

## CONFLICT OF INTEREST POLICY

Policy Category	Corporate Services
Policy Search Name	<i>C – Conflict of Interest Policy</i>
*Anishinabek Standard	
<i>Place of Learning</i>	<i>D. High level of involvement of professional staff who are of the same cultural background as the students with whom they are working.</i>
<i>Educators</i>	<i>N/A</i>
<i>Students</i>	<i>N/A</i>
<i>Curriculum</i>	<i>N/A</i>
Approval Date & Board Motion Number	<i>12/6/2022 Motion#104-2022</i>
Effective Date	<i>12/6/2022</i>
Previous Versions	<i>Date initially approved: December 8, 2017, Motion#267-2017 Date of last revision: 12/8/2017</i>

\*These are organizationally adapted standards from the World Indigenous Nations Higher Education Consortium (WINHEC) and the Alaska Comprehensive Centre/Alaska Native Education approved by the Kenjgewin Teg Board of Directors, 2015.

### 1.0 Background and Purpose

1.1 Kenjgewin Teg benefits from the expertise of individuals with a multiplicity of interests; however, those interests must not conflict with the interests of the employer nor impair the support and respect necessary for the operation of the organization. In addition, employees in all their endeavours are to remain cognizant of the Fundamental Principles of Kenjgewin Teg of neutrality and impartiality.

### 2.0 Definitions

“conflict of interest” A situation where an individual, or the organization he/she would like to represent or has an interest in, has a direct or indirect competing interest with Kenjgewin Teg’s activities/business/services. This competing interest may result in the individual being in a position to benefit from the situation or in Kenjgewin Teg not being able to achieve a result in the best interest of the organization. Conflict of interest for the organization also includes conduct which is not in keeping with the Policies and Procedures of Kenjgewin Teg.

Conflict of interest includes but is not limited to situations:

- Where an employee's private affairs or financial interests conflict with their work duties, responsibilities and obligations, or result in perception that a conflict exists
- Which could impair the employee's ability to act in the interest of Kenjgewin Teg
- Where the actions of an employee would compromise or undermine the trust that Kenjgewin Teg places in its employees.

### **3.0 Application**

3.1 This policy applies to all employees of Kenjgewin Teg.

### **4.0 Policy**

#### **Policy Objective**

4.1 The objective of this policy is to establish a standard of conduct to ensure all employees of Kenjgewin Teg act in the best interests of the employer and its clients and, in pursuing this goal, maintain standards relating to conflict of interest. These standards are intended to enhance confidence in the integrity of Kenjgewin Teg and its personnel.

#### **Application**

##### Conflict of Interest Agreement

4.2 Before or upon assuming their official duties, employees shall sign a document certifying that they have read and agree to abide by the standards within the Conflict of Interest Agreement.

4.3 Employees have a responsibility to review their obligations yearly.

4.4 All employees shall immediately disclose to the President, in writing, any business, commercial or financial interest where such interest might be construed as being in real, potential or apparent conflict with their official duties.

##### External Employment

4.5 Employees may engage in remunerative employment with another employer, volunteer activity, carry on a business, or receive remuneration from public funds for activities outside their position provided that:

- It does not interfere with the performance of their duties, nor with the employee's personal wellness and ability to be competent at discharging their daily duties at Kenjgewin Teg
- It does not bring KT into disrepute
- They do not have an advantage derived from their employment as a Kenjgewin Teg employee

- It is not performed in such a way as to appear to be an official act or to represent the organization's public positions or policies, including the Policies and Procedures of Kenjgewin Teg
- It does not involve the use of Kenjgewin Teg's premises, services, equipment or supplies to which the staff member has access by virtue of their employment, unless official authorization is secured.
- The activity must be avoided if the organization engages in lobbying or otherwise takes public positions on matters of significant controversy involving Kenjgewin Teg

### Public Appearances

4.6 An employee shall not accept any fee for taking part in a public speaking engagement or a public radio/television performance to which he/she was invited as a direct result of:

- His/her position as an employee
- His/her field of knowledge derived from his/her employment with Kenjgewin Teg.

### Breach of Conflict of Interest

4.7 Persons who fail to comply with these standards during the course of their employment will be subject to such appropriate measures as may be determined by Kenjgewin Teg including dismissal from employment.

4.8 Persons who fail to comply with these standards following termination of employment with Kenjgewin Teg hereby acknowledge that the disclosure of confidential information will result in irreparable harm to Kenjgewin Teg and Kenjgewin Teg shall have the right to enforce its lawful rights and remedies against any offending person.

### Reservation of Rights

4.9 Where an individual fails to disclose a conflict or an interest according to this policy or according to other laws or regulations in Canada, Kenjgewin Teg reserves all rights it may have to deal with the contract, conflict and individual involved.

## **5.0 Roles and Responsibilities**

5.1 The President is responsible for the overall management and operation of Kenjgewin Teg.

5.2 The Corporate Services unit is responsible for overall implementation of this policy.

5.3 If a position referred to in this policy is vacant, the policy will not be invalidated. Instead, the President shall designate the roles and responsibilities of that role to another team member(s) and will ensure that the Kenjgewin Teg staff and community is informed of the designation(s) as appropriate.

## **6.0 Evaluation Date – 10/31/2024**

6.1 This policy will be reviewed every two years as part of the Board of Director’s policy review cycle and schedule. The evaluation date above represents the first date upon which this policy becomes eligible for review.

<b>Related Legislation, Policies, Procedures, Guidelines and Documents</b>	Conflict of Interest Agreement
<b>Policies Superseded by this Policy</b>	<i>Kenjgewin Teg Conflict of Interest Policy, #267-2017</i>
<b><i>The official version of this policy is housed in the Office of the President. In case of discrepancy between an online version and the official version held, the official version shall prevail.</i></b>	