

Waterloo Co-operative Residence Incorporated

Conflict of Interest Policy

As approved by the General Manager,
and incorporating all changes through:

23 February 2010

*(Note that, in this policy, the masculine shall include the
feminine and the singular shall include the plural)*

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Revision History

Date	Revisionist	Summary of Changes
12 June 1999	WCRI	Policy Change
16 December 2001	Russ Wong	Template Update
10 April 2007	Laura Reidel	Title page changed to reflect General Manager's jurisdiction over this policy.
31 July 2009	Cary Hubbard	Policy review; Update Part 2 re: personal gain; Update Part 4 to include DMs acting as IDSC Reps; Update Parts 3 & 5 re: employees as Directors
23 February 2010	Cary Hubbard	Part 5: Clarify transition between positions for employees

External Cross-references

Section(s)	Policy/Section Referenced	Referencing Policy	Section(s)
3	Personnel	Judicial	3.1

Part 1: Introduction

This policy aims to prevent a conflict-of-interest involving a member or employee of Waterloo Co-operative Residence Incorporated (WCRI). Whenever a member or employee finds himself in a conflict-of-interest due to financial or self-interest situations, that member or employee must disclose the conflict to his direct supervisor(s) and abstain from voting or otherwise behaving in any way that might compromise himself.

In the case of a conflict-of-interest involving an individual member of the Board of Directors, the individual must appeal to the rest of the Board of Directors for direction.

"Conflict-of-interest," is defined as:

- a) Any situation where employees or members of WCRI have an interest which, if pursued, might prevent them from meeting their obligations to serve the interests of WCRI;
- b) Situations where employees or members of WCRI have interests substantial enough to potentially affect their independent judgement, or the independent judgement of a typical person in their situation, in serving the interests of WCRI.

Part 2: Contracts

This section of the policy covers conflicts-of-interest of those involved in the selection of any person or group contracted to perform paid services for WCRI.

If the selection decision is made by a group, and an individual in the group has a conflict-of-interest, then that individual must abstain from voting during the selection process. He may, however, participate in the discussion.

If the selection decision is normally made by an individual, and that individual is in conflict of interest, then the selection decision must be made by his supervisor(s).

Those making selection decisions, whether members or employees, shall not realize personal gain, whether financial or otherwise, when choosing a vendor to provide a service or good to the Co-op.

Part 3: Employees

The five classes of employees as defined in the WCRI *Personnel Policy* are: permanent full-time, temporary full-time, regular part-time, semester part-time, and casual.

- a) With the exception of members holding a Division Manager position or other semester part-time position, no member may hold an employee position at WCRI.
- b) No employee of WCRI may belong to any of the following: the Board of Directors, a standing committee of the Board of Directors, an Inter-Divisional or Division Judicial Committee, a Division Council, the Inter-Divisional Council, or a division committee.
- c) In the course of employment with WCRI, employees cannot supervise or be supervised by a close relative such as a parent, step-parent, parent-in-law, sister, brother, grandparent, aunt, uncle, or first cousin.
- d) Permanent full-time staff cannot hold any other paid position within the Co-op.

Part 4: Members

With such an intricate and varied governance and participation system, it is not possible to foresee all possible conflicts-of-interest that could occur at WCRI. In order to simplify this policy, member conflicts shall be

grouped into three classifications: inter-divisional conflicts, divisional conflicts, and inter-divisional/divisional conflicts.

4.1 Inter-Divisional Conflicts

These conflicts occur when a member simultaneously occupies more than one inter-divisional position with fining and/or voting authority.

- a) Members of the WCRI Board of Directors are not permitted to hold any other inter-divisional position with fining power and/or voting authority.
- b) The Judicial Co-ordinator and Judicial Representatives may not occupy any inter-divisional position with fining and/or voting authority.

4.2 Divisional Conflicts

These conflicts occur when a member simultaneously occupies more than one divisional position with fining and/or voting authority.

- a) If provided for in the Division Constitution, one person can occupy both the Floor/Block/Building Manager and Division Council Representative positions.
- b) The Division Manager(s) and Assistant Division Manager(s) (if applicable) of each division cannot be members of Division Council.
- c) A Division Council chairperson cannot hold any other divisional position.
- d) Members of a Division Judicial Committee cannot hold any position with fining power.

4.3 Inter-divisional/Divisional Conflicts

- a) Any inter-divisional chairperson cannot be a divisional chairperson for their division for that same committee.
- b) Judicial Representatives and the Judicial Co-ordinator cannot hold any other divisional position with fining and/or voting power.
- c) The Division Manager may serve as the division's representative on the Inter-divisional Social Committee.

Part 5: Permissible Conflicts

When a supervisor of a person who is in the position of a potential conflict-of-interest determines that the potential conflict is not harmful to the interests of WCRI, that person will not be asked to remove himself from the potential conflict. Such a situation will be deemed a "permissible conflict".

Any conflict that has been explicitly noted in Part 4 that occurs for a period of more than one (1) week cannot be considered a "permissible conflict".

Because employees may not hold a position on the Board of Directors, no permissible conflict consideration may be granted for employees who wish to run for the Board of Directors. An employee who wishes to run for the Board of Directors must submit a written resignation to his supervisor at least seven days in advance of the election/appointment date.

In the case of transitions between various positions, a member or employee must either resign one of the two positions immediately upon accepting the other, or must apply to his supervisors for permissible conflict consideration for the length of time of the transition (e.g., a transition period of three (3) days in a highly potential conflict situation may be deemed permissible, while two (2) weeks in the same situation may not). Applications for permissible conflict consideration will be determined on a case-by-case basis.

Part 6: Breaches of the Policy

Breach of this policy, whether committed intentionally or unintentionally, is grounds for staff review in the case of employees and membership review in the case of members.