APPLEGROVE COMMUNITY COMPLEX
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TORONTO
An Agency of the City of Toronto

Applegrove Conflict of Interest Policy for Staff
Accepted by the Board, September 20, 2006

1. **Policy Statement**
All Applegrove's staff members are employees of the City of Toronto and are expected to conduct themselves with personal integrity, ethics, honesty and diligence in performing their duties for the organization. Employees are required to support and advance the interests of the organization and avoid placing themselves in situations where their personal interests actually or potentially conflict with the interests of the agency and the City.

2. **Applicability**
This policy applies to all employees. The standards outlined in this policy are particularly relevant to employees who are in a position to make or influence decisions of the organization.

3. **Definitions**
A conflict of interest refers to a situation in which private interests or personal considerations may affect an employee's judgement in acting in the best interest of Applegrove or the City of Toronto. It includes using an employee's position or confidential information, or using agency time, material or facilities, for private gain or advancement or the expectation of private gain or advancement. A conflict may occur when an interest benefits any member of the employee's family, friends or business associates.

4. **Conditions**

A. Introduction
The rules and examples that follow identify some situations covered by the policy but do not exhaust the possibilities for conflict of interest.

B. Special Treatment
Employees are not allowed to use their positions to give anyone special treatment that would advance their own interests or that of any member of the employee's family, their friends or business associates.

C. Receive Fees or Gifts
Employees may not accept gifts, money, discounts or favours including a benefit to family members, friends or business associates for doing work that Applegrove pays them to do. The exceptions to this are promotional gifts or those of nominal value e.g., coffee mug or letter opener with a company logo or the occasional lunch.

D. Outside Work or Business Activities
Employees may not engage in any outside work or business activities:
a) that conflict with their duties as Applegrove employees;
b) which use their knowledge of confidential plans, projects or information about the agency or the City; and
c) that will, or is likely to, negatively influence or affect them in carrying out their duties as Applegrove employees.

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E. Using Agency Property

a) Some Applegrove equipment and supplies, such as the toy library, are intended for use by community members. These can include staff who meet any other criteria to use the property.
b) Applegrove's policies regarding telephones, computers, photocopiers and faxes permit some use by employees for personal reasons under certain conditions.
c) Other than the situations above, employees may not use, or permit the use of, items of agency property, facilities, equipment, supplies or other resources for activities not associated with their work. Any exceptions to this must be expressly approved by Applegrove's Board, the Executive Director or City Council.

F. Confidential Information

Employees may not disclose confidential or privileged information about the property or affairs of the organization, or use confidential information to advance personal or others' interests. Employees cannot divulge confidential or privileged information about employees without those employees' written authorization.

Note on confidential information: The rule against giving out confidential information does not apply to an employee who alleges wrongdoing on the part of the city or its Council members, officers, employees, agents or contractors – as long as the disclosure of such information is not frivolous, vexatious or slanderous – and making the disclosure serves the public interest and is made in accordance with the provisions of this policy. This reporting of wrongdoing is known as whistle-blowing.

G. Financial Interest

Employees who knowingly have financial interests in an agency or City contract, sale or other business transaction, or have family members, friends or business associates with such interests, must not represent or advise the organization in such transactions.

5. Guidelines for Management and Professional Staff

A. Introduction

Some positions in the organization are more susceptible than others to conflicts of interest. The following two sections are specifically for executives, managers and employees who give professional advice or assistance, or who work on program policies or budgets. These sections also refer to employees in confidential positions working with the above mentioned staff.

B. Representing Others

Staff described in the paragraph above may not appear before Council or a city committee on behalf of a private citizen other than himself/herself, his/her spouse, his/her parents, or his/her minor children, where the employee is either paid, or is involved in any way in the issue/policy.

C. Appointments

Staff who hold positions described above may not seek or accept appointment to a city committee or board (except in the capacity of a city employee) and require permission from the executive director before accepting appointments to other municipal, provincial or federal commissions boards and committees. Staff who hold

positions as board members on community agencies that deal with issues related to their work at Applegrove should inform the executive director of their appointments. When agency issues arise that place them in actual or potential conflict with Applegrove or city policy or procedures, they should declare a conflict of interest.

6. Lobbyists

Expectations on dealing with lobbyists that are consistent with the Code of Conduct for members of Council, are available on request or via the Intranet. When the City's new Lobbyist Registry and policy are finalized, Applegrove staff should follow the new procedures.

7. Reporting Conflict of Interest

A. Requirement

If employees or their family members, friends or business associates have a personal or financial interest that might present a conflict or bias in connection with their duties as employees, they must report this conflict to the executive director in writing. If this conflict is relevant to the City, the Executive Director will forward a copy to the City's chief administrative officer.

B. How to Report

When an employee reports a conflict of interest to executive director in writing, a copy is forwarded to the City's chief administrative officer. If an employee alleges wrongdoing on the part of the city or its Council members, officers, employees, agents or contractors he/she should report this in writing directly to the City's chief administrative officer.

8. Failure to Comply

Employees who fail to comply with this policy are subject to disciplinary action up to and including dismissal.

9. Implementation

Managers and supervisors must make the policy available to all employees and must discuss the entire policy with their employees and highlight any of the rules that have particular relevance, given the nature of the employees' work. Managers and supervisors who need assistance interpreting rules and how they apply to specific situations must talk to the executive director; if h/she needs assistance, the Executive Director must contact City staff. Serious consequences may result from the contravention of this policy. Employees should check with management if they need assistance in interpreting whether a situation they have experienced or are confronting puts them in a conflict of interest situation.

10. Additional Information

Additional information available upon request includes

A. sample questions and answers (City Appendix 1).
B. supplementary guidelines (City Appendix 2)
C. conduct respecting lobbyists (City Appendix 3)