

CANADORE COLLEGE
OPERATIONAL POLICY MANUAL

TITLE: Conflict of Interest

EFFECTIVE DATE: May 22, 2013

1. SCOPE

1.1 Authority

This policy is issued under the authority of the President.

1.2 Application

This policy applies to all College employees, which for the purpose of this policy includes both employees and researchers.

2. DEFINITIONS

2.1 Researchers

All persons, employees, students and any other individuals (collectively "researchers") who are engaged in any research activities conducted on College premises, using College facilities, resources, equipment or otherwise, under the direction, control or auspices of the College.

2.2 Conflict of Interest

There are two categories of conflict of interest that apply in the College community:

- (a) Conventional conflicts of interest are situations in which employees or researchers may have the opportunity to influence College business decisions in ways that could or could appear to lead to personal gain or give improper advantage to themselves, their family or associates.
- (b) Conflicts of commitment are situations in which employees' or researchers' external or research activities interfere or appear to interfere with their paramount obligations to students, colleagues and the College.

3. PURPOSE AND PRINCIPLES

3.1 Colleges operate in the public domain. As such, Canadore College has a responsibility to ensure employees identify perceived and real conflict of interest situations so that appropriate action is taken. By addressing any conflict of interest in a responsible manner, the integrity of both the College and the employee can be upheld.

3.2 This policy is intended to promote transparency and to create a culture of trust in the College and research communities.

3.3 This policy will not supersede applicable collective agreements.

4. POLICY

4.1 Employees are encouraged to participate in external and research activities that enhance their professional standing or the reputation of the College. Employees are expected to manage these external interests or activities so that no conflicts of interest arise.

4.2 Employees must act honestly and uphold high ethical standards in order to maintain and enhance public confidence and trust in the integrity, objectivity and impartiality of the College.

4.3 Employees are obligated to perform their official duties and conduct themselves in a manner that will bear close public scrutiny.

4.4 Employees are obliged to disclose any actual, potential or perceived conflict of interest as soon as it becomes known to them. Disclosure is to be made to the employees' direct supervisor. Where it is not certain whether a matter entails a conflict of interest, they shall disclose the matter in accordance with this section.

4.5 Employees shall not provide preferential treatment to relatives, friends or organizations in which they or their relatives or friends have an interest, financial or otherwise, nor shall they supervise or evaluate relatives or persons with whom they have a personal or intimate relationship.

4.6 Except as otherwise provided, employees may not take any employment, consulting, research or teaching activity outside the College except with the prior written consent of their supervisor. Consent will not be unreasonably withheld provided there is no conflict of interest. Where it is determined that a conflict of interest exists, the College will respond within a reasonable length of time (normally within 2 weeks) advising of the necessary action to avoid, withdraw from, or otherwise resolve the situation.

4.7 Where consent has been provided, but a potential conflict of interest arises during the activity, the onus is on the employee to immediately raise the potential conflict with their supervisor. The College will respond within a reasonable length of time (normally within 2 weeks).

4.8 As part of performance review, supervisors will review this policy and request that employees acknowledge that they are aware of the policy and are not currently in a conflict of interest situation. If employees believe that they may be in a conflict of interest situation, they are to inform their supervisor immediately.

4.9 Employees are not to solicit or accept fees, gifts or other benefits that are connected directly or indirectly with the performance of their College duties from individuals, organizations or corporations, other than the normal exchange of gifts among friends, the normal exchange of hospitality between persons doing

business together, tokens exchanged as part of protocol such as the normal presentation of gifts to persons participating in public functions.

- 4.10 The College maintains a legal interest in the activities of former College employees who, because of their former College association, have privileged and confidential knowledge of College business and operations that if used or disclosed, could have a detrimental impact on the College. No employee or former employee may disclose any privileged or confidential information that is not already in the public domain without seeking explicit permission from the College to do so. It is understood that any such disclosure could have a detrimental effect on the College.
- 4.11 Violations of this policy will be subject to discipline following College or collective agreement provisions. Legal action may be taken against any employee, researcher, organization or entity in circumstances where the breach of this policy results in any type of loss or damage to the College.

5. ROLES AND RESPONSIBILITIES

5.1 President

The President is responsible for the overall management and operation of the College. The President will ensure the policy is implemented and that compliance is monitored.

5.2 Vice-President, Academic

The Vice-President, Academic will be responsible for the effective implementation of this policy and resolve any disputes arising over policy interpretation.

6. EVALUATION

This policy will be reviewed every three years.