



CODE OF CONDUCT

How we *treat each other.*

Standards for everyone in MindBank's orbit

A project and social enterprise of
ElevateHER Mental Health Support Services Canada

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HOW TO READ THIS DOCUMENT

The relationships *we depend on.*

This is the Code of Conduct that defines what MindBank expects of everyone in its orbit — staff, contractors, contributors, advisors, subscribing organizations, partners, and visitors. It also defines what those same people can expect of MindBank.

It exists because the work MindBank does — gathering and stewarding lived-experience knowledge from people who have been harmed — depends on relationships of trust. That trust requires clear standards, and clear consequences when standards are violated.

This document references and builds on the MindBank Privacy Policy, the Compensation Policy, the EDI & Anti-Racism Policy, the Operating Framework, and the Data Protection & Security Policy. If conduct standards conflict between documents, the stricter standard applies.

01. The principles behind every conduct decision

1.1 Care comes first

The work of MindBank serves people who have been harmed. Every decision about conduct — by us, by contributors, by subscribers — is made first with attention to the wellbeing of the people most affected, and only then with attention to operational, reputational, or financial considerations.

1.2 Standards apply to everyone, including us

The project lead is not exempt from this Code. Senior contributors are not exempt from this Code. Funders are not exempt from this Code. The standards described here apply equally regardless of seniority, role, or relationship to MindBank.

1.3 Reporting is protected

People who raise concerns in good faith — about staff, about contributors, about subscribers, about MindBank itself — are protected from retaliation. We will name the failure to honour this commitment as a conduct violation in itself.

1.4 Consequences are real

This Code is not aspirational. Behaviour that violates it has consequences proportionate to the violation, applied consistently. Repeated minor violations are treated as serious. Hidden violations, when discovered, are treated more seriously than openly disclosed ones.

1.5 Repair is the goal where possible

For most violations, the goal is repair — acknowledgment, accountability, learning, and changed behaviour — not punishment. Some violations cannot be repaired and require removal. The distinction is made carefully, in consultation with affected people where appropriate.

02. What MindBank commits to

Before we describe what we expect of others, we describe what we commit to ourselves.

2.1 To contributors and applicants

MindBank commits to:

- Treating every applicant with dignity, regardless of whether we ultimately invite them to contribute
- Being honest about our timelines, capacity, and editorial direction
- Paying contributors what we have agreed to pay, on time, every time
- Honouring consent — including the right to change consent at any time
- Protecting contributor identifying information per the Privacy Policy and Data Protection Policy
- Not pressuring contributors to share more than they choose
- Providing a clear, fair process for raising concerns
- Naming our own mistakes when we make them

2.2 To staff, contractors, and advisors

MindBank commits to:

- Paying fairly and on time per agreed terms
- Providing clear scope and reasonable expectations
- Respecting professional boundaries (including time off, the right to disagree, and the right to decline scope outside the agreement)
- Not creating environments where people are pressured to overwork or to compromise their values
- Receiving feedback, including critical feedback, without retaliation
- Maintaining confidentiality about staff and contractors per their preferences
- Following through on commitments to advisors, including paid advisors

2.3 To subscribing organizations

MindBank commits to:

- Delivering the access and content described in the subscription tier
- Notifying subscribers in advance of material changes that affect them
- Investigating concerns subscribers raise in good faith
- Treating subscribers as partners in upholding ethical use, not as adversaries
- Returning subscriber data per the Privacy Policy when subscriptions end
- Not unilaterally changing terms in ways that disadvantage current subscribers

2.4 To everyone

MindBank commits to:

- Honesty about who we are, what we do, and what we don't do
- Honesty about our pilot stage and the limits of what we have built
- Plain language in our communications
- Reasonable response times to inquiries
- Maintaining the policies that define our practice and revising them when they fall short

03. What we expect of staff, contractors, and advisors

These standards apply to anyone in a paid or formal advisory role with MindBank.

3.1 Treating contributors and applicants with care

- Every interaction with a contributor or applicant is conducted with attention to their wellbeing, not just to the operational task
- Pre-screening and editorial conversations are paced to the contributor, not to internal deadlines
- Communication about timelines, decisions, or changes is direct, kind, and timely
- Contributors are not asked to share more than is needed for the task at hand
- Concerns raised by contributors are taken seriously, documented, and addressed

3.2 Confidentiality and information handling

- Contributor information is discussed only as needed, only with people authorized to know
- Pre-screening notes, contribution drafts, and identifying information are never shared outside the platform's secure systems
- Discussions about contributors do not happen in public spaces, on personal accounts, or with people outside MindBank's defined roles
- Confidentiality continues indefinitely after a person's role with MindBank ends

3.3 Working relationships

- Disagreement is welcomed; disrespect is not
- Feedback is offered directly, with care, and in a form the recipient can act on
- Conflicts between staff or contractors are addressed promptly, with the project lead's support if needed
- Power differentials (project lead vs. contractor, senior vs. junior) are acknowledged and not weaponized
- People who raise concerns are protected, even when their concerns are uncomfortable

3.4 Conduct that is unacceptable

The following are conduct violations regardless of role:

- Discrimination or harassment based on race, gender, sexuality, disability, age, religion, or any other dimension of identity
- Sexual harassment of any kind, including jokes, advances, or pressure
- Bullying, intimidation, or threatening conduct
- Retaliation against anyone who raises a concern
- Misuse of contributor information, including sharing outside authorized scope

- Misrepresenting MindBank's commitments, capabilities, or scope to external audiences
- Personal use of MindBank platforms, accounts, or relationships for unrelated commercial gain
- Romantic or sexual relationships with current contributors during their active engagement, given the inherent power imbalance

3.5 Conduct involving the project lead

The project lead holds significant authority within MindBank. This Code applies to her as fully as to anyone else. Specifically:

- She is not exempt from any standard in this document
- Her conduct can be subject to concerns raised through any of the mechanisms in Section 7
- Concerns about her conduct are reviewed by people other than her — initially by lived-experience advisors and ElevateHER's governance, and eventually by the Ethics Council
- She does not investigate concerns about her own conduct

04. What we expect of contributors and applicants

These standards apply to anyone applying to or engaging with MindBank as a lived-experience contributor.

4.1 Good-faith engagement

- Apply to share your own lived experience, not someone else's
- Be honest in pre-screening conversations and editorial communications
- Respect the editorial process, including timelines, anonymization standards, and final approval steps
- Communicate honestly with the editorial team — including, importantly, when something isn't working

4.2 Treating MindBank staff with respect

- Disagreement is welcome; disrespect, threats, or harassment of staff are not
- Staff and contractors are people doing their work; the same dignity you ask for is the dignity you offer

4.3 Treating other contributors and the broader community with respect

- The lived-experience advisory circle and other contributors are part of MindBank's community
- Disagreements with other contributors should be raised with the editorial team rather than fought publicly
- Comments or content that is racist, transphobic, ableist, or otherwise targeted at other communities is not consistent with contributor engagement and may end the engagement

4.4 What contributors are NOT expected to do

To be explicit, the following are NEVER expected of contributors:

- Sharing details beyond what they choose to share
- Performing emotion or processing on demand
- Validating MindBank's choices or the platform's structure
- Being available outside agreed-upon engagement times
- Producing content on MindBank's preferred timeline if that timeline doesn't work for them
- Endorsing MindBank publicly
- Withholding criticism of MindBank
- Refraining from raising concerns

Contributors retain their full agency throughout their engagement and after. The agreement they sign is a working agreement, not a binding loyalty.

4.5 When contributor conduct creates concerns

If a contributor's conduct toward staff or the community raises concerns, the response follows this order:

1. **Direct conversation** between the contributor and editorial team, attempting to understand and resolve
2. **Pause in active editorial work** if the issue requires more time
3. **Mediation** if needed, including with a lived-experience advisor
4. **Decision about continued engagement**, made by the project lead in consultation with the clinical reviewer, with the contributor's input

Most issues are resolved at step 1. Termination of engagement is a last resort, not a default.

If termination occurs:

- Compensation owed for completed work is still paid (per Compensation Policy, Section 6)
- Published content is handled per the contributor's existing consent terms
- The contributor retains the right to withdraw their content

05. What we expect of subscribing organizations

These standards apply to subscribing organizations and their staff who use MindBank content.

5.1 Ethical use of content

- Use MindBank content only for the purposes stated in your application and agreement
- Do not redistribute content outside your organization
- Do not attempt to identify contributors
- Do not use content in ways that conflict with the contributor consent terms (e.g., commercial use without renewed consent)
- Recognize contributors collectively as "MindBank lived-experience contributors" rather than attempting individual attribution

5.2 Treating contributors with respect

Even though subscribers do not interact directly with contributors, their handling of contributor content is itself a form of treatment:

- Use content in ways that honour the contributor's framing and meaning
- Do not re-contextualize content in ways that distort its message
- Do not extract "moving stories" while ignoring the structural critique those stories contain
- Recognize that engaging with one piece of content does not give you authority over the contributor's experience or community

5.3 Treating MindBank staff with respect

- Communication with MindBank staff is professional and respectful
- Disagreements about content, scope, or terms are raised through documented channels, not by harassing staff
- The same dignity expectation applies in both directions

5.4 Compliance with the ethical use agreement

- The subscriber agreement is binding; this Code reinforces and elaborates it
- Suspected misuse triggers investigation per the Operating Framework, Section 3.3
- Confirmed misuse can result in subscription termination, contributor notification, and potential public disclosure
- Patterns of poor practice are reported in our annual transparency report, with the option to identify the organization where appropriate

5.5 Subscriber accountability beyond MindBank

Organizations whose conduct outside their MindBank engagement reflects poorly on the values MindBank stands for may have their subscription reviewed. Specifically:

- Organizations engaging in racist, transphobic, ableist, or other discriminatory conduct in their public-facing work
- Organizations whose program changes have caused material harm to the communities they serve
- Organizations engaged in retaliation against staff or community members who raise concerns

This is rare but real. The threshold is high; the review is thorough.

06. What we expect at events and in public-facing engagement

When MindBank, or anyone representing MindBank, is engaged in events, training, public speaking, partnership conversations, or similar public-facing work, the following apply.

6.1 Representation

- People representing MindBank publicly do not present pilot capabilities as full capabilities
- Public framing aligns with what MindBank actually does, not aspirational scope
- Where contributor stories or content are referenced, only published, anonymized content is used; only with attention to contributor stated preferences
- Speakers who represent MindBank externally are briefed on what is and is not appropriate to share publicly

6.2 Behaviour at events

- Respect for fellow attendees, organizers, and venue staff
- Sensitivity to the fact that mental health and trauma topics may affect attendees
- Adherence to event-specific safety guidelines and codes of conduct (which may exceed this one)
- Reporting concerns through event channels and to MindBank

6.3 Conflicts of interest

- People representing MindBank disclose any potential conflicts of interest in advance
- They do not use MindBank's name, platform, or relationships for personal gain
- Honoraria received for representing MindBank are handled per agreement and public when reasonable

07. How concerns are raised, and how they are handled

7.1 Where to raise a concern

- **General concerns:** Email hello@mindbank.ca. The project lead receives and triages.
- **Concerns about a specific staff member or contractor:** Same email, addressed to the project lead.
- **Concerns about the project lead's conduct:** Email a lived-experience advisor (when advisory circle is established, contact details published), or contact ElevateHER's governance through the parent organization.
- **Concerns about MindBank itself:** Same channels, depending on whether it's about the project lead's leadership or the project's broader practices.
- **Concerns about the conduct of a contributor toward you:** Email hello@mindbank.ca if you are staff or another contributor. We do not share contributor identifying information without consent, but we do investigate and respond.
- **Concerns about subscriber conduct:** Email hello@mindbank.ca. We take subscriber conduct seriously.
- **Anonymous concerns:** A web form will be implemented for anonymous submissions. Until then, anonymous letters mailed to the office address (69 Brunswick St, Truro, NS) will be accepted and handled.
- **Privacy or data-specific concerns:** Email privacy@mindbank.ca (Privacy Officer).

7.2 How concerns are handled

For all concerns:

1. **Acknowledged within 5 business days**, in writing
2. **Investigated within 30 days**, with the depth proportionate to the severity
3. **Documented** with the concern, the investigation, the conclusion, and the action taken
4. **Responded to in writing** with what we found and what we did
5. **Followed up** to confirm the response addressed the concern (where the person raising it agrees to follow-up)

For concerns involving the project lead's conduct:

- Investigation is conducted by people other than the project lead
- The project lead is informed but does not control the investigation
- Findings are reported to the project lead and to relevant governance (ElevateHER, lived-experience advisors, eventually Ethics Council)

7.3 Possible outcomes of a concern

After investigation, possible outcomes include:

- **No conduct issue identified** — concern documented, no action required, communication to the person who raised it explaining the finding
- **Conduct issue identified, repair undertaken** — apology, mediation, training, process change, with documentation of what was repaired and how
- **Conduct issue identified, removal from role** — for serious or repeated violations
- **Pattern identified, structural change required** — when the concern reveals a systemic issue, not just an individual one
- **Failure of MindBank's own response** — when investigation reveals that the organization itself failed to respond appropriately to an earlier concern; this triggers escalation

7.4 Protection from retaliation

People who raise concerns in good faith are protected from retaliation. Retaliation includes:

- Termination, suspension, or pay reduction
- Removal from the platform or contributor list
- Subscription cancellation in retaliation for a concern raised
- Hostile working conditions
- Harassment, threats, or social exclusion

Retaliation against someone who has raised a concern is itself a serious conduct violation, regardless of the merit of the original concern. People who fabricate concerns to harm others are subject to consequences, but the bar for "fabrication" is high — being wrong is not the same as fabricating.

7.5 Public reporting

The annual transparency report includes:

- Number of concerns raised, by category (without identifying details)
- Number resolved through repair vs. through removal vs. without action
- Patterns identified
- Structural changes made in response

If we have received zero concerns in a year, we report that. If a particular concern is significant enough to warrant public disclosure with consent, we may name it specifically (e.g., a major incident with a subscriber).

08. Consequences for violations

8.1 General principles

- Consequences are proportionate to the violation
- Consequences are applied consistently across roles
- Repair is preferred over removal where possible
- Some violations require immediate removal regardless of intent

8.2 Range of consequences

Depending on the violation:

- **Verbal acknowledgment and conversation** — for minor first-time issues that can be repaired through discussion
- **Documented warning** — for repeated minor issues or moderate first-time issues
- **Required training or mediation** — for issues where the person needs support to change behaviour
- **Pause in role or engagement** — for issues requiring more time to assess and address
- **Formal apology to affected person** — where appropriate and where the affected person consents to receive it
- **Removal from role or engagement** — for serious violations or repeated patterns
- **Public disclosure** — for serious violations where transparency serves accountability or protection of others
- **Legal action** — in cases involving criminal conduct, fraud, or material harm

8.3 Violations requiring immediate removal

The following result in immediate termination or removal, without progressive discipline:

- Sexual misconduct or harassment
- Threats or violence
- Theft, fraud, or material breach of confidentiality
- Bringing weapons to MindBank events or workplaces
- Knowingly false statements that harm contributors or other staff
- Pattern of racist, transphobic, ableist or other targeted discriminatory conduct after warning

8.4 Documentation of decisions

Every conduct decision — including decisions to take no action — is documented in writing.

Documentation includes:

- The concern raised
- The investigation conducted

- The findings
- The decision and the reasoning
- The action taken
- Communication to affected parties

These records are retained per the Data Protection Policy.

09. Limits of this Code

9.1 What this Code can and cannot do

This Code can:

- Set clear expectations
- Provide accountability mechanisms
- Guide consistent decisions
- Communicate values to the public

This Code cannot:

- Prevent all bad conduct
- Substitute for judgment in individual cases
- Make MindBank a perfect organization
- Eliminate the power dynamics inherent in any structured engagement

9.2 Where this Code must give way

If this Code conflicts with:

- **Canadian law** (criminal law, employment law, human rights law) — the law governs
- **The Privacy Policy or Data Protection Policy** on data handling — those policies govern
- **The Operating Framework** on operational decisions — that framework governs
- **A specific contributor's exercised rights** under their consent — those rights govern
- **Common decency** — common decency governs (no policy is a substitute for treating people well)

If you find such a conflict, escalate. We will revise the Code to address it.

10. Updating this Code

This Code is reviewed:

- **Annually**
- **Within 30 days** of any incident that reveals a gap
- **At each governance transition** (advisory circle establishment, Ethics Council establishment, separate incorporation)
- **Whenever feedback from people the Code affects** indicates revision is needed

Material updates are reviewed by the lived-experience advisory circle (when established) and communicated to all relevant parties when adopted.

Change log

- April 2026 — Version 1.0: Initial code, drafted alongside Privacy Policy, Data Protection Policy, and EDI Policy.

A NOTE FROM THE PROJECT LEAD

Held to *this standard*.

A Code of Conduct is only as strong as the willingness to enforce it consistently — including against people who matter to the project, including against me.

I am writing this Code knowing that it will, eventually, be applied to a situation I would rather avoid. A contributor I respect will say something I find hard to address. A subscriber whose money we need will violate terms in a way that requires us to terminate. A staff member I rely on will fall short, and I will have to act. Possibly I myself will fall short, and someone will have to hold me accountable.

I am committing to the practices described here in writing because I want to be answerable to them in those moments. If you find me failing to apply this Code consistently, that failure is itself a serious matter, and I am asking you to name it.

— *Stephanie Atwood, Founder*