PROCEDURE HR-007

CONFLICT OF INTEREST RELATED TO HIRING, SELECTION, PROMOTION AND EVALUATION OF EMPLOYEES

Superintendent Responsible: Superintendent of Human Resources	**Initial Effective Date:** 2021/06/26
Last Updated: 2025/12/19	**Next Review Date:** 2029/12/19

Purpose:
To provide guidance to employees so that conflicts of interest are recognized and either avoided or resolved expeditiously through appropriate disclosure and management.

Guiding Principles:
Employee(s) must not permit relationships with others or external business activities to conflict, or appear to conflict, with the interests of the Grand Erie District School Board (Grand Erie).

1.0 Specific Conflicts

1.1 The following circumstances may give rise to conflicts of interest:
Participating in, or influencing the outcome of the appointment, hiring, promotion, supervision, or evaluation of a person with whom the employee(s) has, or has had, a relationship.

1.2 Acceptance by an employee(s) of a gift from any of the following persons or entities if a reasonable person might conclude that the gift could influence the employee(s) when performing hiring duties with Grand Erie.

- A person, group or entity that has dealings with Grand Erie
- A person, group or entity to whom the employee(s) provides services in the course of their duties to Grand Erie
- A person, group or entity that seeks to do business with Grand Erie

An employee(s) who is offered a gift in the circumstances above shall notify their Administrator(s)/Immediate Supervisor in writing.

2.0 Process for Disclosure of Conflicts of Interest

2.1 All employee(s) have an obligation to disclose to their Administrator(s)/Immediate Supervisor(s) or the Chief Executive Officer (CEO), or designate, any conflict of interest. The employee(s) must disclose in writing as soon as they could reasonably be aware that a conflict of interest exists. The existence of a conflict of interest does not necessarily preclude involvement in the issue which has given rise to the conflict (the 'Matter'). The employee(s) must declare, in writing, the nature and extent of the conflict of interest no later than any meeting or process in which the employee(s) participates and at which the matter is to be considered. The employee(s) must refrain from taking part in any discussion or decision-making in relation to the matter and withdraw from any meeting or process when the matter is being discussed until a decision has been reached regarding the manner in which the conflict of interest will be addressed.

2.2 A conflict of interest involving an employee(s) may also be reported to an Administrator(s)/Immediate Supervisor(s) by any other person. A report to an Administrator(s)/Immediate Supervisor about the existence of a potential, apparent or actual conflict of interest shall be made in writing.

3.0 Process for Management of Conflicts of Interest

3.1 If the Administrator(s)/Immediate Supervisor(s) or CEO, or designate, to whom the disclosure is made also has a conflict of interest, the disclosure should be made in writing to the person at the next highest level of authority or an independent external third party, as required.

3.2 The Administrator(s)/Immediate Supervisor(s) or CEO, or designate, will investigate to determine if a conflict of interest exists. Where appropriate, the Administrator(s)/Immediate Supervisor or CEO, or designate, may consult with the employee(s) and/or others.

3.3 If the Administrator(s)/Immediate Supervisor or CEO, or designate, determines there is a conflict of interest, the Administrator(s)/Immediate Supervisor(s), or CEO, or designate, should resolve the matter as noted below and shall document, in writing, any remedies that have been applied.

3.4 In limited circumstances, there may be situations where an exemption may be granted by the CEO or designate.

4.0 Contraventions

Adherence to this procedure is crucial to the relationships of trust that exist between Grand Erie, its employee(s) and the public. Contraventions, whether arising from dishonesty or inattention, undermine these relationships and may lead to disciplinary action. For employee(s), disciplinary sanctions for breach, will be dealt with in accordance with Grand Erie's Progressive Discipline procedure (HR-018), and may include a range of outcomes appropriate to the nature of the contravention and could include dismissal from employment.

5.0 Definitions

5.1 Conflict of interest means a potential, apparent, or actual conflict where an employee's financial or other personal interest, whether direct or indirect, conflicts or appears to conflict with the employee's responsibility to Grand Erie, or with the employee's participation in any recommendation or decision pertaining to the hiring/selection/promotion or evaluation of employee(s) within Grand Erie.

5.2 Employee(s) means full-time or part-time employee(s) of Grand Erie involved in hiring/supervision of employee(s).

5.3 External activity means any activity of an employee(s) outside the scope of their employment with Grand Erie undertaken as part of a commercial or volunteer enterprise.

5.4 Relationship means any relationship of an employee(s) to persons of their immediate family whether related by blood, adoption, marriage, or common- law relationship, and any relationship of an intimate and/or financial nature during the preceding five years, any student(s)-Administrator(s)/Immediate Supervisor relationship, or any other past or present relationship that may give rise to a reasonable apprehension of bias.

5.5 Administrator(s)/Immediate Supervisor(s) means the person to whom an employee(s) reports to.

Reference(s):

- Conflict of Interest Related to Hiring, Selection, Promotion and Evaluation Policy (HR-07)
- Equity and Inclusive Education Policy (SO-14)
- Ministry of Education School Board Teacher Hiring Practices Policy (PPM 165)
- Progressive Discipline Procedure (HR-018)