



# 2025 National Public Administration

## **It's a Question of Ethics: RTO and Public Service Culture**

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## IT'S A QUESTION OF ETHICS: RTO AND PUBLIC SERVICE CULTURE

### **The Minister is Not Amused and Expects Action**

The Minister of Employment and Social Development Canada (ESDC), Hon. Antoine Manetti, is a newly appointed minister, who also represents his constituency in northwest Saskatchewan. It is a rural riding that covers a large swath of the province, comprising many farming, mining and Indigenous communities. He spends a great deal of his time traveling from community to community to maintain good relationships with his constituents. The challenges in these communities are significant. The main problem is that farmland is being bought up by large corporations that mechanize their operations, leaving local farmers and their families out of work. Despite that, the people are hardworking and do the best they can to support each other, especially as there is little money being generated, and many young people are moving away to find good paying jobs. The Minister is very familiar with the challenges of growing up in a remote farming community with limited economic options. But he also knows that these are proud people, who believe in traditional values, limited government, and self-reliance—values that Antoine also lives by.

The Minister is also a small business owner having taken the reins from his immigrant parents about 10 years ago. He took their modest lumber business and built it into a successful company with local stores in more than a dozen communities. He was and remains highly engaged in his community, starting up a few charitable organizations that support immigrant families in finding work and training them—something his parents asked him to do as a way to repay the loyalty they received in the formative years of their business when Antoine was a teenager. The rules of his business have remained the same since its founding: if employees provide high quality work and service to their customers, they will be rewarded for their loyalty.

Antoine was highly committed to his community. For that, local leaders invited him to run for Mayor four years ago, which he did: winning resoundingly. He led the community in much the same way as his business: he brought fiscal order to the municipality by getting rid of redundant programs, tightening up services and instituting new programs that were needed by residents, particularly those that help them transition to new areas of employment. He encouraged individual responsibility among local government employees and demanded that they assume a public service attitude of respect when dealing with the public. It was this strong leadership that attracted the attention of political party officials in the region, and it was not long before Antoine was running as a federal member of parliament. Seeing a strong work ethic with much rural experience, the Prime Minister was convinced that he had a solid minister of employment and social development. It was unheard of that someone could rise to such a senior post so quickly, but Antoine knew that he could perform very well because he understood what rural and Indigenous communities were going through.

One of his first acts was to take a long look at his department and figure out where efficiency gains may be made in its operations. He noticed straightaway, for example, that there were very few departmental officials assigned and resident in communities that needed their help. His best employment and training advisors were located in larger urban centres, and because of the pandemic were still largely working from home. Although this was fine during the pandemic, the nature of the work was shifting rapidly, and these individuals were needed on the ground.

Taking the needs of communities to heart, he directed his senior management team to do some restructuring with the aim of bringing the expertise these communities needed closer to them. The first step taken was to approach Service Canada to request they make room in their offices spread out across the country for what Antoine called “local employment and training officers with context experience” in these locations. This was a major undertaking that took several months to carry out, because many employment and training advisors had to be reassigned from their current duties to local offices. Much of this work took place during the pandemic, and as such, employment and training advisors could not be assigned immediately. Much of their work, therefore, could be carried out online, even though internet access in many of these rural and Indigenous communities was not reliable. That said, local officials saw the value of these employment and training advisors in crafting plans for economic development post-pandemic.

Many communities began to rely increasingly on the expertise the employment and training advisors provided, but with business returning to normal for the most part post-pandemic, different sorts of challenges arose that required a more hands-on approach. The Minister welcomed the Return to the Office (RTO) directives in mid-2024, as he now had the authority needed to require his employment and training advisors to show up at their local offices. He asked his senior management team to circulate the RTO directives immediately and to restart plans to move employment and training advisors to local Service Canada centres.

The word went out from the Minister’s Office in September 2024, which started a fire storm of protest from employment and training advisors across the country. The complaints were numerous, beginning with the fact that many of them believed they could simply continue with their responsibilities using remote access. They simply did not buy the argument that they needed to be physically present in local offices, despite growing complaints from local government officials, mayors and local businesses that it was difficult to institute various initiatives when employment and training advisors could not attend the many planning sessions needed to get these activities off the ground. More importantly, local officials said that when these federal employment and training advisors are present online, they often require more time to understand local conditions and the needs of the people who live there—time that was usually not invested given divided attention on other files. For many local leaders, this was a constant frustration, because local problems were often discounted, improperly understood, or miscommunicated to more senior decision-makers who made funding and other decisions that made little sense.

As pressure mounted on federal public servants to return to the office, or in the case of employment and training advisors, start to make moves to their assigned Service Canada centres, unrest was building and regional directors general (RDGs) were having to respond to an increasing number of complaints and [protests](#). RDGs were instructed from headquarters that the time for excuses was over—employment and training advisors either moved and took up their responsibilities in-person or they would face disciplinary action and possible termination.

Soon, the Minister was learning from his management team that hundreds of his employment and training advisors were taking to [social media](#) complaining bitterly as to how unfair it was to require them and their families to move, even though these positions had that requirement in place for several months. But it was more than that, other complaints began to surface that put the Minister in a bad light. These were making him look like an uncaring employer, and cabinet

colleagues were taking notice. Antoine realized that he had to act and demanded that his senior management team put an end to these complaints. But first, he needed to fully understand what the substance of the complaints were about and asked a team of his officials to brief him on what was going on with his regional officials.

### **Getting a Lay of the Land: More than RTO Concerns**

Various senior officials at ESDC initiated a series of consultations with departmental public servants in late October 2024, with particular attention given to regional officials through their regional directors general. Public servants were asked to respond to a short survey whereby the results would be anonymized. In addition, RDGs were asked to conduct focus groups through a third party that ensured that the findings could not be attributed to individuals.

At the same time the surveys and focus groups were being conducted, unions began to get involved after responding to significant complaints. They realized that these RTO directives were “causing hardship for individuals” or they were the root of “mental stress and pressure” at a time when public servants were already feeling the pinch of governmental austerity measures. That is, they did not believe they could object to these directives for fear of retribution from managers. Out of frustration at the lack of clear responses from ministers, they began issuing public statements and speaking out in the media against the working conditions and decisions made by the federal government. They heard loudly from public servants that departments and agencies are poised to implement RTO provisions, raising several other concerns about increased workloads, availability of office space, and increased personal costs.

Between the results of departmental consultations and union pressure to respond to complaints, Antoine was beginning to gain a better sense of what was going on in his department. Despite what he thought were some legitimate concerns, he remained steadfast that public statements of discontent and criticism were inappropriate and wanted this to stop immediately. For him, public servants have responsibilities, and one of them is to respect the wishes of the employer. That said, he took a briefing from his senior management team about the complaints. They highlighted several issues, which were also prepared in a briefing note.

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### **BRIEFING NOTE:**

#### **RTO Concerns: Getting the Facts Right**

To: Hon. Antoine, Manetti, Minister of Employment & Social Development Canada  
From: RTO Implementation Committee

Minister, as requested, we are providing a briefing on what we heard from headquarters and regional staff about the RTO directives being considered for implementation across the department. We provide a thematic analysis of staff concerns. Note that half of the 2,500 responses received came from staff headquartered in Ottawa, with the remainder of responses coming from or through all of our regional and district offices. It should be noted that the responses from headquarters staff were more consistent around these themes than regional and district staff. There is one exception though among regional staff. Responses from our newly

created training advisor staff members echoed much of what we heard in Ottawa, and in fact, are even more prevalent publicly through social media expressing their dissatisfaction with the RTO provisions. The overall concerns and frustrations from staff include the following:

### ***1. Workforce Strain: Resistance to Prescribed Presence in the Workplace***

ESDC's implementation of the [Direction on Prescribed Presence in the Workplace](#) has faltered, with compliance to the [Common Hybrid Work Model](#) below the required threshold of 60%. In December 2024, TBS flagged ESDC for critical non-compliance, demanding a strong implementation plan to bring the department into compliance. Departmental public servants are commenting on the disconnect between the government's return-to-office decision and the lack of data supporting it. They perceive the decision as politically motivated rather than data-driven. Public servants and unions also argue that remote work has increased their productivity, which aligns with the efficiency values outlined in the [Values and Ethics Code for the Public Sector](#). The mandated office presence, however, overlooks these productivity gains and focuses instead on physical presence, creating a further disconnect between the policy and the efficiency benefits of remote work. Finally, departmental public servants are questioning the transparency and fairness of the policy, as it appears to be applied inconsistently and without sufficient support.

Compounding this resistance is the federal government's space reduction exercise, with aggressive targets to be met in the next 10 years. This has affected ESDC's ability to deliver its services to Canadians and the real property spaces it occupies not only in Ottawa but in regional and district offices as well. Now, departmental public servants are co-located with officials from other departments in spaces that are less than adapted to their specific business lines. This has led to even greater opposition from many public servants to the Hybrid Work Model. In fact, this finding is pertinent to ESDC employment and training advisors, as office space in Services Canada facilities is highly inadequate to carry out their specific responsibilities.

### ***2. External Criticism: Public and Governmental Scrutiny***

An internal investigation by the Ethics and Conflict of Interest Commissioner revealed that Minister Manetti was in a **conflict of interest** due to his failure to disclose close ties with his lumber business in rural communities. The investigation was initiated after pressure from opposition parties in the House of Commons, prompted by concerns over employment and training programs that disproportionately benefited communities where the Minister's businesses were located. The issue quickly gained traction in the media, with headlines questioning the Minister's ethical conduct and raising suspicions of preferential treatment. The situation escalated as Minister Manetti appeared before a parliamentary committee to address these allegations and provide explanations. Despite his efforts to clarify, public sentiment has been overwhelmingly critical, viewing the situation as an ethical lapse that undermines trust in government. Social media platforms have amplified public dissatisfaction, with the controversy becoming the subject of widespread memes online.

If this was not bad enough, there have been recent and spreading bed bug infestations in several federal buildings, including some occupied by employees at ESDC. These have been widely publicized in the Ottawa area. Staff are scared, and wanting their homes inspected on the government's dime. Although this is not aligned with the public service policy on bed bug

infestation, ESDC senior management decided to allow these expenses, nonetheless, understanding how anxious staff might be. The total amount of \$100,000 was spent on extermination so far in the fall, which included home inspections and treatments. Canadian Press obtained these numbers through an ATIP and published a story that enraged Ottawa residents in particular about the home inspections.

### ***3. Looming Workforce Adjustments and Job Insecurity***

As part of the federal government's [Refocusing Government Spending 2](#) (RGS2) initiative, ESDC is preparing for workforce adjustments, including layoffs scheduled for April 2025 (i.e., post-budget as it is expected the departmental budget will be cut significantly in some program areas), primarily targeting employees in the National Capital Region (NCR). This announcement has created widespread uncertainty and anxiety among national capital ESDC public servants, contributing to an atmosphere of discontent and potential conflict. Many staff feel devalued and expendable, which has further eroded morale and trust within the department. Managers, tasked with implementing the workforce reductions, feel ill-equipped to make operational decisions that align with stringent budgetary targets while maintaining critical services. They fear that scaling back programs will have direct negative consequences on services delivery, especially for vulnerable populations relying on employment and training services in rural communities. The situation is further exacerbated by lingering tensions from ESDC's recent restructuring, which reassigned local employment and training officers to rural Service Canada offices. This shift stretched the workforce in certain regions, leaving large gaps in service in some areas (some of these employment and training advisors were also addressing service gaps in other files). The implementation of the RTO directive has intensified these pressures, with affected employees feeling unsupported as they face the challenges of relocation and adjusting to new designated work locations. Unions have swiftly stepped in to defend their members, many of whom are now required to move to accommodate the department's earlier service improvement initiative. Meanwhile, local governments that experienced reduced service levels in order to prioritize more rural communities, are questioning the department's capacity to deliver effective on-the-ground support to take up some of the slack created by reduced provincial budgets.

### ***4. Workforce Demographics and Working Conditions***

ESDC stands out due to its young demographic: 60% of staff are under the age of 30, and the management cadre (EXs and EX-equivalents) averages 40 years old. Specifically, employment and training advisors fall into this younger category. They are digitally savvy and expect flexible, purpose-driven work environments. ESDC has met its employment equity (EE) targets and has no gaps, reflecting a diverse and inclusive workforce. The culture is marked by professional trust and minimal management oversight, with employment and training advisors in particular viewing the public as their primary responsibility over their minister. They prioritize efficiency as their core value and see themselves as distinct from other public servants due to the direct, service-oriented nature of their work, especially those working in district offices and Service Canada centres.

Based on this information, senior regional officials are sympathetic to the messages being conveyed by their staff but believe that most of these concerns have more to do with public servants in the national capital than regional and district offices. Many offices were closed

during the pandemic in Ottawa, and many public servant jobs were classified in a way that allows for remote working arrangements. Regional and district staff are of the view that it is unfair that NCR employees are allowed to work from home while they are required to relocate and return to the office, despite already providing excellent service remotely. In addition, those moving to Service Canada centres do not feel welcome in these offices - they are regarded as outsiders, and even with disdain as Service Canada staff believe these employment and training advisors are duplicating their work.

### ***Conclusions***

ESDC staff have spelled out their concerns very well. However, as a committee working to implement RTO directives of Treasury Board Secretariat, it has not gone unnoticed that many of our staff both in Ottawa and in regional and district offices and Service Canada centres have become very vocal on social media, including Reddit and other platforms, expressing inappropriate comments about the competence of executives and ministerial staff. In our view, this is causing great harm to the credibility of the department, particularly as provincial counterparts and several local governments are relaxing their work arrangements and attempting to shift to more digital approaches. Also of note, RDGs have had a very difficult time controlling the disruptive behaviours of some of our staff, who have begun work-to-rule campaigns in some offices. This situation is making it quite challenging for our management teams in the regions, as they cannot be everywhere to manage the increasing number of incidents of inappropriate behaviour such as impromptu protests at offices. They are looking for guidance on how to address these situations from the department's senior management team and this committee.

**Signed:** RTO Implementation Committee

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### **Moving beyond the issues: What can senior decision-makers do?**

Having received the briefing note, Antoine was beginning to realize that there were much larger questions to address than simply [returning to the office](#) mandates. The same lines of arguments were being raised at DM breakfasts and meetings. The fact is that DMs could not agree on how to resolve the issue of hybrid work. One thing was for certain, DMs were losing control over the messaging on hybrid work arrangements to social media use by public servants, who have become increasingly brazen in their protests and online posts.

Antoine was quite vocal at DM meetings that the Treasury Board should impose a directive that reinforced the Common Hybrid Work Model policy and limited public servant activities online. He continues to argue that his department is quite large and distributed and that there is no consistency in the application of the RTO policy, which has led to very public statements by staff that his management team is incompetent, unfair, and ill-equipped to enforce the policy. He has maintained that if other departments were applying the policy inconsistently, he is unable to move forward under the close scrutiny of his staff. If anything, he has become frustrated with his own management team to maintain control over the protest situations arising in every region of the country.

Other DMs with regional operations such as Corrections, Fisheries and Oceans, and Transport Canada spoke up to insist that their management teams were not coping well either. For these DMs, this was a significant admission of policy failures. It was also a call for help. For them, this was a time for strong and committed leadership, and not the usual “kicking the ball” to DMs to resolve.

The Clerk of the Privy Council finally relented and admitted that a more centralized approach was needed. DMs could not cope any longer on their own in the absence of a centrally led policy. It was initially thought that DMs would use their own discretion to guide implementation of the Common Hybrid Work Model policy as it fit with department and agency needs, but clearly this was not the case. As such, the Clerk and Secretary of the Treasury Board instituted an additional directive (Annex 1). Although warned that this would only further antagonize public servants, DMs believe there is no choice but to move forward with it.

The challenge now was implementation of the directives at the department and agency level. Antoine understood all too well that these directives (RTO and social media) would not be welcomed by his management team. He also understood that he would be placing his RDGs on the defensive as they struggled not only to implement these directives, but also how to address the inevitable fall-out internally and in public.

Unions representing all departments and agencies would not be taking these directives well either. Even in the absence of the directives being circulated, they were calling on their members to submit letters to ministers demanding that telework arrangements at a minimum could be made with their departments and agencies. The letters highlighted the government’s inability to ensure a safe workplace and the mental distress this was causing on their employees. Already, various department and agency managers were receiving these letters, many of which were being directed to them from ministers’ offices. Managers were becoming overwhelmed by the sheer volume of the letters, and this was only the opening days of the union campaign. The campaign only served to exacerbate tensions within Antoine’s department, which convinced him even more that a central set of directives was needed to give him the authority to respond accordingly.

Antoine essentially got what he wanted: clarity. However, what to do? The complaints were loudest among his employment and training advisors in the regions, who not only had to submit to the Common Hybrid Work Model, but also had to upend their families and move to new residences located closer to either their district office or Service Canada centre.

Antoine called together his senior management team in late January 2025 and briefed them about recent meetings with DMs and the Clerk. He indicated that a new set of directives would be published shortly (i.e., RTO and social media), which was likely to upset a lot of public servants in the department, including the employment and training advisors. These employment and training advisors are among the loudest on social media, and the most opposed to moving their residences. In fact, several have led various protests in the regions. He instructed his senior managers to come up with a plan for implementing the directives recognizing that they would raise many arguments for and against such implementation. Antoine noted that any implementation plan would be left up to the senior management committee, but that a work plan had to be submitted to the Treasury Board Secretariat for final approval.



## Your Task

As members of the RTO Implementation committee within ESDC, you have been directed by the senior management committee of the department to lead a comprehensive presentation not exceeding 15 slides (excluding annexes) on how to implement the directives in Annex 1. However, the senior management committee is also worried about the effects of these directives on supporting a strong ethical culture in the department. Antoine (minister) understands that these directives are symptomatic of larger challenges the department (and the Public Service in general) faces regarding building and sustaining an ethical workplace for the future. The example set today will have lasting effects.

The senior management committee has given much thought as to what they would like the presentation to contain, and it has come up with some important questions to guide your committee's work. In short, whatever plan your committee comes up with must be supported by considerations for what it means to build an ethical workplace for the future.

1. What is the relevance of the RTO directives (past and current directive contained in Annex 1) as it applies to ESDC? Are there specific considerations of relevance as these apply to the regional employment and training advisors (i.e., the fact, for example, that these advisors are dispersed across the country)?
2. What are the arguments for implementing or not implementing the restrictions on social media use for ESDC officials? If there is no relevance favouring implementation of the restrictions for ESDC officials, what argument would you propose to central agencies that ESDC be exempted? Are there certain circumstances under which public servants could or should be permitted to express personal opinions that are critical of government policies via social media using government devices?
3. Are there changes you would make to the Public Service ethical framework or even the department's (see references, as well as Public Service Values & Ethics Code) to reflect the changes implied by these two directives? What would be your rationale for these changes on matters of public service neutrality and impartiality, for example in the case of limiting social media use? On consistency of service delivery in the case of RTO?
4. What are the immediate to long-term implications of the directives on public servant expression rights (e.g., see Fraser case, see references)? What are the risks of implementing the directives to the department as well as the implications of such implementation for other departments and agencies?

Ultimately, the senior management committee wants to find out what the immediate, short- and medium-term effects are for implementing these directives (Annex 1). Equally important, however, they want to know the conditions necessary to create an ethical workplace given the various micro and macro factors affecting the public service generally. It realizes though that there are very immediate pressures to address.

Your presentation is due no later than 5 pm EST on Friday, February 21, 2025. These should be submitted to Raghad Hussein at [raghadhussein3@mail.carleton.ca](mailto:raghadhussein3@mail.carleton.ca) so that the presentations may be coordinated. **Your presentation should be submitted in both PowerPoint and PDF versions** (in order to preserve formatting).

Should you have any questions about the case study, these can be directed to Robert Shepherd or Andrea Rounce. Your questions and the responses will be shared with all teams.

## ANNEX 1

### PROPOSED DIRECTIVE FROM TREASURY BOARD SECRETARIAT: ACTION PLAN ON SOCIAL MEDIA USE AND RTO

#### ISSUE

1. Given various rising tensions and inconsistent application of current policy directives, TBS is implementing a plan that applies to all departments and agencies on the Common Hybrid Work Model. This directive provides clarity on two related issues: to address public servants' use of social media that has sparked negative attention and service disruptions, in addition to many other issues; and to institute additional clarity on current "return to office" directives from TBS. In our view, both are required in order to move hybrid work plans along in an orderly manner. The Treasury Board is firmly of the view that public servants must be present in the office in order to safeguard a public service culture built over many decades and epitomized by the Values and Ethics Code for Public Servants. We are directing that a hybrid work model is the most appropriate approach in the short term. Both social media use and RTO directives are needed to bring clarity to the Common Hybrid Work Model Policy.

#### BACKGROUND

2. There has been significant resistance to the implementation of the *Directive on Prescribed Presence in the Workplace* across departments and agencies, with compliance to the Hybrid Work Model currently reported to be below 60%. The low compliance to this policy can be attributed to a few notable factors:
  - The reliance on self-reporting for compliance introduces bias, which undermines the accuracy of compliance data;
  - The implementation of the Directive was decentralized, which creates challenges in enforcement;
  - Many departments/agencies report a lack of adequate resources or clear, consistent guidance from the TBS to effectively enforce the hybrid work policy.
3. Space Reduction Exercise: The federal government's space reduction initiative has led to increased crowding in federal buildings. Public servants have reported that the shared office environments are poorly suited for the nature of their work, resulting in diminished productivity and morale. Real Property reports indicate that some locations across Canada are facing more significant challenges than others with employees expressing frustration over the lack of suitable workspace.
4. RGS2 and Workforce Adjustments: The ongoing Refocusing Government Spending 2 (RGS2) exercise has resulted in planned workforce reductions. As of January 2025, 50 percent of departments have invoked the workforce adjustments clauses to control costs.

5. Protests and Service Disruptions: The combination of workspace issues and workforce adjustments has led to organized protests and service disruptions. These protests, which have been coordinated and publicized through social media, have resulted in delays and disruptions in government services, raising public concern and attracting media attention.

## CONSIDERATIONS

6. In order to address RTO concerns, it is first necessary to limit public servants' use of social media platforms to reduce disruption. These steps are necessary because:
  - Global geopolitical unrest and Government of Canada decisions may be inconsistent with individual public servant viewpoints. Such disagreements cannot be permitted in public spaces;
  - Social media platforms have become a primary medium for spreading information or misinformation, which raises ethical concerns about the impartiality of public servants;
  - Increased scrutiny by the media on the activities of public servants on social media has raised the urgency of a governmental response;
  - The shifting demographics of public servants has shown significant gaps in creating a common public service ethos;
  - Virtual work arrangements have limited public servant exposure to “office values” making them susceptible to client cooptation.
7. In light of the growing concerns around the use of social media by public servants, Treasury Board ministers, in consultation with the TBS Priorities and Planning Committee, are proposing a new directive to provide clear guidelines on this matter. It is aimed to address how the public service should address instances where public servants openly express disagreement with government directions on public platforms. The proposed directive will prohibit public servants from commenting on any issues where the government has publicly taken a position, regardless of whether it occurs during work hours or in their personal time. Non-compliance with this directive will result in disciplinary action, including dismissal. Recognizing the potential effects of this policy, it is essential to engage with departmental officials and union representatives prior to the rollout. This engagement will help ensure alignment, address concerns, and identify potential challenges in its implementation. Once comments are incorporated in the directive, ministerial approval will be sought.
8. The inconsistent application of “return to office” directives by TBS has attracted accusations of unfairness, non-transparency and uneven measures for determining which positions must be in the office versus those able to remain virtual. These inconsistencies have been amplified by public servants' public complaints on social media and in active protests especially at regional offices. Several departmental and agency management teams have requested greater clarity on return to office measures to which this note now responds.

## **RECOMMENDATION 1**

As of March 1, 2025, public servant activities on social media that serve to protest for or against Treasury Board directives on appropriate use will face disciplinary action. Departments and agencies will be required to institute measures that monitor public servant use of federal assets, including assigned computers and hand-held devices.

## **RECOMMENDATION 2**

We, Treasury Board ministers propose that all public servants are to return to the office 4 days a week effective June 1, 2025, pending an in-depth review of all classified positions to begin as of March 1, 2025. Once completed, all departments and agencies are to submit a detailed work plan with rationale and implementation strategies that indicate which classified positions (i.e., by position type, such as inspectors, analysts, administrative, etc.) are required under the Common Hybrid Work Model Policy to be in the office, virtual or subject to hybrid arrangements.

**I approve / I do not approve:**  
(DM signatures requested)

\_\_\_\_\_  
Signature

Jonathan Hannibal, Clerk of the Privy Council  
Honoré Truthwell, Secretary of the Treasury Board

## Helpful References

Canada. “Values and Ethics Code for the Public Sector.” <https://www.tbs-sct.canada.ca/pol/doc-eng.aspx?id=25049>

ESDC Code of Conduct:

[https://assets.nationbuilder.com/ceiu/pages/224/attachments/original/1668608203/ESDC\\_Code\\_of\\_Conduct.pdf?1668608203](https://assets.nationbuilder.com/ceiu/pages/224/attachments/original/1668608203/ESDC_Code_of_Conduct.pdf?1668608203)

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