



**Archdiocese of Regina**  
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## POLICY

### ARCHDIOCESE OF REGINA

|                     |                                    |                       |               |
|---------------------|------------------------------------|-----------------------|---------------|
| <b>Policy Name:</b> | Conflict of Interest               | <b>Number:</b>        | S1-4          |
| <b>Policy Type:</b> | Diocesan Expectations of Employees | <b>Date Approved:</b> | February 2017 |
| <b>References:</b>  |                                    | <b>Date Revised:</b>  |               |

***Policy Statement:***

- a) All employees of the Archdiocese shall avoid and/or report any conflict of interest situations. If an employee becomes aware of, or becomes involved in, a Conflict of Interest, he or she shall immediately disclose such Conflict of Interest to the Archbishop or his designate. An employee must also disclose what could be “perceived” by an outsider as a Conflict of Interest. An employee cannot avoid the disclosure requirements because the employee feels that he or she was not, is not, or will not be influenced by the Conflict of Interest. No “presumption of guilt” is created by the mere existence of a relationship with outside firms. However, if an employee has any influence on transactions such as policies, purchases, contracts or leases, it is imperative that the employee disclose to the Archbishop or his designate as soon as possible the existence of any actual or potential Conflict of Interest so that safeguards can be established to protect all parties.
- b) An employee who is unsure whether something constitutes a Conflict of Interest shall immediately discuss the specific concern with the Archbishop or his designate in order to determine the Archdiocese’s position on the issue.
- c) The Archbishop or designate will determine:
  - i. If a Conflict of Interest exists;
  - ii. The seriousness of the potential or actual Conflict of Interest
  - iii. What steps are necessary to protect the Archdiocese against the Conflict of Interest. Such steps may include asking the employee to take an unpaid leave of absence.

In making this determination, the Archbishop or designate shall be guided by any other policies which may apply. Additionally the Archbishop or designate may consult legal counsel if the Conflict of Interest involves an issue of legal sensitivity.

- d) With regard to paragraph c(iii), the Archbishop or designate may, depending on the circumstances, institute one or more of the following steps:
- i. Establish internal safeguards to protect the Archdiocese from any Conflict of Interest;
  - ii. Require that the employee cease to be involved in the situation giving rise to the Conflict of Interest;
  - iii. Remove the employee from a position of influence over the Archdiocese with respect to matters which give rise to the Conflict of Interest.
  - iv. Implement the procedures envisioned in Policy S3-8-Employment of Relatives.
  - v. Require the employee repay any benefit he or she has received as a result of the Conflict of Interest.
  - vi. Require the employee to take an unpaid leave of absence.
  - vii. Discipline the employee, up to and including termination for cause, for being involved in a Conflict of Interest.
  - viii. Take any other action deemed advisable by the Archbishop or designate in the circumstances.
- e) Senior Administration, Executives and Directors of the Archdiocese are considered fiduciaries of the Archdiocese. As such they are legally required to put the interest of the Archdiocese ahead of his or her own personal gain, or interest of another organization. A fiduciary cannot profit in any way from his or her special relationship with the company.

***Intent of Policy:***

To inform and provide guidelines to employees for the understanding and prevention of Conflict of Interest situations and to establish a protocol for disclosing and dealing with such Conflicts of Interest.

***Definitions:***

“**Conflict of interest**” is a situation in which an employee whose private interests, or the private interests of a relative or an associate, might benefit financially or otherwise from an employee’s actions or influence as an employee of the Archdiocese. A Conflict of Interest may also arise where, due to the nature of an employee’s position, responsibilities, or the employee’s actions/activities outside of their regular working hours adversely impacts the Archdiocese and or compromises their position and the employment relationship.

Such Conflict of Interests include but are not limited to:

- i. Being retained (volunteer or paid basis) by another organization or business, whether on a consultancy or part-time basis to advise on matters, policy or business similar to that which is being conducted by the Archdiocese;
- ii. Holding shares in a corporation which seeks to do business with the Archdiocese, except where the corporation and the employee holds

shares which are worth less than (1%) of the issued shares in a publicly-traded corporation;

- iii. Being a relation of an individual who is employed by or involved with a business which seeks to do business with the Archdiocese or does do business with the Archdiocese;
- iv. Being involved with or investing in a business which is competitive to the Archdiocese;
- v. Accepting “kickbacks” or “bribes”;
- vi. Failing to advise the Archdiocese of a situation in which the policy S3-8 Employment of Relatives would apply.
- vii. Being investigated, charged, indicted or convicted for a criminal activity which may have an impact on the perception of the individual’s business conduct and which, if publicly known, might affect the reputation of the Archdiocese.

***Procedure:***

- a) Employees who find themselves in a potential or actual conflict of interest situation have a duty and responsibility to notify their immediate supervisor immediately upon becoming aware of such potential or actual conflict of interest. Failure to report such potential or actual conflict of interest will result in disciplinary action being taken up to and including or termination of employment. (Appendix B)
- b) The Archbishop or designate shall investigate the disclosure and seek legal counsel if appropriate, regarding what steps should be taken as a result of the conflict of interest.
- c) The Archbishop or designate shall ensure that the Confidential Declaration of Interest Questionnaire (Appendix B) is completed by the incumbent(s) of specified positions on their accession to any of those positions at least once each year thereafter.
- d) A copy of this policy shall be provided to each employee upon the formal approval of the policy, on his or her first day of employment with the Archdiocese and periodically thereafter as deemed necessary by the Archbishop.

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