

PURPOSE

Nova Scotia Community College's Mission of building Nova Scotia's economy and quality of life through education and innovation is pursued in part through the values of integrity and public accountability. These values may be undermined or perceived to be undermined in situations involving Conflicts of Interest, Conflicts of Commitment or Institutional Conflict. To that end, the purposes of this Policy are:

- to define and promote standards of conduct that support these values;
- to assist members of the NSCC Community to recognize situations involving Conflicts of Interest, Conflicts of Commitment or Institutional Conflicts so that they can, in good faith, take the initiative to disclose, manage and resolve such situations;
- to provide processes and mechanisms for the College to respond to, manage and resolve any such Conflicts

STATEMENT OF POLICY/SCOPE

This Policy applies to any behaviour that is connected to and/or may impact the work and services of the College, the work of College employees or the Mission and/or reputation of the College. It applies to behaviour taking place in any physical or electronic sites.

This Policy applies to NSCC community, which includes, but is not limited to the following:

- All current NSCC employees (regardless of status);
- Students (full-time, part-time, online and apprenticeship, etc.), who are in a position to make or influence decisions in respect of College affairs, activities or business, including, but not limited to, decisions affecting other students;
- Any individual or stakeholder in a contractual relationship with NSCC; and
- College committees, councils, or associations.

DEFINITIONS

Conflict: For the purposes of this Policy, Conflict may refer to any or all of Conflict of Interest, Conflict of Commitment and/or Institutional Conflict as defined herein.

Conflict of Commitment: exists where a College employee undertakes or engages in any activity or commitment, whether paid or unpaid, apart from the employee's normal responsibilities to the College, which may:

- (1) interfere with the employee's ability to effectively carry out his/her College-related duties and responsibilities;
- (2) compete or conflict with the mission, goals and objectives of the College; or
- (3) adversely affect the reputation of the College.

Not all outside activities or business activities of College employees amount to Conflicts of Commitment. Examples of Employee Conflict of Commitment are set out in Appendix A.

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Conflict of Interest: exists when a member of the College Community has or may be perceived as having the opportunity to advance or protect a Personal Interest of the member or of a person with whom the member has a family, personal, business or similar relationship. A Conflict of Interest may arise in circumstances where Personal Interests may directly or indirectly affect the member's professional judgment in the exercise of College duties and responsibilities. Examples of Employee Conflict of Interest are set out in Appendix A.

Institutional Conflict: A situation in which the College or an institution has an existing relationship with a party with which the College or the institution proposes to enter into an activity, contract, or commitment, such that an impartial observer might reasonably question whether the existing relationship might prejudice decisions of the College or institution with respect to the activity.

Personal Interest: exists where one has an interest, including, but not limited to, a financial, family, or professional interest, in a decision, activity or business affair of the College.

POLICY

The occurrence of Conflicts of Interest, Conflicts of Commitment and Institutional Conflict cannot always be avoided. Therefore, it is important to respond appropriately when they arise. To that end, all members of the NSCC community are expected to:

- conduct themselves with the highest ethical standards and in a manner which will bear the closest scrutiny;
- act honestly and in good faith in respect of any reports or disclosures made under this Policy;
- identify situations involving Conflicts of Interest, Conflicts of Commitment or Institutional Conflict;
- avoid doing anything to exploit such Conflicts to serve a Personal Interest;
- take steps to prevent the exploitation of such Conflicts by others;
- take steps to avoid the perception of Conflict;
- disclose Conflict situations to an appropriate person in accordance with the Procedures as soon as possible after becoming aware of them;
- seek guidance before embarking on activities involving Conflict situations;
- co-operate in the management of such Conflicts as required by the College.

The College will respond to Conflicts in as fair, open and consistent manner as is possible and will seek to avoid unfair disadvantage wherever possible.

Each Conflict will be assessed individually so that the College and its external constituencies can be confident that decisions, actions and behaviours are not inappropriately influenced by Personal Interests or institutional interests.

A member of the NSCC Community may be presumed to have become aware of a Conflict at such a time as a reasonable person would have been aware of it.

Failure to comply with the Policy will be assessed by the College and may result in disciplinary action up to and including termination of employment or expulsion.

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Good faith disclosures under this Policy will be handled in accordance with the Safe Disclosure Policy and the Confidentiality Policy. An individual acting in good faith will not be disadvantaged or lose their employment status as a result of reporting their concerns, even when those concerns cannot be substantiated. However, the willful misuse or abuse of the Policy may result in disciplinary action up to and including termination of employment or expulsion.

ROLES AND RESPONSIBILITIES

The **President and Executive** team are responsible for fostering a culture of integrity and effective stewardship of the public trust.

College Leaders (Principals, Deans, Academic Chairs, Directors and Managers) are responsible for fostering a culture of integrity and effective stewardship of the public trust. They are responsible for providing guidance to regarding activities which might be questionable or perceived as questionable as well as addressing and providing assistance in the College review and response to declarations. They also have responsibility for the oversight and application of the Employee Conflict of Interest and Conflict of Commitment Policy including resolution and the coordination of College response in respect of any Declarations of Conflict which are made to them.

The **Director of Human Resources** has responsibility for the oversight and application of the Employee Conflict of Interest and Conflict of Commitment Policy including resolution and the coordination of College response in respect of Conflicts involving College employees.

The **Dean of Students** has responsibility for the oversight and application of the Employee Conflict of Interest and Conflict of Commitment Policy including resolution and the coordination of College response in respect of Conflicts involving College students.

NSCC Employees are responsible for understanding and complying with the Employee Conflict of Interest and Commitment Policy. Employees have an obligation to promptly disclose, as soon as they could reasonably be aware, that a Conflict may exist using the Declaration of Potential Conflict of Interest and/or Commitment form. They must also update the declaration when circumstances change and they become aware of a potential Conflict.

REGULAR REVIEW

The Employee Conflict of Interest and Commitment Policy shall be reviewed in accordance with the NSCC Policy Review Schedule.

POLICY SUPPORTS

Declaration of Potential Conflict of Interest and Commitment Form
Employee Conflict of Interest and Commitment Procedures
Employee Conflict of Interest and/or Commitment Guidelines

Related Policies

Employment of Relatives

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