



HUMAN RESOURCES

Conflict of Interest and Conflict of Commitment OP008

POLICY

Conflicts of commitment, conflicts of interest and perceived conflicts of interest that go unaddressed or are improperly managed threaten to impugn the reputation and integrity of the persons involved and, potentially, the College as a whole. They undermine the public's confidence in the College's and the Person(s) involved ability to pursue and disseminate knowledge, devoid of bias and personal interests. Without that public confidence, the effectiveness of the College as a public institution and of College Persons as Public Servants is diminished.

Moreover, College Persons are expected to vigilantly guard against conflicts of commitment, actual and potential conflicts of interest, and perceived conflict of interest. It is important to note that the mere existence of a conflict of commitment, a conflict of interest or a perceived conflict of interest does not necessarily imply wrongdoing on anyone's part. Rather, conflicts exist regardless of a person's character, intentions and motivations. In situations where a conflict exists or there is a perception of a conflict, it is not sufficient to merely live up to one's obligations it is necessary to do so in a timely, open, forthright, constructive and accountable manner.

Therefore, the purpose of this Policy is to: (a) identify conflicts of commitment, actual and potential conflicts of interest, and situations that may give rise to the perception of a conflict of interest; and (b) to provide procedures whereby such situations are disclosed and either avoided or appropriately managed.

SCOPE

All College Persons

GUIDELINES

1. A Conflict of Commitment occurs where a College Person engages in non-College activities that are substantial or demanding of the College Person's time and attention and adversely affect the discharge of the College Person's responsibilities to the College. College Persons must disclose Conflicts of Commitment and obtain written approval prior to engaging in any activity that may give rise to a Conflict of Commitment. Conflict of Commitment has two parts:
 - a. You use College resources for non-College purposes. Southeast College is quite generous allowing employees to use its resources for things like checking personal email or printing out MapQuest directions. When you go beyond this, you will need your supervisor's okay and your supervisor can say no. For example, you want to use a color copier to make posters for your kid's daycare.
 - b. You are doing things on College time that are not College work. This means that your work time and attention is being diverted from College activities for non-College work. Sometimes there is good reason for this to occur however, you will need your Supervisor's okay, and your Supervisor can say no.

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2. Conflicts of Interest and perceived Conflicts of Interest can arise from a College Person's engagement inside and outside of the College, and the mere existence of a Conflict of Interest or the perception of a Conflict of Interest does not necessarily imply wrongdoing on anyone's part. Nonetheless, Conflicts of Interest and situations that give rise to perceptions of a Conflict of Interest must be recognized, disclosed, and assessed.
 - a. Conflicts of Interest and perceived Conflicts of Interest fall into one of two categories; those that are permissible if appropriately managed; and those that are prohibited because they cannot be appropriately managed.

PROCEDURES

1. College Persons are responsible for seeking guidance from their Supervisor before engaging in any activity that may be questionable. If in doubt about whether a situation would, from the perspective of a reasonably well informed, impartial observer, appear to be a Conflict of Interest, the College person must seek guidance from his or her OOS Supervisor. This must be done in writing. *See disclosure form OP008.1*
2. Except as required by governance process or law, any information disclosed by a College Person to the College pursuant to this Policy will be held by the College in confidence, and will only be available to those individuals who are responsible to the College for its review, for the management, administration and audit of the College, and to funding agencies where relevant. The College will protect personal information of all parties involved as required under the Local Authority Freedom of Information and Protection of Privacy Act(s).
3. OOS Supervisors shall seek guidance from the President and CEO for any disclosure that they are unsure of or for any situations that gives rise to a Conflict or perceived Conflict.
4. Whenever there is a material change from the previously submitted disclosure the College Person must provide immediate disclosure utilizing this same procedure.

REFERENCES

OP008.1 Disclosure Form

Effective Date: May 2018

Date last reviewed: 2017; 2009

Scheduled review date: 2021

Approved by: Executive Management December 2017