



CONFLICT OF INTEREST

Policy name: Conflict of Interest	Responsible Owner: President	Effective date: November 19,2008
Policy number: A02.01.01	Approval Body: SMT	Review date: September 2014
Category: Administrative	Replaces: October 19, 2004	

TABLE OF CONTENTS (WITH ACTIVE LINKS)

[PURPOSE](#)

[SCOPE](#)

[DEFINITIONS](#)

[POLICY STATEMENTS](#)

[PROCEDURES](#)

[LINKS TO SUPPORTING FORMS, DOCUMENTS, WEBSITES, RELATED POLICIES](#)

[RELATED ACTS AND REGULATIONS](#)

[RELATED COLLECTIVE AGREEMENT CLAUSES](#)

PURPOSE

To ensure that all College Employees conduct themselves in a manner that avoids any Conflict of Interest with the College. To prevent any real or perceived Conflicts of Interest that occur as a result of conflict between the personal or private interests of College Employees and their employment responsibilities to the College.

SCOPE

This Policy applies to all College Employees as well as to visiting researchers and students, who are participating as student researchers, in the conduct of Douglas College research studies.

DEFINITIONS

1. College Employees

Persons employed by the College including full-time, part-time, and casual and term employees.

2. **Conflict of Interest**

Conflict of Interest exists where the activities of a College Employee/ researcher have the intention or effect of advancing his/her own interests or the interests of others with whom he/she has a familial, personal or business relationship (a Related Other), in a way that may be detrimental or potentially harmful to the normal operations, the integrity or the fundamental mission of the College. It includes activities that may be perceived as advancing the personal or private interests of the individual, or Related Others, contrary to the interests of the College.

In the research context, Conflict of Interest includes situations where financial or other personal considerations may compromise, or have the appearance of compromising, an investigator's professional judgment in conducting or reporting research.

3. **Related Other**

Any individual with whom a College Employee has a familial relationship and/or shares financial, personal or business interests.

4. **Responsible Administrator(s)**

The administrator responsible for the discipline/program, service area or work unit in which a Conflict of Interest is perceived. In instructional/service areas this would normally be the Dean/Director. Where Conflict of Interest involves an exempt employee it would be the one-up Administrator.



POLICY STATEMENTS

Without limiting the generality of the above, the College recognizes the following as Conflict of Interest situations:

1. Financial Interests

A College Employee/ researcher may not influence any financial transactions of the College for personal gain or gain of Related Others.

Where an employee/ researcher or his/her Related Others, has a direct or indirect financial interest in a proposed contract or transactions with the College, that employee may not influence the awarding of such contracts nor participate in such transactions.

2. Compensated Professional Activities

- a) Employees of Douglas College may be invited to make job-related presentations or utilize 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 interfere with the performance of their duties as College Employees, do not conflict with College operations and do not impose a financial burden on the College.
- b) Any money received for such activities, other than reimbursement of expenses, should be remitted to the College except when the presentation is done on the employee's own time (including holiday time) or where honoraria are related to performance of employee duties and the acceptance of such honoraria has been approved by the Responsible Administrator(s).

3. Compromise of Performance

Douglas College Employees may not undertake compensated or non-compensated external activities or positions, where those activities interfere with, or negatively impact on, their performance of Douglas College duties. Employees must ensure that such activities

- a) do not interfere with, or negatively impact on, the performance of their duties as an employee
- b) cannot be perceived as activities that are in direct competition with those of Douglas College
- c) are not performed in such a way as to appear to be official business of the College nor utilize the College name,
- d) do not utilize College premises, services, equipment or supplies to which the employee has access by virtue of his/her College employment
- e) do not solicit clients to their private business or consulting practice through their connections to Douglas College (i.e. refer Douglas College students or employees to his/her private practice).

Where involvement in compensated or non-compensated professional activities potentially compromise or diminish the employee's ability to fulfill his/her employment obligations to the College, such activities must be disclosed and an unpaid leave or an appropriate reduction in responsibilities and compensation should be arranged.

4. Working Relationships

- a) Douglas College Employees shall not participate in the selection, appointment, employment supervision, or evaluation of a person with whom they have a familial relationship.



- b) Where a selection committee member determines a family member or Related Other, as defined above, has applied for the position, he/she will disclose that conflict and resign from the selection committee for the duration of that selection process.
- c) Douglas College shall avoid appointments that result in a College Employee supervising another employee with whom he/she has familial relationship.
- d) Where a potential Conflict of Interest does occur due to appointment, promotion or emergent relationships, it must be reported in writing to the Responsible Administrator(s) and every effort taken to avoid the Conflict of Interest. This would involve, at a minimum, making alternative arrangements for evaluation, promotion, re-appointment and/or discipline.

5. Acceptance of gifts or favours

- a) In the course of performing their College duties, Douglas College Employees shall not, either directly or indirectly, demand or accept gifts, favours, services or other complimentary items from any individual, organization or corporation, where such practices could reasonably be seen as compromising the employee's objectivity, other than
 - i. the normal exchange of hospitality between persons doing business together
 - ii. token exchanges as part of protocol
 - iii. the normal presentation of gifts to persons participating in public functions or conferences
 - iv. the normal exchange of gifts or hospitality between friends
- b) When a gift of significant value is (or is about to be) offered to an individual employee or to a College unit, the recipient(s) must discuss the acceptance of such gifts with, and obtain approval of, the Responsible Administrator(s), to ensure that



no real or perceived obligations may be attached to such gifts. Significant gifts are normally defined as gifts that have a value of greater than \$500, and include such activities as offers of paid conference attendance or participation in recreational activities from an existing or potential supplier/vendor. In all cases, however, the College President has the final authority to determine what is, or is not, appropriate and may determine disposition of the gift.

- c) This Policy is not intended to restrict the acceptance of gifts to the College Foundation nor the recognition of donors to the College (in accordance with College Policies A04.04.02, A04.04.04, A04.05.01)

6. Confidential Information

- a) Employees/ researchers of Douglas College shall not utilize confidential college records in an unauthorized manner or for unauthorized purposes.
- b) Employees/ researchers shall not utilize nor disclose information that is privileged and/or is not in the public domain, and that they may be able to access as part of their position's responsibilities, without prior authorization by the appropriate Responsible Administrator(s).

PROCEDURES

College Employees and those involved in College research must disclose, in writing to the Responsible Administrator(s), any situations that may be perceived as Conflict of Interest as provided in A02.01.01 Conflict of Interest Procedures.

LINKS TO SUPPORTING FORMS, DOCUMENTS, WEBSITES, RELATED POLICIES

A02.10.04 Integrity in Research and Scholarship

<http://www.douglascollege.ca/~media/7DC115D07F584D2EB3AC693CDF04DDB2.ashx>

A04.04.02 Fund Raising

<http://www.douglascollege.ca/~media/A2B34043E6DB4CF4B77D1EF93960F521.ashx>

A04.04.04 College Acceptance of Student Award Funds

<http://www.douglascollege.ca/~media/641BE70E5D504286B079FDDCB2DF6919.ashx>

A04.05.01 Naming Buildings and Facilities

<http://www.douglascollege.ca/~media/DCC35421AA764D818E72071DEF58986F.ashx>

A20.01.03 Use of College Resources

<http://www.douglascollege.ca/~media/8E7FDC818261485A80A417FFCA625912.ashx>

RELATED ACTS AND REGULATIONS

n/a

RELATED COLLECTIVE AGREEMENT CLAUSES

Decisions made by the Responsible Administrator(s) that impact on members of the DCFA or BCGEU may be grieved through the appropriate grievance process.

Douglas College/BC Government and Service Employees' Union – Article 10

<http://www.douglascollege.ca/~media/C5E78147FFBC41718AE0DFF6B33FD299.ashx>

Douglas College/Douglas College Faculty Association – Article 4

<http://www.douglascollege.ca/~media/B7BFB950CEBB4C04B90D732BE45A6AA3.ashx>