

CONFLICT OF INTEREST POLICY			
Effective Date	April 11, 2018	Policy Type	Administrative
Responsibility	Director, Human Resources	Cross-Reference	1. Province of Alberta Conflicts of Interest Act 2. Progressive Discipline Policy 3. Declaration of Conflict of Interest Form
Approver	Executive Council	Appendices	
Review Schedule	Every 5 years		

1. Policy Statement

- 1.1 Grande Prairie Regional College ("GPRC" or "the College") does not abide conflicts of interest in its community and is committed to accountable and transparent operations in the best interest of the College as a whole.

2. Background

- 2.1 GPRC values integrity and transparency in all of its operations, including academia, administration, with students, and its relationship with the community at large. In advancement of its mission and values, GPRC has developed this policy to identify and address conflicts of interests in our College community.
- 2.2 The President and Chief Executive Officer (CEO) has the authority to govern and delegate management of the College, pursuant to the Post-Secondary Learning Act of Alberta. This policy has been developed under that authority. It is expected that all employees comply with this policy.

3. Policy Objective

- 3.1 The College considers its reputation important and takes steps to protect it. It is committed to being ethical and credible in its relationships with employees, students, vendors, and others. The objective of this policy is to define and explain conflicts of interest and provide specific guidance on how to correctly recognize, disclose, and manage them at GPRC.

4. Scope

- 4.1 This policy applies to conflicts of interest involving employees as well as students and contractors. All persons with duties of care and confidentiality toward GPRC are expected to comply with this policy. This policy will not interfere with the terms and conditions of employment as specified in applicable employment contracts.

5. Definition(s)

- 5.1 “Conflict of interest” exists when an individual has a significant interest, financial or otherwise, that could directly and considerably impact his/her conduct at the College. Generally, this may occur when the external interest provides some motivation or incentive to impact the individual’s conduct, and when the individual has opportunity to make alternate decisions as a result. In short, a conflict of interest is a set of circumstances that creates a risk that professional judgement or actions regarding the College will be unduly influenced by an external interest.
- 5.2 “Work day” is defined as regular working hours that are compensated for in exchange for productive, value added work to the College.
- 5.3 “Vendor” is defined as an individual or company that supplies, or seeks to provide goods and/or services to the College and includes contractors and suppliers.

6. Guiding Principles

- 6.1 Employees have important responsibilities toward the College. Their conduct should not bring GPRC into disrepute. External interests shall not compromise their abilities to perform all activities expected of them, and they should always act in the best interest of the College.
- 6.2 Employees must exercise care in their private affairs to avoid conflicts of interest and manage situations that may be perceived as a conflict of interest. The following examples of situations may be indicative of conflicts of interest:
 - 6.2.1 Entering into a service contract on behalf of the College with a company in which you have a financial interest.
 - 6.2.2 Hiring a consultant who is related to you.
 - 6.2.3 Acceptance of gifts, services, or entertainment of a significant amount (>\$100) from vendors, subordinates and/or students.
 - 6.2.4 Using College resources for the benefit of your private business.
 - 6.2.5 Participation in the recruitment, hiring, promotion, or evaluation of someone related to you.
 - 6.2.6 Enrolment of a student who does not meet the entrance requirements because he/she is related to an employee.
 - 6.2.7 Only awarding contracts to your previous employer.
 - 6.2.8 Carrying on work for an external business or employer during a College work day.
 - 6.2.9 Undertaking outside employment, volunteerism, political activism, and other such activities that interfere with College responsibilities and duties.
 - 6.2.10 Using non-public College information for your personal gain or advantage.
 - 6.2.11 Receiving personal discounts of a significant value from College suppliers or service providers.
 - 6.2.12 Having romantic relationships with other employees where a reporting relationship exists at work.
- 6.3 The preceding list is not exhaustive.

7. Annual Declaration of Interests

- 7.1 Employees will be asked to annually declare themselves free from conflicts of interest, and/or to report conflicts that currently exist. If you are not sure what to declare, err on the side of caution. You may contact the Director, Human Resources for confidential guidance in respect of this policy.
- 7.2 If required, the Director, Human Resources will share the conflict of interest with the immediate supervisor and/or the President and CEO.

8. Immediate Declarations of Interests

- 8.1 If you have self-identified a conflict of interest, you have an immediate obligation to remove yourself from the situation, protect the interests of the College, and complete/submit the Declaration of Conflict of Interest Form to the Director, Human Resources.
- 8.2 Once the declaration has been made, you will be advised on how to proceed. In some cases, conflicts of interest may be tolerated as long as they are disclosed and steps are taken to mitigate any risks to the College.
- 8.3 Anyone who suspects dishonest activity shall make a report immediately to the Director, Human Resources and will not attempt to personally conduct investigations or interviews related to any suspected conflict of interest or fraudulent act.
- 8.4 If required, the Director, Human Resources will share the conflict of interest with the immediate supervisor and/or the President and CEO.

9. Investigation Protocols

- 9.1 Concerns about conflicts of interest can be raised in a number of ways. These include:
 - 9.1.1 Raising the concern with the immediate supervisor;
 - 9.1.2 Notifying the Director of Human Resources directly; and/ or
 - 9.1.3 Direct contact with the President and CEO.
- 9.2 The Director, Human Resources has the primary responsibility for initiating investigative response to all suspected unreported conflicts of interest as defined in this policy. The Director will conduct an initial assessment to determine who, if anyone, will conduct the investigation (internally or externally) and will make a recommendation to the President and CEO and/or external legal counsel.
- 9.3 All initial assessments will be reviewed by the Director, Human Resources to ensure a consistent approach is applied to all suspicions or complaints following discovery or notification of a conflict of interest, as well as risk mitigation activities to minimize additional losses. All investigations undertaken, externally or internally, will be carried out in accordance with applicable law in the Province of Alberta and pursuant to GPRC internal policies.
- 9.4 All employees suspected of knowingly engaging in conflicts of interest are to be treated fairly and consistently, and in compliance with College policies.
- 9.5 If the investigation substantiates that fraudulent activities or unreported conflicts of interest have occurred, the Director, HR will advise the President and CEO.

10. Confidentiality

- 10.1 Human Resources treats all information received confidentially where possible.
- 10.2 Investigative results will not be disclosed or discussed with anyone other than those who have a legitimate need to know. This is important in order to avoid damaging the reputations of persons suspected but subsequently found innocent of wrongful conduct and to protect the College from potential civil liability.

11. Redress

- 11.1 Anyone who contravenes this policy may be subject to a range of corrective measures, up to and including dismissal, with cause, from the College in accordance with the Progressive Discipline Policy. In all cases where GPRC has suffered a financial loss, it will seek to recover its losses in full, along with all costs incurred to investigate and litigate said loss.
- 11.2 Decisions to prosecute or refer investigative results to the appropriate law enforcement and/or regulatory agencies will be made in consultation with external legal counsel and senior management, as will final decisions on disposition of the case.
- 11.3 Reports will be kept anonymous and confidential unless the reporter provides explicit permission to disclose his/her identity. All anonymous reports will be taken seriously and investigated fully. Anonymity will be maintained within the College environment, but cannot be guaranteed in the event that external legal action flows from the disclosure.

12. Roles and Responsibilities

Stakeholder	Responsibilities
Executive Council	<ul style="list-style-type: none">• Approve and formally support this policy.
President and CEO	<ul style="list-style-type: none">• Review and formally support this policy.
Director, Human Resources	<ul style="list-style-type: none">• Develop, maintain, and oversee the implementation of this policy.• Provide guidance on all issues related to Conflicts of Interest.
All Stakeholders	<ul style="list-style-type: none">• Be knowledgeable of and complicit with this policy;• Ensure they have declared potential, actual, or perceived conflicts of interest upon discovery of them;• Act with integrity, transparency, and accountability to protect the College's interests at all times;• Comply with all policies and procedures in conducting their work;• Have a duty to report without delay any encountered conflicts of interest, or suspicious conduct; and• Expected to comply with the ethics and standards associated with any professional body to which they belong and any other applicable legislation.

13. Exceptions to the Policy

- 13.1 Exceptions to the guiding principles in this policy must be documented and formally approved by the Director, Human Resources or President and CEO.

- 13.1.1 Policy exceptions must describe:

- 13.1.1.1 The nature of the exception
 - 13.1.1.2 A reasonable explanation for why the policy exception is required
 - 13.1.1.3 Any risks created by the policy exception
 - 13.1.1.4 Evidence of approval by the Director, Human Resources or President and CEO.

14. Inquiries

- 14.1 Inquiries regarding this policy can be directed to the Director, Human Resources.

15. Amendments (Revision History)

- 15.1 Amendments to this policy will be published from time to time and circulated to the College community.