



AD-HOC POLICY REVIEW COMMITTEE
Report No. 24-046

4 April 2024

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

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

PURPOSE:

1. To seek approval for 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. On 07 December 2023 a revised draft of Policy P.024.HR was presented to the Ad Hoc Committee for Policy Review for initial feedback. This draft included an update to the policy template, removal of procedural language so it could be captured in a new procedure, alignment to the current Human Rights and equity related policies and procedures, and addressing the gaps in the current policy. The proposed draft was posted on the District Consultation webpage for public feedback and shared with the federations along with a new procedure. The feedback received was incorporated into a revised policy (Appendix A) and informed the new procedure where appropriate.

KEY CONSIDERATIONS:

4. Received Feedback and Key Changes

In addition to the feedback received from trustees during the initial discussion at the Committee and the feedback we solicited from federations, administrators and managers, public feedback received through the District website was limited. The following key areas were raised for consideration:

- a. Clarity was requested related to Employee Conflict of Interest and Trustee Conflict of Interest. This language was added to the definition of Employee.
- b. Clarity was requested on teaching and supervising one's own child and to consider exceptional circumstances within the new guidance. This clarity was added to the procedure.
- c. It was requested that we ensure the procedure would contain clarity related to reporting and reviewing conflicts, mitigation strategies, transparency and accountability. These pieces were considered and added, where possible, to the procedure.
- d. Ensuring that the sale of goods (including sports apparel, learning materials, etc) were captured. Clarity around this issue was added to the procedure.
- e. Consideration be given to personal opinions and views of staff and how that could impact conflicts of interest. This was considered and was not determined a conflict of interest under this policy or procedure. Other guidance would capture this feedback.

5. Procedure Draft

In tandem with the policy draft updates, a new procedure is being developed to elaborate on the new policy directive, the components of the previous policy that were procedural, and additional language to capture the feedback we received from the consultation process. Following the approval of the policy, we will return to DEC for final approval of the procedure.

RESOURCE IMPLICATIONS:

6. 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:

7. The policy revisions presented to the Ad Hoc Policy Committee on 07 December 2024 were posted to the District website between 01 December and 05 January 2024. Public awareness of the consultations was raised through parents/guardians, students, and school council communications. Principals/managers were consulted on the changes to the policy and the draft

procedure between February 29 and March 8. The policy along with the new procedure were shared with federations and administrators and their feedback have already been incorporated into the policy and informed the new procedure.

RECOMMENDATION

THAT the proposed revisions to Policy P.024.HR Employee Conflict of Interest, attached as Appendix A to Report 24-046 be approved.

Paula Hall
Superintendent of People, Culture and
Leadership

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