

**Code of Conduct**  
**Accreditation Committee**

# Accreditation Committee

## CODE OF CONDUCT

### I. Preamble

The Code of Conduct (Code) for the Accreditation Committee (“Committee”) applies to all members. The Code reflects a commitment to the Committee’s values and provides a framework to guide ethical conduct in a way that upholds the integrity and reputation of the Committee. Members are expected to behave in a way that aligns with this Code. They understand that this Code does not cover every specific scenario. Therefore, they use the spirit and intent behind this Code to guide their conduct, and exercise care and diligence in the course of their work with the Committee.

To demonstrate commitment to transparency and accountability, this Code is available to the public on the Agency Governance Secretariat website.

### II. Core Values

- a. Members act with impartiality and integrity.
- b. Members demonstrate respect and accountability by understanding the objectives of the committee.
- c. Members value and understand the importance of continuing education.

### III. Guiding Principles

These principles guide the behaviour and decisions of members:

- a. The actions and decisions of members are made to serve the public interest and to advance the mandate and long-term interests of the Committee.
- b. Members are responsible stewards of public resources.
- c. Members will act in good faith and place the interests of the Committee above their own private interests.
- d. Members’ behaviour and actions are fair and reasonable in the circumstance.
- e. Members understand that this Code is not intended to conflict with other Codes of Conduct, and will discuss any potential conflicts with the Superintendent of Insurance.

- f. This Code applies to all members unless a specific exemption is granted by the Superintendent of Insurance.
- g. If a member becomes aware of a real or perceived conflict of interest, he/she must disclose the conflict to the Superintendent of Insurance at the first opportunity. However, disclosure itself does not remove a conflict of interest.
- h. Members encourage their colleagues to act fairly and ethically and can raise related concerns to the Superintendent of Insurance without fear of reprisal.
- i. Breaches of this Code may result in disciplinary action, up to and including removal of the member.
- j. Questions about the Code, or the application of these principles, should be discussed with the Superintendent of Insurance.
- k. Each member confirms annually their understanding of, and commitment to, this Code.

#### **IV. Behavioural Standards**

Behavioural standards help members make appropriate decisions when the issues they face involve ethical considerations. Behavioural standards cannot cover all scenarios but provide guidance in support of day-to-day decisions. All members must adhere to the following standards:

- a. Members must not engage in any criminal activity and comply with all relevant laws, regulations, policies and procedures.
- b. Members must not use their status or position with the Committee to influence or gain a benefit or advantage for themselves or others.
- c. Member conduct contributes to a safe and healthy workplace that is free from discrimination, harassment or violence.
- d. Members must not use drugs or alcohol in a way that affects their performance and safety or the performance and safety of their colleagues, or that negatively impacts the reputation or operations of the Committee.
- e. Members must act in a way that is consistent with the Committee's protocols on public comment.
- f. Members must take reasonable steps to avoid situations where they may be placed in a real or apparent conflict between their private interests and the interests of the Committee. In other words, actions or decisions that members take on behalf of the Committee must not provide them with an opportunity to further the private interests of themselves, their families, their business associates or others with whom they have a significant personal or business relationship.

1. Confidential Information  
Members must respect and protect confidential information, use it only for the work of the Committee and not use it for personal gain. Members must comply with protocols that guide the collection, storage, use, transmission and disclosure of information.
2. Gifts and Gratuities  
Members must not accept or receive gifts and gratuities other than the normal exchange of gifts between friends or business colleagues, tokens exchanged as part of protocol or the normal presentation of gifts to people participating in public functions.
3. Outside Activities  
Members must avoid participating in outside activities that conflict with the interests and work of the Committee. For example:
  - i. Business Interests: Members must not hold interests in a business directly or indirectly through a relative or friend that could benefit from, or influence, the decisions of the Committee.
  - ii. Employment: Members must not take employment that affects their performance or impartiality with the Committee.
  - iii. Volunteer Activity: If members are involved in volunteer work, the activity must not influence or conflict with decisions relating to the Committee.
4. Pre-Separation  
Members considering a new offer of appointment or employment must be aware of and manage any potential conflicts of interest between their current position and their future circumstance, and must remove themselves from any decisions affecting their new appointment or employment.
5. Post-Separation  
Once members have left the Committee, for a period of 24 months, they must not disclose confidential information that they became aware of during their time with the Committee and must not use their contacts with their former colleagues to gain an unfair advantage for their current circumstance.
6. Property  
The Alberta Insurance Council provides administrative services for the Committee, such as the premises and equipment for the Committee's meetings. As such, members may have limited use of the Alberta Insurance Council's premises and equipment for authorized incidental purposes providing such use involves minimal additional expense to the Committee, must not be performed on the member's work time, must not interfere with the mission of the Committee and must not support a personal, private business.

7. Related Persons or Parties  
Members must avoid dealing with those in which the relationship between them might bring into question the impartiality of the member.

## V. Administrative Processes

Administrative processes help members manage ethical dilemmas, including any real or apparent conflict of interest concerns.

- a. Administration

The Code Administrator for Committee members is the Chair<sup>1</sup>.

The Code Administrator receives and ensures the confidentiality of all disclosures and ensures that any real or apparent conflict of interest is avoided or effectively managed. As well, the Code Administrator is responsible for providing advice and managing all concerns and complaints concerning potential breaches of the Code, including conflicts of interest within the Committee. Even though a Committee may have a delegated process for responding to and managing concerns, the Code Administrator is responsible for ensuring procedural fairness.

- b. Disclosure

It is the responsibility of each member to declare in writing to the Code Administrator those private interests and relationships that they think could be seen to impact the decisions or actions they take on behalf of the Committee. When there is a change in their responsibilities within the Committee or in their personal circumstance, members shall disclose in writing any relevant new or additional information about those interests as soon as possible. Where a real or apparent conflict of interest cannot be avoided, members must take the appropriate steps to manage the conflict.

Members disclose these real or apparent conflicts of interest so that the Code Administrator is aware of situations that could be seen as influencing the decisions or actions they are making on behalf of the Committee. This provides members, following a review by the Code Administrator, an opportunity to take action to minimize or remove the conflict. To actively manage a conflict of interest, options include:

- removing themselves from matters in which the conflict exists or is perceived to exist;
- giving up the particular private interest causing the conflict; and,
- in rare circumstances, resigning their position with the Committee.

- c. Reporting a Potential Breach by Another

Members are encouraged to report in writing a potential breach of this Code by another to the Code Administrator. When reporting a potential breach in good faith and with reasonable grounds, members are protected from retaliation for such reporting.

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<sup>1</sup> The Superintendent of Insurance administers the Code of Conduct for the Chair.

- d. Responding to Potential Breach  
Once a potential breach has been reported, the Committee's procedures for responding to and managing a potential breach will be promptly initiated. The Code Administrator will review the circumstance and details of the potential breach and will notify the alleged member. The alleged member has the right to complete information and the right to respond fully to the potential breach. The identity of the reporter will not be disclosed unless required by law or in a legal proceeding. The Code Administrator makes a decision and completes a report of the review in a timely manner. The decision may range from finding no potential breach to one that reveals suspected criminal conduct.
- e. Consequences of a Breach  
Members who do not comply with the standards of behaviour identified in this Code including taking part in a decision or action that furthers their private interests may be subject to disciplinary action up to and including removal of the member.
- f. Review of a Decision  
Members can request in writing that the Superintendent of Insurance review a decision that has been made by the Code Administrator about a real or apparent breach of the Code, including a conflict of interest involving that member.

## **VI. Other Resources**

- a. Where to Get Advice  
When members require advice and guidance in determining whether misconduct or a conflict exists, or need clarification, they may discuss their issue with:
- Superintendent of Insurance; or
  - Director of Insurance Policy.

b. Questions to Consider

When members are faced with a difficult situation, the following questions may help them decide the right course of action:

- Have I reflected on or consulted with the Code Administrator about whether I am compromising the Code's values, principles or behavioural standards?
- Have I considered the issue from a legal perspective?
- Have I investigated whether my behaviour aligns with a policy or procedure of the Committee?
- Could my private interests or relationships be viewed as impairing my objectivity?
- Could my decision or action be viewed as resulting in personal gain, financial or otherwise?
- Could my decisions or actions be perceived as granting or receiving preferential treatment?

**VII. Affirmation**

The Code of Conduct for the Accreditation Committee was introduced in August 2014, and is reaffirmed annually by the Committee to ensure it remains current and relevant.