

## Conflict of Interest Policy

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### 1.0 PREAMBLE

Employees of the College are expected to carry out their duties and responsibilities in the best interests of the College, having regard to the College's mission, policies and obligations, including its legal obligations to its students and employees. In doing so, employees must avoid actual and perceived conflicts of interest.

### 2.0 PURPOSE

The purpose of this policy is to:

- formally outline the obligation employees have to avoid actual and perceived conflicts of interest;

- provide assistance to employees in understanding conflicts of interest so that they may disclose situations that may give rise to actual or perceived conflicts of interest; and
- provide processes and mechanisms for the College to evaluate potential conflicts of interest and resolve actual or perceived conflicts of interest.

### 3.0 SCOPE

The following scenarios are provided as illustrations. This is not an exhaustive list.

#### 3.1 Acceptance of Gifts, Hospitality and Benefits

The acceptance of material gifts or benefits by an employee of the College from anyone doing business with, or soliciting business from, the College, or from students or subordinates can give rise to an actual or perceived conflict of interest and is not permitted.

This includes, but is not limited to the acceptance of:

- Cash or near-cash (i.e. securities, real estate, gift cards)
- Tickets to events, sponsorship, memberships
- Airline ticket or accommodations
- Personal discounts
- Personal commissions
- Tangible items of value (i.e. golf clubs, liquor, jewelry)

This rule is subject to an exception for immaterial gifts. Gifts not exceeding \$50 in value and token courtesies which do not place, or do not cause the appearance of placing, the recipient under any obligation may be accepted.

Employees are encouraged to consult with their managers about materiality and should decline gifts when in doubt. In approving a gift as immaterial, managers should consider the timing of the gift or benefit, any cultural or symbolic factors and all other relevant circumstances.

### **3.2 Outside Activity**

No employee shall, without the written consent of their manager, engage in any outside employment or work that affects the employee's ability to fully and faithfully discharge their College responsibilities or that otherwise gives rise to an actual or perceived conflict of interest.

All outside employment and work (whether volunteer or paid) with the potential to cause an actual or perceived conflict of interest must be disclosed to the College.

No employee shall associate the name or address of the College with any outside activity or business venture without the College's prior written consent.

Using the College and its resources or relationships to promote a personal religious, political, business or other agenda is prohibited as is using students or staff to support outside employment, work or other activity.

### **3.3 Relationship with Students**

Employees who are in or who have been in a close personal relationship with a student must avoid actual or perceived conflicts of interest that arise out of a duty to teach, supervise, evaluate or provide services to the student. Potential conflicts must be disclosed and should ordinarily be resolved by restricting job duties to eliminate any actual or perceived conflict.

### **3.4 Anti-Nepotism**

It is the policy of the College that no individual shall secure an employment advantage arising out of a family or close personal relationship with another employee.

Accordingly:

- no employee shall be in a direct or indirect reporting relationship with another family member of individual with whom they have a close personal relationship; and
- Individuals who wish to be considered for a position at the College and who obtain an interview for the position shall identify any College employee who is a family member and/or individual with whom they have a close personal relationship.

Relationships formed after employment are subject to this policy and are to be disclosed and resolved in accordance with its procedures.

### **3.5 Conflicts of Interest in Procurement**

The absence of actual and perceived influence is of particular importance leading up to and during the competitive bidding process for a product or service. Employees must comply with the conflict of interest provisions of the College's Procurement Policy and Procedures, approved by the GBC Board on February 10, 2010.

### **3.6 Conflicts of Interest in Research**

Employees must comply with the College's Conflict of Interest in Research Policy, approved by the GBC Board on February 11, 2009,

## **4.0 DEFINITIONS**

This section includes an explanation of terms and abbreviations used within the policy and procedure.

"Actual conflict of interest" means a situation in which an employee has a private or personal interest that influences the employee in the exercise of their College duties and responsibilities.

"Close personal relationship" means an intimate relationship or a relationship that would lead a reasonable, well-informed person to believe that an employee will be influenced in the performance of their duties by considerations relating to the relationship.

"Family member" means an employees' spouse (including common-law spouse), child (including a child of a spouse), and parent (including stepparents and foster parents).

"Potential conflict of interest" means a situation in which an employee has a private or personal interest that could influence the exercise of their College duties and responsibilities.

"Perceived conflict of interest" means a situation in which reasonable, well-informed persons would believe that an employee will be influenced in the performance of their duties by considerations relating to their private or personal interest.

## **5.0 POLICY**

### **General Principles**

No employee shall exercise their duties and responsibilities in circumstances that give rise to a perceived or actual conflict of interest

Every employee has an obligation to promptly disclose actual, perceived and potential conflicts of interest to their manager and abide by all directions given by the College to resolve actual and perceived conflict of interests.

This policy shall be interpreted to be consistent with all obligations arising under a collective agreement and under the College's Freedom of Expression Policy.

## **6.0 PROCEDURES**

Employees of the College are expected to use good judgment to identify actual, perceived and potential conflicts of interest. All such conflicts of interest must be promptly disclosed to their manager.

Notwithstanding the above, managers may also identify potential conflict of interests.

Managers who receive a disclosure or identify a potential conflict of interest shall consult with Human Resources and decide whether the circumstances give rise to an actual or perceived conflict of interest that requires resolution. Managers shall consult with the affected employee and Human Resources in developing an acceptable resolution.

If an agreeable resolution cannot be reached, the matter shall be escalated to the Vice President Human Resources, who shall resolve the matter and issue an appropriate direction to the employee and manager.

All disclosures and resolutions shall be documented by Human Resources in a standard form, with all documentation kept in the affected employee's personnel file.

## **7.0 FAILURE TO COMPLY**

Employees who fail to comply with this Policy may be subject to discipline, up to and including discharge.

## **8.0 RELATED POLICIES**

Freedom of Expression Policy  
Code of Conduct for Employees