

Town of Greater Napanee

Staff Conflict of Interest Policy



Approval Date:	June 11, 2025	Resolution #	270/25
Revised Date:	September 8, 2026	Resolution #	379/26
Review Scheduled:	Next Council Term		
Department:	Human Resources	Contact:	Manager of HR
Approval Authority:	Council	Policy No:	HR-2025-02

1. Purpose

The purpose of this policy is to ensure that all employees of The Town conduct themselves in a manner that maintains and enhances public confidence in the integrity, objectivity, and impartiality of the municipality.

2. Scope

This policy applies to all employees, including full-time, part-time, temporary, and contract staff.

3. Definitions

- Conflict of Interest: A situation where an employee's private interests could improperly influence, or appear to influence, the performance of their official duties and responsibilities.
- Pecuniary Interest: Any interest that has a direct or indirect financial impact.

4. Responsibilities

Employees: Must disclose any potential or actual conflicts of interest to their supervisor or Human Resources.

Supervisors: Must ensure that employees are aware of this policy and address any disclosed conflicts of interest. Responsible for any enforcement for any of their direct reports.

Human Resources: Responsible for providing guidance on conflict of interest matters and maintaining records of disclosures. Along with the CAO responsible for enforcement organizationally.

Mayor: Must enforce any conflict that involves the CAO.

5. Policy

Employees must avoid situations where their personal interests conflict, or appear to conflict, with their duties to the municipality. Employees must not use their position for personal gain or the benefit of family, friends, or associates.

5.1. Examples of Conflicts of Interest

Including but not limited to:

- **Personal Relationships:** An employee is involved in the hiring process for a position for which a close friend or family member is an applicant.
- **Financial Interests:** An employee owns shares in a company that is bidding for a municipal contract.
- **Outside Employment:** An employee works part-time for a contractor that does business with the municipality.
- **Gifts and Hospitality:** An employee accepts gifts or hospitality from a vendor who is seeking to secure a contract with the municipality.
- **Use of Municipal Resources:** An employee uses municipal equipment or confidential information for personal projects or financial gain.

5.2. Prohibited Activities

Employees must not:

- Engage in outside employment or activities that conflict with their municipal duties.
- Use municipal property, information, or resources for personal gain.
- Accept gifts, hospitality, or other benefits that could influence, or appear to influence, their decisions.

5.3. First Responder Discount

- Employees who serve as First Responders (including volunteer firefighters, paramedics, police officers, or other recognized emergency service personnel) remain eligible to receive publicly available First Responder discounts, benefits, or incentives offered by external businesses or organizations. Such discounts are not considered a conflict of interest, provided they are offered generally to all qualifying First Responders and are not intended to influence, or appear to influence, the employee's duties or decision-making on behalf of the Town.

6. Procedures

- a. **Disclosure:** Employees must promptly disclose any potential or actual conflicts of interest in writing to their supervisor or Human Resources using the attached disclosure form.
- b. **Review:** The supervisor or ethics officer will review the disclosure and determine the appropriate action to mitigate the conflict.
- c. **Resolution:** Actions to resolve conflicts may include reassignment of duties, removal from decision-making processes, or other measures deemed appropriate.

7. Enforcement

Failure to comply with this policy may result in disciplinary action, up to and including termination of employment.

8. Related Documents

Employee Code of Conduct Policy

9. Appendix

Staff conflict of interest disclosure form.

Revision History

Date	Number	Description
June 11, 2025	HR-2025-02	New Policy
September 8, 2026	Resolution #379/26	Exception regarding First Responder Discounts