



Veterans Review and
Appeal Board Canada

Tribunal des anciens combattants
(révision et appel) Canada

Veterans Review and Appeal Board Code of Conduct



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Introduction

The Veterans Review and Appeal Board

The Veterans Review and Appeal Board (the Board) was created by Parliament in 1995 to provide Veterans and other applicants with an independent avenue of appeal for disability decisions made by Veterans Affairs Canada (VAC). The Board's decisions must be made, and seen to be made, independently and impartially. To achieve this, the Board operates at arm's-length from VAC.

The Board's mission is to provide Veterans, Canadian Armed Forces and RCMP members and their families with timely, respectful hearings and fair, plain-language decisions.

The Board has developed its own values to guide its unique responsibility of providing an independent redress program for applicants. Adherence to both the *Values and Ethics Code for the Public Sector* and the organization's code of conduct is a condition of employment for all federal public servants. The values for VRAB state:

Accountability: We are open and transparent, so that Veterans and Canadians can hold us accountable for our actions and decisions.

Diversity and Inclusion: We are committed to diversity and inclusion, both in the service we provide to Veterans and in striving to be a workplace of choice

Excellence: We strive to serve Veterans better through continuous improvement and innovation.

Impartiality: We treat Veterans in a fair and unbiased manner.

Independence: We provide Veterans with hearings and decisions that are free from outside influences.

Integrity: We enhance public confidence and trust in the appeal process by being professional and ethical.

Respect: We treat Veterans, and one another, with courtesy and respect.

[The Veterans Bill of Rights](#) sets out the rights of Veterans and clients in accessing programs. The Board is fully committed to upholding the Veterans' Bill of Rights in the delivery of its appeal program for applicants.

Building Trust and Credibility

As public servants, we are judged by what we say and do.

Adherence to ethical standards is imperative. We must continue to put our clients first, act with integrity, treat people with respect, be accountable and hold ourselves to high standards of performance.

As employees of the Board you make decisions every day that affect Veterans, clients, their families, your colleagues and the Board. The actions we choose to take as individual employees reflect on us all and influence how others perceive the Board, the Portfolio and the Public Service of Canada.

The Code is a set of guidelines intended to support ethical behaviour and decision-making. It is a condition of your employment with the Board. You are required to conduct yourself in accordance with these values and expected behaviours. As well, you should expect to be treated in accordance with the values presented in this document. By upholding these ethical standards, you maintain and enhance public confidence in the Board, the Portfolio and the Public Service of Canada.

The Code is not meant to conflict with the Board's obligations to its employees under its various collective agreements or employment contracts. In addition, there are lawyers employed with the Board who operate

within a code of conduct established by their professional group or association. These employees have designated standards they must adhere to in order to maintain their professional designation or to remain a member of their professional association. The professional associations also provide the public with complaint and redress mechanisms. The Code is meant to be complementary, not contradictory, to the various professional codes of conduct.

While the Code cannot address every situation, and new issues may arise, you can and should first seek to have any questions or concerns answered by your immediate supervisor or next appropriate level of management (if you do not feel comfortable speaking with your immediate supervisor). Alternatively, you can contact the Organizational Health and Ethics (OHE) Office by calling 1-800- 263-0382 or by email at: oe@veterans.gc.ca

There is a Memorandum of Understanding (MOU) between the Board and VAC which describes an arrangement for VAC to provide various internal services to the Board. Throughout the Code, you will be directed to contact areas within VAC, Government of Canada or the Board. Senior Management at VRAB, when appropriate, may consult with VAC in accordance with the MOU Application.

Application of the Code

Acceptance of the values and adherence to the expected behaviors in the Code are conditions of your employment with the Board, regardless of your level or position. This includes indeterminate and term employees, individuals on leave without pay, students, as well as casual, seasonal and part- time workers. The Code does not apply to Members who have been appointed to the Board; they have their own Code of Conduct.

Failure to comply with any provision of the Code may result in disciplinary action, up to and including termination of employment. These consequences apply to employees who contravene the Code, as well as to those who: condone unethical behavior; fail to report or take reasonable measures to prevent, detect and address such behavior; or seek to retaliate against those who report it. You must take the necessary steps to prevent and avoid real, potential or apparent conflicts of interest.

If you are a supervisor, you have the added responsibility of creating an open and supportive work environment where employees feel comfortable asking questions, raising concerns and reporting unethical behavior. Ethical behavior does not simply happen; it is the product of clear and direct communication of expectations, modeled from the top and demonstrated by example.

Additionally, individuals on any kind of temporary or volunteer assignment with the Board are expected to comply with the requirements in the Code.

The Veterans Review and Appeal Board Code of Conduct came into force on 31 October 2012. The Board has committed to reviewing the Code periodically, not exceeding two years.

Confidential Report

You are required to report all activities that might cause a real, apparent or potential conflict of interest in relation to your official duties (See Chapter II – Conflict of Interest). To do so, you must complete a [Confidential Report](#) and send it to the Deputy Head (Chair) of VRAB. Such a report is to be made within 60 days of your initial appointment or any subsequent appointment, transfer or deployment.

On a regular basis thereafter, and every time a major change occurs in your personal affairs or official duties, you are required to review your obligations under the Code. If a real, apparent or potential conflict of interest exists, you are required to submit a Confidential Report in a timely manner to the Deputy Head of VRAB.

Speak Up

All persons employed with the Board should feel comfortable speaking their mind, particularly with respect to ethical concerns. The information contained in the Code is not intended to respond to every possible ethical issue that might arise in the course of your daily work. When ethical issues arise, you are encouraged to discuss and resolve these matters with your immediate supervisor. If you suspect that a violation of the Code has occurred or potentially could occur, you are to contact your immediate supervisor, the next level of management or Director General of VRAB.

If you believe you are a victim of, or a witness to discrimination or harassment, you must report it to your immediate supervisor. You may also address suspected discrimination or harassment directly with the person engaging in such conduct if you are comfortable doing so and you believe the conduct is unintentional. For more information, please refer to the [Directive on the Prevention and Resolution of Workplace Harassment and Violence](#).

[The Public Servants Disclosure Protection Act \(PSDPA\)](#) encourages you to come forward if you believe that wrongdoing has occurred or is about to occur in your workplace. If you have information that could indicate a serious breach of the Code, you can bring the matter to the attention of your immediate supervisor, Director General of VRAB, the [Senior Officer for Internal Disclosure](#) or the [Public Sector Integrity Commissioner](#).

The Senior Officer for Internal Disclosure is responsible for supporting the Board's Deputy Head/Chairperson in meeting the requirements of the [PSDPA](#). They help promote a positive environment for disclosing wrongdoings, and deals with disclosures of wrongdoing made by employees of the organization. Further information on the duties and powers of the Senior Officer for Internal Disclosure can be found in Annex A: Senior Director of Human Resources Strategy & Program Design.

Support Mechanisms

Support mechanisms have been put in place to assist you in fulfilling your duties and obligations under the *Code*. You are encouraged to discuss any concerns with your immediate supervisor as soon as possible.. For more information, please visit the [Organizational Health and Ethics Web section](#)

The following values are a compass to guide public servants in everything they do. The values should not be considered in isolation from each other as they will often overlap. All persons employed with the Board are expected to take steps to integrate these values into their decisions, actions, policies, processes and systems.

The Board's Code of Conduct complements the Values and Ethics Code for the Public Sector by further defining the Board's own expectations.

CHAPTER I: VALUES AND ETHICS

1. Respect for Democracy

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

1.1 Respecting the rule of law and carrying out their duties in accordance with legislation, policies and directives in a non-partisan and impartial manner.

Ministers are responsible for making decisions for the Government of Canada, including establishing policies and making funding decisions. Public Servants are required to provide advice and ensure implementation of these policies and decisions, as it relates to their official duties.

As a person employed with the Board, you must carry out your duties in an impartial way, making sure that your public statements or actions do not impair your ability to carry out your duties or call into question your impartiality in carrying out those duties. You should use internal means to bring any criticisms you may have to the attention of the Board's management.

You are to refrain from making, through any public medium (such as radio, television, newspaper, blog, or social media), either directly or through a third party, any pronouncement critical of the Board's policies, programs or officials, or expressing personal views in support of, or in opposition to, the Government of Canada or a political party, where the statements or actions might create a conflict with the duties of your position or with the Board's programs. As an employee of the Board, you are challenged and encouraged to recommend improvements on all policies, programs and services provided to our clients.

Only designated and authorized spokespersons can make statements or comments to the media or through social media about the Board or its employees. If you receive a call from the media, you must refer it to the Board's Manager of Communications.

1.2 Loyally carrying out the lawful decisions of their leaders and supporting the Minister in their accountability to Parliament and Canadians.

All persons employed with the Board are required to implement lawful decisions and initiatives. If you have any questions or concerns regarding what duties would be considered politically partisan and what duties are within your obligations to support the Minister, you are encouraged to seek clarification from your immediate supervisor.

1.3 Providing decision-makers with all the information, analysis and advice they need, always striving to be open, candid and impartial.

As an employee of the Board you may be tasked with providing information and advice to management. In fulfilling your responsibilities for developing these materials, you must ensure that you are providing the information required in order for management to make informed decisions.

You must ensure the protection of personal information in accordance with the *Privacy Act* and other Treasury Board of Canada Secretariat (TBS) policies and directives.

Personal information should not be shared within the Board without consent unless it is used for the specific purpose for which the Board collected the information.

2. Respect for People

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

2.1 Treating every person with respect and fairness.

Respect and fairness are fundamental to the culture at the Board. You are expected to:

- provide courteous, prompt, sensitive and professional service to Veterans, clients, colleagues and the public;
- acknowledge and value your distinct roles and contributions and those of your colleagues;
- align your behaviour and your resources to achieve team priorities;
- actively participate and support one another to succeed;
- build relationships and alliances that support our common goals;
- show respect and loyalty to your colleagues;
- act with courtesy and sensitivity toward each other in all situations; and
- challenge the issues, not the people.

Every reasonable attempt should be made to develop and nurture a culture in which work-life balance is respected and promoted in order to foster a healthy and respectful workplace.

Sensitivity to the needs of the public and colleagues involves being polite under difficult conditions, in times of personal stress, and in the face of provocation that does not involve a violation of the law. You must not make any abusive, derisive, threatening, insulting, offensive or provocative statements or gestures to, or about, another person.

2.2 Valuing diversity and the benefit of combining the unique qualities and strengths inherent in a diverse workforce.

Our own actions reflect on our co-workers and define our workplace. You have an obligation to respect the dignity and diversity of Veterans, clients, service providers, partners and colleagues and to treat them as you would like to be treated.

The Board strives to foster a work environment that supports open communication, respect and access to employment and promotional opportunities for all individuals regardless of their race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status, physical or mental disability, and pardoned criminal conviction.

We recognize that having a diverse workforce and providing a work environment where all employees can realize their full potential makes the organization more stimulating and ensures that we address the evolving needs of the Canadian public and of the clients we serve.

2.3 Helping to create and maintain safe and healthy workplaces that are free from harassment and discrimination.

The Board has a zero-tolerance policy for discrimination and harassment, based on categories protected under applicable laws. Prohibited grounds under the *Canadian Human Rights Act* include race, national or ethnic origin, colour, religion, age, sex, sexual orientation, marital status, family status, physical or mental disability, and pardoned criminal conviction. In addition, other grounds for discrimination include language, military status, Veteran status and citizenship status. Harassment includes, but is not limited to, racist, sexist or ethnic comments, jokes or gestures, or any conduct or statement creating an intimidating, hostile or offensive work environment.

If you believe you are a victim of, or a witness to, discrimination or harassment, you must report it to your immediate supervisor. You may also address suspected discrimination or harassment directly with the person engaging in such conduct if you are comfortable doing so and you believe the conduct is unintentional. For more information, please refer to the Treasury Board [Policy on Harassment Prevention and Resolution](#).

The Board is committed to providing a workplace that does not tolerate violence in any form from any source. Therefore, the Board will respond to every incident of actual and potential violence immediately, in a manner proportionate to the seriousness of the situation. Workplace violence includes any act in which a person is abused, threatened, intimidated, bullied or assaulted in the course of their employment. It is not limited to incidents that occur in the traditional place of work; it can occur at off-site business functions, social events related to work.

More information can be found in the [Veterans Affairs Portfolio Policy on Violence in the Work Place](#) and the [Guidelines on Personal Security and Service to the Public](#).

2.4 Working together in a spirit of openness, honesty and transparency that encourages engagement, collaboration and respectful communication.

As public servants, we are accountable for what we do and we strive for a high level of employee engagement. Accountability is ensured by transparency in your open and honest dealings with colleagues, managers, clients and the public.

Two-way communication is encouraged within and between work units to ensure alignment of objectives. Communication also involves actively listening to the point of view of others. Effective communication helps build collaboration. By working collaboratively, we can share knowledge, learn and build consensus.

3. Integrity

Public servants shall serve the public interest by:

3.1 Acting at all times with integrity, and in a manner that will bear the closest public scrutiny; an obligation that may not be fully satisfied by simply acting within the law.

The following list outlines examples of activities that are not authorized:

- engaging in a personal relationship with your client;
- accessing the file of a client and/or employee without a work-related 'need to know';
- accessing a client file of someone who is a relative, a friend, a neighbor or a co-worker (co-worker may also mean a colleague in another organization with whom you work);
- being involved in any Board business transaction and/or approval process that involves a relative, a friend, a neighbor or a co-worker (co-worker may also mean a colleague in another organization with whom you work);
- being involved directly or indirectly in the decision-making process to approve or deny a benefit to a relative, a friend, a neighbor or a co-worker (co-worker may also mean a colleague in another organization with whom you work);
- having direct or indirect access to your own client records unless the access is authorized under the provisions of the *Privacy Act*;

- acting as a supplier of goods or services to the Board when such activities are related to your primary duties as an employee with the Board;
- disclosing sensitive or confidential information (Protected and/or Classified) to another person who does not have an official 'need to know' this information;
- accepting gifts or a bequest from Veterans, other clients, their families, and suppliers with whom the Board does business;
- acting as power of attorney for a client who is not a family member; or
- acting as executor of a will for a client who is not a family member.

3.2 Never using your official role to inappropriately obtain an advantage for yourself or to advantage or disadvantage others.

In ensuring that clients are treated fairly, you must ensure that you do not step out of your official role to assist private entities or persons in their dealings with the government where this would result in preferential treatment to the entities or persons.

Under no circumstances are you authorized to:

- knowingly take personal advantage of, or benefit from, information that is obtained in the course of your official duties and that is not generally available to the public;
- solicit benefits or transfers of economic value from a person, group or organization in the private sector who has dealings with the Board; or
- be involved in any staffing or contracting process involving applicants who you are closely related to or have close ties with, that would hinder your ability to assess their performance in an impartial manner.

Providing information that is publicly accessible is not considered preferential treatment.

3.3 Taking all possible steps to prevent and resolve any real, apparent or potential conflicts of interest between your official responsibilities and your private affairs in favor of the public interest.

In order to protect you and your personal information from any conflict of interest, if you are or become a client of VRAB or VAC, you must identify yourself as a client to your immediate supervisor who will advise the Director of Security and Real Property Services.

For more information on conflict of interest requirements, please see [Chapter II: Conflict of Interest](#).

3.4 Acting in such a way as to maintain your employer's trust.

A great deal of trust is placed on you in the performance of your duties. It is by behaving ethically and with good conduct that employees safeguard the Board's reputation for integrity, honesty and professionalism. Employees maintain their employer's trust by adhering to the Code and the Board's policies.

If you contravene the Code, or any policy of the Board, you could be subject to disciplinary action. Any disciplinary measures taken against you would be in accordance with the [Treasury Board's Guidelines for Discipline](#).

4. Stewardship

Public servants shall use resources responsibly by:

4.1 Effectively and efficiently using the public money, property and resources managed by them.

Stewardship is everyone's responsibility. You are authorized to use the equipment, property or supplies which are owned or rented by the Government of Canada for authorized purposes only. This includes telephones, computers, cell phones, office furniture, photocopiers, fax machines, office supplies, etc.

4.2 Considering the present and long-term effects that your actions have on people and the environment.

Protecting the environment is essential to the well-being of employees, clients and all Canadians. The Board is committed to complying with all environmental laws and regulations.

As an employee of the Board, you are responsible to:

- adopt environmentally responsible practices and products where feasible;
- recycle waste products such as paper, cardboard, glass, polystyrene foam and metal where possible;
- read and follow any signs, labels, instructions and work rules related to the proper handling, storage and disposal of toxic substances and hazardous waste;
- immediately report leaks, spills, inadequate cleanup or improper disposal of any toxic substances or hazardous waste to your immediate supervisor; and
- refrain from using scented products in the workplace.

4.3 Acquiring, preserving and sharing knowledge and information as appropriate.

The Board considers knowledge, information and records to be valuable corporate resources that contribute to achieving our objectives and require diligent management.

All messages and information sent, received or stored on the Board's computer systems may be monitored.

As an employee of the Board, you shall engage in the following activities. Please note that this list is not exhaustive:

- be accountable for the effective and efficient use of information and records;
- create and maintain authentic, reliable and usable records in support of ongoing business, and protect the integrity of those records for as long as required;
- identify and conserve certain types of required information, specifically those that trace policy and program decisions, that have historical or archival importance, or that might be used for educational purposes to explain the wartime history of Canadian Veterans;
- transfer knowledge to other employees as appropriate;
- mentor new employees so they understand the value of keeping good records;
- use official record systems, retain and file records required for business, legal, financial, research or archival purposes, and dispose of these records according to corporate policies;
- limit your access to only client information that you have a 'need to know' in order to perform your duties;
- ensure that anyone to whom you give client information has a legitimate 'need to know' and only disclose specific information that has relevance to the issue(s)
- access the Internet for government business-related purposes only.

If misconduct or misuse is suspected, management is contacted prior to initiating an investigation. Management also reserves the right, where misconduct or misuse is suspected, to request a review of emails or computer files.

For further clarification and more information, please contact the Board's Manager of Information Technology and Information Management.

5. Excellence

Public servants shall demonstrate professional excellence by:

5.1 Providing fair, timely, efficient and effective services that respect Canada's official languages.

The Board supports a workplace where you are encouraged to use your official language of choice. As a national Board, our clients have the right to communicate with, and be served by the Board in the official language of their choice.

The Board strives to provide an environment that respects and embraces our linguistic values, where language poses no barrier to work, and where you are able to work to your greatest potential. You are challenged and encouraged to forward all comments and proposed improvements to the [Boards Official Languages ambassador](#).

5.2 Continually improving the quality of policies, programs and services they provide.

As an employee of the Board, you are challenged and encouraged to recommend improvements to all the Board's policies, programs and services to management.

5.3 Fostering a work environment that promotes teamwork, learning and innovation.

Change is a constant in life. Being flexible and ready to adapt to change is essential to our well-being and contributes to innovation. Through a collaborative teamwork approach, we build on one another's strengths to achieve the Board's priorities. We strive to be an organization committed to life-long learning through training and professional development.

CHAPTER II: CONFLICT OF INTEREST

Ethical Conduct

Personal Assets

You are required to evaluate your personal assets, taking into consideration the nature of your official duties and the characteristics of your assets. If there is any real, apparent or potential conflict of interest between the carrying out of your official duties and your assets, you are to report this matter to the Director General of VRAB in a timely manner.

Where the Director General of VRAB determines that any of these assets results in a real, apparent or potential conflict of interest in relation to your duties and responsibilities, you may be required to divest those assets, either by having the asset sold at arm's length or placed in a blind trust. Employees may not sell or transfer assets to family members or anyone else for the purpose of circumventing the compliance requirements.

The types of assets that should be reported and the procedures for divesting such assets are set out in the [Treasury Board's Directive on Reporting and Managing Financial Conflicts of Interest](#).

Outside Employment or Activities

You may engage in employment outside the public service and take part in outside activities unless the employment or activities are likely to cause a real, apparent or potential conflict of interest or would undermine the impartiality of the public service or your objectivity in the performance of your job duties.

You are required to provide a report to the Director General of VRAB when your outside employment or activities might subject you to demands incompatible with your official duties, or cast doubt on your ability to perform your duties in a completely objective manner. The Director General of VRAB may require that the outside activities be modified or terminated if it is determined that a real, apparent or potential conflict of interest exists.

VRAB Employees who receive a benefit or income either directly or indirectly from a contract with the Government of Canada are required to report to the Director General of VRAB on such contractual or other arrangements. The Deputy Head (Chair) will determine whether the arrangement presents a real, apparent or potential conflict of interest, and may require that the contract be modified or terminated.

Political Activities

If you are considering involvement in a political activity, you should seek the advice of your immediate supervisor or the [Organizational Health and Ethics Office or the Public Service Commission \(PSC\)](#) before acting. You are required to seek and obtain permission from the PSC to seek nomination as, or be a candidate in, a federal, provincial, territorial or municipal election, in accordance with Part 7 of the [Public Service Employment Act \(PSEA\)](#).

"Political activities" are defined in Part 7 of the PSEA as "carrying on any activity in support of, within or in opposition to a political party; carrying on any activity in support of or in opposition to a candidate before or during an election period; or seeking nomination as or being a candidate in an election before or during the election period." This includes using blogs, social networking sites, personal Web sites or video sharing.

If you wish to engage in a political activity not covered by Part 7 of the PSEA, it may constitute a conflict of interest. More information can be found in [VAC's Policy and Guidelines on Political Activity](#).

Social Media

Social media refers to web-based platforms that allow users to publish content and interact online. Social media applications include, but are not limited to, blogs, wiki, MS Teams, podcasting and social networking sites such as Facebook, Instagram, TikTok and, X (formerly Twitter).

Social media enables participants to easily and efficiently collaborate and share ideas and opinions. The Government of Canada currently uses social media both internally and externally. Internally, the Government of Canada uses social media applications such as MS Teams to communicate. Externally, the Government of Canada uses social media applications such as Facebook to communicate with the public. Please note the downloading and use of TikTok is banned from all government devices due to an unacceptable level of risk to privacy and security.

Personal use of social media applications, which refers to the use of a personal social media account for purposes unrelated to professional development or employment (e.g., blogging about gardening tips, checking the weather or bus schedules, or sharing personal or family photos) is limited and must be conducted on personal time. For more information on social media and network use please visit: [The Guideline of Acceptable Network and Device Use](#).

In accordance with the stewardship value and the duty of loyalty, you cannot step outside your official role, and post on social networking sites or other social media applications anything that could compromise your status as an employee of the Board and/or undermine the impartiality and effectiveness of the public service. The duty of loyalty owed by public servants to the Government of Canada encompasses a duty to refrain from public criticism of the Board, the Portfolio, the Government of Canada and/or its employees. You must balance your right to freedom of expression with your loyalty to your employer, and your duty to avoid conflicts of interest.

You have a responsibility to refrain from disclosing confidential information about government policies, programs, officials, employees or clients, or criticizing government policies, programs, officials, employees or clients. A great deal of harm can be caused by disclosing confidential information online as this information can be easily distributed and broadly reproduced for an extended, if not indefinite, period of time.

Gifts, Hospitality and Other Benefits

You are not to accept any gifts, hospitality or other benefits that may have a real, apparent or potential influence on your objectivity in carrying out your official duties or that may place you under obligation to the donor. This includes gifts from Veterans, other clients, their families, and suppliers with whom the Board does business.

The acceptance of gifts, hospitality and other benefits is permissible if they are infrequent and of minimal value, within the normal standards of courtesy or protocol, arise out of activities or events related to your official duties, and do not compromise or appear to compromise your integrity or the integrity of the Board.

You may usually accept incidental gifts such as:

- mugs, pens or similar items (under \$25 value);
- normal Board-related business hospitality (i.e., a coffee or a light lunch valued under \$50); and
- nominal benefits such as a speaker's honorarium or a gift from a delegation of foreign visitors (under \$50 value).

You may not accept:

- cash or cash equivalents (i.e., gift cards, lottery tickets or cheques);
- free and discounted admission to major entertainment or sporting events, travel or conferences (e.g., theatre, ballet, CFL, NHL); or
- cigarettes, alcohol and related goods, or anything prohibited by Canadian law.

It is a serious matter to accept a gift, hospitality or other benefit that does not meet the criteria, including the dollar limits. You are to seek written direction from the Director General of VRAB where it is impossible to decline gifts, hospitality or other benefits that do not meet the principles set out above, or where it is believed that there is sufficient benefit to the organization to warrant acceptance of certain types of hospitality.

Solicitation

You may not solicit gifts, hospitality, other benefits or transfers of economic value from a person, group or organization in the private sector who has dealings with the government.

Similarly, if an outside individual or entity, with whom the organization has past, present or potential official dealings, offers a benefit to the organization such as funding for an event or a donation of equipment, you are to consider whether any real, apparent or potential conflict of interest exists, and obtain the consent in writing of the Director General of VRAB prior to accepting any such benefit.

The Director General of VRAB may require that the activities be modified or terminated where it is determined that there is a real, potential or apparent conflict of interest or an obligation to the donor. These provisions are designed to ensure consistency with paragraph 121(1) (c) of the [Criminal Code](#).

Fundraising

The Government of Canada Workplace Charitable Campaign (GCWCC), the Royal Canadian Legion Poppy Fund, and Canadian Blood Services/Héma Québec are the officially recognized and supported charitable campaign for federal departments.

Other fundraising activities must be approved in advance and in writing by the Director General of VRAB to request approval.

If approval is granted, the fundraising activities can be undertaken given the parameters set out in the response from the Director General of VRAB. If approval is not granted, there should be no active solicitation or communications using either work time or other work resources, such as your computer or a photocopier, as this could constitute a conflict of interest under the Code.

Avoiding Preferential Treatment

When participating in any decision-making related to a staffing process or contracting of services, public servants shall ensure that they do not grant preferential treatment or assistance to family or friends.

When making decisions that will result in a financial award to an external party, public servants shall not grant preferential treatment or assistance to family or friends.

Public servants should not offer any assistance to entities or persons who have dealings with the government, where this assistance is not part of their official duties, without obtaining prior authorization from their designated superior and complying with the conditions for that authorization.

It is not considered preferential treatment to provide information that is easily accessible to the public, to relatives or friends, or to entities in which public servants or their family members or friends have interests.

Prevention of conflict of interest

A public servant maintains public confidence in the objectivity of the public service by preventing and avoiding situations that could give the appearance of a conflict of interest, result in a potential for a conflict of interest, or result in an actual conflict of interest. A conflict of interest does not relate exclusively to matters concerning financial transactions and the transfer of economic benefit. While financial activity is important, it is not the sole source of conflict of interest situations.

A conflict of interest is a situation in which you have private interests that could improperly influence the performance of your official duties and responsibilities. It could also be a situation in which you use your office for personal gain. A real conflict of interest exists at the present time, an apparent conflict of interest could be perceived by a reasonable observer to exist, whether or not it is the case, and a potential conflict of interest could reasonably be foreseen to exist in the future.

It is impossible to foresee every situation that could cause a real, apparent or potential conflict of interest. When in doubt, you should refer to the requirements found in the Code to guide appropriate action. You can also seek guidance from your manager, or the [VAC Safe Workplace Center of Expertise](#).

CHAPTER III: POST-EMPLOYMENT

Requirements for Preventing Post-Employment Conflict of Interest Situations Before and After Leaving Office

To ensure that new employers do not receive an unfair commercial or private advantage by hiring a public servant or former public servant, the Board's senior managers holding executive positions (EX) or their equivalent, as well as EX minus 1 and EX minus 2 positions or their equivalent are subject to a one-year limitation period after leaving office. They have a responsibility to minimize the possibility of real, apparent or potential conflict of interest between their most recent responsibilities within the federal public service and their subsequent employment outside the public service. A detailed list of positions which are subject to post employment measures can be found at the end of the chapter.

Before Leaving Employment

Before leaving employment with the public service, these public servants are to disclose their intentions regarding any future outside employment or activities that may pose a risk of real, apparent or potential conflict of interest with their current responsibilities and discuss potential conflicts with their immediate supervisor or the Director General of VRAB

Post-Employment Limitation Period for Public Servants in Designated Positions

To comply with post-employment measures, the Board's senior managers holding executive positions (EX) or their equivalent, as well as EX minus 1 and EX minus 2 positions or their equivalent are subject to a one-year limitation period after leaving office. Before leaving office and during this one-year limitation period, these public servants are to report all firm offers of employment or proposed activity outside the public service that could place them in a real, apparent or potential conflict of interest with their public service employment to the VAC Director General of Human Resources.

They are to also disclose immediately the acceptance of any such offer. In addition, these former public servants may not do the following during the one-year period, without the authorization of the Director General of VRAB.

- Accept appointment to a board of directors of, or employment with, private entities with which they had significant official dealings during the period of one year immediately prior to the termination of their service. The official dealings in question may either be directly on the part of the public servant or through subordinates.
- Make representations for, or on behalf of, persons to any department or organization with which they personally, or through their subordinates, had significant official dealings, during the period of one year immediately prior to the termination of their service.
- Give advice to their clients or employer using information that is not publicly available concerning the programs or policies of the departments or organizations with which they were employed or with which they had a direct and substantial relationship.

Waiver or Reduction of Limitation Period

A public servant or former public servant may apply to the Senior Director, Human Resources Service Management Director General of Human Resources for a written waiver or reduction of the limitation period. The applicant must provide sufficient information to assist the Director General of VRAB in making a determination as to whether to grant the waiver taking into consideration the following criteria:

- the circumstances under which the termination of the service occurred;

- the general employment prospects of the public servant or former public servant;
- the significance to the government of information possessed by the public servant or former public servant by virtue of that individual's position in the public service;
- the desirability of a rapid transfer of the public servant's or former public servant's knowledge and skills from the government to private, other governmental or non- governmental sectors;
- the degree to which the new employer might gain unfair commercial or private advantage by hiring the public servant or former public servant;
- the authority and influence possessed by that individual while in the public service; and
- any other consideration at the discretion of the Deputy Head.

Table of EX Equivalents, EX minus 1 and EX minus 2 ** /

Tableau des postes classés EX équivalents, EX moins 1 et EX moins 2 ***

EX Equivalents * / EX équivalents *	EX minus 1 / EX moins 1	EX minus 2 / EX moins 2
AC-03	AC-02	
	AG-05	AG-04
AS-08**	AS-07	AS-06
AU-06	AU-05	AU-04
DE-03	DE-02	DE-01
EC-08	EC-07	EC-06
ED-EDS-06	ED-EDS-05	ED-EDS-04
EN-ENG-06, EN-SUR-06	EN-ENG-05	EN-ENG-04
	FI-04	FI-03
	IS-06	IS-05
IT-05	IT-04	IT-03
LP-02, -03		LP-01
LC-01, -02, -03		
MD-MOF-02, -03, -04, -05; MD MSP-01, -02, -03	MD-MOF-01	
	ND-ADV-03, ND-HME-04, ND DIT-04	ND-DIT-03 ND-ADV-02 ND-HME-03
	NU-CHN-08	NU-CHN-07
		OP-03
	PE-06	PE-05
	PG-06	PG-05
PM-07	PM-06	PM-05
	PS-05	PS-04
	SW-SCW-05	SW-SCW-04
WP-07**	WP-06	WP-05

* Subject to change based on salary rates in effect. / *Sujet à modification selon les taux de rémunération en vigueur.*

** Considered EX Equivalents on TBS Charts, but based on current salary rates, not considered equivalent to EX entry level. / *Considérés comme des équivalents EX dans les tableaux du SCT, mais fondés sur les taux salariaux actuels, ils ne sont pas considérés comme équivalents au niveau d'entrée EX.*

*** To determine equivalencies for staffing activities (i.e., deployments), please consult with Human Resources. / *Pour déterminer les équivalences pour les activités en dotation (c.-à-d. les mutations), veuillez consulter l'équipe des ressources humaines.*

CHAPTER IV: ADDITIONAL GUIDANCE

Hybrid Work

Veterans Review and Appeal board is a hybrid workforce where all employees are encouraged to have presence in the workplace to support collaboration and strengthen team cohesion, with minimum onsite requirements set by the operational and organizational needs identified by management. The Board is embracing the flexibilities available under the [Treasury Board Secretariat Directive on Telework](#) and the [VAC Guide to the Hybrid Workforce](#). All Members and Public Servants have a responsibility to ensure they are compliant with Directives and guidelines.

Employee Assistance Program

It is possible that as an employee, you may find yourself in a challenging personal situation, which could affect your professional relationships and performance at work. If you find yourself in this situation, you are encouraged to speak with your immediate supervisor or contact the [Employee Assistance Program](#).

The Employee Assistance Program is a voluntary and confidential service offered in both official languages, to help employees and their family with personal issues that affect their well-being and/or work performance. Any individual wishing to speak to a counsellor or make an appointment can call the [Employee Assistance Program](#), 24 hours a day, 365 days a year at 1-800-268-7708.

Information Requests

You are encouraged to discuss your questions about the Code with your immediate supervisor as early on as possible.

For more information, please visit the [Organizational Health and Ethics Web section](#).

Questions or information requests can also be made by contacting Organizational Health and Ethics by e-mail at [VRAB Workplace Wellness](#).

Use of Artificial Intelligence (AI)

Generative artificial intelligence (AI) tools offer many potential benefits to Government of Canada institutions, however AI should be used with caution, and risks should be evaluated before use. Please refer to [Guide on the use of Generative AI - Canada.ca](#)* for a complete guideline on the use of AI.

*Please note that a formal policy is currently under development. This policy will supersede and take precedence over any and all conflicting information within the VRAB Code of Conduct.

ANNEX A: DUTIES AND OBLIGATIONS

Public Servants

You are expected to abide by the Code, and demonstrate the values of the public sector in your actions and behavior. Furthermore, you must also adhere to the behavioral expectations set out in the Code. If you do not abide by these values and expectations, you may be subject to administrative or disciplinary measures, up to and including termination of employment.

If you are, or you become, a client of VAC or VRAB, you must identify yourself as a client to your immediate supervisor who will advise Director General of VRAB.

All persons employed with the Board must submit a [Confidential Report](#) to the Director General of VRAB on each occasion where outside employment or activities might subject them to demands that are incompatible with their official duties, or cast doubt on their ability to perform their duties in a completely objective manner.

As provided by sections 12 and 13 of the [Public Servants Disclosure Protection Act \(PSDPA\)](#), if you have information that could indicate a serious breach of the Code, you can bring this matter to the attention of your immediate supervisor; the Director General of VRAB, the [Public Sector Integrity Commissioner](#).

Chairperson/ Deputy Head

The Chairperson has specific responsibilities under the PSDPA, including an overall responsibility for fostering a positive culture of values and ethics in the Board. The Chairperson is responsible and accountable for implementing and promoting the Code and is duly authorized to ensure its enforcement. The Chairperson ensures that employees are aware of their obligations under the Code and also ensures that employees can obtain appropriate advice within their organization on ethical issues, including possible conflicts of interest.

The Chairperson is subject to the [Values and Ethics Code for the Public Sector](#) and the [Conflict of Interest Act](#).

Director General of VRAB

The Director General of VRAB plays a key role in the administration and monitoring of the Code. The Director General shall:

- act as the designated senior official on behalf of the Chairperson for the overall application of the Code;
- receive, examine and make decisions related to confidential reports submitted by employees;
- is responsible for the general administration of the Code;
- ensure ongoing compliance with the requirements and spirit of the Code;
- provide guidance and direction to employees and managers on the interpretation and application of the Code;
- encourage and ensure an ongoing dialogue on values and ethics;
- inform employees bi-annually, or as situations warrant, about the requirements of the Code;
- ensure that information set out in confidential reports remains strictly confidential as stipulated in the *Privacy Act*; designate positions subject to post-employment measures or excludes positions from the application of the post-employment measures;
- reduce or waive the limitation period of employment for an employee or former employee with respect to post-employment; and
- ensure that learning opportunities regarding the Code are available to employees and managers.

Senior Director, Human Resources

Under the MOU between the Board and VAC, VAC may:

- maintain a center of expertise through liaison with values and ethics experts in other federal organizations;
- provide employees with advice related to values and ethics issues and concerns, and assists employees with difficult ethical decisions;
- assist in the development and delivery of values and ethics awareness and training;
- assist senior managers in determining the alignment of their programs and policies to ensure that they are consistent with the Board's values and ethics;
- advise the Board on the application of *Public Servants Disclosure Protection Act* (PSDPA)

The Senior Officer for Internal Disclosure helps promote a positive environment for disclosing wrongdoings, and deals with disclosures of wrongdoing made by persons employed with the Board. The Senior Officer is responsible for supporting the Chairperson in meeting the requirements of the PSDPA. The Senior Officer's duties and powers within the Board also include the following, in accordance with the internal disclosure procedures established under the [PSDPA](#):

- provide information, advice, and guidance to public servants regarding the organization's internal disclosure procedures, including the making of disclosures, investigations into disclosures, and the handling of disclosures made to supervisors;
- receive and record disclosures, and reviews them to establish whether there are sufficient grounds for further action under the [PSDPA](#);
- manage investigations into disclosures, including determining whether to deal with a disclosure under the [PSDPA](#), to initiate an investigation, or to cease an investigation;
- coordinate the handling of a disclosure with the senior officer of another federal public sector organization if a disclosure or an investigation into a disclosure involves that other organization;
- notify the person(s) who made a disclosure in writing of the outcome of any review and/or investigation into the disclosure, and of the status of actions taken on the disclosure, as appropriate; and
- report the findings of investigations, as well as any systemic problems that may cause wrongdoings, directly to his or her chief executive, with recommendations for corrective action, if any.

Managers and Supervisors

Public servants who are also managers have a particular responsibility to exemplify the values of the public sector.

Managers and Supervisors:

- ensure that all new employees receive an orientation and that the Code is provided along with all other applicable policies and procedures of the Board;
- encourage and ensure an ongoing dialogue on values and ethics within their organization;
- lead by example in their actions and behaviors;
- provide advice and direction to employees who find themselves in situations that could cause a real, apparent or potential conflict of interest;
- advise the Director General of VRAB when an employee self-identifies as a client of VRAB or VAC;
- consult the Director of Corporate Services to clarify the provisions of the Code; or to report any potential or suspected breach of the Code to take appropriate corrective measures to resolve the

real, apparent or potential conflict of interest, and where discipline is warranted, managers are to ensure that any action taken is in accordance with the Treasury Board's [Guidelines for Discipline](#); and

Director, Administrative Services and Chief Security Officer

Under the MOU between the Board and VAC, the VAC Director of Administrative Services and Chief of Security conduct auditing and monitoring of access to ensure appropriateness of staff usage of the Client Service Delivery Network (CSDN) and any other client systems; and conducts monitoring and protecting of client information of clients who are also employees. The Director also investigates and reports any cases of unauthorized access to the appropriate supervisor.

References

[Values and Ethics Code for the Public Sector](#)
[VAC Safe Workplace Centre of Expertise, Workplace Relations, Human Resources](#)
[Public Servants Disclosure Protection Act \(PSDPA\)](#)
[Treasury Board Policy on Harassment Prevention and Resolution](#)
[Privacy Act](#)
[Guidelines on Personal Security and Service to the Public](#)
[Public Service Employment Act \(PSEA\)](#)
[Criminal Code](#)
[Conflict of Interest Act](#)
[Treasury Board's Guidelines for Discipline](#)
[Employee Assistance Program](#)
[Policy on Conflict of Interest and Post-Employment](#)
[The Veterans Bill of Rights](#)
[Guidelines for Discipline](#)
[Confidential Report](#)
[Employee Assistance Program](#)
[Treasury Board Secretariat Directive on Telework](#)
[Treasury Board's Directive on Reporting and Managing Financial Conflicts of Interest](#)
[Directive on the Prevention and Resolution of Workplace Harassment and Violence.](#)
[Guide on the use of Generative AI - Canada.ca](#)