

Lakelands Public Health

Code of Conduct

Regulating the Board of Health

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About the Code of Conduct

What is the Code of Conduct?

It is the expectation of Lakelands Public Health (legal name, Haliburton Kawartha Northumberland Peterborough Health Unit) that Board of Health (BOH) members conduct themselves at the highest level of ethical behaviour and business-like manner while engaging in all Board duties or activities as a representative of the Board.

Board members direct the activities of Lakelands Public Health (LPH or “Health Unit”) as a whole rather than in their own interest or the interest of any specific individual or group. Board of Health members’ contributions to discussions and decision-making are positive and constructive and interactions in meetings are courteous, respectful, open, and co-operative.

Compliance with the Code is expected, along with all BOH policies, by-laws, and all applicable laws and regulations.

Applicability

All BOH members of LPH (legal name) are expected to adhere to the regulations set out in this document.

All members of BOH Committees or those engaged in Board activities that are not members of the BOH are expected to adhere to the regulations set out in this document.

Scope

The regulations set out in this Code of Conduct relate to the individual responsibilities of ethical conduct along with responsibilities of behaviour regarding:

1. Communication;
2. Conduct;
3. Confidentiality; and,
4. Conflict of Interest.

Principles and Responsibility of Ethical Conduct

Board members are responsible for abiding by the [Health Protection and Promotion Act](#) (HPPA) and its regulations, the [Ontario Public Health Standards: Requirements for Programs, Services, and Accountability](#) (OPHS), any Public Health Accountability Agreement between LPH and the Province, this Code of Conduct document, the rules set out under the BOH by-laws and any other legislation governing boards of health so that the action of and any decision of the BOH is made in an efficient, knowledgeable, and expeditious manner.

Board members are accountable for exercising the powers and discharge the duties of their office honestly, in good faith, and in the best interests of the BOH and LPH to support the delivery of legislatively mandated public health programs and services. Board members exercise the degree of care, diligence, and skill that a reasonably prudent person would exercise in comparable circumstances.

BOH members will:

- Carry out the powers of office only when acting as a voting member during a duly constituted meeting of the BOH or one of its appointed bodies.
- Respect both the responsibilities delegated by the BOH to the Medical Officer of Health/Chief Executive Officer (MOH/CEO) and those legislated responsibilities of the MOH/CEO, avoiding interference with their duties but insisting upon accountability and reporting mechanisms for assessing LPH performance.
- Be active, committed, positive, constructive, and professional while serving in the role as a Board of Health member.
- Support Board of Health actions and decisions.
- Advocate the interests of LPH and assist in developing community understanding and support and promote public health programs and services to fulfill LPH's mandate.

Board members will not:

- Engage in nepotism.
- Represent the specific interests of any constituency.
- Attempt to exercise individual authority over the organization except as explicitly set forth in BOH policies or by-laws.

Communication

In order to speak in a unified voice, the BOH Chairperson or designate serves as the official spokesperson for the Board of Health with the media, ministries, or other organizations while conducting BOH business.

When contacted by the media regarding BOH/Health Unit-related topics:

- Board members do not speak to the media unless instructed to do so by the Chairperson.
- Media requests directed to the Board Chairperson or any other member are referred to the LPH Communications team to process accordingly.
- Any comments to the media by any other Board members not previously approved to speak on behalf of the Board will make it clear that their comments are not on behalf of the Board or LPH.
- Board members will consider the impact on the Board and LPH of any comments made to the media, authorized or otherwise.

It is essential that structured open lines of communication are maintained.

Board members must remain neutral by referring all requests for program-related information or organizational services, either on a personal nature or on behalf of others, to the MOH/CEO who is responsible for initiating a course of action appropriate to the circumstances and will advise the Board member of the outcome.

The accountability structure is that the MOH/CEO is the only employee accountable to the Board. All other Health Unit staff are accountable to the MOH/CEO. Board members should not engage in or encourage direct communication with employees who bypass internal LPH processes; instead, they should direct such employees to follow established reporting lines within the Health Unit to raise concerns with the Board. Likewise, Board members should refrain from direct communication with Health Unit staff regarding organizational matters unless explicitly authorized.

Conduct

The BOH expects of itself, and its members, ethical and prudent conduct. This commitment includes proper use of authority and appropriate decorum in group and individual behaviour when acting as Board members in a manner that demonstrates fairness, respect for individual differences, and an intention to work together for the common good.

Respect

LPH representatives are required and expected to treat each other, our suppliers, clients, stakeholders, and all members of the Health Unit community with respect. We will behave fairly and respectfully to all with whom we have contact in our workplace.

LPH is committed to ensuring that all members of the Health Unit community act with each other, and everyone with whom they interact in our workplace, in a manner that is respectful, civil, and professional. The Health Unit is also committed to providing and fostering a positive and respectful workplace free from discrimination, harassment, and violence.

The Health Unit will take all reasonable precautions to prevent these behaviours and to protect Health Unit representatives in the workplace.

Harassment

LPH is committed to preventing harassment from occurring. Harassment is any conduct that denigrates or shows hostility toward an individual based upon citizenship, race, place of origin, ethnic origin, color, ancestry, disability, age, creed, sex/pregnancy, family status, marital status, sexual orientation, gender identity, gender expression, receipt of public assistance and record of offences or any other protected ground. Retaliation against anyone reporting harassment in good faith is also strictly prohibited.

Violence

Acts or threats of physical violence, including possession of a weapon, intimidation, harassment and/or coercion will **not be** tolerated. This prohibition against threats and acts of violence applies to anyone on Health Unit property. Workplace violence includes any behavior that causes an individual to reasonably fear for their personal safety or the safety of family, friends and/or property.

Personal Use of Health Unit Resources and Information Technology

Members are expected to act as good stewards of Health Unit funds, assets, opportunities, equipment, and resources. Health Unit assets are to be used for Health Unit purposes. You are responsible for ensuring that these assets are used for legitimate purposes and for reporting suspected or known abuse of Health Unit property to the BOH Chairperson. This responsibility includes protecting Health Unit property from loss, theft, fraud, misappropriation, abuse, and unauthorized use. Health Unit assets include property, credit cards, materials, equipment, supplies, information, intellectual property, and services.

The Health Unit's facilities, equipment, supplies, time, trademarks, computers and other electronic equipment and communications systems must be used in compliance with the applicable policies the Health Unit has established to protect our information technology resources and the information they contain. These vital Health Unit assets and records must be safeguarded against accidental or unauthorized modification, disclosure, misuse, or destruction. You are expected to be aware of and to abide by the specific policies which address use of the Internet and intranet, email, network servers, software, and cell phones. If you are provided with any of these items, subject to applicable laws, your electronic communications and cell phone use may be monitored to verify that you are complying with Health Unit policy.

Confidentiality

All members of the Board of Health will not, during their term of office or at any time thereafter, either directly or indirectly disclose or permit the disclosure of any confidential information of the Health Unit except as expressly authorized by the BOH to carry out their duties as a Board member.

In accordance with rules under [Municipal Freedom of Information and Protection of Privacy Act](#) (MFIPPA), [Personal Health Information Protection Act, 2004](#) (PHIPA), OPHS, BOH Code of Conduct, by-laws and policies, Board members will keep in confidence any confidential information acquired by virtue of their position, in either oral or written form, except when required by law or authorized by the BOH to do otherwise. Where a matter has been discussed during a closed session (in camera), members will keep the matter or substance of the deliberations on the in-camera meeting confidential.

Board members will:

- not use information obtained in their capacity as a Board member that is not available to the public for personal gain or advancement to their interest or the interests of another individual, group, or organization, or to the detriment of the Health Unit;
- maintain the security of all information regarding the affairs of the Health Unit and safeguarding confidential information that has been entrusted to the Health Unit by others. All confidential information should be properly protected from advert or inadvertent disclosure;
- ensure confidential documents and correspondence (printed or electronic) are securely stored and disposed of using best practices. Documents relevant to actual or threatened litigation must be appropriately retained and preserved as directed by

- legal advisors;
- disclose to the BOH Chairperson any situation in violation, or that may appear to be in violation, of confidentiality as set out in this Code; and,
- complete annually a Declaration of Confidentiality Form.

The Chairperson for the BOH is responsible for:

- Board members' awareness of confidentiality and compliance with confidentiality regulations;
- confirming completion of the Declaration of Confidentiality Form by each Board member; and,
- addressing any reports of violation or potential violations to this document.

Related Documents:

[Declaration of Confidentiality Form](#) (internal form, available upon request)

Conflict of Interest

BOH members are subject to the current conflict of interest legislation in the Province of Ontario, including compliance, at all times, with the *Municipal Conflict of Interest Act*.

Board members have a duty to ensure that the integrity of the decision-making processes of the BOH are maintained by ensuring that they and other members of the Board are free from conflict or potential conflict in their decision-making. It is inherent in a member's fiduciary duty that conflicts of interest be disclosed, avoided where possible, and prudently managed. It is important that all members understand their obligations when a conflict of duty or potential conflict of interest arises. Members will avoid situations in which they may be in a position of actual or perceived conflict of interest.

Situations where a conflict of interest might arise cannot be set out exhaustively, but generally arise in the following circumstances:

- When a Board member is directly or indirectly interested in a contract or proposed contract with the BOH. For example: Board members are bidding on or doing contract work for the BOH.
- When a Board member acts in self-interest or for a collateral purpose (e.g., political gain or other improper purposes) and diverts to their own personal benefit an opportunity in which the BOH has an interest.
- When a Board member has a conflict of "duty and duty". This might arise when the Board member:

- serves as a board member or officer of another corporation that is related to; has a contractual relationship with; has the ability to influence the BOH policy; or has any dealings whatsoever with the BOH; or,
- is also a board member or officer of another corporation related or otherwise, and possesses confidential information received in one boardroom that is of importance to a decision being made in the other.
- When the LPH conducts business with suppliers of goods or services or any other party of which a relative or member of the household of a Board member is a principal, officer or representative.
- When a Board member or a member of the Board member's immediate family accepts gifts, payments, services or anything else of more than token or nominal value (more than \$25.00) from a party that hopes to transact business with the BOH (including a supplier of goods and services) for the purposes or perceived purpose of influencing an act or decision of the Board. Board members will not accept any financial or other endorsements for fulfilling their duties and obligations as members of the BOH other than provided for by legislation and BOH policy. If, despite attempts to discourage gifts, you receive a gift of more than nominal value as the result of a work relationship, you must inform the BOH Chairperson (or Vice Chairperson, in the case of the Chair). If the gift exceeds \$25 in value, it should be returned with a note respectfully declining the gift, donated to a local charity on behalf of the Health Unit, or dispensed within the Health Unit with Chair or Vice Chair approval. You should never accept cash, gifts of stocks or bonds, liquor, lavish entertainment, or travel.

Conflict of Pecuniary Interest

Members are required to declare conflicts of *pecuniary* interest under the [Municipal Conflict of Interest Act](#). Members must comply with the Pecuniary Interest policy (02-13).

Related Documents:

[Pecuniary Interest Policy](#)

[Pecuniary Interest Declaration Form](#)

Compliance

Board of Health members will hold each other accountable for complying with all regulations set forth in the Code of Conduct document.

Informal Complaint Process

Any person who identifies or witnesses' behaviour or activity by a Board of Health member

that appears to be in violation of the Code of Conduct are encouraged, but not required, to try and address the issues on their own as follows:

1. Inform the Board member that their behaviour or activity is in violation of the Code of Conduct.
2. Request or encourage the Board member to cease the prohibited behaviour or activity.
3. If applicable, confirm with the Board member your satisfaction or dissatisfaction with their response to the concern brought forward.
4. If desired, request the assistance of the Board Chairperson or Vice Chairperson to mediate a discussion with the offending Board member to resolve the issue.
5. Retain a written record of the incident(s), including the date, time, location, others present, or any other relevant information, including the steps take to resolve the matter. Additionally, the Board member the complaint is made against should also retain a written record of when they were approached by the complainant, the discussion that took place, and what they have done to address the complaint brought against them.

Formal Complaint Process

Any person who identifies or witnesses behaviour or activity by a Board of Health member that appears to violate the Code of Conduct may raise their concerns through a formal process. If the complaint involves the Chairperson, the Vice Chairperson will assume their role in the process as outlined below.

In cases where a Health Unit staff member wishes to file a complaint against a Board member, they must follow the LPH Employee Code of Conduct and Respectful Workplace policy. These policies offer additional layers of support and assistance, such as guidance from direct supervisors and/or Human Resources.

1. A written complaint will be submitted to the BOH Chairperson by the complainant, and will:
 - Set out the specific section(s) of the Code of Conduct that has allegedly been violated along with an explanation of how or why the actions are in violation of the Code of Conduct.
 - Include the name of the Board member alleged to be in violation of the Code of Conduct along with the date, time, and location of the alleged violation.
 - Include the name of any witnesses that can support the allegation.
 - Include any other information relevant to the alleged violation of the Code of Conduct.
2. Once the complaint is submitted to the BOH Chairperson, to complete an investigation, the Board Chairperson and the MOH/CEO will hold separate meetings with the

complainant and the offending Board member to discuss the situation and determine whether there has been a breach of the Code of Conduct. The MOH/CEO will take notes of the meeting.

3. If the Board Chair and MOH/CEO agree that there has been no breach of the Code of Conduct, no other action is required, and a report will be provided to the Board with full disclosure of the relevant information and findings at the next regularly scheduled meeting of the Board. As this matter may involve an identifiable individual, the report will be confidential and presented during a closed (in camera) session. The Board Chair will provide a copy of the preliminary report to the individual accused of the alleged violation prior to its presentation to the Board.
4. If the Board Chair and MOH/CEO agree that there has been a violation of the Code of Conduct, or cannot unanimously agree that there has not been a violation of the Code of Conduct, the matter will be referred to the Board of Health with a full report to determine whether there has been a violation of the Code of Conduct, and if so, what, if any, might be appropriate for the circumstances. As this matter may involve an identifiable individual, the full report will be confidential and presented during a closed (in camera) session at the next regularly scheduled meeting of the Board. If the Board determines that there has been no violation of the Code of Conduct, no further action will be taken.
5. If the Board determines that there has been a violation of the Code of Conduct, the Board has the right, in its sole discretion, to recommend and/or take action as follows:
 - 5.1. No action taken against the offending Board member.
 - 5.2. Request a public apology from the offending Board member, failing which, other options may be considered.
 - 5.3. A public reprimand by the Board of Health of the offending Board member.
 - 5.4. A resolution of the Board of Health requesting the resignation of the offending Board member which will be non-binding on the Board member in question, with notification to their respective appointing authority in writing of the request to resign.
 - 5.5. All other remedies that may be available to the Board of Health by law.
6. When determining the appropriate course of action for violation of the Code of Conduct, the Board will consider:
 - 6.1. The Board member's past conduct.
 - 6.2. The severity of the violation of the Code of Conduct.
 - 6.3. The implications of the violation of the Code of Conduct to the Board of Health and the Health Unit.
 - 6.4. The Board member's cooperation in addressing the violation.

6.5. The Board member's general level of remorse for the violation of the Code of Conduct.

7. Where the offending Board member is a municipal representative, and where the Board of Health has determined that the violation appears to have also breached the municipal code of conduct, the Board will consult with or report to the respective Municipal Integrity Commissioner on the matter.

Depending on the severity of the incident, the Health Unit reserves the right to engage in a different procedure as deemed necessary or appropriate. For example, if the complaint involves a serious incident of workplace violence, harassment, and/or discrimination, such investigations may be conducted by the Health Unit or a third party. The particular investigative steps may vary from matter to matter but will be appropriate in the circumstances of each complaint. An investigatory report will be completed and provided to the Board of Health in the manner described above.

The Health Unit reserves the right to instigate an investigation when it becomes aware of a potential issue involving workplace violence, harassment, or discrimination regardless of whether a formal complaint was submitted. The Health Unit may contact or refer the complaint to the appropriate authorities when necessary.

Document Information and Version History

Document Information

Policy	Code of Conduct Regulating Board of Health Members
Section	Board of Health
Number	02-12
Policy Lead	Board of Health
Approval Level	Board of Health
Original Approval	2025-10-15
Reviewed/Revised	
Next Review	2027-10-15

Version History

DATE	LEAD	DESCRIPTION
October 15, 2025	A. Gorizzan	Original

Acknowledgement

By signing this form, I, _____,
(Print Name)

acknowledge that I have received a copy of the Code of Conduct regulating Board of Health Members for Lakelands Public Health (legal name, Haliburton Kawartha Northumberland Peterborough Health Unit), I have read and understood the Code of Conduct, and I agree to abide by it at all times during my membership and/or service with LPH.

Further, I understand that compliance with the Code of Conduct, including all referenced policies and procedures within, is a condition of my membership, such that a violation of the Code of Conduct may result in disciplinary action, up to and including termination.

Signature

Date

Distribution: Board of Health Executive Assistant (original)

Member (copy)