

POLICY NAME: Conflict of Interest for Employees	POLICY NUMBER: 3.1.2	CATEGORY: Governance
RESPONSIBLE EXECUTIVE: President	APPROVAL AUTHORITY: Board of Governors	EFFECTIVE DATE: July 3, 2023
NEXT FULL REVIEW DATE: July 2, 2028	REVISED: October 25, 2023	REPLACES:

Purpose

Coquitlam College (the College) must earn the trust of its students, employees, regulatory bodies, and stakeholders. The policy Conflict of Interest serves to preserve the trust between the College and those considering the College for their studies. This trust is earned in part by requiring that all Employees behave in a manner that avoids any real, perceived or potential Conflict of Interest between their own interests and the employment responsibilities and duties they owe to the College.

Scope

This policy applies to all employees of the College.

Policy Statements

1. Coquitlam College expects its Employees to conduct their work-related activities with honesty and with integrity, and to conduct themselves ethically and responsibly, in a manner consistent with the values and goals of the College.
2. College Employees must be familiar with College policy regarding Conflict of Interest, and to avoid and/or disclose situations that could reasonably be interpreted as real or potential Conflicts of Interest.
3. In the course of performing their College duties, Employees shall not, either directly or indirectly, demand or accept gifts, benefits, favours, services or other complimentary items, such as but not limited to offers of paid conference attendance or participation in recreational activities, from any individual, organization or corporation where such acceptance could reasonably be seen to create a real or perceived obligation on the part of the Employee, or to compromise the Employee's objectivity. Allowable exceptions to this restriction include the following:
 - a. the normal exchange of hospitality between persons doing business together;
 - b. exchanges as part of established protocol;
 - c. the exchange of gifts or hospitality between friends.
4. When a gift or benefit is (or is about to be) offered to an individual Employee or a department of the College, the recipient(s) must discuss the acceptance of such gift or benefit with a Coquitlam College Senior Administrator, and obtain the approval of the Senior Administrator, to ensure that

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- acceptance of the gift or benefit creates no real or perceived obligation. In all cases, however, the College President has the final authority to determine what is, or is not, appropriate.
5. If College Employees are invited to make job-related presentations or to use their professional skills and expertise in support of professional activities and/or community projects, the College encourages such participation provided that these activities do not
 - a. interfere or impede the performance of their duties as College Employees;
 - b. conflict with College operations to the loss of the College; or
 - c. create a financial burden for the College.
 6. The College acknowledges that Employees may also work elsewhere, but the College expects Employees to fulfill their employment roles and duties fully, without interference or conflict arising from any commitments they may owe to other employers. The College also expects Employees to control their external commitments in order to ensure that these do not create a Conflict of Interest or affect their commitment to the College in a negative manner.
 7. Before undertaking compensated or non-compensated external activities or positions, Employees must ensure that such activities
 - a. could not reasonably be perceived as activities that compete directly with activities or interests of the College to the detriment of the College;
 - b. will not interfere with or negatively affect their performance or duties as a College Employee;
 - c. are not performed in such a way as to use the College's name or appear to be official College business;
 - d. do not use College premises, services, equipment or supplies to which the Employee has access by virtue of College employment; and
 - e. do not transition clients to a private business or consulting practice through their connections to the College (e.g., refer College Students or Employees to the private practice of the Employee or Related Other(s)).
 8. A College Employee may not influence any financial transactions of the College for personal gain or gain of any Related Other(s). Where an Employee or a Related Other has a direct or an indirect financial interest in a proposed contract or transaction with the College, that Employee may not influence the awarding of such contracts or participate in such transactions.
 9. College Employees shall not participate in the selection, appointment, employment supervision or evaluation of a person who is a Related Other.
 10. The College shall avoid appointments that result in a College Employee supervising another Employee who is a Related Other. Where a potential COI does occur due to appointment, promotion or emergent relationship, it must be reported in writing to the appropriate supervisors and every effort taken to avoid the COI, including, at a minimum, making alternative arrangements for the evaluation, promotion, re-appointment and/or discipline of the Employee being supervised.
 11. Where an Employee is a member of a selection committee and determines that a family member or Related Other has applied for the position under that selection committee's purview, the Employee must disclose the Conflict of Interest to the selection committee's Chair and shall not serve on the committee for the duration of that particular selection.
 12. College Employees will not access confidential College records in an unauthorized manner or for unauthorized purposes.

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13. College Employees shall not without prior written authorization by the Chief Executive Officers or President use or disclose information that is privileged, is not in the public domain or is accessible to them by virtue of their employment role or responsibilities.

Procedures

14. Any Employees with questions or concerns about whether their external employment or activities might constitute a real or potential Conflict of Interest are encouraged to discuss their circumstances with a Senior Administrator.
15. College Employees must disclose real or potential COI in writing at the earliest opportunity to a Senior Administrator

Definitions

Conflict(s) of Interest (COI): A real or potential situation in which the activities of a College Employee may reasonably be perceived to have the intention or effect of advancing the Employee's interests or the interests of one or more Related Other(s) in a way that may be detrimental or potentially harmful to the normal operations, integrity or fundamental mission of the College; includes Conflict of Commitment and activities that may reasonably be perceived as advancing the personal or private interests of the individual or Related Others contrary to the interests of the College, as well as situations in which financial or other personal considerations may compromise, or have the appearance of compromising, an investigator's professional judgement in conducting or reporting research.

Employee: A person who is employed by the College.

Related Documents

None