

## STAFF CONFLICT OF INTEREST

### Background

Greater St. Albert Roman Catholic Separate School District No. 734 believes that the effective management of the District is facilitated by employees avoiding situations which could be construed as placing them in a conflict of interest. This obligation demands that there not exist, or appear to exist, any conflict between the private interests of employees and their responsibility to the District and the community. This administrative procedure applies to all salaried employees and all persons employed on a contractual basis.

### Procedures

1. A conflict of interest arises when:
  - 1.1 An employee, because of knowledge, responsibilities or authority associated with the employee's position with the District is perceived as, directly or indirectly, providing benefit to:
    - a) The employee personally, or
    - b) A member of the employee's family, or
    - c) A business or organization in which that employee, or a member of the employee's family, has an interest or holds a position.
  - 1.2 An employee's relationship, employment or position with or interest in, another person, business or organization affects the exercise of the individual's duties or responsibilities as an employee of the District.
2. A conflict of interest exists in the above situations irrespective of whether the District, under the particular circumstances has been disadvantaged or receives a benefit.
3. An employee shall not accept a gift, favour or service from any individual, organization or corporation with which the District does business or potentially may do business, other than normal exchanges of gifts between friends, the normal exchange of hospitality between persons doing business together, tokens exchanged as part of protocol, or the normal presentation of gifts to persons participating in public functions.

4. The Superintendent is responsible for:
  - 4.1 Ensuring that all employees are familiar with and adhere to this administrative procedure;
  - 4.2 Reviewing conflict of interest situations and interpreting and applying Board policy and District administrative procedures as appropriate; and
  - 4.3 Keeping the Board informed on conflict of interest situations and their resolution.
  
5. Employees are responsible for exercising reasonable care to ensure that they avoid conflict of interest situations.
  - 5.1 Employees who exercise a regulatory, supervisory or other discretionary control over others shall, wherever possible, disqualify themselves from dealing with relatives with respect to those functions;
  - 5.2 Employees may not take supplementary employment including self employment, which may cause an actual or apparent conflict of interest.
  
6. Where an employee does find him/herself in an actual, perceived or potential conflict of interest, the employee must:
  - 6.1 Disclose in writing to his/her supervisor and the Superintendent the nature and extent of the conflict of interest; and
  - 6.2 Refrain from acting in connection with the conflict of interest unless, and to the extent that, the Superintendent may in writing otherwise permit.
  
7. Situations which may be construed as a conflict of interest include but are not limited to the following:
  - 7.1 Accepting lavish meals, entertainment, trips, flights, hotel accommodation or car rentals from any individual or organization with which the District does business or plans to do business;
  - 7.2 Giving a gift or favour of other than nominal value to any individual or organization with which the District does business or plans to do business;
  - 7.3 Using District time, materials, facilities or information for one's personal gain;
  - 7.4 Pursuing personal gain by using the time, materials or facilities of those doing business, or seeking to do business, with the District;
  - 7.5 Acquiring ownership or any significant financial interest in an organization with which the District does business, or in anticipation of its doing business with the District;

- 7.6 Using one's influence or authority as an employee of the District to solicit from organizations, with which the District does business, contributions to charitable, recreational, cultural or social associations; and
- 7.7 Using one's position or authority to exert pressure inappropriate to the role and relationship, in an attempt to influence others into a particular course of action.

References: Government of Alberta: *School Act*, Sections 60, 61 and 113  
Alberta Human Rights Act  
Freedom of Information and Protection of Privacy Act  
Personal Information Protection Act  
Canadian Human Rights Act

Implementation Date: February 14, 2019