

Board Policies

ADMINISTRATIVE AFFAIRS

137.00 - CONFLICT OF INTEREST

A potential conflict of interest arises whenever a person is identified pursuant to this policy as having a direct or indirect financial interest with The College.

A person has a financial interest if the person has, directly or indirectly, through business, investment or immediate family member(s) (a) an ownership or investment interest in any entity with which The College has a transaction or arrangement, or (b) a compensation arrangement with The College or with any entity or individual with which The College has a transaction or arrangement, or (c) an actual or potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which The College is negotiating a transaction or arrangement. Compensation includes direct or indirect remuneration as well as gifts or favors that are more than incidental.

It is the intent of Cowley College to avoid whenever possible, even the appearance of impropriety, each full-time employee and Board member will:

1. Immediately disclose any direct or indirect arrangement, agreement, investment or other activity with any vendor, supplier, or other party doing business with the College, or changes therein
2. Refrain from participation in any discussion, selection, award, vote or administration of a bid or proposal, purchase, or contract with which the employee or Board member has a potential conflict of interest.

The provisions of this policy do not apply to expenditures for materials, goods, wares, or services required to reconstruct, remodel, repair or equip buildings, vehicles and/or equipment when such purchase is necessitated by the occurrence of a loss because of an emergency situation. An emergency is classified as any event or activity that is life-threatening or jeopardizes the safety of the college, and/or the wellbeing of the constituents of the college. Reference Board Policy 132.00 for additional clarity.

For purposes of this policy, immediate family member is defined as spouse, parent, child, father-in-law, mother-in-law, step-parent, step-child, grandparent, grandchild, sister, brother, sister/brother-in-law, and son/daughter-in-law.

Contracts or minutes of meetings should reflect the disclosure of the conflict of interest and the steps taken by the employee or Board member to alleviate the conflict.

Potential conflict of interest disclosure forms will be maintained in the office of the Chief Financial Officer.

This Policy is implemented through Procedure AP132/137.

Adopted March 19, 2012
Revised July 18, 2016
Revised July 19, 2021