

PERSONNEL

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NAME: CONFLICT OF INTEREST

PHILOSOPHY/PURPOSE

Great Plains College is committed to ensuring that our business interests are protected and that employee safety and productivity are maintained. The College is entrusted with the protection of public interest; therefore, it is essential that employees conduct themselves conscientiously, honestly and in accordance with the best interests of Great Plains College. As an employee, you must avoid any situation in which there is, or may appear to be, a potential conflict between Great Plains College interests and your own personal interests. As such, we are responsible to disclose, and subsequently resolve, any situations that might result in actual or perceived conflicts of interest.

SCOPE

The provisions of this policy apply to all persons employed by the College. It is the responsibility of each employee to seek the guidance of his/her out-of-scope director before engaging in any activity from which a conflict of interest may arise.

DEFINITIONS

Conflict of Interest:

A situation in which an employee, whether for himself/herself or some other person, attempts to promote a private or personal interest which results in, or could appear to result in:

- a) an interference with the employee's professional objectives and responsibilities; or
- b) a gain, benefit or an advantage of a financial or personal nature by virtue of his/her position in the College.

POLICY

This policy outlines the College's stance on potential conflicts of interest in:

1. Secondary employment
2. Nepotism
3. Acceptance of Gifts
4. Transactions of business
5. The use of personnel and/or equipment for non-business purposes
6. Post-employment conduct

Secondary Employment

Employees may be employed outside of the College provided that such employment does not:

- a) cause an actual or perceived conflict of interest;
- b) compete either directly or indirectly with the business of the College;
- c) interfere with the employee's responsibilities at the College; or
- d) involve the unauthorized use of College premises, equipment, materials or supplies.

The following examples articulate some possible conflicts of interest related to secondary employment:

- a) College employees working for a secondary employer, whether as owner, employee, partner, officer or director, in direct competition with College services or on College time;

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- b) Using the name of the College, College letterhead, and/or institutional materials when engaging in supplementary professional activities or other outside activities to advance or pursue personal business interests;
- c) Securing outside employment that impairs the employee's performance, duty and workload capabilities at the College.

Nepotism

Nepotism is the practice among those with power or influence of favouring relatives or friends, especially by giving them jobs. Relatives and friends of Great Plains College employees are eligible for employment with Great Plains College provided that:

1. The hiring process is open, equitable and candidates are selected in accordance with Great Plains College hiring practices.
2. A direct or indirect supervision/subordinate relationship is not created between such employees.
3. Great Plains College employees do not directly or indirectly influence the selection and hiring process in which their relative and/or friend is a candidate.
4. Directors and supervisors exclude themselves from any hiring process where their relative and/or friend is a candidate.

The following examples articulate some possible conflicts of interest related to nepotism:

- a) College employees who share the same household and a direct or indirect reporting relationship exists;
- b) College employees who have an intimate personal relationship with another employee where the relationship affords an opportunity for collusion between the two employees that would have a detrimental effect on the College;
- c) College employees acting in any official matter where there is a personal interest that is incompatible with an unbiased exercise of official judgment;
- d) College employees who feel a personal obligation to use their role at the college to inappropriately influence decisions made to benefit the private interests of an individual or another organization.
- e) College employees who attempt to influence the hiring panel's decision by sharing information about their friend or family member who has applied for a position at the College.

Employees who are direct relatives with a College student, employees who share the same household with a College student, employees who share financial interests with a College student, or employees who have an intimate and/or close personal relationship with a College student shall not be employed in situations where the employee instructs, tutors, supervises, counsels or evaluates that student.

College employees should recognize that engaging in an intimate personal relationship with a College student may give rise to a subsequent claim that the relationship is or was sexual harassment.

Acceptance of Gifts

An employee shall not accept a gift, favour or service from any individual, organization or corporation doing business with the College, that compromises or even appears to compromise, their ability to make objective and fair business decisions. Monetary gifts must be disclosed.

The following circumstances outline where the giving and receipt of a gift would be acceptable:

- Normal exchange of gifts between friends;
- Normal exchange of gifts of hospitality between persons doing business together;
- Exchange of gifts as part of protocol; or
- Presentation of gifts to persons participating in public functions.



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Transactions of Business

Great Plains College employees should avoid any investments, associations, communications, or sales that create a conflict of interest or that interfere with their ability to perform their duties at the College or that interfere with College business.

The following examples articulate some possible conflicts of interest related to transactions in business:

- a) Divulging confidential or restricted information to any unauthorized person or releasing such information in advance of authorization for its release.
- b) Being party to a material contract or proposed material contract with the College, or being a director of, or having a material interest in, any person who is a party to a material contract or proposed material contract with the College.
- c) Acting on an external board, council, association or any other organization that has a material influence, or might reasonably be expected to have a material influence, on the function of the College.

Use of Personnel and/or Equipment for Non-Business Purposes

Use of Great Plains College property or services for personal or non-business purposes, that is not solely for the benefit of the College, is generally prohibited.

Post-Employment Conduct

Employee obligation to protect the interests of Great Plains College extends after he/she leaves employment with the College. Former employees have an implied obligation of good faith and confidentiality, as well as fiduciary obligations. Examples of violations include, but are not limited to:

- a) Use or disclosure of employer confidential information.
- b) Exploitation for your own benefit, of any Great Plains College business opportunity of which you were intimately aware as an employee.
- c) Removal or failure to return Great Plains College property.



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GUIDELINES

Due to the range and complexity of College activities, the provisions of this policy cannot be exhaustive. However, there are four major principles that aide in assessing conflicts of interest that are not specifically mentioned in this policy.

1. Openness and full disclosure are paramount. Even the appearance of a conflict of interest is to be avoided. College employees are required to discuss, with their out-of-scope director, any actions that have the potential for conflict of interest. When private interests are freely and frankly declared, the possibility of conflict is lessened.
2. Employees should enjoy the same rights in their private dealings as any other individual, unless it can be demonstrated that a restriction is in the College's best interests.
3. The College does not pay for the same service twice. Employees shall not accept monetary or other payment, in addition to normal salary or expenses, for duties that they perform in the course of their employment.
4. The College is required to deal with any potential conflict of interest situation discovered even if it is not disclosed.
5. This policy may be waived in whole or in part by the President, in consultation with the Board of Governors, provided that:
 - a) upon review, it is found to be essential to do so in order to meet operational needs; and
 - b) sufficient safeguards are in place to ensure that the College's interests are not compromised.