



Northlands College Policy Conflict of Interest

POLICY STATEMENT

Northlands 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 interest of Northlands College. As an employee, you must avoid any situation in which there is, or may appear to be, a potential conflict between Northlands College interests and your own personal interests. 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. As such, you are responsible to disclose, and subsequently resolve, any situations that might result in actual or perceived conflicts of interest.

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.

GUIDELINES

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

- Secondary employment
- Nepotism
- Acceptance of gifts
- Transactions of business
- The use of personnel and/or equipment for non-business purposes
- 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



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- d) Involve the unauthorized use of College premises, equipment, materials or supplies.

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 Northlands College employees are eligible for employment with Northlands College provided that:

1. The hiring process is open, equitable and candidates are selected in accordance with Northlands College hiring practices.
2. Northlands College employees do not directly or indirectly influence the selection and hiring process in which their relative and/or friend is a candidate.
3. Directors and Supervisors exclude themselves from any hiring process where their relative and/or friend is a candidate.

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 are not to be accepted and an offer of such will be disclosed to the employee's Director.

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

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

Transactions of Business

Northlands 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.

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

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



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Post-Employment Conduct

Employee obligation to protect the interests of Northlands 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 Northlands College business opportunity of which you were intimately aware as an employee.
- c) Removal or failure to return Northlands College property.

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.

This policy may be waived in whole or in part by the President & CEO 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.

Policy Originated:	Approved by: President & CEO
Last Approved: January 2018	Signature: 