



GOVERNANCE POLICY

Title: CCSAI Conflict of Interest Policy

Responsibility: Advocacy and Research Coordinator

Created: December 2015

Approved by Governance Committee:

Approved by CCSAI Full Board:

1.0 PURPOSE

- 1.1 The Centennial College Student Association (hereinafter the “CCSAI”) is committed to acting with, integrity, transparency, and objectivity. Conflict of Interest policies increase the likelihood that decisions are objective, balanced and fair to all parties. The purpose of this policy is as follows:
 - 1.1.1 To protect the integrity of the CCSAI’s decision making processes to ensure that decisions are objective, balanced and fair to all parties.
 - 1.1.2 To assist members of the CCSAI Board of Directors in determining whether their position in the organization has the potential to be used for their own private interests.
 - 1.1.3 To assist the CCSAI in preventing and/or managing real or perceived conflicts of interest.

2.0 DEFINITIONS

- 2.1 In Conflict of Interest is any situation where a member has a private or personal interest that is sufficiently connected to his or her duties and responsibilities as a board member that it influences the exercise of these duties and responsibilities.
- 2.2 Perceived Conflict of Interest is a situation where a reasonably well-informed person could believe that a board member has an actual conflict of interest, even where that is not the case in fact.
- 2.3 Potential Conflict of Interest is a situation where a Board member has a private or personal interest that could influence the performance of their duties or responsibilities, provided that they have not yet exercised that duty or responsibility.
- 2.4 Private Interest means any personal advantage or benefit that may be pursued by a board member, whether it is a financial interest, or a professional interest that relates to their career or professional affiliations. Private interests also includes those that are interpersonal in nature, meaning any relationship that they have with other individuals, including but not limited to a current or former romantic partner, friend, family member, colleague (from occupations including but not limited to remunerated work, student group activities, and campus publications), roommate, or student group leadership or projects, which would, or reasonably could, affect their judgment with respect to their responsibilities as a board member.

3.0 POLICY

- 3.1 A conflict of interest arises when a board member's private interest supersedes or competes with their official duties and responsibilities as a board member. This could arise from an actual, potential or perceived conflict of interest of a financial or other nature.
- 3.2 For the purposes of this policy, the following events or circumstances describe situations which may be deemed as conflicts of interest, as well as situations which may create a conflict of interest or perceived conflict of interest:
 - 3.2.1 Preferential Treatment: A board member using their position in the CCSAI to influence a decision so as to further their own private interests or those of a party with whom they have an interpersonal relationship.
 - 3.2.2 Use of Privileged Information: A board member disclosing information obtained in the course of their duties and which is not generally available to the public and which, once disclosed, may place or could reasonably be expected to place, the individual in a situation where the interests of the CCSAI are in conflict with those of the person having received the information.
 - 3.2.3 Contracts and Financial Transactions: A board member who knowingly has a private interest in a CCSAI contract or business transaction.
 - 3.2.4 Hiring: A board member involved in a hiring process involving a candidate with whom they have an interpersonal relationship.
 - 3.2.5 Outside Activities: board members engaged in external activity, such as work outside the CCSAI, or affiliations that create a conflict of interest or perceived conflict of interest and which prevents them from prioritizing their duties and responsibilities to the CCSAI.
 - 3.2.6 Gifts, Hospitality, and Other Benefits: Accepting a gift, hospitality, donation, or other benefit from a person, group, or organization which may influence a decision or result from securing a financial transaction. A member may accept minor gifts as token courtesies (i.e., notepads, pens, coffee mugs, etc.), but may not accept gifts that may put them in a position of obligation. No individual member can accept a gift over \$50 of value and no gifts over \$200 of value will be accepted by the Association.
 - 3.2.7 Use of CCSAI Resources: A board member who uses the CCSAI resources, including but not limited to office supplies, building space, staff time, or funding, in pursuit of personal or professional interests. The CCSAI permits its board members to use CCSAI communication devices, including but not limited to email addresses, telephones, computers, and internet connections, for limited personal use.
- 3.3 Conflicts of Interest will be considered not to exist where:
 - 3.3.1 The interest is so remote or insignificant in nature that it cannot be reasonably regarded as likely to influence a board member.
 - 3.3.2 The private or financial interest of the board member is in common with a broad group of which the board member is a member.
 - 3.3.3 Where the issue is one of general or public information.

4.0 PROCEDURES

- 4.1 Board members shall avoid any activity or undertaking that may give rise to a conflict of interest, either actual or potential, between their employment activities, board responsibilities and their private interests.

- 4.2 In cases where a conflict cannot be avoided, board members shall report a conflict of interest (including perceived and potential conflicts of interest) at the earliest opportunity to the Executive Director.
- 4.3 Any board member who perceives another board member to be in conflict of interest in a matter under consideration shall to raise this concern directly and immediately with the Executive Director. The Executive Director shall discuss the matter with the board member who is perceived to be in conflict and, as appropriate, to hold further discussion with the reporting board member.
- 4.4 If the discussions between the Executive Director and board member do not lead to a resolution, the matter may be brought to a board meeting. The Board shall determine whether or not a conflict of interest exists and the appropriate course of action.

5.0 BOARD MEETINGS

- 5.1 At the beginning of every Board meeting, the Chair of the Board shall ask and have recorded in the minutes whether any board member has a conflict of interest to declare in respect to an agenda item.
- 5.2 Where a board member is unsure whether a conflict of interest exists, they shall raise the perceived potential conflict with the board, and the Board shall determine by vote whether or not a conflict of interest exists. Said board member shall refrain from voting on whether or not a conflict of interest exists.
- 5.3 When the conflict of interest is perceived or potential, the board shall determine whether the member or members of the board remain for the discussion and vote on agenda items. The minutes should reflect what takes place.
- 5.4 When a Board member has declared or has been found to be in a conflict of interest, the member shall:
 - 5.4.1 Not attempt in any way before, during or after the meeting to influence the voting on the related matter;
 - 5.4.2 Refrain from participating in any discussions of the related matter by the board or committee of the board and refrain from voting on motion in relation to the matter.
- 5.5 Where a conflict of interest is discovered after consideration of a matter, it shall be declared to the board and appropriately recorded at the first opportunity. If the board determines that the involvement of the said board member influenced the decision of the matter, the Board shall re-examine the matter and may rescind, vary, or confirm its decision.

6.0 REVISION LOG

| Date | Summary of Changes |
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