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Annual Report 2024-2025

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HEU Ethics Commissioner

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In the spirit of reconciliation, we recognize that the Ethics Commissioner's office works from the traditional territories of the Semiahmoo, Kwantlen, Katzie and Tsawwassen First Nations.

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Message from the Ethics Commissioner

This is my first annual report as the HEU Ethics Commissioner. It covers the period from September 1, 2024 to December 31, 2025.

I began my term as Commissioner on October 20, 2025, after the departure of the prior Ethics Commissioner, Ritu Mahil. This report therefore covers a 16-month period, covering the prior Commissioner's foundational work as well as my transition into the role between October 20 and December 31, 2025. Future reports will cover standard 12-month periods aligned to the calendar year.

As the first HEU Ethics Commissioner, Ms. Mahil received and addressed numerous complaints, enquiries and requests for advice; arranged for the Provincial Executive to receive training; and established a roster of investigators to support her work. Ms. Mahil was key to establishing the Ethics Office and implementing the [Code of Conduct for the Provincial Executive](#). I thank Ms. Mahil for her energy and effort both creating and developing the Office. I also recognize the staff at Southern Law who helped HEU to develop the legal structure for the Ethics Office, provided training in 2024-2025, and offered critical administrative support as I transitioned into the role.

Most importantly, however, I thank the Provincial Executive members and alternates who participated in and cooperated with the Commissioner's processes in 2024-2025. The Ethics Commissioner's office is responsible for providing guidance and oversight, but the Provincial Executive bears the responsibility of actually meeting the high standards set out in the Code. I commend HEU and its Provincial Executive for committing to a model of ethical conduct supported by independent oversight.

It is an honour to serve as Ethics Commissioner and I look forward to serving HEU and its members in 2026 and working to foster a sound leadership culture.



Jess Hadley
Ethics Commissioner



Introduction

The Ethics Commissioner is an independent officer that HEU created in 2024 by adopting the [Code of Conduct for the Provincial Executive](#).

The Commissioner's role is to oversee and independently enforce the Provincial Executive's compliance with the Code of Conduct and other HEU policies relating to Provincial Executive conduct. The Code requires the Provincial Executive – the governing body of the HEU between Conventions – to demonstrate a high standard of ethical and professional conduct at all times. Among other things, the Provincial Executive is expected to act honestly, in good faith, and in the best interests of HEU; to avoid conflicts of interest; and to communicate respectfully at all times.

The Ethics Commissioner's duties under the Code of Conduct include:

- Giving the Provincial Executive conduct advice about ethical matters,
- Training the Provincial Executive on the Code of Conduct and related issues,
- Providing information, including via the HEU's website and this Annual Report, about the conduct standards in the Code and about the Commissioner's work, and
- Resolving complaints about conduct violations, either through informal processes (such as mediation) or by formally investigating them and determining appropriate sanctions and remedies.

A flowchart explaining the Commissioner's complaint resolution processes is attached as an appendix to this Annual Report, at page 9. The Commissioner's complaint resolution work is supported by a roster of investigators with appropriate expertise.

The Ethics Office is funded by HEU's members, and as Commissioner I am required to be independent, meaning that I am not influenced by the Provincial Executive. My role is to serve HEU as a whole. Any HEU member, employee, or leader can seek the Commissioner's support and it is my responsibility to ensure that their questions and concerns about Provincial Executive conduct are addressed in a fair, transparent and timely way.



Note about this report

I took office close to the end of the reporting period, so this report is based partly on the previous Commissioner's records. For the financial reporting portion, it is based on information provided by HEU staff.

This report captures the foundational journey of the Ethics Office. While the transition to a new Commissioner in October 2025 allowed for a fresh review of systems, this report reflects the Ethics Office's continuous effort to build a culture of accountability from its inception up until the end of its first reporting period.

Education and Information in 2024-2025

During 2024-2025, the Ethics Office delivered three in-depth education sessions for the Provincial Executive, focused on:

- the standards of conduct;
- the Commissioner's processes for handling complaints; and
- the importance of strong, professional, respectful relationships between the Provincial Executive and HEU's employees.

The Provincial Executive participated actively in these sessions, showing commitment to their own professional development and to leading the organization in an ethical and transparent way.

The Ethics Office also provided approximately 40 instances of individual advice under the Code of Conduct, not just to Provincial Executive members and alternates but also to HEU members and employees.

Finally, since taking office in October 2025, I have implemented a practice of publishing Ethics Commissioner bulletins (with information on relevant ethics-related topics) and summaries of Ethics Commissioner decisions, to keep the membership apprised of the Ethics Office's work. These materials are available online [here](#).

Advice and Complaints in 2024-2025

The Code gives HEU members, employees and elected leaders the right to contact the Ethics Commissioner for advice; to make confidential requests for support with conduct concerns; and to file complaints.



In its first 16 months, the Ethics Commissioner fielded numerous requests for advice, and confidential requests for support with specific conduct concerns, from HEU stakeholders. These requests were not tracked during the bulk of the reporting period so they cannot be reported numerically here. Such requests will be reported numerically for 2026.

In its first 16 months, the Ethics Office also received a total of 108 complaints under the Code. 82 of these complaint files were completed by the end of the reporting period, while 26 remained open.

A total of 43 complaints (nearly 40% of the 108 complaints the Ethics Office received during the reporting period) were rejected because they dealt with a topic outside the Commissioner's jurisdiction. These included complaints involving workplace issues; concerns about respondents who were not elected to the PE; and objections to operational decisions by HEU. This volume of out-of-scope complaints highlights an opportunity for further member education regarding the specific mandate of the Ethics Office (see Strategy 2 at page 6 below). Wherever possible, the Ethics Office referred each of the rejected complaints to the appropriate forum or resource.

In addition, a further 18 complaints were rejected in 2024-2025 for the following reasons:

- 1 was rejected as untimely (too late); and
- 6 were rejected because the complainants did not provide enough information for the Commissioner to assess their complaint; and
- 11 were rejected because they duplicated complaints that were resolved other than via formal resolution.

Meanwhile, and a total of 21 complaints were accepted and resolved during 2024-2025:

- 6 were resolved through the Commissioner's **formal processes**, via an investigation and a final decision. In each of these files the Commissioner found the Code had been violated and imposed a sanction.¹ As required by the Code, summaries of the Commissioner's decisions are available on the [Ethics Office website](#).

¹ This included 3 complaints that were duplicative, which were consolidated and handled together with the complaint that they duplicated.



- 6 were resolved via an **informal process** such as mediation.
- 6 were discontinued at the complainant’s request.
- 3 were closed because the Ethics Office determined they did not raise an issue that, if proven, would violate the Code.

The vast majority of the complaints that were accepted during the reporting period concerned three issues, which sometimes overlapped:

- conduct at HEU’s 2024 Convention;
- the use of social media; and
- alleged bullying, harassment, discrimination and disrespectful behaviour.

Financial Report

2024–2025

In the first four months of the reporting period, from September 1 to December 31, 2024, HEU spent **\$184,241.07²** on the Ethics Office, a figure that included an investment in initial education about the Code and the Commissioner’s role; the processing and resolution of early complaints filed with the Office; and the provision of advice to HEU members, staff and the Provincial Executive.

In the subsequent 12 months of the reporting period, from January 1 to December 31, 2025, HEU spent **\$368,679.22** on the Ethics Office, a figure that included ongoing education for the Provincial Executive; the processing, investigation and resolution of complaints during 2025; and the provision of advice to HEU members, staff and the Provincial Executive.

2026 (Anticipated)

HEU has approved a budget of \$394,800 for the Ethics Office in 2026, broken down as follows:

Strategy / Planning	\$62,900
Complaints and Investigations	\$245,800
Meetings with Provincial Executive	\$47,200
Education & Reporting	\$23,100
Paralegal and Admin Support	\$9,300

² Figures in this report are inclusive of tax.



Legal Services	\$2,500.00
IT	\$4,000.00
Total	\$394,800.00

The 2026 budget prioritizes proactive education via formal sessions and meetings with the Provincial Executive (see Strategies 1 and 2 below), an approach intended to reduce the long-term costs associated with complex, reactive investigations.

My goal is for the Ethics Office to come in under budget for 2026 as I refine our systems based on learnings from our first reporting period. In any case, the 2026 Annual Report will provide a detailed breakdown of the Ethics Office’s financial picture for 2026, comparing the above budget to actual expenditures.

Strategies and Recommendations for 2026

Based on my observations about the Ethics Commissioner work supporting the Provincial Executive in 2024-2025, I have identified **three key areas for strategic action** in 2026. In addition, I have identified **one recommendation** for the Provincial Executive to consider.

Strategy 1: Extend Education on the Code to a Broader Group

The Commissioner’s education efforts have thus far focused on sitting members of the Provincial Executive. In 2026 the Commissioner will build on this in two ways:

- In 2026 the Ethics Office will provide Provincial Executive **alternates** with appropriate training to reflect the fact that they too are bound by the Code of Conduct.
- In 2026 the Ethics Office will develop plain language resources - available to **all HEU members, employees and leaders** - on who the Code applies to, what type of conduct it deals with, who can make complaints under the Code, and how the Commissioner will handle complaints. This will help address a pattern of complaints rejected because the complainants did not understand the Commissioner’s role and processes. HEU may also wish to have the Commissioner make a presentation at the 2026 Convention on these same topics.

Strategy 2: Provide Focused Education for Convention Participants

The Commissioner received many complaints arising out of the 2024 Convention, and the election for the Provincial Executive. At a high level, these complaints showed



that Convention participants lacked alignment on what kinds of conduct were (and were not) an acceptable part of Convention electioneering. They also revealed a lack of clear messaging about what remedies are available for process and conduct concerns during Convention. All of this likely resulted in part from the fact the Code was still relatively novel at that time.

To better support the Provincial Executive and HEU heading into the 2026 Convention in November, the Commissioner will work with HEU staff to provide training and literature on the following points:

- What election-related conduct is (and is not) permitted under the Code of Conduct;
- How to seek support if there are concerns about Provincial Executive conduct during Convention; and
- Ways the Provincial Executive (and candidates for the Provincial Executive) can set a tone that builds members' trust in the Provincial Executive.

Strategy 3: Set Expectations on Social Media and the Duty of Loyalty

In 2024-2025 the Commissioner received many complaints about Provincial Executive members and alternates using social media to publicly criticize the union and its institutions and leaders, to share confidential information, or to vent frustrations about other people involved with HEU. While some of these complaints were not substantiated, others resulted in findings that the Code was violated and the imposition of appropriate sanctions.

For the Provincial Executive, who are elected to lead and represent HEU, it is a clear breach of the Code of Conduct and HEU's Social Media Policy to engage in public disparagement of the union or to use digital platforms for the expression of internal grievances. Such public criticism of HEU conflicts with the Provincial Executive's duty to be loyal to HEU, and commentary aimed at specific individuals can amount to bullying and harassment or otherwise violate the Code and the Social Media Policy.

In 2026, the Commissioner will continue to clarify the range of appropriate online conduct for the Provincial Executive. The Ethics Office remains committed to consistent accountability measures for inappropriate online conduct and for confidentiality violations.



Recommendation: Procedural Amendments to Code

Finally, I recommend that Provincial Executive consider amending the Code to empower the Commissioner to enforce a confidential and effective complaint process. Such procedural powers are standard and will enable the Ethics Office to ensure the integrity of the process as it matures.

First, I recommend the Code be amended to **require parties and witnesses to comply with the Commissioner's directions of confidentiality**, and to allow the Commissioner to impose consequences for non-compliance. For example, the Provincial Executive could consider amendments specifying that:

- a. If a Provincial Executive member or alternate breaches a confidentiality direction from the Commissioner, this is a Code of Conduct violation that could attract sanctions;
- b. If a HEU member breaches a confidentiality direction from the Commissioner, the Commissioner can impose consequences (e.g. dismissal of their complaint(s) and/or a refusal to accept future complaints);
- c. If a HEU employee breaches the Commissioner's directions about confidentiality, the breach will be addressed through HEU's workplace policies.

Second, I recommend the Code be amended to **require the Provincial Executive, HEU members, and HEU employees to co-operate with the Commissioner's processes**, including by participating in interviews, providing documents, and responding in a timely way to requests from the Commissioner. Consequences for a failure to co-operate could be framed the same way as for breaches of confidentiality directions.

Closing Comments

The HEU has been proactive in creating a Code of Conduct for its elected leaders, and in creating an Ethics Commissioner's office responsible for applying the Code. HEU's vision in doing this is to cultivate a culture of ethical, transparent leadership.

The Ethics Commissioner is a key player in realizing this vision, by providing a timely, orderly, even-handed, and proportional process under the Code, one that all parties see as trustworthy and independent. The Ethics Office looks forward to working with the HEU, the Provincial Executive and the membership during 2026 as we continue this important work.



Appendix: Ethics Commissioner Complaints Process

