CATHOLIC DISTRICT SCHOOL BOARD OF EASTERN ONTARIO
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BOARD ADMINISTRATIVE PROCEDURE

ADMINISTRATIVE PROCEDURE

804 – Conflict of Interest

Nurturing Employee Relations

Title of Administrative Procedure:

Conflict of Interest

Date Approved:

February 2026

Projected Review Date:

February 2031

Directional Policy Alignment:

The *Conflict of Interest* Administrative Procedure aligns with *CDSBEO's Nurturing Employee Relations Directional Policy* by ensuring employees understand the requirements and expectations with respect to conflicts of interest and nepotism. CDSBEO is committed to fair, transparent hiring and avoiding conflicts of interest, including nepotism and favoritism.

Alignment with Multi-Year Strategic Plan:

The *Conflict of Interest* Administrative Procedure supports the four tenets of believing, protecting, learning, and nurturing. This vision calls the Board to these Strategic Priorities:

CDSBEO Multi-year Strategic Plan

Purpose

CDSBEO holds its employees to the highest standards of personal integrity, ethical conduct, and diligence in fulfilling their roles. Employees of the Board have a duty to support and advance the interests of the Board and at all times must avoid situations where their personal interests, actually or potentially, conflict with the interests of the Board. This administrative procedure will educate all employees about possible conflicts of interest and provide guidance when a conflict of interest (whether real, potential or perceived) arises so that these situations are recognized and either avoided or resolved swiftly through appropriate disclosure and management.

Action Required

Employee Responsibilities Regarding Conflict of Interest

Employees must proactively avoid conflicts of interest and not take part in any actions that could create one. If an employee learns about a conflict, whether they are involved in it or not, they must promptly disclose it in writing to their supervisor. Actual, perceived, or potential conflicts do not automatically prevent participation but must be declared and resolved before further involvement; resolution may include, but is not limited to, removing the employee from related matters. Failure to disclose a perceived, potential or existing conflict of interest may result in disciplinary action, up to and including termination.

Potential Conflicts of Interest

1. Supervision:

No family and/or relatives are permitted to work together in a supervisor relationship, either in a subordinate or supervisory role to each other. Employees will not be assigned to or offered positions in which they directly report to a family member or where there is an indirect relationship such that a family member may influence employment, salary or promotion considerations. This includes situations where employees share financial interests, business interests or where there is a personal relationship.

2. Recruitment, Hiring, and Promotion:

Employees who are involved with the recruitment, interviewing, hiring, placement or promotion of applicants must not participate in the process where there is a conflict of interest as per Administrative Procedure E1-10 - Staffing Plan and Hiring Process. The employee must discharge these responsibilities in a fair and equitable manner and take steps, including excluding themselves from the process if applicable, to ensure that they are free from any real, perceived or potential conflicts prior to fulfilling their duties.

3. Supplementary Employment & Volunteer Work:

The Board recognizes certain supplementary employment opportunities may provide valuable professional development experience and a supplemental income for employees. The Board does not permit employees to engage in employment or any business activity which will place

the employee in a situation of conflict of interest with the Board and the performance of assigned duties. This includes performing supplemental employment duties during regular work hours with the Board or using Board facilities or property at any time to perform work associated with supplemental employment. Employees who use board facilities outside of the work day must follow the Community Use of School administrative procedure: F4-2 Community Use of Schools.

Staff who provide external client services, such as social work, speech and language pathology, or psychological services, cannot have CDSBEO students as clients due to potential overlap with school services. Volunteering is also restricted if it creates a conflict of interest with the Board's interests or assigned duties, including cases where an organization's values oppose those of the Board.

5. Teaching Students:

A teacher is in a conflict of interest if the teacher accepts any form of compensation for service rendered to a student(s) outside of the school day when the teacher is assigned to work with the same student(s) during the school day in the current school year. Any instruction of students for which compensation is being rendered, must be outside the school day and not on Board property. The Board only supports a teacher providing home instruction to a student with whom the teacher would otherwise work during the school day as outlined in the Administrative Procedure 205 Home/Hospital Individualized Instruction.

6. Evaluation and Supervision of Students with Family Relationships:

When an employee has an immediate family relationship with a student, an actual or perceived conflict of interest may arise, including the potential for favouritism in the assessment of academic work. To mitigate such concerns, it is advised that a student not be assigned to a class taught by their parent or guardian, where possible. Should a conflict of interest occur, the employee is obligated to notify the principal and disclose all relevant facts pertaining to the situation. Furthermore, in matters involving student recognition such as school-based awards, including those presented at graduation, staff members whose child is eligible for consideration shall not participate in the selection process.

7. Confidential Information:

In general, employees are prohibited from using or releasing confidential information to further their own interests. Confidential information acquired during the course of the employee's employment with the Board may only be used for the purpose of carrying out authorized activities on behalf of the Board.

Conflict of Interest Resolution Process

When a conflict of interest arises, or when a potential conflict is identified, the employee must provide written notification to their next immediate supervisor—provided that the supervisor is not implicated—outlining all relevant facts. If that supervisor also has a conflict of interest, the disclosure must instead be submitted to the next higher level of authority.

The supervisor receiving the disclosure is responsible for investigating the matter and may consult with the employee and other relevant individuals or departments (i.e. Superintendent, Human Resources, or Finance etc.), to clarify the issue, determine whether an actual or perceived conflict exists, and decide on an appropriate course of action. This may include removing the employee or student from the situation or directing the employee to cease the activity, giving rise to the conflict.

In circumstances where no resolution is reached, the Superintendent of Human Resources or designate, in consultation with appropriate parties, will determine the existence of an actual or perceived conflict of interest.

Responsibilities

The Board of Trustees is responsible for:

- Reviewing this Administrative Procedure to ensure its alignment with the Nurturing Employee Relations Directional Policy.

The Director of Education is responsible for:

- Designating resources for ensuring the implementation of and compliance with this Administrative Procedure.
- Ensuring annual review of this Administrative Procedure

Superintendents of Schools and System Portfolios are responsible for:

- Ensuring principals, managers and supervisors are consistent with the application of this Administrative Procedure.

- Ensuring that any employee for whom they have supervisory responsibility is aware of the requirements under this Administrative Procedure.
- Participating in the resolution of potential conflicts of interest.
- Notifying the Superintendent of Human Resources or designate of any conflict of interest or situation involving nepotism that they may be aware of.

Superintendent of Human Resources or designate is responsible for:

- Determining if a conflict of interest exists and an appropriate remedy.
- Participating in the resolution of potential conflicts of interest.

Principals, Managers and Supervisors are responsible for:

- Ensuring hiring and supervision practices are free from conflict of interest, bias or favoritism.
- Ensuring staff they supervise are aware of the requirements under this Administrative Procedure.
- Participating in the resolution of potential conflicts of interest.

All employees are responsible for:

- Understanding and complying with this Administrative Procedure.
- Avoiding situations where their personal interests are in conflict or may potentially conflict with the interests of the Board.
- Being diligent in taking steps to avoid influencing Board decisions in which they themselves have a personal interest whether or not they are engaged in the affairs of the Board.
- Reporting to the Board in writing through their immediate supervisor any circumstance of a personal or financial interest which is or might be perceived to be a conflict of interest.

Progress Indicators

- Board employees conduct themselves at all times with the highest standard of personal integrity, ethics and due diligence in the performance of their duties.

Definitions

- **Conflict of Interest:** involves situations in which the personal or private interest of an employee or the employee's family or close business associates, conflict with the interests of the Board or when there is reasonable basis for the perception of such conflict.

- **Confidential Information:** refers to information that an employee is privy to as a result of their employment and is not otherwise generally available.

- **Immediate Family Member:** spouse, sibling, parent, guardian, spouse's parent, step-parent, foster parent, grandparent, spouse's grandparent, step-grandparent, child, step-child, foster child, grandchild, step-grandchild, child's spouse, dependent relative.

- **Nepotism:** showing favoritism to family or close associates in hiring, promotion, or supervision, ignoring merit, often involving conflicts of interest.

- **Relationship:** any relationship of the employee to persons of his or her immediate family whether related by blood, adoption, marriage, or common-law relationship, and any relationship of an intimate and/or financial nature during the preceding five years, any student-supervisor relationship, or any other past or present relationship that may give rise to a reasonable apprehension of bias.

- **Service:** any work done or duty performed for an individual, group, agency or organization that would otherwise be performed by an employed person or a consultant under contract for the performance of the work or duty.

References

- Directional Policy 800 – Nurturing Employee Relations
- PPM 165 Expectations for School Board Hiring Policies
- Administrative Procedure E1-10 - Staffing Plan and Hiring Process
- Administrative Procedure 1109 - Purchasing of Goods and Services
- F4-2 Community Use of Schools Administrative Procedure
- Administrative Procedure 205 - Home/Hospital Individualized Instruction
- Administrative Procedure 201 - Out of School Activities
- Education Act – Regulation 612/00 - School Councils and Parent Involvement Committees
- Ontario Human Rights Code 24(1)(d) - All Stages of Employment
- Municipal Freedom of Information and Protection of Privacy Act, R.S.O. 1990
- 1002 Freedom of Information and Protection of Privacy