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“Public servants are responsible for keeping up with the speed and pace of things as they change. We are at a time of significant change right now, and we’ve got to keep up with it. We don’t always know what that looks like, that’s why reflecting on our values and ethics is so important. We are stewards of the public trust.”

The Late Honourable Senator Ian Shugart
October 2023

Word from the Deputy Ministers

As public servants, we share a collective responsibility to serve Canadians to the best of our ability. We support the implementation of government policies, ensure service delivery, and are guardians of public trust. Our work is guided by the pillars of integrity, respect for democracy, stewardship, excellence, and respect for people, and we remain committed to upholding the core values of the public sector.

The world in which we operate is undergoing transformation, and to adapt, we must reflect on the values and ethics that serve as a guiding light in our daily work. It was therefore time to update the Canadian Heritage Code of Values and Ethics, originally launched in 2012.

This Code highlights the importance of acting with integrity and respect and serves as a practical tool—with clear principles—to help us make fair and ethical decisions in our daily work. It also reminds us to act with integrity, treat others with respect, and in a manner that promotes transparency, accountability, and public trust. It supports a workplace culture rooted in equity, inclusion, and the shared responsibility of defending the public good.

The new Code addresses topics such as artificial intelligence, security, harassment prevention, personal use of social media, political activity, and the disclosure of conflicts of interest. This update also meets the requirements of [the Public Servants Disclosure Protection Act \(PSDPA\)](#).

Together, let us continue to lead by example—embodying the principles of the Code in all that we do—and making Canadian Heritage a healthier, more ethical and trusted workplace for the Canadian public.

Isabelle Mondou (she)
Deputy Minister, Canadian Heritage

Andrew Brown (he | him)
Associate Deputy Minister, Canadian Heritage

1. The Role of Federal Public Servants

1.1 General Role

Federal public servants have a fundamental role to play in serving Canadians, their communities and the public interest under the direction of the elected government and in accordance with the laws. As professionals whose work is essential to Canada's well-being and the enduring strength of the Canadian democracy, public servants help to maintain public trust.

The Constitution of Canada and the principles of responsible government provide the foundation for the role, responsibilities and values of the federal public sector. Constitutional conventions of ministerial responsibility prescribe the relationships among ministers, parliamentarians, public servants and the public. According to the [Values and Ethics Code for the Public Sector](#), a professional and non-partisan federal public sector is integral to our democracy.

At Canadian Heritage, we are passionate about the work we do and our dedicated employees are located across the country to better serve Canadians by directly supporting the delivery of our programs and services.

Visit the [PCH page](#) to learn more about our mandate, portfolios, sectors, Deputy Heads and more.

1.2 Deputy Minister of Canadian Heritage

The Deputy Minister, as Deputy Head of the Department, has specific responsibilities under the [Public Servants Disclosure Protection Act](#), including establishing an organizational Code and an overall responsibility for fostering a positive culture of values and ethics in the organization.

The Deputy Head ensures that employees are aware of their obligations under the [Values and Ethics Code for the Public Sector](#) and that employees can obtain appropriate advice on ethical issues, including possible conflicts of interest.

The Deputy Head ensures that the Canadian Heritage Code and all internal disclosure procedures are implemented and that they are regularly monitored and evaluated. He is responsible for ensuring a non-partisan provision of programs and services by Canadian Heritage.

The Deputy Head is subject to the Canadian Heritage Code and to the [Conflict of Interest Act](#).

1.3 Management

Managers at Canadian Heritage plays a key role in upholding the [Values and Ethics Code for the Public Sector](#) at all levels. The managers are responsible for setting behavioural standards, ensuring employees understand and adhere to them, and leading by example in demonstrating ethical conduct and professionalism.

The management team must also integrate values and ethics into their leadership style, making the Canadian Heritage Code tangible for employees, and promote continuous learning on issues related to values and ethics in the work of policies, programs, and services of PCH.

Managers must address violations of the Canadian Heritage Code fairly and promptly, taking appropriate disciplinary action if necessary. Through their actions and decisions, managers influence the ethical climate, create a psychologically safe and non-discriminatory environment, and inspire employees to uphold to the values and behaviors expected by the Canadian Heritage Code that support them.

2. Expected Values and Behaviours

At Canadian Heritage, the public service values serve as a guiding framework that inspires and directs us in fulfilling the Department's mandate. We recognize that every individual has a personal responsibility to contribute to a healthy and productive workplace environment.

We are committed to conducting ourselves in accordance with the following core values of the public sector and the expected behaviours that support them.

2.1 Respect for people

Treating all individuals with respect, dignity, and fairness is essential in our relationship with Canadians. It contributes to a safe and healthy work environment that encourages engagement, openness, and transparency. The diversity of people and ideas is the source of our capacity to innovate.

Public servants shall respect human dignity and the value of every person by:

- Treating every person with respect and fairness.
- Valuing diversity and the benefits of having the unique qualities of a diverse workforce.
- Helping to create and maintain safe and healthy workplaces that are free from harassment, violence and discrimination.
- Working together in a spirit of openness, honesty and transparency that encourages engagement, collaboration and respectful communication.

Respect for People is a core commitment at Canadian Heritage, reflected in how we treat each other and in our operations. This includes:

- Encouraging the use of both official languages.
- Fostering a diverse, inclusive workplace.
- Supporting reconciliation with Indigenous peoples to promote understanding and healing.
- Embracing the inclusion of all equity-seeking groups, ensuring a respectful, equitable environment for all.
- Promoting a healthy work-life balance.
- Resolving differences constructively, free from reprisal.

At Canadian Heritage, we expect to be treated with respect and fairness in alignment with these values.

2.2 Respect for Democracy

The system of Canadian parliamentary democracy and its institutions are fundamental to serving the public interest. Public servants recognize that elected officials are accountable to Parliament, and ultimately to the Canadian people, and that a non-partisan public sector is essential to our democratic system.

Public servants shall uphold the Canadian Parliamentary democracy and its institutions by:

- Carrying out their duties in accordance with legislation, policies and directives in a non-partisan and impartial manner.
- Loyal carrying out the lawful decisions of their leaders and supporting ministers in their accountability to Parliament and Canadians.
- Providing decision makers with all the information, analysis and advice they need, always striving to be open, candid and impartial.

At Canadian Heritage, we serve the public good with pride and passion. We respect the law and ensure that our decisions are transparent, so that the public can trust our work. For example:

- We take actions in a manner that inspires and maintains public confidence.
- We draw upon a diversity of perspectives to understand, and we give our best advice in favour of the public interest.
- We establish and maintain efficient and impartial working relationships with our stakeholders.

2.3 Integrity

Integrity is the cornerstone of good governance and our democracy. By upholding the highest ethical standards, public servants maintain and enhance public confidence in the honesty, fairness and impartiality of the federal public sector.

Public servants shall serve the public interest by:

- Acting at all times with integrity in a manner that can withstand public scrutiny.
- Never using their official roles to inappropriately obtain an advantage for themselves or to advantage or disadvantage others.
- Taking all possible steps to prevent and resolve any real, apparent or potential conflicts of interest between their official responsibilities and their private affairs in favour of the public interest.
- Acting in such a way as to maintain their employer's trust.

At Canadian Heritage, we are motivated and guided by personal and professional integrity. For example:

- We consider all applications for grants, contributions and services in a neutral, non-partisan manner in accordance with established eligibility criteria and procedures, acknowledging that Ministers may not always agree with or support our recommendations.
- We make or facilitate decisions based on sound evidence and knowledge.
- We seek advice in situations when we identify a potential conflict of interest or the perception of a conflict of interest.

2.4 Stewardship

Federal public servants are entrusted to use and care for public resources responsibly, for both the short and the long term.

Public servants shall use resources responsibly by:

- Effectively and efficiently using the public money, property and resources managed by them.
- Considering the present and long-term effects that their actions have on people and the environment.
- Acquiring, preserving and sharing knowledge and information as appropriate.

At Canadian Heritage, we responsibly and wisely manage resources and information entrusted to us. For example:

- We use and allocate resources for grants, contributions, contracts and services in an open, fair and honest manner and in accordance with the established procedures.
- We identify and manage risk responsibly and effectively.
- We respect personal information, privacy and confidentiality.

- We do not use public resources including equipment, workplace and paid time to conduct personal business.

2.5 Excellence

Excellence in the design and delivery of public sector policy, programs and services is beneficial to every aspect of Canadian public life. Engagement, collaboration, effective teamwork and professional development are all essential to a high-performing organization.

Public servants shall demonstrate professional excellence by:

- Providing fair, timely, efficient and effective services that respect Canada's official languages.
- Continually improving the quality of policies, programs and services they provide.
- Fostering a work environment that promotes teamwork, learning and innovation.

At Canadian Heritage, we are committed to serving Canadians by continuously improving the quality of service. For example:

- We offer reliable advice and quality services that are accessible and consistent across Canada.
- We inform our recommendations and decisions with evidence and diverse perspectives.
- We create an environment that promotes learning, innovation and initiative to continuously improve the way we do things.

The values and behaviors at Canadian Heritage are interconnected and serve as a moral compass in our work as public servants. They guide our words, decisions, actions, and interactions with clients, colleagues, and the public.

When these values conflict, employees are encouraged to consult with their managers or the Office of the Ombuds, Well-being, and Ethics (OOWE). Adherence to these values is a condition of employment, and breaches may lead to corrective actions or disciplinary measures, including termination.

3. Duty of Loyalty

In Canada's system of parliamentary democracy, public servants owe a duty of loyalty to their employer, the Government of Canada. This duty derives from the essential mission of the public service to help the duly elected government, under law, to serve the public interest. The duty of loyalty supports the importance and necessity of an impartial and effective public service to achieve this mission.

Employment in the public service requires the acceptance of certain constraints, which should be considered in our day-to-day activities and our off-duty conduct. We maintain our professional integrity through the way we present ourselves, serve clients, use social media, talk about Canadian Heritage and the Government of Canada, prevent conflicts of interest, and engage in activities like volunteering.

The duty of loyalty forms part of our conditions of employment in the Public Service.

To know more on the duty of loyalty, consult the [Treasury Board Secretariat website](#).

4. Breach of the Canadian Heritage Code

As employees, we have a moral and ethical responsibility to protect and strengthen our work culture. This means not ignoring, hiding, or excusing misconduct, and respectfully questioning behaviors that go against the values of the public sector. Anyone who suspects or witnesses a breach must report it through the proper channels and act in good faith.

Accountability for breaches must be enforced fairly and consistently, with respect for due process. Employees are encouraged to report misconduct to their manager or the Office of the Ombuds, Well-being, and Ethics (OOWE).

Breaches of the Canadian Heritage Code may result in disciplinary actions, including termination. Canadian Heritage is committed to maintaining a respectful and inclusive environment, which requires active participation from all employees. Management must address breaches promptly and seek guidance from the OOWE, when needed.

Failure to act can also, in certain circumstances, be considered a breach of the Canadian Heritage Code.

5. Hate and all Forms of Discrimination

At Canadian Heritage, we are committed to creating a respectful, inclusive environment free from racism, discrimination, and any harmful behaviours. This includes discrimination based on race, ethnicity, religion, gender, disability, and other protected grounds as outlined in the [Canadian Human Rights Act](#). Discrimination, hate, or unfair treatment, whether individual or systemic, will not be tolerated.

If there are issues of hate, discrimination, or inequity, including those related to our processes or systems, they should be reported immediately. The Inclusion, Diversity, Equity, and

Accessibility (IDEA) Office and the Office of the Ombuds, Well-being, and Ethics (OOWE) are available to provide support.

Everyone at Canadian Heritage is expected to treat each other with respect and avoid harmful behaviours like derogatory language, stereotypes, or social exclusion.

6. Workplace Harassment and Violence

At Canadian Heritage, every employee is responsible for maintaining a physically and psychologically safe and healthy workplace.

Under Part II of the [Canada Labour Code](#), harassment and violence are 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, including any prescribed action, conduct or comment. This includes all forms of harassment, such as sexual harassment, sexual violence, family violence, and discrimination based on prohibited grounds in the [Canadian Human Rights Act](#).

The [Canadian Heritage Workplace Harassment and Violence Prevention Policy](#) applies to all Canadian Heritage employees and supports a workplace that values inclusion, equity, diversity, and accessibility. These values are essential to maintaining a harassment and violence-free environment.

If you experience or witness such behaviour, you can file a report verbally or in writing with the [Harassment and Violence Prevention and Resolution Division](#).

7. The Public Servants Disclosure Protection Act

[The Public Servants Disclosure Protection Act \(PSDPA\)](#) encourages federal public servants to report wrongdoing, such as breaking laws, mismanagement, or misuse of public resources, while protecting them from retaliation. It ensures employees can report unethical behaviour safely and outlines a clear process for making reports, either within the organization or to the [Public Sector Integrity Commissioner](#), while protecting the identity of disclosers and witnesses.

The wrongdoing must be serious and involve breaking the law, policy, or significant mismanagement. It must be in the public interest, affecting government integrity or public trust.

The Senior Officer for Disclosure (SOID) helps the Deputy Head meet the requirements of the PSDPA by creating a safe environment for reporting wrongdoing and protecting the identities of employees and witnesses.

If a member of the public believes a public servant has violated the Canadian Heritage Code, they can report it to the SOID or the [Public Sector Integrity Commissioner](#).

For more information, contact the [SOID](#) for PCH who is also the Chief Audit Executive for PCH.

8. Guidance for Public Servants on their Personal Use of Social Media

Social media is a powerful tool for staying connected and sharing information, but it can create challenges for public servants in maintaining personal and professional boundaries.

While public servants have the right to express themselves, they must also uphold public trust and maintain a professional, non-partisan image to protect democracy.

Public servants should avoid sharing confidential or sensitive information online and use judgment. If unsure about the ethical implications of social media use, employees are encouraged to seek guidance. The Department will support employees in navigating these challenges while maintaining the integrity of the public service.

Additionally, employees should not speak to the media on behalf of the department unless authorized. All media inquiries must go through [Media Relations](#).

For more guidance, employees can refer to the Treasury Board Secretariat's page on [Guidance for Public Servants on their Personal Use of Social Media](#).

Finally, public servants should also be aware of cybersecurity best practices to protect sensitive information when using social media. For guidance on Cybersecurity Awareness, visit the [Canadian Centre for Cyber Security](#).

9. Use of Artificial Intelligence

Artificial Intelligence (AI) is one of the most promising technologies of our time. While AI can improve our daily lives, it also raises substantial moral and ethical questions as well as responsible use considerations. As this new technology evolves, public servants at Canadian

Heritage are expected to adhere to emerging [Directive on Automated Decision-Making](#) on how AI should or should not be used.

Public servants must be vigilant in ensuring that AI technologies are used ethically, avoiding biases, and ensuring that these technologies serve the public good while safeguarding privacy and fairness. To ensure AI is being used responsibly and appropriately, public servants must seek the knowledge and guidance needed to make informed decisions.

For more information on the use of AI, consult [Generative AI in your daily work](#).

10. Security and Employee Responsibility

Maintaining security at Canadian Heritage is everyone's responsibility. All employees and contractors must:

- Stay informed about security responsibilities by attending awareness sessions and completing required courses.
- Follow security procedures in the workplace, during remote work, and while traveling for business.
- Report security events quickly to reduce risks.
- Inform management of any personal changes that could affect security, such as a criminal record, criminal charges or arrest.

10.1 Security of Information

Employees must protect sensitive information by:

- Keeping data secure and using it only for authorized purposes.
- Avoiding discussions about confidential matters in public places.
- Reporting any suspected data breaches to the Information Security team.

10.2 Security of Networks

Employees must:

- Follow IT and cybersecurity policies.
- Use strong, unique passwords and keep them private.
- Avoid installing unauthorized software or connecting unauthorized devices.
Be cautious of phishing, malware, and other cyber threats, and report suspicious activity to IT Security.

10.3 Security of Premises

Employees help ensure physical security by:

- Wearing Canadian Heritage ID at all times on-site and not allowing unauthorized access to secured areas or sharing access passes.
- Following emergency procedures and cooperating with security staff during drills or incidents.

Maintaining the security of our operations, people, and information is a shared responsibility. By adhering to these guidelines, employees help safeguard the integrity and reputation of our department.

Failure to respect those measures may affect your security clearance and may expose you to disciplinary measures up to and including termination.

11. Political Activities

As public servants, you can engage in political activities if they don't affect your ability to perform your duties impartially. If you plan to run for election at any level (federal, provincial, territorial, or municipal), you must first get permission from the [Public Service Commission](#) (PSC).

The permission process depends on election's type:

- Municipal: approval required from an executive (EX group or equivalent).
- Provincial or territorial: approval required from an assistant deputy minister (or equivalent).
- Federal election: approval required from the deputy head (Deputy minister).

This applies to all employees, including those on leave or students. Since the PSC takes 30 days to decide, it's important to request permission early. More details on how to apply can be found on the PSC website.

For other political activities, like supporting or opposing a candidate or party, no permission is needed. However, consider how your duties and public visibility might affect your participation. The [Political Activities Self-Assessment Tool](#) can help you decide.

Be mindful of your digital presence and print, as social media posts can spread quickly within the public and impact your professional role.

The PSC is the only body that can investigate allegations of improper political activities. If an investigation finds a breach, the PSC can recommend corrective actions.

The designated political activities representative for Canadian Heritage is:

- Eliane Habib, Ombuds and Director, Office of the Ombuds, Well-being and Ethics (OOWE)

The designated political activities representative is responsible for:

- Providing advice, guidance and information to managers and employees.
- Acting as liaison between the PSC and the organization.
- Raising awareness of political activities among managers and employees.

12. Conflict of Interest

A conflict of interest is any situation in which public servants have private interest(s) that could improperly influence the performance of their official duties and responsibilities, or in which public servants use their offices for personal gain.

A conflict of interest may be:

- Real: existing at the present time.
- Apparent: perceived by a reasonable observer to exist, whether that is the case or not.
- Potential: reasonably foreseen to exist in the future.

Employees are encouraged to regularly assess their personal situations for potential conflicts of interest and seek guidance before issues arise. The Department offers tools and support for preventing conflicts of interest and ensuring that all decisions are made impartially and in the public interest.

The [Directive on Conflict of Interest](#) (Directive) came into effect on April 1st, 2020. It replaces Appendix B of the [Policy on Conflict of Interest and Post Employment](#) (dated April 2, 2012).

In the event of a conflict between the text in the Canadian Heritage Code and the [Treasury Board's Directive](#), the latter shall prevail. Compliance with this directive is a condition of employment and failure to comply with this directive may lead to disciplinary actions. While the following is not exhaustive, persons employed must read and respect the [Directive](#).

For greater certainty, assistant deputy ministers and their equivalents are subject to the [Lobbying Act](#) (Act). In the case of any conflict between this Directive and this Act, this Act takes precedence.

12.1 Mandatory Disclosure Exercise

Employees whose personal situation is represented below must submit a [Confidential Declaration Form for Conflicts of Interest](#) to the Office of the Ombuds, Well-Being and Ethics [by email](#);

- Employee or their immediate family members with business contracts with Canadian Heritage or the Government of Canada.
- Employee or their immediate family members with contracts with organizations receiving money from Canadian Heritage or the Government of Canada.
- Employee or their immediate family members owning companies doing business with Canadian Heritage or the Government of Canada.
- Employee lobbying or doing business with lobbyists.

12.2 Gifts, Hospitality and other Benefits

Persons employed must refuse gifts, hospitality, or other benefits that could influence their objectivity or create a sense of obligation.

However, accepting such items is allowed if they are infrequent, of minimal value, align with normal courtesy or protocol, relate to official duties, and do not compromise integrity.

If a person employed by PCH cannot decline a gift that falls outside these conditions or believes its acceptance benefits the organization, they must report it and seek written direction from their deputy head.

12.3 Financial Arrangements, Solicitation and Use of Government Property

Persons employed must avoid any financial arrangements—such as procurement, contracts, or grants—with external parties where a conflict of interest or duties may arise.

Persons employed must not solicit gifts, hospitality, or other benefits from individuals or organizations that deal with their department, including during official fundraising campaigns, without prior written approval from their deputy head.

Government property must not be used, directly or indirectly, for anything other than approved official purposes.

12.4 Post-employment

Before leaving the public service, persons employed must report any planned future employment or activities that could create a conflict of interest with their recent duties. Those

in positions deemed at risk for post-employment conflicts must, during and for one year after leaving, report all firm job offers that might pose such a conflict.

They must also seek written approval from their deputy head before accepting roles or making representations involving organizations with which they had significant dealings or before using non-public information to advise new employers or clients.

An authorization from the general administrator is also required to if applying for a waiver or reduction of the one-year post-employment limitation period.

12.5 Consequences of non-compliance

A person employed at Canadian Heritage who has not complied with the requirements set out in this Directive may be subject to disciplinary measures, up to and including termination of employment.

12.6 References

Legislation:

- [Conflict of Interest Act](#)
- [Criminal Code](#)
- [Financial Administration Act](#)
- [Lobbying Act](#)
- [Privacy Act](#)
- [Public Service Employment Act, Part 7](#)

Related policy instruments:

- [Contracting Policy](#)
- [Directive on Interchange Canada](#)
- [Policy on Communications and Federal Identity](#)
- [Policy on Privacy Protection](#)
- [Policy on the Planning and Management of Investments](#)
- [Values and Ethics Code for the Public Sector](#)

12.7 Enquiries

Persons employed can seek support by communicating with the Department's [Values and Ethics' team](#).

Annex A

Assets, Liabilities and Trusts

Reportable Assets and Liabilities

As persons employed by Canadian Heritage, you must carefully evaluate on a regular basis whether your assets and liabilities need to be reported. In doing so, you must take into consideration the Canadian Heritage mandate, the nature of your official duties and the characteristics of your assets and liabilities.

To determine whether your situation is at risk of a real, apparent or potential situation of a conflict of interest, you are invited to complete the [Self-assessment Tool for Analysing Conflict of Interest Risks](#), available on the Canadian Heritage Intranet.

According to this tool, if the carrying out of your official duties and your assets and liabilities are at risk of a real, apparent or potential situation of a conflict of interests, you must therefore submit a [Confidential Declaration Form for Conflicts of Interest](#) to the Office of the Ombuds, Well-being and Ethics at Canadian Heritage. If both are not related, no report is then required.

Any assets and or direct and contingent liabilities that might give rise to a conflict of interest must be reported within 60 days of your first appointment or any subsequent appointment, transfer or deployment.

Any measures required to manage or resolve a conflict of interest will normally be completed or in place within 120 calendar days, or such other appropriate time as determined by the Department after a determination that a real, apparent or potential conflict of interest exists.

Examples of assets and liabilities that must be declared (non-exhaustive list):

- Publicly traded securities of corporations and foreign governments, and self-administered Registered Retirement Savings Plans (RRSPs), self-administered Registered Education Savings Plans (RESPs), tax free savings accounts, and Registered Disability Savings Plans (RDSPs), or similar tax-related saving vehicles, that are composed of these securities, where these securities are held directly and not through units in mutual funds;

- Interests in partnerships, proprietorships, joint ventures, private companies and family businesses, particularly those that own or control shares of public companies or that do business with the government;
- Interests in labour-sponsored venture capital corporations or similar entities;
- Commercially operated farm businesses;
- Real property that is not for your private use or for your family members;
- Commodities, futures and foreign currencies held or traded for speculative purposes;
- Assets placed in trust or resulting from an estate of which you are a beneficiary;
- Secured or unsecured loans granted to persons other than to members of your immediate family;
- Any other assets or liabilities that could give rise to a real, apparent or potential conflict of interest due to the nature of your official duties or the non-public information to which you have access; and
- Direct and contingent liabilities in respect of any of the assets described in this section.

Non-reportable Assets

Assets and interests for your private use and that of your family members, as well as non-commercial assets, are not subject to the compliance measures.

For example, such assets include the following:

- Residences, recreational properties and farms used or intended for your use and that of your families;
- Household goods and personal effects;
- Works of art, antiques and collectibles;
- Automobiles and other personal means of transportation;
- Cash and deposits;
- Canada Saving Bonds and other similar investments in securities of fixed value issued or guaranteed by any level of government in Canada or agencies of those governments;
- Registered Retirement Savings Plans and Registered Education Saving Plans that are not self-administered;
- Investments in open-ended mutual funds;
- Guaranteed investment certificates and similar financial instruments;
- Annuities and life insurance policies;
- Pension rights;
- Money owed by a previous employer, client or partnership;

- Personal loans receivable from members of your immediate families and small personal loans receivable from other persons where you have loaned the moneys receivable; and
- Any liability, such as a car loan, home renovation loan or credit card account, from a financial institution or business entity granted on terms available to the public.