



## Conflict of Interest

### Background

These guidelines provide information on conflict of interest situations that employees must avoid during their employment with KTCEA.

### Guidelines

A conflict of interest exists where there is a direct or indirect conflict between an employee's responsibility to KTCEA and their self-interest, the interests of their family members, and/or the interests of any entity in which the employee has a financial or other interest/involvement.

Employees must at all times avoid conflicts of interest, or perceived conflicts of interest, in the performance of their duties, including:

1. Taking part in decisions that may provide an advantage to or negatively impact a personal interest of the employee, or their immediate family.
2. Using their role to influence or seek to influence a KTCEA decision in a manner that may provide an advantage to, or alternately prejudice, a personal interest of the employee, or their immediate family.
3. Communicating or using information that is not publicly available and of which the employee has become aware as a result of their duties with KTCEA, to either provide an advantage to, or prejudice a personal interest of the employee or their immediate family.

Under no circumstances may an employee provide gifts, payments, favours, service or other benefits or services as a means to influence outside parties, nor shall they accept such from an outside party with the exception of the following:

1. The normal exchange of gifts between friends.
2. The normal presentation of gifts to persons participating in public functions.
3. A reasonable exchange of hospitality between persons conducting business together.
4. Tokens exchanged as part of a commonly acknowledged business protocol.

Where an actual or potential conflict of interest exists, the employee is required to declare the conflict in writing to the Superintendent or Deputy Superintendent, and must remove themselves from involvement in the matter unless otherwise directed in writing by the Superintendent or Deputy Superintendent.

These guidelines apply to all KTCEA employees. If clarification is required, employees are requested to speak to their supervisor.

Employees who contravene the provisions of this Administrative Procedure are subject to disciplinary action up to and including termination of employment.

#	Procedure	Roles & Responsibilities
1.	Adhering to the guidelines in this Administrative Procedure and other KTCEA Policies, Procedures, and the law.  Reporting violations or potential violations of the Conflict of Interest Guidelines to the Superintendent or Deputy Superintendent.	Employees
2.	Ensuring employees adhere to the Conflict of Interest Guidelines.  Informing leadership of violations of these guidelines.  Investigating and addressing violations.	Supervisors
3.	Supporting supervisors in the interpretation and enforcement of the Conflict of Interest Guidelines.	Associate Superintendents
4.	Supporting employees and supervisors in the interpretation of the Conflict of Interest Guidelines, including investigating violations as required.	Human Resources
5.	Supporting supervisors in the interpretation and enforcement of the Conflict of Interest Guidelines.	Superintendent

**References:**

KTCEA Policy 12 Human Resources

**Procedure Amendments and Updates**

The responsibility for updating and amending this procedure rests with the Associate Superintendent Corporate Services. The next scheduled update of this Administrative Procedure is April 1 annually.