



**AD-HOC POLICY REVIEW COMMITTEE**  
**Report No. 23-081**

**07 December 2023**

**TIER 2 REVISIONS TO POLICY P.024.HR EMPLOYEE CONFLICT OF INTEREST**

**Key Contact: Paula Hall, Superintendent of People, Culture, and Leadership**

**PURPOSE:**

1. To seek input on the proposed revisions to Policy P.024.HR Employee Conflict of Interest.

**STRATEGIC LINKS:**

2. The Conflict of Interest policy and the proposed updates reflect the Board's commitment to and value for the responsible use of resources as set out in the Ottawa-Carleton District School Board's (OCDSB) 2023-2027 Strategic Plan.

**CONTEXT:**

3. Policy P.024.HR Employee Conflict of Interest was last updated in 2003. The current version of the policy includes many procedural details, including the different circumstances where employees' conflicts of interest could arise and how they are managed. The revisions proposed in Appendix A align the policy with the writing conventions by staff and the direction included in other Board policies.

**KEY CONSIDERATIONS:**

4. Key Revisions  
The revised draft policy is informed by other Board policies, policies in place at other districts, as well as the language set out in [PPM 165 - School Board Teacher Hiring Practices](#). The proposed revisions relate to several key considerations.
  - a) OCDSB Policy Template: The policy has been modernized to align with the updated OCDSB policy template, including the addition of an equity commitment statement at the forefront of the policy.
  - b) Policy vs. Procedural Language: As indicated above, the current version of the policy includes a lot of language that is procedural in nature. This language has been removed and will be incorporated into a new

Employee Conflict of Interest procedure currently in development. The policy document has been revised so that the language is more reflective of other policy documents, setting out higher level principle statements, and deferring the detailed processes to the procedures. For example, while the policy includes language with regard to employees' responsibilities and obligations to avoid conflicts of interest, as well as the obligation to disclose conflicts where they do arise, the process for making such disclosures will be migrated to the new procedures.

- c) Human Rights and Equity Framework: The policy has also been reviewed through an equity and human rights perspective. This includes ensuring the language of the policy is aligned with a human rights approach, as well as ensuring it supports the implementation of other relevant policies, including the [Policy P.147.GOV Human Rights](#) and [Policy P.146.HR Equitable Recruitment, Hiring, and Promotion](#). An important aspect of ensuring that recruitment, hiring and promotion processes are fair and equitable means ensuring that any employees who are involved in the recruitment, hiring and promotion processes are objective and unbiased, and free from any actual, potential or perceived conflicts of interest. In particular, [PPM 165 Hiring Practices](#) specifically requires districts to have hiring policies in place that prevent conflicts of interest in their hiring processes.
- d) Addressing Identified Gaps in the Current Policy: Such as, staff who are directly supporting students with whom they have a relationship, reprisals for whistleblowing, clarifying language with regard to accepting gifts, clarifying the definition of conflict of interest, including providing examples in the policy.

## **RESOURCE IMPLICATIONS:**

- 5. There are no direct financial costs or human resource implications to the proposed changes to the policy. Ensuring there is clear direction on conflicts of interest for employees, at both the policy and procedure level, will help to mitigate against the reputational risks that arise when employees are, or appear to be, influenced in their decision making to further their own best interests, rather than the organization's or its constituents' best interests.

## **COMMUNICATION/CONSULTATION ISSUES:**

- 6. As a Tier 2 Policy Review, the proposed draft will be posted to the District website and awareness will be raised on this consultation through parent/guardian, student, and school council communications. Feedback from the public will be received between 01 December and 05 January 2024.

Internal stakeholders, including federations, principals/managers and others will be consulted directly on the changes to the policy and the new procedure through established internal structures (e.g; labour management meetings and collaborative tables).

## **GUIDING QUESTIONS:**

- Does the policy fully address employee conflict of interest issues?
- Are there any unintended consequences to this policy?
- Is the policy clear in terms of expectations?

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Paula Hall  
Superintendent of People, Culture and  
Leadership

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Pino Buffone  
Director of Education and  
Secretary of the Board

## **APPENDICES**

Appendix A: Revised Policy P.024.HR Conflict of Interest

Appendix B: Standing Policy P.024.HR Conflict of Interest