive or Chief Executive Officer had substantial involvement in dealings in the year immediately preceding the end of their employment with LABC, must not accept employment with that private sector employer.

LABC Executives must inform the Chief Executive Officer about the prospect of employment that may place them in an actual or perceived conflict of interest or in breach of the future employment restrictions. The Chief Executive Officer must inform the LABC Board Chair.

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We will not accept money or other transfers of economic benefit from individuals or other organizations during LABC work or LABC work-related activities, other than incidental gifts, customary hospitality, or other benefits of nominal value.

Gift-giving or complimentary meals or entertainment can be a common business and social practice. However, they may lead to complexities or reputational harm for LABC. Take care when accepting or offering any gifts, meals, or entertainment to avoid the perception that you may be receiving inappropriate personal benefits because of your employment with LABC or making decisions for the wrong reasons.

LABC employees should not directly or indirectly receive, solicit, or offer gifts, entertainment, or benefits from anyone in the course of your work for LABC—even during traditional gift giving seasons.

Some gifts, entertainment or benefits may be acceptable if they are customary in the business circumstances, including:

- Occasional items of nominal value—This includes items with an estimated value of \$100 or less, such as promotional items or items to express gratitude or customary hospitality (e.g., coffee mug, chocolate, flowers). These items should only be given/accepted infrequently. Gifts that can be shared among staff or used by the office can be accepted. Gifts must not include alcohol or cannabis products.
- Networking events or meals—Attending a networking event or meal with someone you do business with such as a member of the legal community, may be valuable in building or maintaining a business relationship. It is acceptable in the ordinary course of business provided it's infrequent and the value is reasonable.

If you are unsure whether to accept hospitality or a gift offered as a courtesy in a business relationship, ask your immediate supervisor before accepting the offer.

We will disclose, in good faith, information concerning any breach of these Standards.

Please note that this Standards of Conduct does not apply to disclosures specifically contemplated by the [Public Interest Disclosure Act \(PIDA\)](#) and LABC's PIDA Policy.

Reporting breaches of the Standards of Conduct

In most cases, your manager should be your first point of contact, whether you require advice, wish to make a disclosure or report a breach or potential breach of the Standards of Conduct. If you feel unable to discuss an issue with your immediate manager or your manager failed to address your concern, you may contact the Manager, Human Resources, or the General Counsel and Corporate

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Secretary.

Management will respect the privacy of anyone who seeks advice or discloses a breach or potential breach of the Standards of Conduct as much as is possible in the circumstances. Any disclosures or reports under the Standards of Conduct will be treated as confidential and will only be disclosed if necessary, including, for example, a threat of serious harm.

LABC's commitment to confidentiality is also subject to all laws which may require us to disclose information. If you've made a report to your supervisor, the Manager, Human Resources, or the General Counsel and Corporate Secretary, they may contact you for additional information if required for an investigation.

Retaliation

Anyone who, in good faith, has made a disclosure, or is cooperating in an investigation, about a breach or potential breach of the Standards of Conduct by another person or party will not be retaliated against.

Retaliation against such individuals is a breach of this Standards of Conduct. If you are concerned about possible retaliation, the Manager, Human Resources or the General Counsel and Corporate Secretary, on request, may monitor the circumstances on your behalf and report any concerns to a member of the executive management committee. If you feel you have been retaliated against contrary to the Standards of Conduct, please contact the Manager, Human Resources or the General Counsel and Corporate Secretary.

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History

Board Approved December 8, 2023: Revised and updated to reflect new strategic plan and core beliefs.

Updated June 28, 2022: removed outdated CEO message.

Revised February 9, 2021: Revised instant messaging guidelines under Electronic Communications section; updated Protection and Use of Company Property section for consistency with the Hardware and Software policy.

EMC Approved April 16, 2019: Added a section on Electronic Communications.

September 1, 2018: Updated job titles.

Board Approved November 2014 – replaces all previous versions. Formerly Code of Ethics.

Revised August 1, 2007: Altered language under the Disclosure of Wrongdoing section to reflect the Disclosure of Wrongdoing policy.

EMC Approved February 13, 2007: Workplace manner and violence guidelines added; confidentiality section shortened; discrimination & harassment definitions updated; security section deleted; disclosure of wrongdoing guidelines added; media and public debate section revised and separated into a media section and an affidavit section; cultural competence guidelines added; reformatted. Revised July 2004. EMC Approved September 1997.

SEE [POLICY](#) AND [FORMS](#) PAGES FOR: Other policies and forms referenced in this document.