Winnipeg

CITY OF WINNIPEG POLICY NO. XXX-XXX

POLICY TITLE *Conflict of Interest*	**ADOPTED BY** *City Council*	**EFFECTIVE DATE** *July 2, 2019*
ORIGIN / AUTHORITY *EPC, Council*	**CITY POLICY NO**	**MOST RECENT CONSOLIDATION** *March 21, 2001*

1. Purpose:

The purpose of the Conflict of Interest Policy is to define what a conflict of interest is, what process needs to be followed, how to avoid a conflict situation, what needs to be done to assess a conflict, and what is required to essentially eliminate the conflict and address the issue fully for the protection of the employee and the City.

To provide clarity on expectations and the process for each policy, the City of Winnipeg has separated the Code of Conduct and Conflict of Interest into two (2) distinct documents.

2. Definitions:

2.1 "Conflict of Interest" means a situation in which a person, such as a public official, an employee, or a professional, has a private or personal interest sufficient to appear to influence the objective exercise of his or her official duties.

2.2 "Employees" means all workers, including but not limited to, employees, students, and volunteers performing duties for the City of Winnipeg.

3. Policy Expectations

As a City, we expect our employees to demonstrate appropriate behaviours while they do their jobs for the City; demonstrating good judgement, maintaining positive interactions with others and using respectful communication. The following five **(5)** core values create the foundation for these behaviours and will help to successfully guide our employees:

- ✓ Integrity
- ✓ Diversity
- ✓ Respect
- ✓ Accountability
- ✓ Quality

Our residents expect and deserve **integrity** which includes transparent disclosure, good conduct, and good **quality** of work from the people working for the City, this includes **respecting** the policies of the organization by disclosing and acting to resolve any conflict of interest in the public interest. **Accountability** is the willingness to take responsibility for one's own actions; establishing expectations of oneself, managing one's own personal conduct which includes considerations, such as, a declaration of a conflict of interest, and accepting consequences for one's actions. These values are core principles that we expect individuals to demonstrate in their professional and business interactions with others. They help us make the right decisions and stay focused on civic, organizational, department, and professional development goals.

3.1 What conduct is expected under this Conflict of Interest Policy?

When employees find themselves in an actual or a perceived conflict of interest, they have an obligation to be transparent and to protect themselves and the City by working through the disclosure process. Employees must not, directly or indirectly, participate in the following behaviours:

- Place themselves in a situation in which their private/personal interests conflict with the City.
- Fail to report situations in which they are in a conflict of interest.
- Use their position as a City employee to try to influence a decision to benefit their own interests or to improperly further another person's private interests.
- Accept outside employment that interferes with your position with the City.
- Engage in a business transaction or other private arrangement for personal gain or financial profit if doing so is in conflict with the performance of their duties.
- Strive for or receive personal gain by giving preferential treatment to anyone while performing their duties as a City employee.
- Seek or accept personal or private gain from the use of confidential or non-public information acquired during the course of their employment.
- Use of or permit the use of City property to promote or serve their personal or private interests.
    - Solicit or accept fees, gifts, or other benefits that are connected directly or indirectly with the performance of their duties, from any individual, organization or corporation, other than:
    - The normal exchange of gifts among friends or colleagues;
    - The normal exchange of hospitality between persons doing business together;
    - Tokens exchanged as part of protocol or cultural appreciation;
    - The normal presentation of gifts to a person participating in a public or workplace function. Any gift or benefit accepted must be of nominal value and must not create an obligation or perceived obligation between the parties.
- Establish and accept the results of the conflict of interest review.

4. Responsibilities

4.1 Employees:

Employees are responsible to read and understand this Policy, not place themselves in a conflict of interest situation, openly report when a conflict of interest arises and work with their supervisor and HR to resolve any conflict of interest situation.

4.2 Supervisors:

Supervisors are responsible for orienting and educating employees on Conflict of Interest and will support their employees through the disclosure process. In addition, supervisors are required to provide feedback and monitor the workplace for compliance.

4.3 Human Resources:

Human Resource Services (HR) supports the Supervisor and the employee to ensure they have access to the information required and that any complaints/disclosures are dealt with appropriately. HR staff will assist management when conflict of interest issues are suspected or disclosed. HR will work with Directors and the employee to ensure that a fair review is conducted and that all outcomes protect the employer and the employee.

5. Appendices

5.1 Appendix A – Conflict of Interest