

Conflict of Interest Policy

Wales Young Institute

Name of Institution

3857

Institution Number

Conflict of Interest

Name of Policy

December 19, 2019

Date of Implementation

August 30, 2021

Date of Last Revision

I. PURPOSE

The **Conflict of Interest Policy** is to ensure that all College Employees conduct themselves in a manner that avoids any Conflict of Interest with the College. To prevent any real or perceived Conflicts of Interest that occur as a result of conflict between the personal or private interests of College Employees and their employment responsibilities to the College.

The employees include

II. SCOPE

This policy applies to all our employees regardless of employment agreement or rank.

III. DEFINITIONS

1. College Employees

Persons employed by the College including instructors, administrative assistants, Program Coordinator, Sales and Marketing representative, and anyone who is working for Wales Young Institute.

2. Conflict of Interest

Conflict of Interest exists where the activities of a College Employee/ researcher have the intention or effect of advancing his/her interests or the interests of others with whom he/she has a familial, personal or business relationship (a Related Other), in a way that may be detrimental or potentially harmful to the normal operations, the integrity of the fundamental mission of the College. It includes activities that may be perceived as advancing the personal or private interests of the individual, or Related Others, contrary to the interests of the College.

In the research context, Conflict of Interest includes situations where financial or other personal considerations may compromise, or have the appearance of compromising, an investigator's professional judgment in conducting or reporting research.

3. Related Other

Any individual with whom a College Employee has a familial relationship and shares financial, personal, or business interests.

4. Responsible Senior Educational Administrator (SEA)

The Senior Educational Administrator (SEA) is responsible for the discipline/program, service area, or work unit in which a Conflict of Interest is perceived.

IV. POLICY STATEMENTS:

Without limiting the generality of the above, the College recognizes the following as Conflict of Interest situations:

1. Financial Interests

A College Employee/ researcher may not influence any financial transactions of the College for personal gain or gain of Related Others.

Where an employee/ researcher or his/her Related Others, has a direct or indirect financial interest in a proposed contract or transactions with the College, that employee may not influence the awarding of such contracts nor participate in such transactions.

2. Compensated Professional Activities

- a) Employees of Wales Young Institute may be invited to make job-related presentations or utilize their professional skills and expertise in support of professional activities and/or community projects. The College encourages such participation provided that these activities do not interfere with the performance of their duties as College Employees, do not conflict with College operations and do not impose a financial burden on the College.
- b) Any money received for such activities, other than reimbursement of expenses, should be remitted to the College except when the presentation is done on the employee's own time (including holiday time) or where honoraria are related to performance of employee duties, and the acceptance of such honoraria has been approved by the Senior Educational Administrator (SEA).

3. Compromise of Performance

Wales Young Institute Employees may not undertake compensated or non-compensated external activities or positions, where those activities interfere with, or negatively impact on, their performance of Wales Young Institute duties. Employees must ensure that such activities:

- c) do not interfere with, or negatively impact on, the performance of their duties as an employee
- d) cannot be perceived as activities that are in direct competition with those of Wales Young Institute
- e) are not performed in such a way as to appear to be official business of the College nor utilize the College name,

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- f) do not utilize College premises, services, equipment or supplies to which the employee has access by virtue of his/her College employment
- g) do not solicit clients to their private business or consulting practice through their connections to Wales Young Institute (i.e., refer Wales Young Institute students or employees to his/her private practice).

Where involvement is compensated or non-compensated professional activities potentially compromise or diminish the employee's ability to fulfill his/her employment obligations to the College, such activities must be disclosed and an unpaid leave or an appropriate reduction in responsibilities and compensation should be arranged.

4. Working Relationships

- a) Wales Young Institute Employees shall not participate in the selection, appointment, employment supervision, or evaluation of a person with whom they have a familial relationship.
- b) Where a selection committee member determines a family member or Related Other, as defined above, has applied for the position, he/she will disclose that conflict and resign from the selection committee for the duration of that selection process.
- c) Wales Young Institute shall avoid appointments that result in a College Employee supervising another employee with whom he/she has a familial relationship.
- d) Where a potential Conflict of Interest does occur due to appointment, promotion, or emergent relationships, it must be reported in writing to the Responsible Administrator(s) and every effort taken to avoid the Conflict of Interest. This would involve, at a minimum, making alternative arrangements for evaluation, promotion, re-appointment and/or discipline.

5. Acceptance of gifts or favors

- a) In the course of performing their College duties, Wales Young Institute Employees shall not, either directly or indirectly, demand or accept gifts, favors, services or other complementary items from any individual, organization or corporation, where such practices could reasonably be seen as compromising the employee's objectivity, other than:
 - i. the normal exchange of hospitality between persons doing business together
 - ii. token exchanges as part of the protocol
 - iii. the normal presentation of gifts to persons participating in public functions or conferences
 - iv. the normal exchange of gifts or hospitality between friends

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- b) When a gift of significant value is (or is about to be) offered to an individual employee or a College unit, the recipient(s) must discuss the acceptance of such gifts with, and obtain approval of, the SEA to ensure that no real or perceived obligations may be attached to such gifts. Significant gifts are normally defined as gifts that have a value of greater than \$500 and include such activities as offers of paid conference attendance or participation in recreational activities from an existing or potential supplier/vendor.

6. Confidential Information

- a) Employees/ researchers of Wales Young Institute shall not utilize confidential college records in an unauthorized manner or for unauthorized purposes.
- b) Employees/ researchers shall not utilize nor disclose information that is privileged and/or is not in the public domain, and that they may be able to access as part of their position's responsibilities, without prior authorization by the appropriate Senior Educational Administrator (SEA).

V. PROCEDURES

College Employees and those involved in College must disclose in writing to the Senior Educational Administrator (SEA).