



Canadian Space Agency Organizational **Values and Ethics Code**



Table of contents

1. Overview	1
1.1 Our mandate	1
1.2 Roles and responsibilities of employees	1
1.3 Compliance with the Code	2
2. Values and expected behaviours of the public sector and the CSA	3
2.1 Respect for democracy	3
2.2 Respect for people	5
2.3 Integrity	6
2.4 Stewardship	7
2.5 Excellence	8
2.6 Consequences	9
3. Conflicts of interest and post-employment	10
3.1 Definitions	10
3.2 Preventing conflicts of interest	11
3.3 Requirements for preventing and managing conflict of interest situations during employment	12
3.3.1 Personal assets	13
3.3.2 Outside employment or activities	13
3.3.3 Political activities	14
3.3.4 Gifts, hospitality and other benefits	15
3.3.5 Solicitation and fundraising	16
3.3.6 Preferential treatment	17
3.4 Requirements for preventing post-employment conflict of interest situations before and after leaving office	17
3.4.1 Before leaving the public service	17
3.4.2 Post-employment limitation period for public servants occupying a designated position	18
3.4.3 Waiver or reduction of limitation period	19
3.5 Consequences	19
4. Disclosure of wrongdoing in the workplace	20
5. Avenues for resolution, resources and references	21

1. Overview

1.1 Our mandate

As its mandate, the Canadian Space Agency (CSA) promotes the peaceful use and development of space, advances the knowledge of space through science, and ensures that space science and technology provides social and economic benefits for Canadians.

Working at the CSA makes it possible to discover a fascinating world of space science and technology. In partnership with universities, the space industry, research centres and other government agencies across Canada and around the world, the CSA helps to secure Canada's position in this rapidly developing sector.

We are at the dawn of a new era of space exploration. Over the past 20 years, with the International Space Station, we have learned to live in space and develop technologies that work in space. Earth's orbit is becoming more commercial, and we are now aiming for deep space.

The CSA carries out its mandate within a complex legal and regulatory context that requires the understanding and compliance with numerous regulations and the need to exercise vigilance and good judgment. CSA employees must understand and respect their responsibilities in terms of values and ethics.

1.2 Roles and responsibilities of employees

All employees¹

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 law. As professionals whose work is essential to Canada's well-being and to the enduring strength of the Canadian democracy, public servants uphold the public trust.

The Constitution of Canada and the principles of responsible government provide the foundation for the roles, responsibilities and values of the federal public sector. Constitutional conventions of ministerial responsibility govern the relationships between ministers, parliamentarians, public servants and the public. A professional and non-partisan federal public sector is integral to our democracy.

It is the responsibility of all employees to set an uncompromising example of ethical conduct. Employees of all levels need to remember that their decisions reveal, challenge and shape the character of the organization. Everyone must strive to act in the best way possible to ensure that they maintain and reinforce the trust that everyone has in the organization.

All employees are required to familiarize themselves and comply with the provisions of the [Values and Ethics Code for the Public Sector](#) (VECPS), this CSA Organizational Values and Ethics Code and the [Directive on Conflict of Interest](#)².

Managers

Public servants who are also managers are in a position of influence and authority that gives them a particular responsibility to exemplify the values of the public sector and the CSA. Therefore, the behaviours

¹ The term "employees" refers to all federal public servants, including all persons employed by the CSA, such as term and indeterminate employees working full or part-time, persons on leave without pay or any other type of leave, students appointed under Student Programs, casual employees, seasonal employees and the President. The term "employees" also includes people on assignment at the CSA through Interchange Canada, as well as the astronauts.

² See Section 1.3, Compliance with the Code below.

adopted by CSA managers, and the example they set daily by adopting and promoting the organizational and public sector values, are of utmost importance. They are the advocates for everyone's commitment to an ethical work environment.

Values and ethics are the foundation of leadership in the public service. To strengthen our ethical culture, managers must, and have the responsibility to, demonstrate leadership within their team by:

- Setting an outstanding and inspiring example of ethical professional conduct and accepting accountability for their actions.
- Identifying potential ethical risks in the workplace and ensuring that employees understand the specific ethical risks they could face, as well as actions they can take to mitigate these risks.
- During performance management, considering how employees have embraced and applied the organization's values while working to meet their work objectives.
- Understanding and taking into consideration the organization's values when making decisions on recruitment, staffing and recognition.
- Providing employees with regular opportunities to participate in open dialogue on values and ethical issues and encouraging reflection and questioning.

The President

As the deputy head of a public sector organization, the President has specific responsibilities under the [Public Servants Disclosure Protection Act \(PSDPA\)](#), including establishing this organizational code.

The President is also responsible for fostering a positive culture of values and ethics. They ensure that CSA employees are aware of their obligations as outlined in the VECPS and this organizational code. The President also ensures that employees have access to appropriate guidance on ethical issues within the CSA, including the risk of conflict of interest.

The President ensures that the current Code, which incorporates the VECPS and the internal disclosure process, are effectively implemented in our organization and are regularly assessed and monitored.

The President also ensures that the CSA carries out its mandate in a [non-partisan](#) manner.

The President is subject to the current Code and to the [Conflict of Interest Act](#).

1.3 Compliance with the Code

Because we must adhere to the VECPS and the current CSA Code in our actions and behaviours, compliance with the VECPS, the CSA Code and the Directive on Conflict of Interest is a **condition of employment** for all CSA employees, regardless of their level or position. At the CSA, we can all expect to be treated in accordance with these values. A breach of this Code may result in disciplinary measures, up to and including, termination of employment.



Note: This Code is not an exhaustive list of all behaviours that are not acceptable within the CSA and that could be subject to administrative or disciplinary actions.

2. Values and expected behaviours of the public sector and the CSA

The CSA Organizational Values and Ethics Code brings together in a single document the values of the public sector and provides information on expected behaviours specific to the CSA.

The [Values and Ethics Code for the Public Sector](#) outlines the expected behaviours that correspond to the values of the federal public sector:

- Respect for democracy
- Respect for people
- Integrity
- Stewardship
- Excellence



Public sector values are also our values. As CSA employees, we must act in accordance with these values and adopt behaviours expected of us as federal public servants. These values and expected behaviours cannot be considered in isolation from each other as they will often overlap.

2.1 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 Canadian parliamentary democracy and its institutions by:

- Respecting the rule of law and carrying out our duties according to the applicable legislation, policies and directives, in a non-partisan and impartial manner.
- Loyal carrying out the lawful decisions of our leaders and supporting ministers in our 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 the CSA, we ensure that the decisions of our leaders are faithfully implemented. CSA employees are professional, objective and impartial, qualities that are vital to our democratic system.



At the CSA, respecting **democracy** includes:



- Complying with legislation, policies and directives and acting accordingly.
- Helping to maintain and enhance the CSA's image and reputation. We are subject to the duty of loyalty and must exercise caution and restraint to ensure that we do not threaten the impartiality, integrity or neutrality of the public service while carrying out our duties.
- For the managers of the organization, making decisions with the interests of the organization in mind, preferably while striving to reach a consensus and providing appropriate strategic direction.

Failing to respect **democracy** includes:



- Failing to help our leaders make decisions by providing incomplete and biased advice.
- Refusing to respect the decisions made by authority figures.

Use of social media

Public trust is at the core of the value of respect for democracy. We understand that the comments, criticisms, photos, videos and personal information that we post on social media are not private, even when using a personal non-public account. As public servants, we must use sound judgment to ensure that our personal and professional³ use of social media does not compromise the CSA or the Government of Canada's reputation, protected information, or working relationships with colleagues, stakeholders and clients.

When using social media for personal or professional use, it is therefore expected that we:

- Be mindful of our duty of loyalty to the federal public service and refrain from publicly criticizing decisions of the CSA and the Government of Canada, regardless of our political opinions.
- Avoid activities that could reflect negatively on the CSA or the Government of Canada.
- Remember that only designated spokespersons can issue statements or make comments on behalf of the CSA or the Government of Canada.
- Exercise caution in our public comments, ensuring that they do not damage the reputation of others, are not discriminatory and do not undermine or compromise the integrity or security of the CSA operations or its employees.

³ Examples of the use of a personal social media account for professional purposes includes networking, sharing, collaborating, researching and keeping up to date with our profession, all in the context of work or professional development, however this account has not been authorized to represent the Government of Canada. Examples of the use of a personal social media account for personal purposes includes keeping up with friends, family and personal interests, all within a personal context with no ties to our work or profession.

2.2 Respect for people

Treating all people with respect, dignity and fairness is fundamental to our relationship with the Canadian public and contributes to a safe and healthy work environment that promotes engagement, openness and transparency. The diversity of our people and the ideas they generate are the source of our innovation.

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

- Treating every person with respect and fairness.
- Valuing diversity and the benefit of combining the unique qualities and strengths inherent in a diverse workforce.
- Helping to create and maintain a safe and healthy workplace that is free from harassment and discrimination.
- Working with others in a spirit of openness, honesty and transparency that encourages engagement, collaboration and respectful communication.



Respect for people is a public sector value that is reflected at the CSA in many ways. Treating people with respect, dignity and fairness is fundamental to our employees' relationships with colleagues, managers, partners, Canadian citizens and other individuals. The CSA employees are expected to show civility, courtesy and decorum. The CSA does not tolerate discrimination, as defined in the [Canadian Charter of Rights and Freedoms](#), harassment or violence between employees (any group and level) or toward third parties. In that regard, our organization has a [Policy on Workplace Harassment and Violence Prevention](#) in addition to [formal](#) and [informal](#) complaint resolution procedures.

At the CSA, showing respect towards people includes:

- Seeking out, valuing and being open to the diversity of each person's talents and points of view and treating others with fairness and dignity even in their absence.
- Striving for consensus in decision-making, while respecting each person's role and responsibilities, as well as all applicable laws and policies, while recognizing that inclusion is essential to achieving our goals with excellence.
- Demonstrating courtesy, kindness, diligence, attentiveness and professionalism.
- Using respectful language when communicating orally and in writing.
- Fulfilling our responsibilities and obligations with respect to health and safety.
- Helping to create and maintain a healthy, welcoming, respectful and trusting work environment.

Failing to show **respect** for people includes:



- Abusing power and using authority or status to intimidate or threaten someone.
- Causing harm to individuals or groups by employing disrespectful words or actions that denigrate or discredit colleagues or collaborators, present or absent, in work meetings or any other work setting.
- Displaying or circulating suggestive material that could be interpreted as offensive to others.
- Talking about people rather than ideas and spreading gossip.

2.3 Integrity

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

Public servants shall serve the public interest by:

- Always demonstrating integrity and acting in a manner that will bear the closest public scrutiny, an obligation that may not be fully satisfied by simply acting within the law.
- Never using our official roles to gain advantage for ourselves or others or to place others at a disadvantage.
- Taking all possible steps to prevent or resolve any real, apparent or potential conflict of interest between our official responsibilities and our private affairs in favour of the public interest.
- Acting in such a way as to maintain our employer's trust.



CSA employees must be able to account for their daily actions and decisions while carrying out their duties in accordance with the applicable laws, policies, directives and codes.

In addition, as CSA employees, we are engaged in fostering a culture of scientific excellence and integrity, two goals which are at the heart of our organization's mandate and activities. A positive culture of scientific integrity strengthens the trust of employees and stakeholders in the credibility and reliability of our scientific activities. It also enhances the contribution of science to evidence-informed decision making and the development of government policy and advice. The [CSA's Scientific Integrity Policy](#) refers to several values and expected behaviours found in the CSA Code and should be consulted in parallel as situations and needs arise.

At the CSA, demonstrating **integrity** includes:



- Managing files and projects with attentiveness while ensuring their integrity.
- Handling sensitive information (protected or classified) with care, so as to protect it.
- Being impartial and fair when choosing scientific and technical projects that align with our mandate and mission and being mindful that these projects are to be managed responsibly.
- Avoiding all forms of real, potential or apparent conflicts of interest between external partners and suppliers and employees who have a contractual, scientific or technical authority at the CSA.

Failing to demonstrate **integrity** includes:



- Knowingly participating in unauthorized⁴ or illegal activities.
- Using CSA property or resources for personal ends.
- Claiming inappropriate, wasteful or falsified expenditures.
- Using confidential or privileged information to gain advantage for ourselves or for any other person or entity.
- Refusing to take responsibility of our words and actions.

2.4 Stewardship

Federal public servants are entrusted with the responsible use and care of public resources, for both the short term and the long term.

Public servants shall use resources responsibly by:

- Effectively and efficiently using the public money, property and resources they manage.
- Considering the short and long-term effects of our actions on people and the environment.
- Acquiring, preserving and sharing knowledge and information, as appropriate.



⁴ For example, taking part in unauthorized political activities or speaking at a conference as a CSA representative without permission, or using the Agency's networks for unauthorized purposes.

At the CSA, demonstrating **stewardship** includes:



- Complying with the policies and directives on the use of public funds, particularly for purchases, rentals, hospitality, travel, conferences and training.
- Behaving responsibly with respect to health and safety in our work environment and that of our colleagues.
- Using work resources, property and time wisely, in accordance with the applicable collective agreements or the conditions of employment established by the employer.
- Complying with policies, laws, regulations and directives relating to the management, creation, disclosure, transfer and protection of scientific and non-scientific intellectual property.
- Ensuring proper information management (documents and data).
- Adopting behaviour that protects our environment for current and future generations, which means minimizing our consumption of energy, office supplies (especially paper), cleaning products and drinking water at work and when travelling and disposing of waste and electronic waste in a responsible manner.

Failing to demonstrate **stewardship** includes:



- Making illegal or unacceptable use of tangible or intangible government property⁵ and inappropriately using public money.
- Assigning Crown copyright to a third party.
- Using a third party's intellectual property without permission.

2.5 Excellence

Excellence in the design and delivery of public sector policy, programs and services is beneficial to every aspect of Canadian life. Engagement, collaboration, effective teamwork and professional development are all essential to a high-performance 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 we provide.
- Fostering a work environment that promotes teamwork, learning and innovativeness.

⁵ Government property includes, but is not limited to, information held by the Department, buildings, vehicles, facilities, files and documents, office equipment and supplies, ergonomic equipment, computers, laptops, USB memory sticks, printers, photocopiers, telephones, mobile wireless devices, electronic networks, software, video equipment, data banks, ID cards, intellectual property.

At the CSA, excellence is reflected, among other things, by innovativeness - a key component of the CSA's mission. The objective of innovativeness is to be at the forefront of the development and application of space knowledge for the benefit of Canadians. While respecting all applicable laws, policies and directives, demonstrating excellence and innovativeness is the ability to use our knowledge, understanding, creativity, flexibility and critical thinking to develop new applications, procedures, processes and technology in all activities that help the CSA fulfill its mandate.

At the CSA, acting with **excellence** includes:



- Performing well by demonstrating competence and professionalism.
- Encouraging, supporting and promoting ongoing professional development and learning.
- Maintaining a professional image and wearing appropriate attire in the workplace.
- Identifying needs and opportunities for collaboration between sectors or external partners, while applying our competencies, knowledge, talents and abilities and aligning our actions with common CSA-specific interests and ensuring that the interests of Canadians are served.
- Recognizing all contributions, both formally and informally.
- Fostering an open environment by encouraging our colleagues and partners to share new ideas, and evaluating these objectively, based on their applicability and effectiveness to the CSA's mandate.
- Promoting creative thinking while emphasizing innovativeness and expected outcomes.

Failing to act with **excellence** includes:



- Circumventing the laws, policies and directives of the CSA and central agencies.
- Not seeking to increase our knowledge of new trends, tools and methods in the context of our activities.
- Not providing service in both official languages when our position requires it.
- Not following CSA communication management protocols (media relations, spokesperson responsibilities, corporate identity, etc.).
- Knowingly withholding relevant information that could help colleagues, managers and partners do their work more effectively and meet their organizational objectives.
- Not listening to new ideas presented by peers, employees and collaborators, which could allow things to be done more efficiently.

2.6 Consequences

All employees who do not comply with the requirements set out in this Code may be subject to disciplinary measures, up to and including termination of employment.

3. Conflicts of interest and post-employment

3.1 Definitions

Conflict of interest: A situation in which the public servant has private interests that could improperly influence the performance of their official duties and responsibilities or in which the public servant uses their office for personal gain. This also applies to situations where the public servant uses their office in ways that benefit family members, friends or associates, past, present or future.

To uphold the values and ethics of the public sector and faithfully serve the public interest, employees and public servants need to recognize the different types of conflicts of interest and minimize the associated risks:

- **A real conflict of interest** exists at the present time. It involves a direct conflict between a public servant's current duties and responsibilities and their existing private interests.
- **A potential conflict of interest** arises where a public servant has private interests that could reasonably conflict with their official duties in the foreseeable future.
- **A perceived or apparent conflict of interest** exists where it could be perceived, or appears, that a public servant's private interests could improperly influence the performance of their duties – whether or not this is in fact the case.

Example of a **real** conflict of interest: owning assets or interests in a company that has business relations with the CSA.

Example of a **potential / apparent** conflict of interest: volunteering for an organization that occasionally has contracts with the Government of Canada or with the CSA.



Conflict of duties: A conflict, whether real, apparent, or potential, that arises not because of the personal interests of a person employed in the core public administration, but as a result of one or more concurrent and competing official responsibilities.

For example, these roles could include their primary public service employment and their responsibilities in an outside role that forms part of their official duties, such as an appointment to a board of directors, or other outside function.

3.2 Preventing conflicts of interest

As Canadian Space Agency employees, we are subject to rigorous ethical standards in order to maintain public confidence in the objectivity of the public service. Indeed, it is our responsibility to ensure that the public service is impartial and consistently perceived as such.

Conflict of interest does not relate exclusively to matters concerning financial transactions and the transfer of economic benefit. While financial activity is important, conflicts of interest in any area of activity can negatively impact the perceived objectivity and impartiality of the public service. With the permanent and pervasive nature of information technology, we should be particularly sensitive to conflicts of interest that may arise from messages and information transmitted via the Internet and other media.

Each employee is responsible for preventing, avoiding and resolving their real, apparent or potential conflicts of interest.

We can prevent conflicts from arising between our public duties and private interests by:

1. Taking all reasonable steps to recognize, prevent, report and resolve any real, apparent or potential conflicts of interest between our official responsibilities and our private affairs.
2. Refraining from having private interests that could be affected by government decisions and actions in which we participate or of which we have knowledge.
3. Not knowingly taking advantage of or benefiting from information that is obtained in the course of our official duties and is not available to the public.
4. Refraining from the direct or indirect use of, or allowing the direct or indirect use of, federal government property or resources, including property leased to the government, for anything other than officially approved activities or in order to obtain personal gain, including performing outside activities during work hours.
5. Not assisting private entities or persons in their dealings with the government, where this would result in preferential treatment of the entities or persons, including those within the space sector.
6. Not interfering in business relationships between private entities or individuals and the government in order to improperly influence outcomes.
7. Maintaining the impartiality of the public service and not engaging in political or outside activity that impairs or could be seen to impair our ability to perform our duties in an objective manner.
8. Applying the same criteria and good judgement to social media use as would be applied to any other conflict of interest area.

Please note that decisions concerning situations of real, apparent or potential conflicts of interest are made in favour of the public interest.

It is impossible to foresee every situation that could give rise to a conflict of interest. When in doubt, we should refer to the requirements set out in this Code, in the [Values and Ethics Code for the Public Sector](#) and in the [Directive on Conflict of Interest](#) to guide appropriate action. We can also seek guidance from our manager who will work with the CSA's Values and Ethics team.



The [Self-assessment Risk-Analysis Tool](#) is a guide for CSA employees intended to help them assess the risks associated with various types of activities that may give rise to a conflict of interest.

3.3 Requirements for preventing and managing conflict of interest situations during employment

Persons employed at the CSA are required to submit a [confidential report](#) describing all outside employment or activities, as well as assets and liabilities that must be declared according to the list on the first page of the confidential report form.



Note: According to the [CSA Human Resources Delegated Authorities Instrument](#) (p. 34), Director Generals are delegated by the President to respond to these confidential reports with the support of the CSA's Values and Ethics team.

This declaration must be submitted within 60 days of an initial or subsequent appointment, transfer or deployment and every time there is a significant change in our personal affairs or official duties. If applicable, please send a completed confidential report to the following mailbox: valeursethique-valuesandethics@asc-csa.gc.ca.

For example, conflicts of interest may arise in relation to the following:

- Owning assets
- Having an outside employment or participating in outside activities
- Partaking in political activities
- Receiving gifts, hospitality and other benefits
- Organizing fundraising activities or solicitation
- Handling situations of preferential treatment (including family, friends or other persons or entities)

Please note that this is not an exhaustive list and that Article 121 of the [Criminal Code](#) includes infractions relating to inappropriate behavior on the part of public servants.

3.3.1 Personal assets

It is our responsibility to evaluate our assets by considering the nature of our official duties and the characteristics of our assets. If there is any real, apparent or potential conflict of interest between the performance of our official duties and our assets, we must report this matter to our Director General, via a confidential report submitted to the CSA Values and Ethics team in a timely manner. Please note that the first page of the confidential report form lists all the assets subject to a declaration.

If the Director General determines that any of these assets results in a conflict of interest in relation to our official duties, we may be required to divest these assets, or to take other measures to resolve the conflict.

3.3.2 Outside employment or activities

As public servants, we may engage in employment outside the public service and take part in outside activities unless the employment or activities are likely to give rise to a real, apparent or potential conflict of interest or would undermine the impartiality of the public service or our objectivity.

We are required to provide a confidential report to our Director General, via the CSA Values and Ethics team (valeursetethique-valuesandethics@asc-csa.gc.ca), when our outside employment or activities might subject us to demands incompatible with our official duties, or cast doubt on our ability to perform our duties or responsibilities in a completely objective manner. If it is determined that a real, apparent or potential conflict of interest exists, the Director General may require that either mitigation measures be taken or that the outside activities be modified or terminated.



Note: Outside activities may include but are not limited to the following situations:

- **Sitting on a board of directors**
- **Speaking at a conference**
- **Volunteer work**
- **Freelance or contract work**
- **Managing a website or social media page**
- **Owning a private business**
- **A secondary employment outside work hours**
- **Outside employment while on a leave of absence**
- **A teaching appointment**
- **A publication of an article or personal manuscript**

3.3.3 Political activities

As public servants, our right to engage in any political activity at the federal, provincial, territorial or municipal level is governed by [Part 7](#) of the [Public Service Employment Act](#) (PSEA). The Act states that a public servant may engage in any political activity as long as it does not impair or is not perceived by others as impairing their ability to perform their duties in a politically impartial manner.

A political activity is defined by the PSEA as:

- Any activity in support of, within or in opposition to a political party.
- Any activity in support of or in opposition to a candidate before or during an election period.
- Seeking nomination as, or being a candidate, in a municipal, provincial, territorial or federal election, before or during the election period.



Whether a political activity will compromise impartiality, or will be perceived as doing so, depends on factors such as the nature of the political activity, the nature of our duties within the organizational context, and the level and visibility of our position.

Employees considering involvement in a political activity should consult the [Public Service Commission \(PSC\) web site](#) page on political activities and complete the [PSC's Political Activities Self-assessment Tool](#). Additionally, an employee should seek the advice of their manager, as well as CSA's [Designated Political Activities Representative](#), before initiating any involvement.

Note:

- If an employee wishes to seek nomination as a candidate in an election, they need to request and obtain permission from the PSC at least 30 days in advance. Employees must also contact the CSA's [designated political activities representative](#) at valeursethique-valuesandethics@asc-csa.gc.ca.
- The Act gives the PSC the authority to investigate allegations of improper political activities by public servants, and to take any corrective measures it considers appropriate, up to and including dismissal.

Examples of non-candidacy political activities include:

- Going door-to-door to solicit votes for a candidate or party
- Putting a sign on your front lawn supporting a candidate
- Donating to a candidate or party
- Attendance at a political rally

Important: You must not identify yourself as a CSA employee during political activities.

Any employee who wishes to engage in a political activity that is not covered by Part 7 of the PSEA and that could constitute a conflict of interest is required to report the proposed activity to the [Designated Political Activities Representative](#). Similarly, any employee who is subject to this Code but who is not subject to Part 7 of the PSEA, who wishes to engage in any political activity that could constitute a conflict of interest, is to report the proposed activity to the Designated Political Activities Representative.

3.3.4 Gifts, hospitality and other benefits

We are expected to use our best judgment to avoid situations of real, apparent or potential conflict of interest by considering the following criteria on gifts, hospitality and other benefits and by respecting the [Values and Ethics Code for the Public Sector](#) and the [Directive on Conflict of Interest](#), which are reflected in the CSA Code.

It is prohibited to accept any gift, hospitality or other benefit that may have a real, apparent or potential influence on our objectivity in carrying out our official duties and responsibilities or that may place us under obligation to the donor. This includes free or discounted admission to sporting and cultural events, travel or conferences.

Although the normal expectation is to not accept gifts, hospitality or other benefits, it is permissible if all the following conditions are met:

- They are infrequent and of very minimal value;
- They are within the normal standards of courtesy, hospitality or protocol;
- They arise out of activities or events related to official duties; and
- They do not compromise or appear to compromise our integrity or that of the CSA in any way.

If we are offered a gift, hospitality or other benefit that does not meet all of the above conditions, we must notify our manager and declare it via a [confidential report](#) submitted to the CSA Values and Ethics team in a timely manner.



Tip: Before accepting any gifts, consider the following:

- How would this appear to an outside objective person?
- Who is the gift from and what is their intent?
- Is it to gain favour or advantage?

When in doubt, it is best to decline the gift, hospitality or other benefit.

Where it is impossible to decline gifts, hospitality or other benefits that do not meet the conditions set out above, or where it is believed that there is sufficient benefit to the CSA to warrant acceptance of certain types of hospitality, we are required to promptly declare it and seek written direction on the procedure to be followed (e.g. accept the gift on behalf of the Government of Canada or the CSA) via a confidential report sent to the CSA Values and Ethics team (valeursetethique-valuesandethics@asc-csa.gc.ca).

3.3.4.1. Honoraria

When we participate in events (as a conference speaker or panel member, for example) in our official capacity, we do not accept any form of honorarium, regardless of whether such participation was during or outside work hours.

3.3.4.2. Travel offers and third party expenses

Any business travel that we undertake must be part of our official duties and responsibilities. As a result, travel costs should normally be covered by the manager's budget since the objective of such business travel serves the CSA in fulfilling its mandate.

Reimbursement of travel costs by a third party (such as a private sector organization, a university, a non-government organization or a provincial, municipal or territorial government) may give rise to the appearance of a conflict of interest, such as preferential treatment, and call into question the CSA's objectivity and impartiality. Thus, no reimbursement from a third-party organization should be considered if there is a possibility that employee objectivity may be affected, or perceived as being affected, or if there is potential for the CSA's integrity to be compromised. Sponsored travel from any other organization or private entity must be declined.

Example: If you take part in an event organized by a university and the university offers to pay your travel expenses (airfare, hotel, food, etc.), you have to refuse this offer.

Reimbursement of participation costs by third parties should normally only be considered in special or extraordinary situations, such as when an employee represents the CSA at a conference, seminar or workshop on matters related to their official duties and expertise. If a third party wishes to reimburse expenses, the employee must consult their manager and the Values and Ethics team.

3.3.5 Solicitation and fundraising

The [Directive on Conflict of Interest](#) (section 4.2.17) states that public servants 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. When fundraising for the Government of Canada Workplace Charitable Campaign, employees must have prior written authorization from the President in order to solicit donations, prizes or contributions in kind from external organizations or individuals.

Similarly, if an outside individual or entity with whom the CSA has past, present or potential official dealings offers a benefit to the CSA such as funding for an event or a donation of equipment, employees are to consider whether any real, apparent or potential conflict of interest exists, and obtain the written authorization of the President by contacting the Values and Ethics team. The President may require that the activities be modified or terminated where it is determined that there is a real, apparent or potential conflict of interest or an obligation to the donor. These solicitation provisions are designed to ensure that this Code is consistent with paragraph 121.(1)(c) of the [Criminal Code](#); they are not intended to prevent employees from taking part in charitable works.

Currently, the federal government continues to support exclusively the Government of Canada Workplace Charitable Campaign, The Royal Canadian Legion Poppy Campaign and Canadian Blood Services / Héma-Québec. For any other solicitation taking place on the properties of the CSA, or involving a CSA employee, a written request must be made to the Values and Ethics team.



Note: Soliciting donations from colleagues to mark a significant moment in a colleague's life (e.g., purchasing a gift for a colleague who has just had a child, donating to an association rather than sending flowers following a death, contributing to the purchase of a retirement gift) is not considered solicitation for the purposes of the CSA code. However, care must be taken to ensure that contributions are optional and that employees do not feel obligated to contribute.

Employees are generally prohibited from soliciting in the workplace, from using CSA equipment to prepare their solicitation activities or distribute solicitation materials, or from approaching their contacts at the CSA (external or internal), in order to obtain donations for external purposes (e.g., for charitable organizations for which they volunteer).

3.3.6 Preferential treatment

We are responsible for demonstrating objectivity and impartiality in the exercise of our duties and in our decision-making, whether related to staffing, financial awards, program operations or any other exercise of responsibility.

This means, for instance, that we are prohibited from granting preferential treatment or advantages to family members, friends or any other person or entity. It is also prohibited to disadvantage any person or entity who has business dealings with the government due to antagonism or personal prejudice.

Transmitting information that is accessible to the public is not considered preferential treatment.

It is our responsibility to recognize situations where we may be in a conflict of interest, such as a reporting relationship, to declare it by filling out a [confidential report](#) and to take appropriate action.

3.4 Requirements for preventing post-employment conflict of interest situations before and after leaving office

All public servants have the responsibility to minimize the possibility of a 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.

3.4.1 Before leaving the public service

According to the [Directive on Conflict of Interest](#) (4.2.19), before leaving our position, we are required to inform our manager of our intentions regarding our future employment or activities and discuss potential conflicts of interest.

3.4.2 Post-employment limitation period for public servants occupying a designated position

Public servants occupying a designated position are subject to a one-year limitation period following the termination of their functions. Before the termination of their functions and during the one-year limitation period, they must report to their deputy head all firm offers of employment and outside activities that might give rise to a real, apparent or potential conflict of interest with their public sector employment.



Note: At the CSA, designated positions include all EX and EX minus 1 positions and their equivalents as well as some other key positions.

Limitation period restrictions

Public servants occupying a designated position are not allowed, without the prior written approval of the President, in the year following the termination of their employment, to:

- a. Accept an appointment to a board of directors of, or employment with, outside entities or individuals with which they had significant official dealings, either directly or through their subordinates, in the year immediately prior to leaving their employment in the public service.
- b. Make representations on behalf of entities or individuals outside the public service to any government organization with which they had significant official dealings, either directly or through their subordinates, in the year immediately prior to leaving their employment in the public service.
- c. Give advice to their clients or any new employer by using information that is not publicly available concerning the programs or policies of the department or organization with which they were employed or with which they had a direct and substantial relationship.

Note that the third restriction must be respected even after the one-year period has elapsed. All public servants are restricted from divulging sensitive and classified information by their Oath of Office and the [Policy on Government Security](#).



Note: The third post-employment limitation applies to all public servants and can never be reduced or waived.

3.4.3 Waiver or reduction of limitation period

A public servant or former public servant may ask the Deputy Head, via the Values and Ethics Team, for a written waiver or reduction of the limitation period. According to the [Directive on Conflict of Interest](#), the public servant or former public servant must include at least the following information in order to allow the Deputy Head to decide if the request is justified:

- a. The circumstances under which they are leaving or have left public service employment.
- b. Their general employment prospects.
- c. The significance to the government of the information they possessed by virtue of their position or former position in the public service.
- d. The desirability of a rapid transfer of their knowledge and skills from the government to private, other governmental or non governmental sectors.
- e. The degree to which their new employer might gain unfair commercial or private advantage.
- f. The authority and influence they possessed while in the public service.
- g. Any other consideration, at the discretion of the Deputy Head.

For the procedure to follow for the post-employment period and any requests for a waiver or reduction of the one year post employment limitation period, please contact the Values and Ethics team.

3.5 Consequences

All employees who do not comply with the requirements set out in this Code may be subject to disciplinary measures, up to and including termination of employment.



4. Disclosure of wrongdoing in the workplace

The definition of wrongdoing refers to serious violations that are contrary to the public interest or the interests of the organization. According to the [Public Servants Disclosure Protection Act](#) (PSDPA), examples of such wrongdoing are⁶:

- A contravention of any Act of Parliament or of the legislature of a province, or of any regulations made under any such Act.
- A misuse of public funds or a public asset.
- A gross mismanagement in the public sector.
- An act or omission that creates a substantial and specific danger to the life, health or safety of persons, or to the environment.
- A serious breach of the Values and Ethics Code for the Public Sector (VECPS) or the organizational code.
- Knowingly directing or counselling a person to commit a wrongdoing.

Under the PSDPA, all CSA employees who are aware of alleged wrongdoing must, confidentially and without fear of reprisal, notify the senior officer responsible for disclosure of wrongdoing by e-mail at: agentsuperieurdivulgation-seniorofficerdisclosure@asc-csa.gc.ca. They can also discuss it with their manager or via the [Public Sector Integrity Commissioner](#).

At the CSA, the Chief Audit and Evaluation Executive is the designated senior officer responsible for disclosure of wrongdoing. They are the only one with access to this mailbox, and will receive, investigate and respond to disclosures on a confidential basis.

For more information you can consult the [Wrongdoing Disclosure Process](#) in place at the CSA, available under the Values and Ethics section of the Intranet.



Important: Employees who disclose wrongdoing in the public service under the PSDPA are legally protected from any form of reprisal they may suffer as a result of disclosing such information.

⁶ Based on the [section 8](#), Wrongdoing.

5. Avenues for resolution, resources and references

The CSA Organizational Values and Ethics Code has been designed to guide our conduct as CSA employees. Compliance with the Code is every employee's personal responsibility. We must exercise vigilance and judgment while ensuring that we adhere to the Code.

However, we should recognize that dilemmas, doubts and value conflicts are inevitable. In those situations, good judgement is required, and open dialogue is encouraged, to ensure that we uphold the values and follow the associated expected behaviours set out in the Code.

The first person to contact if you have any questions or concerns is your immediate supervisor or your manager.

The CSA Values and Ethics team is also available to support all employees.

The following questions may help you to make good decisions and act in accordance with expectations.

- ✓ Are my actions legal and do they comply with the applicable CSA and Treasury Board Secretariat policies?
- ✓ Are my actions consistent with the values of the CSA and the public sector?
- ✓ What are the consequences of my actions?
- ✓ How might the media or the public perceive this measure or decision?

List of available resources

CSA Values and Ethics Team

They are responsible for planning, preparing, coordinating, implementing and communicating values and ethics activities, policies and guidelines at the CSA. The team prepares reports and action plans and provides advice and guidance on values and ethics, conflict of interest and post-employment issues.

Senior Official for Preventing and Resolving Conflicts of Interest

The Senior Official has the responsibility and delegated authority to prevent and resolve situations involving a conflict of interest or a conflict of duties. At the CSA, this mandate is entrusted to the VP, Corporate Strategy and Innovation, and Chief Financial Officer (CFO).

Senior Officer for Disclosure of Wrongdoing

The Senior Officer for Disclosure of Wrongdoing is responsible for receiving information on alleged acts in the workplace, conducting related investigations and making recommendations to the President on actions to be taken. At the CSA, this mandate is entrusted to the Chief Audit and Evaluation Executive.

Designated recipient responsible for the prevention of harassment and violence in the workplace

As part of the [Work Place Harassment and Violence Prevention Regulations](#), the CSA is putting in place several tools and resources to prevent [harassment and violence in the workplace](#) and is appointing a designated recipient responsible for coordinating the Notice of Occurrence process.

CSA Designated Political Activities Representative

The Designated Political Activities Representative is responsible for providing advice and guidance on political activities and for acting as a liaison between the CSA and the [Public Service Commission \(PSC\)](#) responsible for administering the political activities regime. At the CSA, this mandate is entrusted to the Senior Advisor in Values and Ethics.

Health and safety committees

Health and safety committees play a key role in preventing work-related injuries and diseases. You can find more information on their role and mandate on the [Committees and Representatives](#) intranet page.

Intellectual property

You can find more information on effective intellectual property management on the [IPMTT intranet web page](#), along with tools, forms and other resources such as the Procedure for Scientific and Technical Information Publications and the Procedure for Invention Disclosure.



References

The following is a list of documents that identify expected behaviors relating to the various themes addressed in this Code. It is not exhaustive but includes the most relevant documents.

Acts:

[Canada Labour Code](#)

[Canadian Charter of Rights and Freedoms](#)

[Canadian Human Rights Act](#)

[Canadian Space Agency Act](#)

[Conflict of Interest Act](#)

[Constitution Acts](#)

[Copyright Act](#)

[Criminal Code](#)

[Employment Equity Act](#)

[Financial Administration Act](#)

[Lobbying Act](#)

[Privacy Act](#)

[Public Servants Disclosure Protection Act](#)

[Public Service Employment Act](#)

Policies, publications and other references:

[Conflict of Interest and Post-Employment](#)

[Directive on Conflict of Interest](#)

[Directive on the Prevention and Resolution of Workplace Harassment and Violence](#)

[Duty of Loyalty](#)

[Occupational Health and Safety Directive](#)

[Policy on Government Security](#)

[Policy on Official Languages](#)

[Policy on People Management](#)

[Policy on Service and Digital](#)

[Political Activities](#)

[Scientific Integrity Policy](#)

[Values and Ethics Code for the Public Sector](#)

[Workplace Harassment and Violence Prevention Regulations](#)