



NAME: 06.11 CONFLICT OF INTEREST	VERSION: 1
ADOPTED: JUNE 5, 2015	REVIEW: 2018-2019

REVIEW EVERY 3 YEARS

PREAMBLE

An actual or perceived Conflict of Interest (COI) is a situation, not an accusation. Being in a COI does not imply guilt or inappropriate behaviour on the part of the parties involved however, if it is not dealt with properly, it could leave doubt about the objectivity of a particular decision-making process.

CONFLICT OF INTEREST DEFINED

1. A conflict of interest refers to situations in which an employee, a Trustee or a committee member may have the opportunity to influence Richmond Christian School decisions in ways that could lead to personal gain or give advantage to associates or firms in which the party has or may be perceived to have an interest.
2. “Private or personal interest” refers to an individual’s self-interest (e.g. to achieve financial profit or avoid loss, or to gain another special advantage or avoid a disadvantage); the interests of the individual’s immediate family or business partners; or the interests of another organization in which the individual holds a position (voluntary or paid).

SCOPE OF APPLICATION

3. A conflict of interest is a situation in which a person has a private or personal interest sufficient to appear to influence the objective exercise of his or her official duties. This may include a Board of Trustee, current or former employee or current or former volunteer; referred to in this policy as an “affected person”.

TYPES OF CONFLICT

4. An Affected Person may be in a conflict of interest situation that is:
 - a. Actual or real, where his/her official duties are or will be influenced by his/her private interests

- b. Perceived or apparent, where his/her official duties appear to be influenced by his/her private interest.
- c. Foreseeable or potential, where his/her official duties may be influenced in the future by his/her private interests.

BOARD OF TRUSTEES

- 5. Board members are expected to separate their Trustee and private interests in accordance with existing Richmond Christian School policies, provincial law, and federal regulations.
- 6. Trustees have an obligation to disclose and eliminate (if necessary) any potential or actual conflicts of interest.
- 7. Board members have a fiduciary duty of loyalty to the organization, duty of obedience to the law and duty of care to be informed. This includes many attributes not the least of which is to refrain from dealings with the Society where a conflict of interest is present or where the perception of a conflict of interest may exist.

MANAGEMENT OF A CONFLICT OF INTEREST (COI)

- 8. Preventing a real or perceived COI is ideal, however should a situation arise with an Affected Person, the following best practice applies:
 - a. Declare it. Ensure transparency through self-declaration and by making sure that a written record of the declaration is made to the Board of Trustees.
 - i. Any services provided to the Society by an Affected Person, or an individual or organization with whom an Affected Person has a personal or professional interest in, to the Society and where the value of those services is greater than \$1,000, a written notice of the work to be performed and the scope of services to be provided must be presented at the next scheduled Board meeting at least 15 business days in advance of the time when the work or service is scheduled to commence.
 - ii. If the scope of work to be provided is greater than \$10,000 two additional independent quotes for the work or service must be sought and presented to the Board of Trustees at least 15 business days in advance of a decision to proceed being made.
 - b. Discuss it. If a potential COI is brought to the attention of any Trustee or Senior Administrator it must be brought to the attention of the Board and discussed as an Agenda item at its next meeting.

- c. Deal with it. Measures to mitigate or eliminate a conflict of interest will depend on what is appropriate to the severity of the situation. Options may include:
 - i. Restrict the involvement of the Affected Person in the decision making process.
 - ii. Recruit a third party to assist with a review of the perceived COI.
 - iii. Remove the individual from affected duties.
 - iv. Relinquish the private interest.
 - v. Resign from the official duties.