



COLLEGE OF THE NORTH ATLANTIC

OPERATIONAL POLICY

TOPIC: CONFLICT OF INTEREST

Policy No.	HR-401	Division	Human Resources
Supersedes	n/a	Board Policy Ref.	BP-HR-401B
Related Procedure	HR-401-PR	Effective Date:	February 9, 2011

1.0 DEFINITIONS

College	Refers to College of the North Atlantic.
Board	Refers to the Board of Governors of the College.
Conflict of Interest	A circumstance whereby the personal interests of employees or their relatives will benefit or be perceived to benefit as a result of the employees' official positions, actions or influences, or when the interests of the College are sacrificed to the benefit of those personal interests.
Employee	Refers to all staff of the College, including the President.
Employer	Means the College.
Outside Employment or Interest	Means any activity outside of the duties and responsibilities associated with the employees' positions with the College for which the employees or relatives would expect to receive compensation by way of a salary, dividend, commission, fee or benefit in kind.
Relative	Means the spouse, parents, brothers, sisters and children of the employees, and/or their spouses.

Staff Means all management, faculty and support staff of the College.

2.0 PURPOSE AND SCOPE

The College acknowledges that staff are involved in activities that are outside their College responsibilities and encourages employees to keep their knowledge and skills up-to-date. The College also recognizes that there are faculty and staff who, either as individuals, or through involvement in companies, can provide services to the College.

The College, therefore, recognizes that conflict of interest may arise in the following areas, not necessarily intended to be all inclusive or exclusive:

- Outside employment;
- Bidding on College contracts for goods, services and consulting work;
- Internal contracting.

The following policies and procedures, as required by *The College Act 1996*, will govern all College staff in their relationship with and activities inside and outside their place of employment.

3.0. POLICY

- 3.1 Before or upon assuming their responsibility with the College, employees shall provide their Campus Administrator and the President with a declaration, in writing, and signed by the employee, disclosing any activity which could be interpreted to be a real, potential or perceived conflict of interest and certifying that they have read the Guidelines and will comply with its provisions as a condition of their employment with the College. In addition, employees shall provide at any time upon request, the campus administrator and the President with a declaration as outlined above and such declaration shall be provided within 30 days of receiving a request for such a declaration from the campus administrator or President or within 30 days of the employee becoming aware of any real or perceived conflict of interest.
- 3.2 No conflict should exist, or appear to exist, between the employees' position with the Employer and any outside employment or interest.
- 3.3 Employees are expected at all times to conduct their affairs in a manner which will not place them in a position where they are or are seen to be under obligation to any person or party who might obtain benefit from the fact that they work for the Employee

- 3.4 While outside employment and interests on the part of employees may be approved by the Employer, provided that these activities are consistent with the employees' duties and responsibilities and do not call into question their ability to perform their duties and responsibilities objectively, the first and foremost obligation and allegiance of employees must be to the Employer, and each employee's position with the Employer must take precedence over any and all outside employment and interests.
- 3.5 The Employer encourages employees to keep their knowledge and skills up-to-date and, to the extent that it does not interfere with the employees' positions with the Employer, therefore, encourages employees to pursue outside employment and interests which will enhance their knowledge and skills.
- 3.6 The Employer recognizes that as a post-secondary institution, there are faculty and staff who are qualified to offer services as individuals, as principals in companies, or as employees of companies, and that the College can benefit from reduced costs and ongoing support.
- 3.7 Employees may be contracted to provide services to the College, however, the College expects its employees' first allegiance to the performance of their assigned duties, and contracted work performed by employees should be performed outside working hours.

3. PROCEDURE

The Executive Director of Human Resources shall ensure that procedures are developed and implemented in accordance with this policy.

Approval History	
Approved by President	June 17, 1997
Reviewed	February 9, 2011
Next Review	February 2014