

SUPERIOR-GREENSTONE DISTRICT SCHOOL BOARD

Section Personnel

Policy Name CONFLICT OF INTEREST

723

Board Approved: June 22, 2021

Review By: December 2026

The Superior-Greenstone District School Board ("the Board") is committed to safeguarding the public interest and trust in public education. Board employees, volunteers and trustees are expected to uphold the public trust and demonstrate integrity in all of their dealings. Conflicts of interest, whether *actual, potential or perceived*, may impact on the integrity and public image of the Board and public education generally. Employees and volunteers are therefore responsible and accountable for identifying and avoiding any situations which may present a potential or actual conflict of interest or be perceived to be a conflict of interest as between their personal interests and their official duties and responsibilities as a Board employee or volunteer.

POLICY

It is the policy of the Superior-Greenstone District School Board that Employees, Volunteers and Trustees are required to disclose any potential or actual conflicts of interest that could compromise, or be perceived to compromise, their objectivity and judgment to their immediate supervisor immediately upon becoming aware in writing of the actual or potential conflict of interest. As such, employees and volunteers may be required to excuse themselves from any duty or transaction where they have, or may appear to have, a conflict of interest that could compromise, or be perceived to compromise, their objectivity and judgement.

1.0 DEFINITION

- 1.1 For the purposes of this policy, a conflict of interest is any situation in which an individual has a personal or financial interest that may:
 - Affect their judgement and/or the performance of their duties or responsibilities to the Board; and/or
 - Cause them to act, or appear to act, in a way that is not in the best interests of the Board; and/or
 - Negatively affect the reputation of the Board in the community.
- 1.2 An individual is in a conflict of interest when they get, or hope to get, personal gain by using their position, influence, time, resources, facilities and/or student or staff information.
- 1.3 Personal gain from a conflict of interest could include something gained for a friend, family member or a business associate.

- 1.4 An individual should not have, or be involved in, any direct or indirect personal or financial interest that would, or could, negatively affect the reputation of the Board, and/or interfere with their independent exercise of judgment on behalf of the Board.
- 1.5 Conflicts of interest may include, but are not limited to, circumstances whereby a Board employee or volunteer:
- Is involved in a hiring or staff allocation decision when they have a close personal relationship with the applicant or affected staff member
 - Supervises or manages employees with whom they have, or have had, a close personal relationship where performance and discipline is required
 - Is involved in any business or other outside activity or interest that interferes with their regular duties and responsibilities at, and for, the Board
 - Uses the Board's equipment, resources, materials, or facilities in any form whatsoever, in the pursuit of outside employment, including paid private practice
 - Is involved in purchasing or other supply chain–related activities and accepts gifts or favours or provides preferential treatment to any bidders or suppliers and/or publicly endorses suppliers or products
 - Is involved in any business or other outside activity or interest that could create an actual, possible, or perceived conflict of interest, or could adversely affect the reputation of the Board in the community.

2.0 DUTY TO DISCLOSE

- 2.1 Employees, Volunteers, and Trustees must report any actual, potential, or perceived conflict of interest that they have, or may have, to their immediate supervisor as soon as they become aware of the conflict. All conflicts of interest are to be reported using the Superior-Greenstone District School Board Conflict of Interest Declaration Form by selecting *Self-declaration*.
- 2.2 Anyone who has reason to believe that another Board employee or volunteer may be in a conflict-of-interest situation is encouraged to report to the Director of Education, or designate, the perceived conflict using the Superior-Greenstone District School Board Conflict of Interest Declaration Form by selecting *Report about another employee/volunteer*.

3.0 CONFIDENTIALITY

- 3.1 Any personal information disclosed under this policy will be treated confidentially. Any personal information collected, relevant to a particular conflict of interest will be used by the Board for purposes of evaluating the risk of the conflict of interest and for fashioning an appropriate remedy.

- 3.2 In order to adequately address any disclosed or potential conflicts of interest, it may be necessary for the immediate supervisor to seek direction and guidance from senior staff. If such consultation or further discussion is necessary, the supervisor will advise the affected individual accordingly.

4.0 CONSEQUENCES OF BREACH

- 4.1 Anyone who engages in activities that contravene this policy, including failing to disclose a conflict of interest, may be subject to disciplinary action up to and including termination of employment, and/or other appropriate measures.

5.0 ACCOUNTABILITY

- 5.1 Employees are charged with a personal responsibility to identify and report conflict of interest situations in accordance with this Policy.
- 5.2 Immediate Supervisors are responsible for identifying and/or clarifying conflict of interest situations with the employees who report to them before passing this to the Director or designate.
- 5.3 Human Resources is responsible for ensuring that all new employees are aware of this policy.
- 5.4 The Director or designate, in consultation with Human Resources, is responsible for deciding whether a conflict-of-interest situation exists and the subsequent action(s) that may be required.

6.0 SCOPE

- 6.1 This policy applies to board employees, volunteers and trustees.
- 6.2 This policy shall in no way relieve any employee, volunteer or trustee from complying with any laws, statutes, regulations, rules, or applicable standards of professional conduct or practice.

7.0 NOTIFICATION

- 7.1 Each employee and volunteer will be made aware of the Policy.

Legal References

Education Act

Municipal Freedom of Information & Protection of Privacy Act

Related Procedures and Policies

- Policy 704 Hiring Policy
- Policy 207 Lines of Communication Regarding Complaints
- Policy 210 Student Trustee
- Policy 217 Trustee Expenses
- Policy 303 Purchasing
- Policy 304 Surplus Equipment, Furniture and Books
- Policy 307 Travel, Meals and Hospitality Expenditures
- Policy 522 Scholarships and Trust Funds
- Policy 605 Special Education
- Policy 609 Prior Learning Assessment and Recognition
- Policy 802 Individual Trustee
- Policy 803 Board of Education
- Policy 539 Indigenous Education Advisory Committee



Small Schools Make a Difference

Superior-Greenstone District School Board Conflict of Interest Declaration Form

Please complete this form if you believe that you may be involved in a conflict-of-interest situation or if you are unsure and seek to disclose a potential or perceived conflict of interest. Please read Superior-Greenstone District School Board Conflict of Interest Policy 723.

SECTION 1: PERSONAL DETAILS

NAME: [Click here to enter text.](#)

JOB TITLE / AREA OF RESPONSIBILITY: [Click here to enter text.](#)

PHONE: [Click here to enter text.](#) EMAIL: [Click here to enter text.](#)

SECTION 2: DISCLOSURE DETAILS

The following is a: Self-declaration Report about another employee/volunteer

The actual, potential, or perceived conflict of interest relates to: *(tick all appropriate box/es)*

- | | |
|--|---|
| <input type="checkbox"/> Relationship with family or friends | <input type="checkbox"/> Staff recruitment |
| <input type="checkbox"/> Outside work activities (paid/unpaid) | <input type="checkbox"/> Relationship with external parties |
| <input type="checkbox"/> Financial interest | <input type="checkbox"/> Disposal of school assets |
| <input type="checkbox"/> Gifts/benefits | <input type="checkbox"/> Provision of external consultancy services |
| <input type="checkbox"/> Provision of private tutoring | <input type="checkbox"/> Other (if you selected other please provide details) |
| <input type="checkbox"/> Procurement of goods and services | |

The following actual, potential, or perceived conflict of interest has been identified. Please provide all relevant details.

[Click here to enter text.](#)

The (actual, potential or perceived) conflict is expected to last: *(tick appropriate box)*

- 0–12 months >12 months or ongoing Do not know

SECTION 3: TO BE COMPLETED BY THE PRINCIPAL/SUPERVISOR/DIRECTOR

In my opinion the details provided: *(tick appropriate box)*

- Do not constitute a conflict of interest, employee may continue the activity (proceed to Section 4).

Do constitute an actual, potential, or perceived conflict of interest (provide a detailed action plan below).

If the situation does constitute a conflict of interest, please ensure that the following actions have been considered:

- Ensure all information surrounding the conflict has been disclosed to Supervisor or Director of Education if report is concerning another employee/volunteer and documented.
 - Inform likely affected persons of the conflict, seeking their views where relevant as to whether they object.
 - Reformulate the scope of work or restricting access to certain information.
 - Recruit a third party to oversee part, or all, of the process.
 - Recommend relinquishing the interest that is causing the conflict.
 - Temporarily remove the person from the process or responsibilities.
 - Monitor the person's activities closely in relation to the conflict of interest.
 - Take no further action because the conflict is minimal.
 - If necessary, consult with your supervisor when self-declaring and the Director of Education, or designate, when reporting another employee/volunteer.
-

I have reviewed the above considerations and request that the Employee takes the following action to eliminate/manage the conflict:

[Click here to enter text.](#)

Plan to be reviewed:

Within 1 month

Within 3 months

Within 6 months

Within 12 months

Other – specify

N/A: Conflict is one-off or short duration

SECTION 4: EMPLOYEE'S DECLARATION

To the best of my knowledge and belief any actual, potential, or perceived conflicts between my duties as an employee and my private and/or business interests have been fully disclosed in this form in accordance with the requirements of the Limestone District School Board Conflict of Interest Administrative Procedure AP 403.

I acknowledge, and agree to comply with, any approach identified in this form for removing or managing an actual, potential, or perceived conflict of interest.

SIGNATURE:

DATE:

SECTION 5: PRINCIPAL / SUPERVISOR/ DIRECTOR

The actions described in the approach outlined in Section 3 have been put in place to effectively manage any actual, potential, or perceived conflict of interest disclosed in Section 2. The approach outlined in Section 3 ensures that the Limestone District School Board's public interests and reputation is adequately protected.

NAME: [Click here to enter text.](#)

SIGNATURE:

DATE:
