College of Occupational Therapists of Manitoba

Quality Occupational Therapy – Accountable to Manitobans

Code of Ethics: Ethical Responsibilities for Registered Occupational Therapists

Effective 2026

Note to Readers

Questions regarding the content or application of this document should be made to:

College of Occupational Therapists of Manitoba (COTM)

P.O. Box 46032 RPO Westdale

Winnipeg, Manitoba R3R 3S3

Phone: 204-957-1214 | Email: OTinfo@cotm.ca

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Acknowledgments

The Code of Ethics was coproduced as a template for use across Canada, in consultation and collaboration with registrants/members, college advisory committees and the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO) Code of Ethics working group and board.

ACOTRO respectfully acknowledges the content taken and adapted from the Alberta College of Occupational Therapists (ACOT), building on the Codes of other regulatory organizations in Canada and worldwide.

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Introduction

Purpose

The purpose of the Code of Ethics is to set out the ethical principles and values governing the conduct of occupational therapists registered to practice in Manitoba regardless of role, responsibilities, job title, practice area, practice setting, client population, years in practice or level of experience.

The Code of Ethics is intended to be used to:

- guide members on how to conduct themselves and how to navigate the wide range of ethical scenarios and dilemmas that can arise in practice;
- encourage self-reflection, self-evaluation, and to inform decision making amongst occupational therapists, with the expectation that the client's welfare is central in any ethical decision;
- provide the public with information about ethical care and services that are to be expected from a registered occupational therapist;
- guide the establishment of standards of practice and guidelines for regulatory responsibilities and activities; and
- serve as an ethical basis to support quality practice environments.

Background

Occupational therapists registered to practice in Manitoba are governed by *The Occupational Therapists Act 2002* (*The OT Act).* The Council of the College of Occupational Therapists of Manitoba (COTM) is required to establish and maintain a code of ethics under the provisions of *The OT Act* and pursuant to section 2.3. of *COTM Bylaws* (2022, p. 5).

The Code of Ethics outlines the ethical responsibilities and expectations for members' conduct and is one of the ways that COTM fulfills its mandate to promote and protect the public interest. Members are required to uphold the Code of Ethics and failure to do so may constitute unprofessional conduct.

Appendix A outlines important foundational legislation, other governing authorities and guiding documents for occupational therapy practice in Manitoba.

Code of Ethics

Ethical Principles and Values

The ethical principles and values form the basis of the Code of Ethics. These are the fundamental reference points for members to serve the best interests of their clients and act in a way that garners and sustains the public's trust and maintains the integrity of the profession.

COTM's mission is to protect the public by regulating, advocating and advancing safe, ethical and quality occupational therapy practice in Manitoba. The Code supports this mission and has been developed as a requirement of *The OT Act* and in collaboration with the Association of Canadian Occupational Therapy Regulatory Organizations (ACOTRO).

Ethical Principles

1. **Committing to continuous learning and improvement**
   Ensure that our work is informed by the latest knowledge and practices, striving for excellence and competence.

2. **Minimizing the risk of Harm**
   Act thoughtfully to minimize the risk of harm, considering the impact of our decisions on individuals, communities, and society at large.

3. **Respecting Autonomy**
   Honour the right of individuals and collectives to make informed decisions by providing them with the information, support, and resources needed to act in line with their values.

Core Values

1. **Accountability**
   Accept full responsibility for our actions and decisions, ensuring they align with professional standards and ethical conduct.

2. **Collaboration**
   Work cooperatively with colleagues, clients, and key partners, recognizing that diverse perspectives lead to better outcomes.

3. **Humility**
   Approach our work with humility, being open to learning, feedback, and acknowledging the value of others' perspectives.

4. **Integrity**
   Uphold honesty, fairness, and consistency in all professional actions, adhering to both the spirit and letter of the law.

5. **Respect**
   Treat everyone with dignity, fairness, and respect, recognizing and honoring cultural differences, individual and collective experiences.

6. **Transparency**
   Foster trust by communicating openly and honestly, ensuring clarity in all professional interactions.

Commitment to Ethical Practice

By following these principles and values, members of the College of Occupational Therapists of Manitoba ensure their conduct serves the public good, fosters trust, and maintains the profession's integrity. Ethical practice requires ongoing reflection and a commitment to growth, ensuring occupational therapists act in the best interests of those we serve.

Ethical Responsibilities

The responsibilities and accountabilities listed in this document have been selected for their relevance to current occupational therapy practice. They are not exhaustive and are of equal importance.

The principles and values listed in this document are to be demonstrated in the practice of occupational therapy and are also woven throughout practice directions, practice guidelines, guidance documents and standards of practice.

Code of Ethics Reflected in Practice

Members are expected to start with the responsibilities they have for themselves in addition to attending to the ethical responsibilities they have to their clients, the public, their colleagues and the profession.

A. Reflective Practice

Practice is reflective when the occupational therapist:

1. Engages in self-reflection and continuous learning throughout their career to acquire, maintain, and enhance competence in practice.
2. Provides services only in areas of competence and seeks support and additional education, training, mentorship or supervision when a gap in competence is identified.
3. Considers degree of privilege and experiences of oppression and how they influence the therapist-client relationship.
4. Exercises independent judgment.
5. Uses a risk management-based approach that allows identifying and addressing the most significant risks to client occupations, health and wellness, reducing overall risk to the client. Taking a risk-managed approach to practicing occupational therapy is part of providing safe, effective and ethical occupational services.

B. Respectful and Meaningful Practice

Practice is respectful and meaningful when the occupational therapist:

1. Acknowledges and respects the rights of all people to take part in occupations that support survival, health, and well-being without risk to safety, dignity, or equity.
2. Serves the client's best interest, by working in a transparent, honest manner while striving to do no harm.
3. Provides occupational therapy services that uphold the dignity of each client.

4. Provides services to all clients in a respectful, unbiased manner. This includes not discriminating or refusing to provide services based on grounds protected under the Manitoba Human Rights Code.
5. Seeks to create an *ethical* or neutral space for dialogue.
6. Provides services that incorporate equity-focused approaches.
7. Respects and supports a client's autonomy to choose whether to proceed with occupational therapy services, including in situations when a client does not have capacity to provide informed consent.
8. Respects a client's autonomy to determine their own tolerance for risk in service provision.
9. Incorporates risk management approaches in service provision as appropriate for the client's priorities, needs and circumstances, and the practice situation.
10. Recognizes the power imbalance inherent in the therapist-client relationship and determines and communicate boundaries appropriate for the practice situation.
11. Manages conflicts of interest that cannot be avoided with transparency and integrity.
12. Implements measures that protect personal information, ensuring these protections when utilizing all forms of communication, in-person, written or electronic, such as using artificial intelligence (AI), social media, virtual care tools and other forms of electronic communication.

C. Collaborative Practice

Practice is collaborative when the occupational therapist:

1. Practises collaboratively with clients, colleagues and other key partners to promote coordination and alignment of client services.
2. Creates and sustains practice environments that are free from discrimination or oppression.
3. Provides mentorship and guidance as needed to colleagues, students and persons they are responsible for supervising.
4. Seeks, receives, and then uses professional judgment when acting on feedback given by colleagues or others regarding the provision of occupational therapy services and the member's conduct.

D. Professional Practice

Practice is professional when the occupational therapist:

1. Maintains a level of professional conduct that promotes the respect and integrity of the profession and sustains public confidence.
2. Recognizes systems of inequity in their practice context and acts within their professional sphere of influence to:
    (a) address and prevent racism and other forms of discrimination or oppression,
    (b) minimize the ecological costs of care.
3. Acts transparently and with integrity in all professional and business activities (e.g., fees and billing; contracts or terms of agreement with clients or contracting organizations; advertising of professional services; use of online platforms, including Artificial Intelligence (AI) services; and responds to any real or perceived conflicts of interest; etc.).
4. Works effectively within the systems where occupational therapy services are provided (i.e., education, health, social, justice) and the policies, procedures or processes of any funding programs accessed in the provision of services.
5. Shows leadership through one or more of the following:
    (a) contributing to the education of students, assistants or other system partners;
    (b) mentoring or educating occupational therapists;
    (c) engaging with professional networks or communities of practice;
    (d) contributing to the occupational therapy body of knowledge.
6. Engages in quality improvement activities that support the provision of quality occupational therapy services.

Use of the Code of Ethics

The Code first outlines and provides commentary on the core values and principles the College has adopted to guide the ethical practice of occupational therapy.

The Code of Ethics is a resource for members and others with whom they interact.

For example:

Occupational therapists use the Code of Ethics to:

- Guide ethical conduct and decision making. When resolving ethical issues, members consider applicable legislated and governing authority, the Competencies, the Practice Standards, and other college guidance documents together with what they know about their own practice context (e.g., organization policies and resources, geographic location, client population, etc.) and their clients' context.
- Be accountable for decisions, actions, professional competence and judgement; serving the client's best interest, by working in a transparent, honest manner and while striving to do no harm.

Occupational therapists are responsible for their decision making and actions and must, when requested by COTM, be able to articulate their rationale for ethical decisions made. Failure to follow the Code of Ethics may be found to constitute unprofessional conduct.

COTM, within its legislated mandate of serving and protecting the public interest, uses the Code of Ethics to inform members of their ethical responsibilities in daily practice. The Code of Ethics is also used to frame responses to members' questions or concerns about practice and in addressing complaints of unprofessional conduct.

Clients and the public may use the Code of Ethics to gain understanding of how their occupational therapist should be conducting themself.

Employers or supervisors of occupational therapists can use the Code of Ethics to support or assist the evaluation of employee conduct.

Educators and students use the Code of Ethics to inform curriculum content and student placement or entry-to-practice expectations.

Other health professionals and service providers may use the Code of Ethics to provide insight into how they can expect an occupational therapy colleague to conduct themselves.

Supplemental Resource

Occupational Therapy Statement of Commitment to Indigenous Peoples in Canada. Report from the Occupational Therapy Truth and Reconciliation Task Force. (ACOTPA, et al., 2023).

Guiding Terms and Concepts

Accountability

Accepting full responsibility for our actions and decisions, ensuring they align with professional standards and ethical conduct.

Client

Occupational therapists work with people of any age, along with their families, caregivers, and substitute decision makers. Occupational therapists may also work with collectives such groups, communities, and the public at large (ACOTRO, ACOTUP, & CAOT, 2021). The client is the individual, family, group, community or population engaging with occupational therapy services.

Context

Context(s) refers to the wide variety of factors that can influence occupational therapy services. Context includes a member's or client's immediate environment and resources but also includes "history, geographic location, the natural and built environment, social and economic laws, legislation and policies, organizational policies and rules, social and cultural norms and expectations, social identities, secular and religious beliefs, prevailing societal attitudes and behaviours, networks and power relations within and among collectives (families, groups, communities and populations)." (Egan & Restall, 2022, p.306).

Ethical spaces

When an occupational therapist works with someone who has a different worldview, they seek to create an *ethical* or neutral space for dialogue. This is a space to "step out of our allegiances, to detach from the cages of our mental worlds and assume a position where human-to-human dialogue can occur" (Ermine, 2007).

Equity

Equity is different from equality. Equality means everyone has the same resources and opportunities. Equity allocates resources and opportunities based on each person's circumstances, so that they can achieve equal outcomes. We need to take an equity approach because so many barriers to equality still exist in our society.

Humility

Cultural and intellectual humility is an approach to working with people that seek to find common ground and mutual respect. The occupational therapist knows that they cannot fully appreciate another person's culture, and they must not assume that their own culture is superior. They listen deeply to what the client says about their life and experience. They stay open to the possibility that they might need to question their own professional knowledge and beliefs.

Integrity

Upholding honesty, fairness, and consistency in all professional actions, adhering to both the spirit and letter of the law.

Occupational rights

The World Federation of Occupational Therapists (2019) recognizes occupational rights for all people to:

- Take part in occupations that support survival, health, and well-being.
- Choose occupations without pressure or coercion, while acknowledging that with choice comes responsibility for others and for the planet.
- Freely engage in needed and chosen occupations without risk to safety, human dignity, or equity.

Privilege

In the context of equity, privilege refers to unquestioned and unearned advantages that people enjoy when they are members of more dominant groups in a society.

Respect

Treating everyone with dignity, and fairness, recognizing and honoring cultural differences and individual experiences.

Respecting Autonomy

Honoring the right of individuals to make informed decisions by providing them with the information, support, and resources needed to act in line with their values.

Social position and power

The words *social position* and *power* are used in *The Competencies for Occupational Therapists in Canada* (2021/2024) to refer to the concept of *positionality*. Differences in social position and power shape personal identity and privilege in society.

Competent occupational therapists know how to analyze their positionality in order to act in an unjust world. This means being aware of one's own degree of privilege based on factors such as race, class, educational attainment, and income.

Transparency

Foster trust by communicating openly and honestly, ensuring clarity in all professional interactions.

References

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Appendix A

The following table outlines other important foundational legislation, other governing authorities and guiding documents for occupational therapy practice in Manitoba. Members are encouraged to review these documents on a regular basis.

Document	Description
The Occupational Therapists Act, C.C.S.M. c. O5	The Act defines the practice of occupational therapy by setting the general boundaries of practice. Additionally, The Act protects the public by defining the term "occupational therapist".
Occupational Therapists Regulation, M.R. 174/2005	The Occupational Therapists Regulation ("The Regulation") primarily addresses the categories and requirements of registration. The Regulation specifies the requirements to change registration status and to renew a member's registration.
The Human Rights Code	The Manitoba Human Rights Code is the provincial law that protects individuals and groups from discrimination and promotes equality of opportunity in Manitoba.
COTM By-Laws	The by-laws principally deal with the administration of COTM. The by-laws state under section 2.3 "All members shall Practise occupational therapy in accordance with the Code of Ethics."
The Personal Health Information Act	The Personal Health Information Protection Act establishes rules governing the collection, use, disclosure, retention and destruction of personal health information in a manner that recognizes the right of individuals to privacy of their personal health information.
The Truth and Reconciliation Commission of Canada: Calls to Action.	The Truth and Reconciliation Commission of Canada: Calls to Action made several calls to action which aims to restore relationships, foster social cohesion, and prevent future violations, in order to redress the legacy of residential schools and advance the process of Canadian reconciliation.
COTM Code of Ethics (CoE)	The set of values and principles that guide the conduct of occupational therapists registered to practice.

Document	Description
Competencies for Occupational Therapists in Canada- ACOTRO, ACOTUP, CAOT (2021)	Outlines the broad range of skills and abilities required of all occupational therapists at all stages of their career. Occupational therapists registered to practice in Canada are expected to use the competencies document to inform their practice and competence needs.
Standards of Practice	The set of regulatory requirements that define the minimum expectations for the practice of occupational therapy that results in the provision of ethical, accountable and effective services.
Practice Guidance Documents	Practice guidance documents include Practice Statements, Practice Guidelines and Fact Sheets. They are developed by the College to support members in the interpretation and application of relevant legislation, competencies and standards.