

Procedure Number:	2001
Procedure Title:	Conflict of interest Policy
Approved by:	President
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Review date:	N/A
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1. Purpose

1.1. This policy outlines the principles and framework to identify, disclose and resolve real or perceived conflicts of interest at UCW promptly and appropriately.

2. Scope

2.1. This Policy applies to all UCW employees including those hired on a on-going, fixed term or other contract basis. Behaviour expected of members of the Board of Governors with regard to conflict of interest is addressed in the UCW Board of Governors Resolutions and Minutes.

3. Definitions

These definitions apply to terms as they are used in this policy:

Word/Expression	Definition
Personal Interest	means an interest that arises from an employee’s relationship with a Related Person;
Private Interest	means a private, financial, or personal interest, and includes a Personal Interest;
Related Person	means a person who is, or within the previous five (5) years has been <ul style="list-style-type: none"> ○ related to the employee by blood, adoption, guardianship, marriage or common-law marriage, ○ a close personal friend of the employee, or ○ in an amorous or intimate (including but not limited to sexual) relationship with the employee.

3. Key Principles: Accountability and Integrity

3.1. All University Canada West employees are expected to act with integrity in the University’s best interests, supporting the University’s mission and goals, and avoiding circumstances that may place their own interests in conflict with UCW’s.

3.2 Conflicts of interest threaten to damage the reputation of, or cause harm to, the persons involved and potentially undermine public confidence and trust in the University as a whole. The University and its employees shall take all reasonable steps to ensure that conflicts of interest do not arise.

4. Conflicts of Interest

4.1. General principles

4.1.1. While the University recognizes that employees have private lives and will have outside interests as citizens and members of the community, employees are expected to conduct their private affairs in a manner that avoids any actual, potential or perceived conflict between their Private Interests and their duties to the University.

4.1.2. A conflict of interest will arise in any situation where an employee's Private Interest may influence or conflict with an employee's duty to act in the best interests of the University.

4.1.3. Employees are expected to arrange their private affairs in a manner that prevents conflicts of interest from arising.

4.1.4. Employees have a duty to disclose actual or potential conflicts of interest at the earliest possible opportunity. Disclosure is required before the employee engages in the activity that may create a conflict.

4.2. Examples of conflict of Interest Situation

4.2.1. Gifts and Entertainment

4.2.1.1. Employees must not request or accept from an individual (including a student), corporation or organization, directly or indirectly, a personal gift or benefit that arises out of their employment with the University. The only exceptions are minor gifts and token courtesies which do not place, or do not have the appearance of placing, the employee under any obligation to the outside party.

4.2.1.2. When an employee is in doubt as to whether to accept a gift, the employee should discuss the situation with their Supervisor.

4.2.2. Personal Relationships at Work

4.2.2.1. Conflicts of interest arising out of close personal relationships in the workplace must be avoided. Employees must never have influence, input or decision-making over the hiring, supervision, evaluation, promotion, discipline, dismissal or establishment of terms and conditions of employment of a Related Person. This includes, but is not limited to, influence over the engagement, evaluation or retention of a Related Person who is a contractor or other person with whom the University conducts business.

4.2.2.2. Employees must not participate in personnel decisions pertaining to Related Persons.

4.2.2.3. Employees and their Related Persons must not be employed or retained in positions where the working relationship affords an opportunity for collusion between them.

4.2.2.4. The above restrictions on working relationships may be waived at the discretion of the University, provided sufficient safeguards are in place to ensure that the University's interests are not compromised.

4.2.3. Relationship with Students

4.2.3.1. Faculty members and other University employees who are responsible for dealing with students have a duty to act in a fair, objective and unbiased manner at all times. Given the imbalance of power inherent in such relationships, employees must avoid situations where the employee is responsible for instructing, evaluating or otherwise dealing with a student who is a Related Person. Any employee who has influence, input or decision-making power over a student's instruction, evaluation, academic interests or other matters shall not become involved in a business, financial or close personal relationship with a student for the duration of their professional, supervisory or evaluative role.

4.2.3.2. It is a breach of trust for a faculty member or other University employee to enter into a romantic or intimate relationship with a student, whether or not that relationship is consensual, in circumstances where the student may be vulnerable because of the employee's position of power.

4.2.3.3. Any actual or potential conflicts of interest arising from a business, financial or close personal relationship with a student must be reported immediately to the employee's Supervisor and managed in accordance with this Code.

4.2.4. University Personnel, Resources or Assets

4.2.4.1. Employees must not use the University's students, employees, resources, intellectual property, instructional materials, facilities or assets for the personal or private purposes of the employee, a Related Person, or a company or organization in which the employee has a Private Interest, without first obtaining the written permission of the University.

4.2.5. Influence or Personal Gain

4.2.5.1. Employees must not use their position with the University for personal advantage or gain.

4.2.5.2. An actual or potential conflict of interest must be declared and managed before an employee

- purchases or influences the purchase of equipment, supplies or services from the employee, a Related Person, or a company or organization in which the employee has a Private Interest,

- sells, transfers or disposes of University assets to the employee, a Related Person, or a company or organization in which the employee has a Private Interest,
- selects or influences the selection of textbooks or other instructional aids for a course, in circumstances where the employee, a Related Person, or a company or organization in which the employee has a Private Interest, will receive revenue from the sale of the textbook or instructional aid, or
- receives payment from an outside source for work that is part of the employee's duties and responsibilities.

4.2.6. Conflict of Commitment

4.2.6.1. University employees must

- devote all their time and attention, and provide their best efforts, skills and talents, to the business of the University during the employee's working hours,
- faithfully, honestly and diligently perform the employee's duties and responsibilities,
- deal at all times in good faith with the University and its Board members, employees, students and other stakeholders, and
- act at all times in the best interests of the University.

4.2.6.2. A conflict of commitment occurs where an employee is, or might reasonably be perceived to be, engaging in outside business or employment activities that conflict with the obligations described above. Conflicts of commitment may arise from external teaching, research, consulting, professional or other activities which, by virtue of their nature or time commitment, prevent the employee from fulfilling their obligations to the University.

4.2.6.3. No employee shall, without the written authorization of the University, engage in any activity that conflicts or competes with the University, or which materially encroaches on the time or attention which should be devoted to the University, or affects the employee's ability to fully discharge their University responsibilities.

4.2.6.4. While situations involving conflict of commitment are more applicable to full-time employees, part-time employees are also required to ensure that they have the ability to devote the time and attention required to fulfill their duties and responsibilities as employees of the University.

4.3. Disclosure of Conflicts of Interest

4.3.1. If an employee is or becomes aware of an actual or potential conflict of interest involving themselves or another employee, the employee has a duty to disclose the details to their Supervisor at the earliest possible opportunity.

4.3.2. If an employee is unsure whether a particular situation presents an actual or potential conflict of interest, the employee should discuss the matter with their Supervisor. If further guidance is required, it should be sought from Human Resources.

4.3.3. If the University determines that an actual or potential conflict of interest exists, the University will take appropriate steps to avoid or manage the conflict. These steps may include, but are not limited to, the following:

- Requiring the employee to refrain from being involved in any decisions or dealings on behalf of the University that may conflict or otherwise intersect with the employee’s Private Interest;
- Taking steps to ensure that the employee does not exercise supervisory, instructional or other responsibilities in connection with a Related Person;
- Requiring the employee to cease their involvement in the Private Interest at issue;
- Removing the employee from any position(s) of trust or authority that may conflict or otherwise intersect with the employee’s Private Interest; and/or
- Requiring the employee to repay any benefit received by the employee that may have been connected to a Private Interest.

4.3.4. The above list is not exhaustive. The University has the sole discretion to implement any protective steps it considers necessary to avoid or manage an actual or potential conflict of interest or otherwise to protect the University’s interests.

Related policies

Policy Number	Policy Title
8003	Standard of Conduct
	Employee Handbook