



Impact Assessment
Agency of Canada

Agence d'évaluation
d'impact du Canada

Addressing Misconduct and Wrongdoing at the Impact Assessment Agency of Canada



2024–2025 ANNUAL REPORT

November 28, 2025

Canada 



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Contents

Introduction	3
Organizational context.....	3
What is the difference between misconduct and wrongdoing?	3
Categories of misconduct and wrongdoing	4
Handling of misconduct and wrongdoing at IAAC	5
Measures taken in the event of a founded case of misconduct or wrongdoing	6
Overview of cases	7
Misconduct	7
Harassment and violence	7
Breaches of the IAAC Code of Conduct.....	8
Security breaches	8
Breaches of the IAAC Network Acceptable Use Policy.....	8
Scientific integrity	8
External investigations	9
Office of the Public Sector Integrity Commissioner.....	9
Canadian Human Rights Commission	9
Employment and Social Development Canada (ESDC)	10
Public Service Commission of Canada (PSC)	10
Conclusion.....	11



Introduction

This annual report aims to increase transparency about the handling of cases of misconduct and wrongdoing at the Impact Assessment Agency of Canada (IAAC). It provides a summary of cases of misconduct and wrongdoing during the 2024–2025 fiscal year, as well as investigations conducted by external bodies during that period. It also provides information on the informal and formal reporting mechanisms made available to employees.

Organizational context

IAAC, which reports to the Minister of the Environment and Climate Change, is a federal agency responsible for assessing the environmental, social and economic impacts of major federal projects to protect the rights of Indigenous peoples and the environment. With several hundred employees based in the National Capital Region and regional offices across Canada, IAAC works closely with a variety of partners, including other federal departments, provincial and territorial governments, and Indigenous communities.

At IAAC, all employees and managers are responsible for following the [Agency Code of Conduct](#) to ensure a healthy, respectful, safe workplace free from harassment and discrimination. They must also comply with the [Values and Ethics Code for the Public Sector](#), which sets out clear expectations for behaviour and integrity. By emphasizing impartiality, transparency and respect for others, IAAC encourages its employees to report cases of misconduct or wrongdoing and protects those employees who do so.

Any employee—whether in the National Capital Region or in a regional office—who is directly or indirectly affected by a case of misconduct or wrongdoing can and must report it, regardless of level or position. IAAC is committed to treating all complaints seriously, evaluating them thoroughly and, if they are founded, taking the appropriate administrative or disciplinary measures. No employee should fear reprisal for doing the right thing. We commit to respecting and protecting everyone's confidentiality.

What is the difference between misconduct and wrongdoing?

Misconduct is defined as any action by which a person willfully contravenes an act, a regulation, a rule, an IAAC or Treasury Board policy, an approved procedure, the IAAC Code of Conduct, a reasonable and legitimate request from management, or the Values and Ethics Code for the Public Sector: in short, an action by which an employee contravenes one of the obligations they accepted when they became a public servant.

The term “**wrongdoing**” is strictly used to describe incidents handled under section 8 of the [Public Servants Disclosure Protection Act](#) (PSDPA). The PSDPA defines wrongdoing as follows:



- a contravention of any Act of Parliament or of the legislature of a province, or of any regulations made under any such Act, other than a contravention of section 19 of the PSDPA.
- [a misuse of public funds or a public asset](#);
- [a gross mismanagement in the public sector](#);
- an act or omission that creates a substantial and specific danger to the life, health or safety of persons, or to the environment, other than a danger that is inherent in the performance of the duties or functions of a public servant;
- [a serious breach of a code of conduct](#) established under section 5 or 6; or
- knowingly directing or counselling a person to commit a wrongdoing set out in any of points above.

Categories of misconduct and wrongdoing

At IAAC, misconduct and wrongdoing are categorized as follows:

Harassment and violence

Harassment and violence in the workplace is defined as any action, conduct or comment, including of a sexual nature, that can reasonably be expected to cause offence, humiliation or other physical or psychological injury or illness to an employee.

An act of harassment and violence can also include abuse of authority, as well as harassment based on the prohibited grounds within the *Canadian Human Rights Act* (race, national or ethnic origin, colour, religion, age, sex, sexual orientation, gender identity or expression, marital status, family status, genetic characteristics or disability).

Some cases of harassment and violence are investigated as possible wrongdoing under the *Public Servants Disclosure of Wrongdoing Protection Act* (PSDPA) as a serious breach of a code of conduct. When the wrongdoing is deemed to be founded, it must be [https://search.open.canada.ca/wrongdoing/made public](https://search.open.canada.ca/wrongdoing/made-public).

Breaches of the IAAC Code of Conduct

The IAAC Code of Conduct sets out behaviours that employees must respect and uphold. A breach occurs when an employee fails to adhere to the values and ethics expected under the Code. Examples include making undue use of influence or abusing access to resources, making false statements or providing false personal information, threatening or bullying a colleague, or failing to declare a conflict of interest.

A conflict of interest is any situation in which an employee has private interests that could improperly influence the performance of their official duties or in which the employee uses their office for personal gain. A conflict of interest may be real (already exists), apparent (perceived by a reasonable observer to exist, whether this is the case) or potential (could reasonably be foreseen to exist in the future).



Security incident

Security incidents include a range of inappropriate activities, including unauthorized access to protected or classified information in the workplace. These activities may include theft, illegal or unauthorized use of Government of Canada property, breach of trust, breaking and entering, vandalism, sabotage, subversive activities, espionage, unauthorized disclosure, or destruction or concealment of information.

Some situations may lead to a review of an employee's reliability status or security clearance, such as in cases when the behaviour or information raises doubts about the employee's reliability or loyalty to Canada.

Policy on Scientific Integrity

Following the signing of a memorandum of understanding between the Treasury Board of Canada Secretariat and the Professional Institute of the Public Service of Canada (PIPSC) in 2016, twenty-five federal departments and agencies adopted policies on scientific integrity.

IAAC's Policy on Scientific Integrity guides science and research related work at IAAC. The policy applies to IAAC employees who design, conduct, communicate, manage, review or make use of IAAC research, science or related activities, regardless of group or level.

Financial mismanagement

Financial mismanagement results in the loss of public funds or government assets. It may include suspected fraud; misuse, misappropriation or theft of government funds or assets; contract or procurement fraud; contractor misconduct; or mismanagement or misappropriation of funds.

In some cases of financial mismanagement, the investigation into the potential wrongdoing is conducted under the provision regarding misuse of public funds or a public asset in the *Public Servants Disclosure of Wrongdoing Protection Act* (PSDPA). When the wrongdoing is deemed to be founded, it must be [made public](#).

Handling of misconduct and wrongdoing at IAAC

All IAAC employees should feel comfortable reporting any situation that they believe may constitute misconduct or wrongdoing without fear of reprisal. Recourse procedures are available to employees who witness real or apparent misconduct or wrongdoing.

Managers are always the first point of contact. Employees can also turn to the Office of Shared Ombuds Services (OSOS) for confidential, informal services and assistance or help navigating the various recourse options. OSOS can be reached by email at <mailto:1conversation@tpsgc-pwgsc.gc.ca> or by phone at 1 833 225 2881.

IAAC handles all allegations of misconduct and wrongdoing in accordance with IAAC and Government of Canada policies and guidelines. This includes conducting fair, objective and relevant investigations as quickly



as possible when necessary. All necessary measures are taken to protect the confidentiality of the information collected and the privacy of the persons concerned. IAAC also seeks to ensure procedural fairness for all parties involved, including those under investigation and those who have initiated formal proceedings.

In cases of misconduct where a decision cannot be made solely on the information initially disclosed, an investigatory process is launched. This may take the form of a fact-finding exercise or a formal investigation. A fact-finding exercise is used when a situation is relatively straightforward, and the facts are not disputed by the various parties and do not require a significant level of investigation. When the situation is more complex and further information is required, a formal investigation may be launched.

In the case of wrongdoing, when a disclosure is received, an admissibility analysis is carried out based on several criteria to determine whether an investigation should be launched. Investigations are carried out as quickly and informally as possible, with the required thoroughness. The disclosure procedures under the [Public Servants Disclosure of Wrongdoing Protection Act \(PSDPA\)](#) are available on the IAAC website.

While all complaints and allegations are received and assessed to ensure they are handled appropriately, not all allegations are subject to a formal investigation process. In some cases, the complaint or allegation may be unfounded, or informal redress mechanisms may be more appropriate. In any case, management plays a key role in maintaining a healthy work environment, and services are available to all parties. The OSOS offers a variety of independent and confidential services, including the Employee Assistance Program (EAP) and the Informal Conflict Management System (ICMS), to support employees and help restore the work environment. In addition, the Values and Ethics team and the Labour Relations team can help managers promote and reinforce the importance of the Values and Ethics Code and the Code of Conduct and deal with inappropriate behaviour.

Measures taken in the event of a founded case of misconduct or wrongdoing

After the available facts are examined and the standard of proof used in administrative investigations is applied, an allegation of misconduct or wrongdoing may be deemed either founded or unfounded. As an employer, IAAC is responsible for ensuring that appropriate administrative or disciplinary measures are taken when an allegation of misconduct or wrongdoing is deemed to be founded. In some cases, both disciplinary and administrative measures are warranted.

- Disciplinary measures are formal corrective measures aimed at fixing behaviour. They are generally progressive, escalating with successive acts of misconduct. To determine the appropriate measure, the manager must consider all aggravating and mitigating circumstances. In some cases, however, the misconduct may be so serious that it warrants a severe measure for a first offence. Disciplinary measures may be grieved.
 - Disciplinary measures may take the form of an oral reprimand, written reprimand, temporary suspension without pay, financial penalty, demotion or even termination.



- Administrative measures are measures taken to make the necessary adjustments to a situation. Some situations may require one or more administrative measures. In some cases, it may be determined that an administrative measure is sufficient to remedy the situation.
 - Administrative measures may include placing an employee on administrative leave without pay, temporarily withdrawing delegation of human resources and/or financial authorities, or other measures depending on the situation.
 - Administrative measures can also be used to equip the employee with tools to prevent the misconduct from recurring. These measures may include providing a letter of expectations, developing an action plan to change the person's behaviour, giving training or coaching, or scheduling regular meetings with management.

Overview of cases

Misconduct

During the 2024–2025 fiscal year, IAAC did not identify any cases of misconduct that led to disciplinary measures following a formal administrative investigation.

Until recently, IAAC's internal systems tracked only administrative investigations into allegations of misconduct that resulted in disciplinary measures under the Treasury Board Secretariat's *Guidelines for Discipline*, including, but not limited to, written reprimand, suspension, financial penalty, demotion or termination.

Administrative investigations that resulted in administrative measures only, such as letters of expectations, mandatory training or temporary adjustments to responsibilities, were not systematically recorded or tracked.

With a view to transparency and continuous improvement, IAAC recently updated its internal systems to track all administrative investigations into allegations of misconduct, whether they result in disciplinary and/or administrative measures. This will help IAAC provide more complete and representative data during the next fiscal year.

Harassment and violence

Employees who witness or are victims of harassment or violence in the workplace can inform their manager and/or submit a notice of occurrence to Health Canada's Harassment and Violence Prevention Unit (HVPU), which acts as the external designated recipient for IAAC.

The HVPU, a neutral entity independent of IAAC, is responsible for responding to incident notices and related issues, guiding, and supporting the parties involved throughout the complaint resolution process and working with IAAC's internal teams (Health and Safety, Wellness and Labour Relations) to coordinate efforts to restore the workplace.



This process, conducted in accordance with the *Workplace Harassment and Violence Prevention Regulations*, aims to identify and mitigate systemic risk factors to prevent similar incidents from occurring. It is not intended to assign blame or recommend disciplinary or compensatory measures. A formal investigation may be requested if informal resolution efforts fail.

To date, only one notice of occurrence has been transferred to the HVPU, and the process is under way.

Employees can also raise concerns with their manager, who can intervene with the support of the Labour Relations team. Unionized employees can also consult their union representative to explore other mechanisms, such as mediation or the grievance process.

Breaches of the IAAC Code of Conduct

During the period covered by this report, no investigations into breaches of the IAAC Code of Conduct were carried out.

Security breaches

During the period covered by this report, no investigations involving employee security were carried out.

Breaches of the IAAC Network Acceptable Use Policy

During the period covered by this report, no investigations or incidents relating to IAAC's Network Acceptable Use Policy were reported.

Scientific integrity

During the period covered by this report, no investigations or incidents relating to scientific integrity were reported.



External investigations

As part of their mandates, other Canadian entities may conduct their own investigations into IAAC or members of our staff. This section provides information on the types of investigations conducted by these entities, as well as a summary of all investigations conducted into alleged misconduct or wrongdoing from IAAC employees or suppliers.

Office of the Public Sector Integrity Commissioner

The Office of the Public Sector Integrity Commissioner of Canada is an independent federal organization established to implement the [Public Servants Disclosure Protection Act](#). The Office of the Commissioner investigates wrongdoing in the federal public sector and helps protect whistleblowers (people who make a protected disclosure of wrongdoing) and investigation participants from reprisal.

The Office of the Commissioner helps strengthen accountability and oversight of government activities by

- providing an independent and confidential process for receiving and reviewing disclosures of wrongdoing in or relating to the federal public sector from public servants and members of the public;
- reporting founded cases of wrongdoing to Parliament and recommending corrective measures to deputy heads; and
- providing a mechanism for handling and resolving complaints of reprisal against current and former public servants, including through conciliation and referral of cases to the Public Servants Disclosure Protection Tribunal.

During the period covered by this report, no investigations involving IAAC were conducted by the Office of the Public Sector Integrity Commissioner.

Canadian Human Rights Commission

Under the *Canadian Human Rights Act*, any individual or group of individuals may file a human rights complaint with the Canadian Human Rights Commission (CHRC) regarding any action or decision that takes place in Canada and that they have reasonable grounds to believe has resulted in the unfair or negative treatment of a person based on the prohibited grounds of discrimination:

- race, national or ethnic origin, colour;
- religion;
- age;
- sex;
- sexual orientation, gender identity or expression;



- marital status or family status;
- genetic characteristics;
- disability; or
- conviction for an offence for which a pardon has been granted or in respect of which a record suspension has been ordered.

The CHRC reviews discrimination complaints and, if necessary, gathers information from the parties to determine next steps and whether the complaint will be sent to the Canadian Human Rights Tribunal (CHRT) to determine whether discrimination has occurred. Visit the [CHRC website](#) for more information on the review process.

During the period covered by this report, no complaints were received from the CHRC concerning IAAC.

Employment and Social Development Canada (ESDC)

Employment and Social Development Canada (ESDC) investigations focus on the department's occupational health and safety program as well as the workplace environment. These may include investigations into the department's application of the *Work Place Harassment and Violence Prevention Regulations*, and may be triggered by a complaint filed under section 127.1 of the *Canada Labour Code* (Internal Complaint Resolution Process) when an employee believes that there has been a contravention of Part II of the Code and that an accident, injury or illness may occur or has already occurred.

Under these circumstances, ESDC may:

- Ask the employer or employee to submit an Assurance of Voluntary Compliance (AVC). An AVC is the employer's or employee's written commitment to a health and safety officer that a contravention of the *Canada Labour Code* will be corrected within a specified period.
- Issue a direction, which is a formal written order directing the employer or employee to correct a contravention of Part II of the Code within a specified period.

During the period covered by this report, ESDC did not ask IAAC to submit any reports on reportable accidents, as no accidents of this type occurred.

Public Service Commission of Canada (PSC)

As part of its mandate to oversee the integrity of the staffing system and the political impartiality of the federal public service, the Public Service Commission investigates concerns relating to specific appointment processes and allegations of improper political activities in organizations subject to the *Public Service Employment Act*.

The Public Service Commission (PSC) did not conduct any investigations into IAAC during the period covered by this report.



Conclusion

The 2024–2025 report on cases of misconduct and wrongdoing at IAAC is the first annual publication devoted to this subject. It is an important step in our ongoing commitment to promoting an organizational culture rooted in ethics, accountability and transparency.

This report underscores IAAC's commitment to ensuring that all allegations are thoroughly investigated and that appropriate action is taken when the facts are confirmed.

By promoting the tools, support services and recourse mechanisms available to staff, the report also seeks to raise awareness among employees and encourage them to help create a respectful, healthy and inclusive work environment.

Beyond presenting data, this report reflects IAAC's ongoing commitment to upholding the highest standards of professional conduct in accordance with the principles of the Values and Ethics Code for the Public Sector and the IAAC Code