Conflict of Interest Procedures

Category: People and Culture;
Approval Authority: Vice-President Administration and Services;
Effective Date: September 2026;
Amendments: N/A.

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1. Purpose

The purpose of this document is to provide additional guidance and detailed instructions for the processes related to the Conflict of Interest (COI) Policy (the "Policy").

These Procedures outline the process for identifying, disclosing, assessing, managing, and monitoring real, potential, and perceived conflicts of interest.

These Procedures must be read in conjunction with the Policy and applicable collective agreements, Board policies, Senate bylaws, and other University procedures.

Procurement-related conflicts of interest are also governed by the University's Procurement Procedures, including Appendix 6 – Conflict of Interest Procedures.

2. Application

These Procedures apply to activities undertaken in connection with University duties, including:

- employment responsibilities
- committee participation
- procurement activities
- research
- hiring and evaluation decisions
- use of University resources

Definitions outlined in the Policy apply to this document.

3. Identification of Conflicts

Members are responsible for identifying and avoiding situations where personal, financial, or other interests could improperly influence, or appear to influence, their University duties.

Conflicts may arise in a variety of circumstances, including but not limited to:

- procurement and vendor selection
- hiring, promotion, supervision, or evaluation decisions
- allocation of resources or funding
- external employment or consulting engagements
- relationships with suppliers, contractors, donors, or research partners
- the use of University resources for personal benefit

Members must remain vigilant to situations that may give rise to real, potential, or perceived conflicts of interest.

Where a real, potential, or perceived conflict exists, members must immediately refrain from participating in related discussions, recommendations, evaluations, approvals, procurement activities, negotiations, or decision-making processes until the matter has been reviewed and addressed in accordance with these Procedures.

4. Disclosure of Conflicts

Members must disclose any real, potential, or perceived conflict of interest as soon as they arise or are reasonably foreseeable.

Disclosure must:

- be submitted in writing using the Conflict of Interest Declaration Form (or applicable alternate process);
- include a description of the conflict and any proposed mitigation measures;
- be submitted to the member’s immediate supervisor or department head.

Where appropriate, members are encouraged to seek guidance from the Office of People and Culture prior to submission.

Procurement Conflicts:

Procurement-related conflicts of interest are additionally governed by the University Procurement Procedures, including Appendix 6 – Conflict of Interest Procedures. Members involved in procurement activities must comply with the procurement-specific disclosure, recusal, assessment, mitigation, documentation, and monitoring requirements set out in the Procurement Procedures.

5. Review and Assessment

Upon receiving a disclosure, the direct Supervisor or Department Head will:

- review the disclosure for completeness;
- request additional information if required;
- determine whether a conflict exists;
- assess the level of risk;
- evaluate the proposed mitigation strategy;

Pending review of a disclosure, interim measures may be implemented where appropriate, including temporary recusal, restricted access to information, reassignment of responsibilities, or suspension of participation in procurement or decision-making activities.

The Supervisor may consult with:

- The Office of People and Culture
- Risk Management
- Procurement Services
- Legal

Procurement-related conflicts of interest are governed by the University Procurement Procedures, including Appendix 6 – Conflict of Interest Procedures.

6. Approval

i. The Senior Administrative Council (SAC) member responsible will:

- review the disclosure and recommendations;

- determine whether the conflict can be managed;
- approve the proposed plan or require amendments;
- determine whether escalation is required;
- forward the form and any relevant documents to the Chief Human Resources Officer & Associate Vice-President, People and Culture to initiate the committee review.

ii. Committee Review

A committee comprised of the:

- Chief Human Resources Officer & Associate Vice-President, People and Culture (or delegate); and
- General Counsel & Associate Vice-President, Legal, Compliance, and Privacy (or delegate); and
- Associate Vice-President, Risk Management & Internal Auditor (or delegate); and
- Director, Procurement Services (or delegate), if applicable

will review the information provided by the SAC member. The committee will be responsible to:

- review the disclosure and recommendations;
- determine whether the conflict can be managed;
- approve the proposed plan or require amendments;
- determine whether escalation is required.

Procurement-related conflicts of interest will be reviewed and managed by Procurement Services in accordance with the University Procurement Procedures, including Appendix 6 – Conflict of Interest Procedures, in consultation with the Office of People and Culture, Risk Management, and Legal Counsel, as applicable.

iii. Escalation to the President is required where:

- the conflict is high risk;
- the member cannot fully recuse themselves;
- the conflict involves significant financial, strategic, or reputational impact;
- the member is a senior leader or reports directly to the President.

The President may approve, impose conditions, or deny participation.

7. Conflict Management

Where a conflict is identified, the University will determine whether it can be managed, mitigated, or eliminated.

Management strategies may include:

- recusal from decision-making
- removal from committees or processes
- reassignment of duties
- changes in reporting relationships
- information access restrictions
- divestment of financial interests
- discontinuation of external activities
- prohibition of certain relationships or transactions

A documented conflict management plan may be required and will be subject to periodic review.

Where a conflict cannot be adequately managed, the University may prohibit or terminate the activity or relationship.

Procurement-related conflict management measures must be addressed in accordance with the University Procurement Procedures, including Appendix 6 – Conflict of Interest Procedures.

8. Roles and Responsibilities

Members

- Identify and disclose conflicts
- Provide complete and accurate information
- Comply with approved management plans
- Complete annual conflict of interest declarations where the situation giving rise persists

Supervisors / Department Heads

- Review disclosures
- Assess risks and mitigation strategies
- Ensure timely escalation where required

Senior Administrative Council

- Approve and oversee conflict management decisions

Office of People and Culture

- Provide guidance and interpretation
- Maintain records
- Support assessment and reporting
- Coordinate annual declaration processes
- Conduct audits or reviews of COI management plans

Risk Management

- Provide guidance and support assessment of COI's

Procurement Services

- Support identification and management of procurement-related conflicts of interest in accordance with the Procurement Procedures, including Appendix 6 – Conflict of Interest Procedures;
- determine and implement procurement-related conflict management measures and mitigation approaches; and
- Provide guidance regarding procurement integrity, supplier fairness, and unfair advantage considerations; and

Legal Counsel

- Provide advice where legal or contractual considerations arise.

9. Gifts, Benefits, and Hospitality

Members must not accept gifts, benefits, or favours from parties with University dealings unless all of the following apply:

- the item is of nominal value;
- it is infrequent;
- it aligns with normal standards of courtesy and hospitality; and
- it does not influence, or reasonably appear to influence, decision-making, or the performance of University duties.

Gifts must not be accepted during an active procurement process from:

- a supplier participating in the process; or
- a supplier that may reasonably be expected to participate in the process.

Members must not solicit gifts, benefits, or favours under any circumstances.

Where uncertainty exists regarding whether a gift, benefit, or hospitality may be accepted, members must consult their supervisor and/or Procurement Services prior to acceptance.

10. External Employment and Activities

External activities must not:

- interfere with University duties; or
- create a real, potential, or perceived conflict.

Conflicts arising from external activities must be disclosed. The University may impose conditions or restrictions as necessary.

11. Personal Relationships

Members must not participate in decisions involving individuals with whom they have a close personal relationship.

Such situations must be disclosed, and appropriate measures will be implemented.

12. Use of University Resources

University resources must not be used for personal benefit unless authorized.

Confidential information must not be used for personal or external advantage.

13. Recordkeeping and Reporting

All COI disclosures and management plans will be stored securely and retained in accordance with the University's records retention schedule and applicable privacy legislation. Access will be limited to individuals with a legitimate need to know.

The Office of People and Culture will:

- securely retain all disclosures and management plans;
- restrict access to authorized individuals;

- ensure compliance with retention and privacy requirements.

Procurement-related conflict documentation must additionally be retained in accordance with the Procurement Procedures and applicable procurement files and systems.
The Associate Vice-President and Chief Human Resources Officer, People and Culture, will report on an annual basis, all confirmed COIs to the appropriate Committee of the Board of Trustees.

14. Updates and Annual Declarations

A COI declaration form will need to be resubmitted if the situation and / or plan changes or annually for COI management plans that must remain in place. This provides an opportunity to revisit and assess the plan and make any necessary changes.

Review Period: Every 5 years;
Next Review Period: 2031-2032;
Related Policies and Policy Instruments: Conflict of Interest Policy**,** Procurement Procedures (including Appendix 6 – Conflict of Interest Procedures), Conflict of Interest Declaration Form**,** Code of Conduct, Procurement Policy, Responsible Conduct of Research Policy, Safe Disclosure Policy, Safe Disclosure Procedures, Records Management Policy, Broader Public Sector Accountability Act;
Required Consultations: Executive Team, Human Resources Committee;
Recommended Consultations: Procurement; Risk Management

The University Secretariat manages the development of policies through an impartial, fair governance process, and in accordance with the Policy Management Policy & Procedures. Please contact the University Secretariat for additional information on University policies and policy related instruments and/or if you require this information in another format:

Open: Monday through Friday from 8:30 a.m. to 4:30 p.m.;
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