Policy
Procedure
College Standard
Standard Operating Procedure
Guideline
Local Practice

Policy Title	Policy Number	
Employee Ethics and Conflict of Interest	**AD-HR-1.05**	
Executive Responsible	Administrator Responsible	
VP Finance & Corporate Services	**Director of Human Resources**	
Approving Body	Approval Date	Date of Next Review
Executive Committee	**October 30, 2026**	**October 2031**

PURPOSE

The College of New Caledonia (CNC; the College) seeks to foster an ethical workplace grounded in integrity, fairness, and accountability. This policy sets out the expectations for employee conduct in situations where personal interests may conflict, or be perceived to conflict, with the interests of the College. Employees are expected to act with honesty, transparency, and professionalism, and to disclose any actual, potential, or perceived conflicts of interest to their manager or Human Resources without delay. By doing so, employees help sustain public trust and uphold the values of the College community.

SCOPE

This policy applies to all College employees, including those in regular, term, casual, and contract positions.
Conduct involving fraud, financial misconduct, or intentional misuse of College resources, are not within the scope of this policy and instead fall within the scope of the *Fraud Risk Management Policy and Procedure*.
Alleged breaches of this policy will be addressed in accordance with the *Issue Resolution and Investigation Procedure*, as applicable.
Where conduct falls within the scope of both this policy and another College policy or process, including the *Protected Disclosure Policy and Procedure*, the College, at its discretion, may determine which process or procedure to use to addressed it.

POLICY STATEMENTS

All employees are required to uphold the highest standards of ethical behaviour and to avoid situations that may create, or may appear to create, a conflict between personal interests and their duties to the College. This policy addresses the following areas of ethical responsibility:

1. Honesty and Integrity
2. Gifts and other complimentary items
3. Workplace relationships
4. Use of College Property

5. Privacy and confidentiality
6. Conflict of interest
7. Outside remuneration
8. Political activity
9. Legal proceedings
10. Public Comment, Representation, and Association

These areas of ethical responsibility are intended to provide guidance to all employees but do not comprehensively cover all areas of ethical responsibility. Employees who are uncertain about their obligations in a particular circumstance should seek clarification from their manager or Human Resources.

1. Honesty and Integrity

1.1 Employees are required to conduct themselves honestly, with integrity, and impartially. Employees must not engage in acts of dishonesty or commit theft, fraud or intentional misuse or destruction of CNC property or that of any College member.

1.2 Employees are required to comply with all applicable laws.

1.3 Employees must not engage in conduct that compromises the College's ability to accomplish its mandate or undermines public trust in the integrity of the institution.

1.4 Employees must limit the services they provide to being within the boundaries of their competence, based on their education, training, professional experience, and professional development.

1.5 Employees must accurately represent their qualifications, educational backgrounds, experience, and professional credentials. Employees must immediately notify the College of any changes to those qualifications or professional credentials that could have any impact on an employees' work or position with the College.

2. Gifts and Other Complimentary Items

2.1 The solicitation or acceptance of gifts, favours, services, hospitality or other complimentary items, directly or indirectly, in any way related to an employee's employment at the College, is not permitted with the exception of the following:

a) nominal hospitality or customary gestures of courtesy between persons doing business together;
b) the normal presentation of gifts or honoraria to persons participating in a public function, workshop, presentation, or conference;
c) the normal exchange of gifts between friends or colleagues;
d) token gifts exchanged as part of an official, ceremonial, cultural, or customary College activity, provided the gift is of nominal value, which is situation specific but in general cases means not exceeding $75; or
e) situations where the employee has purchased a ticket, such as a raffle ticket, or was otherwise eligible to receive a prize.

2.2 Where a gift is intended as a donation to the College rather than a personal gift to an employee, it may be considered a gift-in-kind donation. In these circumstances, employees must follow the *Gift-in-Kind Donation Acceptance Policy and Procedure* and consult their manager and Donor Relations staff before accepting the gift on behalf of the College.

3. Workplace Relationships

3.1 Employees must not initiate or in any way engage in a romantic, intimate, or sexual relationships with a student or another employee where the employee has supervisory, evaluative, instructional, advisory, or other decision-making authority over that individual. This includes authority or influence relating to grades, academic progress, employment performance, work assignments, promotion, or career advancement.

3.2 Employees must not engage in or allow personal relationships with students or coworkers that create actual, potential, or perceived conflicts of interest; favouritism; bias; harassment; preferential treatment; or abuse of power. Where an employee has a personal relationship with a student or subordinate that is not prohibited under this Policy, the employee is responsible for ensuring none of these actual, potential, or perceived conflicts arise. Where an employee believes any such potential conflicts exist or may arise, they must immediately disclose it to the direct manager.

3.3 Employees must ensure that relationships with co-workers do not interfere with work performance or effective functioning of the workplace.

3.4 Employees with any question or uncertainty about any personal relationship they have within the workplace should discuss them with their manager or the Director of Human Resources.

3.5 Conflicts involving the employment, supervision, or employment-related decisions of family members or individuals with whom an employee has a close personal relationship must also be managed in accordance with the *Employment of a Relative Policy*.

4. Use of College Property

4.1 Employees are responsible for the proper care, management, and cost-effective use of College property and assets in their possession or that they have use of, including facilities, equipment, vehicles, technology, supplies, intellectual property, and the College's name.

4.2 College property and assets are to be used for College business purposes and may not be used, removed, borrowed, purchased, or disposed of for personal purposes except as authorized under applicable College policies, procedures, protocols, or with written approval from a person at the College with the necessary authority.

4.3 Incidental personal use of College property may be permitted only where the use is authorized, and where the use:

a) is consistent with applicable College policies, procedures, operational

protocols, sign-out processes, or written approval requirements;
b) Infrequent and of short duration (i.e. overnight or weekend use);
c) Does not impact College operations, employee productivity, or result in additional cost to the College;
d) Complies with sign-out procedures, if applicable, and occurs outside of working hours where possible;
e) Does not involve College supplies;
f) Does not expose the College to risk;
g) Is limited to activities for which the employee has appropriate training, where applicable;
h) Is not connected to personal profit or the profit of a family member; and
i) Ensures the property is returned in the same or better condition, with the employee responsible for reimbursing the College for any damage or loss where that is not possible.

4.4 Where proposed personal use does not meet the incidental use case requirements listed above, the employee must obtain prior written approval from their manager.

4.5 College vehicles may not be used for personal use, unless the employee has prior written approval from their manager.

4.6 Misuse of College property or assets that results in personal gain, deception, or financial loss to the College constitutes fraud and will be addressed under the *Fraud Risk Management Policy*.

5. Privacy and Confidentiality

5.1 Personal information must be handled in accordance with the *Freedom of Information and Protection of Privacy Policy and Procedures*, applicable privacy legislation, and other College privacy requirements. Suspected or confirmed privacy incidents must be reported and managed in accordance with the *Privacy Breach Management Procedure*.

5.2 Employees must not record meetings, conversations, telephone calls, virtual meetings, or other workplace interactions unless:
a) the participants have been informed in advance and have agreed to the recording; or
b) the recording is authorized or required by law, an approved accommodation, an investigation process, or another authorized College process.

5.3 Where a recording is made under section 5.2, participants must be informed of the recording unless the applicable law or authorized College process permits or requires otherwise.

5.4 Recordings must be used only for their intended purpose and handled in accordance with applicable privacy, records management, and information security requirements.

5.5 The duty to maintain privacy and confidentiality over personal information

of others and confidential information attained through their employment with the College continues after an employee leaves the College.

6. Conflict of Interest

6.1 Employees must avoid any private or financial interests that conflict, or could reasonably be perceived to conflict, with their position at, duties with, or responsibilities to the College.

6.2 Employees must not use their College position or authority to give preferential treatment to family members or friends, or organizations in which they or their close associates have a personal or financial interest.

6.3 Employees must not:

a) use confidential information obtained through their employment for personal benefit or allow it to be used improperly for the benefit of others; or

b) benefit, or appear to benefit, from any College transaction over which they have influence, such as appointments, contracts, purchases, sales, grants, or regulatory approvals.

6.4 Employees must immediately disclose to their manager any actual, potential, or perceived conflict of interest, including the nature and extent of the conflict. Where a conflict exists, employees must refrain from participating in related discussions, decision-making, voting, recommendations, or approvals unless expressly authorized in writing by the appropriate Executive Committee member.

6.5 Employees who suspect fraud or financial misconduct by another employee of the College must report their concerns promptly following the reporting process outlined in the *Fraud Risk Management Policy and Procedure*. Employees who report such concerns in good faith are protected from reprisal.

7. Outside Remuneration

7.1 Employees may engage in outside employment, operate a business, or receive payment for personal activities while employed with the College if in doing so:

a) It does not interfere with the performance of their College duties;

b) It does not create an actual, potential, or perceived conflict of interest (see Conflict of Interest section);

c) It does not involve the unauthorized use of College work time, premises, services, equipment, information, or supplies;

d) It does not result in an advantage that is derived from their employment as a College employee;

e) It does not appear to be an official act or to represent College opinion or policy; and

f) It does not bring the College into disrepute.

7.2 Employees who are members of a bargaining unit are also subject to and

must comply with relevant provisions regarding outside employment set out in their respective collective agreements.

8. Political Activity

8.1 Employees are free to participate in political activities including belonging to a political party, supporting a candidate for elected office and/or actively seeking elected office. However, employees must ensure their political activities are clearly separated from activities related to their employment. If engaging in political activities, employees must ensure they maintain both the actual and perceived impartiality in the exercise of their College duties and responsibilities.

8.2 Employees must not engage in political activities during working hours or use College facilities, equipment, or resources in support of these activities. Employees must also not represent their personal political views as those of the College.

8.3 Employees who choose to run for or hold elected office must disclose this to their manager and Human Resources to ensure that the College is satisfied they are able to do so while continuing in their position and if so, to ensure that any required workplace accommodations or conflict-of-interest considerations are considered and addressed.

9. Legal Proceedings

9.1 Employees must not provide or sign an affidavit or other sworn statement on behalf of the College relating to facts that have come to their knowledge in the course of their duties without prior authorization from the College and, where appropriate, review by legal counsel. This requirement does not apply in circumstances where the employee, or their accredited bargaining agent, is a party to the legal proceeding in question.

9.2 Employees are required to cooperate, as reasonably requested, with legal counsel representing the College with respect to legal proceedings, subject to applicable law, collective agreements, and any actual conflict of interest.

9.3 Employees must maintain strict confidentiality over all privileged materials prepared by legal counsel for the College that they are provided or have access to. Employees who have access to privileged information must not disclose it without authorization from the College official with authority to waive or authorize disclosure of the privilege.

10. Public Comment, Representation, and Association

10.1 Employees have the right to freedom of expression and free association in accordance with the laws of British Columbia and Canada.

10.2 Employees must not represent, or give the impression, that their personal views or activities are those of the College. In any public or private forum, including hearings, debates, protests, or social media, employees must clearly distinguish their personal opinions from the position of the College.

10.3 Employees must not engage in conduct, including public or online communication, that could reasonably be expected to cause material harm to the reputation, operations, or legitimate interests of the College.

10.4 Departments of the College must request prior approval from the President before entering an association with any external advocacy or special interest group.

10.5 College letterhead, forms, logos, or other branding must not be used for personal purposes.

10.6 Employees participating in social media on behalf of the College must comply with *CNC's Social Media Accounts Policy* and maintain professionalism in all online communication that may reflect the College.

Definitions and Acronyms	
Confidential Information	Includes any information or material related to College business that is or becomes known by an individual through their employment with the College. This can include information relating to College students, staff, operations, contracts, services and service methods, facilities, equipment, technology, research, plans, personnel, finances, policies, and business procedures. It is important to recognize that confidential information can exist in many forms, including orally, in written documents, digital or electronic media and in graphics, and it may not necessarily be marked "confidential".
Conflict of Interest	Means a situation in which an employee's personal or financial interests are or may be perceived to be in conflict with the College's interests or mission, or with the proper performance of the employee's job duties, responsibilities, or obligations. A conflict of interest may be actual, potential or apparent. A perceived conflict of interest can be as detrimental as an actual conflict of interest. Conflicts of interest undermine or compromise public confidence in the College or the College's trust in the employee's ability to properly discharge his/her work responsibilities.
Employees	A person employed by the College, including full-time, part-time, permanent, temporary, casual, contract, and term employees.
Family Members	For the purpose of this policy, family members include any; a) spouse, including a married, common-law, or domestic partner b) parent, step-parent, or guardian c) child, step-child, or ward d) sibling (including step or half-sibling) e) grandparent or grandchild f) person who resides in the same household g) person with whom the individual has a close personal relationship that could reasonably be perceived to influence their decision-making
Personal Information	Recorded information about an identifiable individual other than business contact information.

Professionalism	Describes conduct which complies with accepted standards in the methods and manner in which duties are performed. Professionalism is required in the following areas of College activity: job performance; academic preparation; workplace conduct; classroom conduct; interactions between students, faculty, staff, administration, colleagues and the general public (inside and outside the College).
Supporting Information	
Related Policies, Forms, Documents, Websites	Administrative Personnel Policy and Procedure AD-HR-1.02 Faculty Local & Common Collective Agreement CUPE Collective Agreement Issue Resolution and Investigation Procedure AD-HR-1.10 Employment of a Relative Policy AD-HR-1.12 Freedom of Information and Protection of Privacy Policy AD-CO-4.14 Gift-In-Kind Donation Acceptance Policy and Procedure AD-F-2.16 Protected Disclosure Policy and Procedure AD-HR-1.27 Social Media Accounts Policy and Procedure AD-CO-4.09
Acts and Regulations	BC College and Institute Act BC Freedom of Information and Protection of Privacy Act BC Human Rights Code