

Conflict of Interest Policy

Policy #: 05

Approved:

Ratified:

Last Reviewed:

Review Schedule: Every two years

Date for Next Review: April 2026

Definitions

- **RPIRG** - the Regina Public Interest Research Group
- **Board** - the Board of Directors of RPIRG
- **Executive Director** - the senior employed employee of RPIRG
- **Directors** - Board members of RPIRG
- **Conflict of interest (COI)** - Any conflict of interest, whether it is real, potential, or perceived
- **URSU** - the University of Regina Students' Union
- **Close personal relation** - refers to, but is not limited to, an individual's partner, spouse, ancestor, sibling, children, family member (including chosen family), close friend, and/or kin

Purpose

5 -(1) Purpose of Policy

- a. The purpose of this policy is to outline the parameters of Conflict of Interest for employees, contractors, volunteers, and Directors.

Applies to

5 -(2) Application of Policy

- a. This policy applies to:
 - i. RPIRG Directors
 - ii. RPIRG employees
 - iii. RPIRG contractors
 - iv. RPIRG volunteers

Guiding Principles

5 -(3) Guiding Principles

- a. An individual has not done anything wrong if they are in conflict of interest or perceived conflict of interest, so long as they manage the conflict appropriately and transparently.

- b. The management of conflicts is more critical for those who wield more significant decision making power within the organization, therefore more checks ought to be in place for those with more decision making power.
- c. In general, if an employee or Director is unsure they are in conflict or perceived conflict, they should err on the side of caution and “over-disclose”.

Policy Clauses

5 -(4) Types of Conflicts

- a. RPIRG recognizes three types of Conflicts of Interest (COI).
 - i. A Real COI is when an individual within RPIRG’s Board of Directors, staffing or volunteer membership has a close personal relation or is involved in personal, professional or business interests that are at odds with the best interests of RPIRG.
 - ii. A Potential COI is when an individual within RPIRG’s Board of Directors, staffing or volunteer membership has a close personal relation or is involved in personal, professional or business interests that could be at odds with the best interests of RPIRG.
 - iii. A Perceived COI is when an individual within RPIRG’s Board of Directors, staffing or volunteer membership may reasonably be perceived by others or the general public as having a close personal relation or having two or more competing interests, one of which could be interpreted as potentially interfering or undermining their responsibilities to RPIRG.
- b. All types of COI shall be considered and addressed with the same due diligence as a Real COI, and must be avoided when possible.
 - i. When it is impossible to avoid a COI, the COI must instead be mitigated accordingly.

5 -(5) Importance of Addressing Conflicts

- a. Addressing conflicts is necessary to:
 - i. ensure that those with special vested interests are restricted from internal persuasion and influence over the Board of Directors, the consensus decision-making process and RPIRG’s internal operations; and
 - ii. supplement, but not replace, Provincial and Federal laws governing Conflicts of Interest applicable to non-profit organizations.
- b. Adherence to this policy should ensure Directors, employees, contractors, and volunteers will act fairly, equitably, and ethically in their actions, and the integrity of neither RPIRG nor its Board of Directors is compromised.
- c. Mismanaged Perceived or Potential COIs, even when they do not turn into Real COIs, may undermine the trust and public confidence in RPIRG’s decision-making processes, and may make it more difficult for Board, employees, contractors, and volunteers to continue their respective work without being subjected to additional undue scrutiny.

5 -(6) Conflict of Interest Disclosure

- a. Within one week of joining the Board of Directors, all Directors shall complete a Conflict of Interest Declaration form that includes, at minimum:
 - i. the Director's name, address, and email address;
 - ii. the Director's affiliation with any other groups, organizations or companies, either as an employee or volunteer;
 - iii. the Director's relationship to any current RPIRG employees, contractors, Directors, or volunteers and to any former RPIRG employees, contractors, Directors, or volunteers who have been affiliated with RPIRG over the past three years;
 - iv. a space to indicate whether any Real, Potential, or Perceived COIs exist and the details of these conflicts.
- b. Directors shall update their Conflict of Interest Declaration form when applicable, no less than once per year.
- c. During all Board meetings of RPIRG, a standing agenda item for the Disclosure of Conflict of Interest will be included.
 - i. During this agenda item, Directors shall disclose any COIs that they may have related to business on the agenda. Directors shall also ask each other about the relevance of any COIs that they believe to be relevant to their peers.
- d. All individuals should disclose COIs as soon as they become aware of them either during a Board meeting or via email to the Executive Director and/or Board of Directors.
 - i. The nature of the COI and all pertinent information regarding the COI must be disclosed to the Executive Director and/or Board of Directors.
 - ii. In the case of sensitive information, the individual may choose to disclose all pertinent information regarding the COI to only two additional individuals, one of whom must be the Executive Director.
- e. When an individual has disclosed a Perceived or Potential COI, the Board of Directors may determine if the disclosure warrants any mitigating action. If the Board determines that the COI is not a significant or medium risk to the organization, they may pass a resolution that clearly articulates the authority or permission granted to the individual related to the COI.

5 -(7) Responding to and Mitigating Conflicts of Interest

- a. During any meeting, any Director, employee, contractor, or volunteer with a COI must excuse themselves from the room while the Board comes to a consensus decision regarding the conflicted matter in order to avoid undue influence and/or the potential effects of peer pressure.
 - i. Before recusing themselves, the individual(s) identified as having a COI may make a presentation to the Board arguing for/against the conflicted matter but must recuse themselves from voting on said matter.
 - ii. A Director who is involved in an action group or community group requesting funding may speak to the motion and field/answer questions pertaining to the matter during this presentation, but must recuse

themselves and excuse themselves from the Board while the funding application is discussed.

- b. All conflicts will be mitigated using the Conflict Mitigation Matrix in Appendix A.
 - i. For conflicts not explicitly listed in the Mitigation Matrix, RPIRG's Board of Directors and Executive Director will jointly determine the mitigation strategy, without input from the conflicted individual(s).

5 -(8) Records of Conflict of Interest

- a. If the COI is disclosed during a meeting, the full name(s) of individuals disclosing a COI must be recorded in the meeting minutes.
 - i. The nature of the COI and all pertinent details must be recorded in the meeting minutes. If a matter poses issues of privacy or security as laid out in Provincial/Federal Law governing non-profit organizations or RPIRG By-Laws, Policies and Constitutional documents, then a set of In-Camera minutes on the matter must be kept detailing the sensitive matter. All names of those present, stand-asides, abstentions and final decisions on the matter(s) must be documented publicly.
 - ii. The full name(s) of individuals who recuse themselves must be recorded in the meeting minutes in the section of the agenda containing the conflicted subject.
- b. If the COI is disclosed outside of the course of a meeting, a description of the COI shall be included as an addendum to the next meeting minutes.
 - i. This description must include, at minimum:
 - 1. the name(s) of the individual(s) involved in the COI;
 - 2. whether the COI is Real, Perceived, or Potential; and
 - 3. the details of the COI.
 - ii. The individual(s) involved in the COI must recuse themselves during any future discussion on the conflicted subjects, whether those discussions take place during a meeting, via email, or through other means.
 - iii. When an individual has recused themselves, this must be recorded in the meeting minutes in any section of the agenda containing the conflicted subject.
- c. In the case of a Perceived COI, the process outlined in 5-(6)d shall be followed, and:
 - i. A thorough explanation, including all details of the subject and final decision - including whether or not the Perceived COI was decided to be treated as a Real COI or not - shall be clearly documented in the minutes;
 - ii. If it is decided that the individual(s) in question should Abstain or Stand Aside during voting, this shall be documented as per 5-(8)a-b.

Conflict Mitigation Matrix

Conflict	Applies to	Mitigation Strategy
Is employed by, is a Director of, is a contractor, or has ownership of a supplier or partner of RPIRG	Employees, Directors, Contractors	<ul style="list-style-type: none"> • Declaration required • No involvement with managing any transactions or the relationship with the conflict organization • Exclusion from any discussions relating to the conflict organization • Commitment to remind colleagues of the conflict if the conflict organization is a topic of discussion
A close personal relation is employed by, is a Director of, is a contractor, or has ownership of a supplier or partner of RPIRG	Employees, Directors, Contractors	<ul style="list-style-type: none"> • Declaration required • No involvement with managing any transactions or the relationship with the conflict organization • Exclusion from any discussions relating to the conflict organization • Commitment to remind colleagues of the conflict if the conflict organization is a topic of discussion
Has a close personal relation applying for a job with RPIRG	Employees, Directors, Contractors	<ul style="list-style-type: none"> • Declaration required • Not involved in hiring process for this role or position • Exclusion from any discussions relating to the hiring of said role
Has a friend, former colleague, or professional peer applying for a job with RPIRG	Employees, Directors, Contractors	<ul style="list-style-type: none"> • Declaration required • Any involvement in hiring process for this role or position must include a secondary individual who does not have a conflict • May not provide information about the candidate that has not been disclosed by the candidate during the hiring process to all members of the hiring team (e.g. the candidate's previous work should not be included as a reason to hire them if this work was not included on their CV) • If the individual was involved in hiring process, the final outcome of hiring decision for the role must be approved by the Board or HR Committee (even if the conflict candidate is not selected)

Takes or expresses independent interest in a contract offered to RPIRG	Employees, Directors	<ul style="list-style-type: none"> • Declaration required, before submitting interest to RPIRG • Permission required from Board required before submitting interest. The Board may decline or provide guidelines through submission or upon successful awarding of a contract. • If the Director receives the contract, after submitting interest, they must notify the Board
Uses their RPIRG affiliation on their resume	Employees, Directors, Contractors, Volunteers	<ul style="list-style-type: none"> • Not considered a conflict, no declaration required
Uses their RPIRG affiliation on press releases, media interviews, public statements, or social media posts of third party organizations they are active in	Employees, Directors, Volunteers	<ul style="list-style-type: none"> • Advance permission required from RPIRG's Executive Director (or in the case of the Executive Director, from the Board) who may decline permission or provide guidance • Declaration required of involvement in third party organization
Uses pictures of RPIRG activities, employees, board members, or organizational events with an organization or business they are affiliated with	Employees, Directors, Contractors, Volunteers	<ul style="list-style-type: none"> • Advance permission required from RPIRG's Executive Director (or in the case of the Executive Director, from the Board) who may decline permission or provide guidance • No declaration required
Active in another social or environmental justice organization in a Director or employment capacity	Employees, Directors, Contractors, Volunteers	<ul style="list-style-type: none"> • Declaration required • Coordinate activities with RPIRG's Executive Director (or in the case of the Executive Director, from the Board) who may establish guidelines
Employed in media or a regular media commentator that reports on Canadian or Saskatchewan social or environmental justice activities	Employees, Directors, Contractors, Volunteers	<ul style="list-style-type: none"> • Declaration required • Declare conflict with media organization they are involved with • Coordinate any messaging related to RPIRG with the Executive Director (or in the case of the Executive Director, with the Board)
Sits on a URSU, university, or	Employees,	<ul style="list-style-type: none"> • Declaration required

government committee	Directors, Contractors, Volunteers	<ul style="list-style-type: none"> • Declare conflict with committee they are involved with • Coordinate messaging with RPIRG's Executive Director (or in the case of the Executive Director, with the Board) pertaining to RPIRG's interests with the committee
Active in a political party in a leadership or management capacity unrelated to RPIRG	Employees, Directors, Contractors	<ul style="list-style-type: none"> • Declaration required • Should remove themselves from discussion if it includes any political parties
Is employed at URSU as a management employee	Directors, Employees, Contractors	<ul style="list-style-type: none"> • Declaration required • Will resign from the Board of Directors • [For employees] Advance permission required from RPIRG's Executive Director (or in the case of the Executive Director, from the Board) who may decline permission or provide guidance
Is employed at URSU as a non-management employee	Directors, Employees, Contractors	<ul style="list-style-type: none"> • Declaration required • Advance permission required from RPIRG's Executive Director (or in the case of the Executive Director, from the Board) who may provide guidance
Runs for the URSU election	Directors	<ul style="list-style-type: none"> • Declaration required • Will resign from the Board of Directors if elected
Runs for a student centre election	Directors	<ul style="list-style-type: none"> • Declaration required • Will resign from the Board of Directors if elected
Serves on a student group committee, or organization	Directors, Employees, Contractors	<ul style="list-style-type: none"> • Declaration required • No participation in any discussion related to RPIRG's partnership or funding to the student group, committee, or organization
Runs for political office municipally, provincially or federally	Employees, Directors, Contractors	<ul style="list-style-type: none"> • To advise the Executive Director and Board prior to announcing intention to run for political office • No involvement in RPIRG outreach or media activities until after the election campaign • Should not post on RPIRG social media sites until after the election campaign

		<ul style="list-style-type: none">• May participate in a nomination contest without resigning• Must resign before launching a campaign• [For employees] A leave of absence, without pay, will be granted during the election time period upon request• May apply to return if campaign is unsuccessful
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