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One Executive Place  
600, 1816 Crowchild Trail NW  
Calgary, Alberta T2M 3Y7  
Phone: (403) 802-1680  
Fax: (403) 270-7446  
www.familytherapy.org  
e-mail: cftc@familytherapy.org

## CFTC Response to Ethical and Moral Conflict Policy

This policy aims to ensure that all personnel and procedures at CFTC adheres to ethical and moral standards that are consistent with CFTC policies, values and Code of Ethics. By adhering to these standards, we can ensure that CFTC's mission is conducted in a manner that is consistent with our values and principles.

The policy aims to address potential breaches to CFTC's ethical standards, beyond issues addressed in CFTC's policies to prevent violence and harassment at the workplace. As such, this policy defines procedures and responsibilities to respond to breaches to CFTC's Code of Ethics such as, but not limited to:

- Neglecting Regulatory Frameworks, such as disregarding the protection of clients' personal information, or neglecting any type of professional, legal, and/or ethical duties.
- Arbitrary Discrimination: Discriminating against particular clients or their families because of their religion, cultural background, ethnicity, gender identities, disabilities, sexual orientation, socioeconomic status, political preferences, or family structure/form; or incurring in arbitrary allocation of resources, such as arbitrarily prioritizing attending to community needs for treatment.
- Violating Clients' Rights.
- Unacceptable Practices: Participating in immoral or unprofessional practices in the workplace, such as the consumption of alcohol, illegal substances, or engaging in sexual activities in the workplace.
- Transgression: Transgressing any of the CFTC's policies.

### Definitions for this policy:

"Worker" or "CFTC staff" is any person who works at CFTC including staff, students, contractors, and volunteers. Responsibilities.

"Clients" are people who receive professional services, which normally includes a person under the age of 19 and their family or people they live with.

"Respondent" is a person allegedly breaching the Code of Ethics

"Complainant" is a person reporting an incident of breach to CFTC's policy and/or Code of Ethics.

### Responsibilities:

Workers are responsible for talking appropriate action in response to any perceived breaches to CFTC's values and/or Code of Ethics. This includes informing the respondent about the current policy if they reasonably claim ignorance of a particular policy, and will report the incident any time they consider the respondent should reasonably know the policy. If the breach relates to violation of clients' rights or unacceptable practices (as defined in this policy), workers will immediately report the breach to their supervisors and/or to the Executive Director; the supervisors (e.g., Clinical Supervisors, Administrative Officer) will immediately report the incident to the Executive Director, and will provide support and advice to individuals raising ethical or moral questions or concerns.



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The Executive Director is responsible for investigating and taking appropriate action in relation to any reported incidents of staff breaching CFTC policy and/or its Code of Ethics.

The Executive Director will provide support and advice to individuals raising ethical or moral questions or concerns, and will respond to complaints in accordance with this policy.

The Executive Director will investigate incidents and complaints in a fair and timely manner, which includes taking and documenting appropriate corrective actions to address the reported incidents. The Executive Director will provide complainants with a written response or plan to address the concern within 10 business days.

When the respondent is a professional, the Executive Director may also encourage complainants to issue a formal complaint to a professional college. When the respondent is a researcher associated with the CFTC, the Executive Director may encourage the complainant to issue a formal complaint to a Research Ethics Committee.

The Executive Director pledges to respect the privacy of all concerned as much as possible. However, the Executive Director may create an ad-hoc advisory committee with members of the organization that may be able to provide advise on how to proceed investigating or adopting corrective action in a particular reported incident, typically members of the Executive Team and/or the Board of Directors. Apart from these forums, the Executive Director will not disclose the circumstances related to a reported incident, or the names of the complainant, the person alleged to have committed the breach, and any witnesses, except where necessary to:

- Investigate the incident or to take corrective action,
- Inform the parties involved in the incident of the results of the investigation and any corrective actions taken,
- Comply with other legal requirements.

Non-compliance with the policy may result in disciplinary action, up to and including termination of employment.

No workers can be penalized, reprimanded or in any way criticized when acting in good faith while following this policy. This policy does not discourage a worker from exercising the worker's right under any other law, including the Alberta Human Rights Act.

*Joaquin Gaete-Silva*  
JOAQUIN GAETE-SILVA

EXECUTIVE DIRECTOR

January 15, 2024