

Addressing Misconduct and Wrongdoing at The Canadian Institutes of Health Research Annual Report (Fiscal year 2024-2025)



Also available on the Web in HTML format
© His Majesty the King in Right of Canada (2026)
Cat. No. MR2-30E-PDF

Table of Contents

Message from the President	3
Introduction.....	4
Organizational Context	4
Our culture	4
Understanding Misconduct and Wrongdoing at CIHR.....	5
Reporting Misconduct.....	5
Internal Support available.....	5
External Recourse Mechanisms available	6
Steps for Handling Internal Misconduct Complaints.....	7
Outcome of Substantiated Misconduct and Wrongdoing Cases.....	7
Other administrative measures.....	8
2024-2025 Findings	8
Mitigation Measures Implemented in 2024/2025	11
Creating a Safe and Inclusive Environment	11
Promoting Integrity: Values and Ethics Awareness	11
Conclusion	13
Annex A - Resources, support services and recourse mechanisms	13
Annex B – Office of the Ombud, Employee Assistance Program and APEX	14



Message from the President

At CIHR, we are committed to fostering a culture of ethical behaviour, as well as an environment where employees feel safe and empowered to report situations of misconduct without fear of reprisal.

In response to the [message from the Clerk of the Privy Council](#) to Deputy Ministers and heads of federal organizations, I am pleased to present the first CIHR Report on Misconduct and Wrongdoing. This report is part of our ongoing commitment to fostering a healthy, respectful, transparent, and inclusive workplace culture.

This report provides a summary of the misconduct and wrongdoing cases by public service employees at CIHR during the fiscal year 2024-25. Given that CIHR is a small federal agency, the numbers are carefully presented to ensure employee confidentiality.

Please note that CIHR provides supports designed to prevent, address, and assist in reporting on misconduct, including:

- [Office of the Ombuds for Small Departments and Agencies](#), where employees can discuss and find solutions to workplace issues without fear of reprisal; and
- [New Intranet pages](#) with information related to professional conduct, integrity, ethics and values, and processes for reporting workplace misconduct (both informal and formal); and
- Mandatory courses for employees on [Preventing Harassment and Violence in the Workplace for Employees](#) and [Values and Ethics Foundations for Employees](#).

The publication of this first report is a testament to our commitment to recognize the negative impacts of misconduct and wrongdoing on our people and enhance transparency around how these issues are addressed. Treating one another with professionalism and respect is an essential part of achieving organizational excellence at CIHR.

As an agency, we remain committed to promoting ethical behaviour and to upholding the values of the federal public service. We look forward to continuing to improve our workplace culture through annual publication of this report, continuing to invest in prevention measures such as the ombuds as well continuing to update and improve the policies and processes involved in addressing misconduct and wrongdoing at CIHR.

Dr. Paul Hébert
President



Introduction

This annual report provides increased transparency on how CIHR manages misconduct and wrongdoing. It presents a summary of the cases of misconduct deemed founded over the 2024-2025 fiscal year (from April 1, 2024, to March 31, 2025), as well as of the investigations completed by external bodies.

The report also provides information on the informal and formal mechanisms available to CIHR employees to report issues and concerns.

Organizational Context

CIHR is the Government of Canada's health research investment agency supporting over 15,000 world-class researchers from all pillars of health research and from all regions of Canada.

Created in 2000, CIHR is an independent agency that reports to Parliament through the Minister of Health. Located in Ottawa, CIHR is a non-unionized Agency with more than 585 employees working in a hybrid work model across the country.

CIHR currently integrates research through a unique interdisciplinary structure made up of 13 "virtual" institutes led by Scientific Directors across Canada. CIHR's Institutes are networks of researchers brought together to focus on important health concerns in a structure that encourages partnership and collaboration across sectors, disciplines and regions. The Secretariat on Responsible Research helps to ensure that Canadian researchers conduct their research responsibly.

It is important to note that although CIHR Institutes are an integral part of the Agency's work, Institutes staff are not considered CIHR or Government of Canada employees. Scientific Directors remain employees of their individual academic institution, which hosts the Institute during their term. The Scientific Directors manage an Institute team, employed by the academic institution, that helps with its operations and collaborates closely with CIHR staff. For this reason, this report does not include any misconduct in relation to Institutes or Institute staff.

Our culture

Workplace culture at CIHR is built on respect, collaboration, and integrity. Employees at all levels are expected to contribute to a safe and healthy environment by adhering to internal policies and the CIHR Code of Conduct. This includes fostering positive relationships, working constructively as a team, and maintaining an atmosphere free from harassment, violence, and retaliation. By embedding these values into daily practices, CIHR promotes a culture that supports well-being, accountability, and excellence in public service.

Understanding Misconduct and Wrongdoing at CIHR

In the context of this report, misconduct refers to actions by an employee that violate laws, policies, standards of conduct, or ethical expectations, either willfully or through negligence. It can occur inside or outside the workplace and even outside working hours.

Examples of misconduct may include actions that cast doubt on the honesty and integrity of the employee such as unauthorized absence from work, insubordination, and tardiness; actions that detrimentally affects the employer's reputation; renders an employee unable to properly discharge their employment obligations; causes other employees to refuse or to be reluctant to work with the employee; or inhibits the effective management of operations.

Wrongdoing is defined under the [Public Servants Disclosure Protection Act \(PSDPA\)](#) and refers to more serious breaches that impact the integrity of the public sector. It includes contravention of federal or provincial laws, misuse of public funds or assets, gross mismanagement, serious breaches of a code of conduct, acts endangering the life, health and safety of Canadians or the environment or directing or counselling someone to commit a wrongdoing.

Reporting Misconduct

Internal Support available

1. **Delegated Manager:** Employees are encouraged to speak with their manager if they feel comfortable doing so.
2. **Office of the Ombud:** A confidential and impartial resource for employees to raise concerns outside formal reporting channels.
3. **Labour Relations (LR):** Handles informal and formal complaint processes for misconduct or policy violations and coordinates formal grievance processes and workplace harassment and violence complaints. As a non-unionized employer, LR supports both management and employees in the process with a focus on fostering a respectful and ethical workplace.
4. **Senior Officer for Internal Disclosures of Wrongdoing:** For disclosures under the *Public Servants Disclosure Protection Act* (PSDPA).
5. **Office of Conflict of Interest (COI):** For personal declarations or COI-related issues
6. **Security Services & IT Security Unit:** For security breaches, incidents, and IT-related misconduct.

External Recourse Mechanisms available

1. Office of the Public Sector Integrity Commissioner

- The Office of the Public Sector Integrity Commissioner of Canada is an independent federal organization that was established to implement the [Public Servants Disclosure Protection Act](#). The Office investigates wrongdoing in the federal public sector and helps protect whistleblowers, those who make a protected disclosure of wrongdoing, and those who participate in investigations from reprisal.

2. Canadian Human Rights Commission (CHRC)

- If an employee believes they have experienced discrimination based on protected grounds (such as race, gender, disability, religion, age, etc.), and the issue cannot be resolved internally, they can file a complaint with the CHRC.
- The Commission investigates these complaints and ensures compliance with federal human rights legislation to promote equality and prevent discriminatory practices in federally regulated workplaces.

3. Occupational Health and Safety Program (ESDC)

- Its role is to address contraventions related to Part II of the Canada Labour Code, which governs occupational health and safety in federally regulated workplaces. This program ensures that employers comply with health and safety standards to protect employees from hazards and maintain a safe work environment.

4. Public Service Commission of Canada

- Its purpose is to ensure the integrity and non-partisanship of the federal public service by overseeing staffing and political activities. In the case of staffing for CIHR, the PSC does not have any oversight on our staffing activities given the Agency does not fall under the *Public Service Employment Act*.
- Specifically, employees can contact the PSC to report improper political activities. This helps maintain the principle of a politically neutral public service.

5. Federal Public Service Labour Relations and Employment Board (FPSLREB)

- The FPSLREB is an independent quasi-judicial statutory tribunal established by the *Federal Public Sector Labour Relations and Employment Board Act (FPSLREBA)*. As a Section V employer per the *Financial Administration Act* and as a non-unionized employer, the FPSLREB may only receive grievances where a disciplinary action resulted in termination, demotion, suspension or financial penalty.
- The Board can also interpret, apply and give relief in accordance with the Canadian Human Rights Act, except for matters relating to the right to equal pay for equal work.

6. Law enforcement

CIHR may refer cases to law enforcement agencies if uncovered information provides reasonable grounds to suspect that a person may pose a serious threat to others or may be involved in fraud or other criminal conduct.

Steps for Handling Internal Misconduct Complaints

Based on CIHR's informal and formal recourse mechanisms, every internal complaint is assessed in accordance with the following steps:

- 1- **Intake and Initial Review** - Gather all relevant details and confirm whether the complaint falls under misconduct, wrongdoing or another category (e.g. harassment, policy violation).
- 2- **Preliminary Assessment** - Compare the complaint against CIHR policies, standards or conduct, and applicable legislation and determine if there are sufficient grounds for further investigation or if informal resolution is possible.
- 3- **Fact-Finding** Collect supporting evidence and clarify facts.
- 4- **Analysis** – Assess whether the alleged behaviour contravenes the CIHR Code of Conduct, Values and Ethics Code or other relevant policies and consider the impact on workplace integrity, safety and operations.
- 5- **Decisions/ Next steps** – if misconduct is substantiated, identify appropriate resolution options (informal measures, progressive discipline, or formal investigation).

Once the resolution option for a way forward or the appropriate resource is identified, the appropriate mechanism is triggered, and the relevant process will be applied.

Before imposing any disciplinary action, the delegated manager, with support from a Labour Relations Advisor, promptly conducts a fair and objective assessment of the complaint and holds a pre-disciplinary meeting with the respondent to ensure they understand the allegations and have an opportunity to present their perspective.

When the nature of an alleged misconduct requires a formal investigation, Labour Relations will initiate the request for these services. Workplace investigations are conducted as promptly as possible to establish the facts. If disciplinary action is recommended following the investigation, it is implemented without delay.

Outcome of Substantiated Misconduct and Wrongdoing Cases

Once misconduct or wrongdoing has been substantiated, internal corrective measures are enforced to restore workplace integrity.

Discipline is generally applied progressively unless the misconduct is so serious that immediate suspension or termination is warranted. The progressive discipline process typically follows these steps, with increasing severity for repeated incidents:

1. Verbal Warning

A verbal warning to an employee if this is a first incidence of misconduct.

2. Written Reprimand

A written letter to impose discipline by the delegated manager.

3. Suspension

Employees who are suspended without pay are not entitled to receive wages during the period of suspension nor are they permitted to use accumulated leave or overtime or receive payment for a statutory holiday that occurs during the suspension period.

4. Termination with cause

CIHR may terminate an employment relationship with cause if an employee's misconduct is sufficiently serious to irreparably damage that relationship.

Other administrative measures

As part of disciplinary measures, a delegated manager may also impose administrative actions, such as demoting the employee, suspending or revoking decision-making authority, or removing access to resources like a travel card.

Additional measures may be applied to help employees learn from their misconduct and prevent recurrence. Depending on the situation, CIHR may use the following tools:

- **Letter of expectations:** Outlining required improvements and behavioural standards
- **Improvement plan:** a structured plan to correct behaviour
- **Training or information sessions:** Providing education on policies or codes of conduct
- **Regular follow-up meetings:** Monitoring progress and reinforcing expectations

2024-2025 Findings

During fiscal year 2024–2025, 21 (HR) complaints or allegations of misconduct were reported relating to CIHR employees.

Category	Number of cases	Summary/outcome
Internal Complaints		
Financial Mismanagement	0	
Misconduct includes values and ethics, harassment and discrimination, and policy violations	21	Due to the size of the Agency, numbers are being reported in an aggregate format to preserve the confidentiality of the employees involved. An intake and initial review were completed for all submitted cases. Labour Relations worked with the employee and/or management, as was appropriate to resolve the issues. Five (5) cases were referred to informal conflict resolution (ICR). Two (2) cases were paused per the request of the employee. Thirteen (13) cases ended with a discussion or verbal warning per CIHR's Discipline policy. Two (2) cases resulted in written warnings. All cases involved a reset of expected behaviours and a discussion of policy requirements. In one (1) case a verbal warning and a written warning were provided to the individual as the misconduct continued.
Internal Grievances	3	Three (3) internal grievances were received for breach of policy. All three were denied as it was determined that the policies were appropriately applied.
Misuse of Government Assets	0	
Personal Security Violations	0	
CIHR Network Acceptable Use Policy	1	Discussion was held with employee.

Conflict of Interest	0	There were no misconduct related to the employees' noncompliance with requirements of the Conflict of Interest Policy.
External Complaints		
Interactions with Police Services	0	
Disclosures of wrongdoing	0	
Grievances referred to the Federal Public Service Labour Relations and Employment Board for adjudication or mediation.	0	
Canadian Human Rights complaints	0	

Mitigation Measures Implemented in 2024/2025

To strengthen workplace integrity and prevent recurrence of misconduct or wrongdoing, CIHR implemented a series of proactive measures during the 2024–2025 fiscal year. These initiatives focused on fostering a respectful, safe, and ethical work environment through mandatory training, enhanced awareness campaigns, and updated policies. By prioritizing prevention and education, CIHR aims to equip employees and managers with the tools and knowledge needed to uphold the highest standards of conduct and values across the organization.

Creating a Safe and Inclusive Environment

CIHR delivered mandatory three-hour training sessions on harassment and violence prevention to all employees from January to March 2024. Eighty-seven percent (87%) of employees attended the training.

Promoting Integrity: Values and Ethics Awareness

CIHR has implemented various initiatives to strengthen awareness and promote a deeper understanding of how values and ethics apply in daily operations such as:

Annual performance discussions

- Employee responsibilities (such as completion of annual mandatory training) and compliance with CIHR's Code of Conduct and Values & Ethics Code for the Public Sector are reviewed and confirmed in performance evaluations with respective managers.

Mandatory training

- During the CIHR onboarding process, newly hired employees are required to complete the mandatory training and review both the Code of conduct and the Values & Ethics Code for the Public Sector, the internal process of disclosure of wrongdoing and the Conflict-of-Interest Policy and complete the form to that effect. Employees are also directed to the intranet to review relevant information on values and ethics.
- All employees and managers were required to complete “Values & Ethics Foundations” training by March 31, 2025.
- Values & ethics employee sessions at all levels
 - A toolkit was developed to hold sessions facilitated by managers to help employees understand and apply core values and expected behaviours through round table discussions and values and ethics case scenarios.
 - Sustained through HR’s train-the-trainer approach, the sessions were introduced at the Executive level.
 - Supporting resources include a facilitator guide and participant guide, forming two structured sessions.
- Security Awareness and Training sessions are offered twice per year to all staff

- The ‘Managing and Safeguarding Information’ course is offered multiple times per year to all staff
- The onboarding of all employees includes a comprehensive security briefing and signed terms and conditions for device/network use are completed, signed and retained on file.

CIHR's Code of Conduct

- The Code of Conduct and the frequently asked questions (FAQ) are currently under review and scheduled for approval by end of year 2025.
- Training materials are being developed to deliver information sessions to employees to ensure compliance once the Code is approved.

New resources for employees

- Political Activities Guidance: the intranet page was updated to reinforce the non-partisan nature of the Public Service.
- Disclosure of Wrongdoing: the internal process under the *Public Servants Disclosure Protection Act* and related frequently asked questions (FAQ) were reviewed, updated, and communicated to staff.
- Integrity, Values & Ethics Intranet Page: a new intranet page was developed and launched to provide resources and guidance on roles, responsibilities, behavioural expectations, and reporting mechanisms.
- Formal and informal workplace complaint mechanisms at CIHR: a new intranet page was developed and launched to provide guidance to employees regarding informal and formal complaint processes available within CIHR and outside the organization.
- Implemented Finance policies and guidelines on the use of taxis and occasional travel along with guides and frameworks related to procurement, quality assurance for financial transactions, retroactive contracting and confirming order, and a procurement knowledge portal.

Communication Highlights

Over the course of the year, all CIHR employees were informed and kept abreast of updates from the Clerk, important resources and values and ethics initiatives.

Here are a few highlights:

- The Survey on the Public Servants Disclosure Protection Act was shared with employees, and they were encouraged to complete it.
- Employees were invited to explore CSPS Values & Ethics learning paths, online courses, and videos.
- The Deputy Ministers’ Task Team’s Values and Ethics Report for the Clerk of the Privy Council was promoted in CIHR's newsletter.
- The President's Office prepared an internal message to all employees inviting them to register to the Symposium on “What Unites Us, Defines Us: Values and Ethics in Today’s Federal Public Service” that was held October 15–16, 2024.

- To better assess the scope of employee external engagements and other circumstances that may create COI risks in compliance with COI reporting requirements, all CIHR employees were required through a message from the President to complete and submit the new online Confidential Report by December 6, 2024.
- The COI Office also developed and launched the *Leading with Integrity: Guidelines on COI Prevention and Management for CIHR Executives*. The Guide was made available on their intranet site for consultation.

Conflict of Interest

CIHR has a comprehensive framework for preventing and managing conflict of interest. In 2024–25, CIHR completed its first all staff electronic declaration exercise with a 100% submission rate. The Office of the COI Officer issued mitigation measures for approximately 5% of declarations, most of which were preventative—for example, confirming that outside employment or engagements occur outside work hours or that time is appropriately accounted for, and reminding employees to proactively report changes in circumstances. CIHR has since updated its online guidance to support employees in preventing and managing COI situations.

Conclusion

This report underscores CIHR’s commitment to accountability, transparency, and integrity in managing misconduct and wrongdoing. While the findings for 2024–2025 highlight areas requiring attention, they also present opportunities to strengthen our organizational culture. Through enhanced training, updated policies, and proactive communication, CIHR continues to foster a safe, respectful, and inclusive workplace where values and ethics guide every decision.

Moving forward, we remain dedicated to preventing misconduct, supporting employees, and promoting trust across the organization. By addressing challenges constructively and reinforcing our shared principles, we aim to uphold the highest standards of public service and ensure a work environment built on respect, collaboration, and integrity.

Annex A - Resources, support services and recourse mechanisms

Senior Officer for Disclosures of Wrongdoing for disclosure of wrongdoing pursuant to the *Public Servants Disclosure Protection Act*.

Office of the COI Officer for personal declaration or a COI-related issue related to their work responsibilities.

Security Services for processes relating to security clearance and levels, and security breaches and incidents.

Information Technology (IT) Security Unit for processes relating to detection of IT Security incidents and protection of employees and CIHR's information and IT assets.

Employees can also directly contact the organizations below:

- Canadian Human Rights Commission: Discrimination complaints outside of CIHR's formal complaint mechanisms
- Office of the Public Sector Integrity Commissioner of Canada for disclosures of wrongdoing outside of CIHR's Internal Process led by the SOID.
- Occupational Health and Safety Program (ESDC) to report contraventions related to Part II of the Canada Labour Code
- Investigation into Improper Political Activities to report improper political activities with the Public Service Commission of Canada <https://www5.psc-cfp.gc.ca/form/investigation-enquete/political-politiques-en.html>

Annex B – Office of the Ombud, Employee Assistance Program and APEX

Office of the Ombuds for Small Departments and Agencies

CIHR offers its employees the services of an external ombudsperson. This service allows employees to explore options to resolve workplace issues without fear of reprisal by contacting the Office of the Ombuds for Small Departments and Agencies.

The Office of the Ombuds is an independent, impartial, and confidential resource that is a safe space to discuss matters related to well-being, mental health, as well as any issues of harassment, inclusion and diversity.

Employee Assistance Program Services

The Employee Assistance Program (EAP) provides employees and designated family members access to a free confidential service including assessment, crisis intervention, referral for short term counselling and follow-up provided by the national network of mental health professionals on contract with EAS. Accessing the EAP is voluntary.

Furthermore, through the EAP agreement, CIHR acquired LifeSpeak which is a web-based e-learning platform, available 24/7, that offers expert-led educational modules on a variety of wellness-related themes. This platform offers hundreds of short video training, monthly "Ask the Expert" online sessions where you get real-time access to the world's leading experts on topics on a completely anonymous and confidential basis.

APEX Advisory Services

Confidential Advisory Services for all Executives.