

CONFLICT OF INTEREST

1. GENERAL

- A. Halifax Regional Police (HRP) aims to achieve the highest ethical standards by ensuring all employees perform their duties without favour, affection, malice or ill will, to promote public confidence in the integrity, impartiality and accountability of HRP, and to maintain fairness and morale within the organization.
- B. This policy outlines the expectations and procedures concerning actual, perceived or potential conflicts of interest.

2. POLICY

- A. A conflict of interest exists when the duties and responsibilities of an employee are compromised by a financial or personal interest which is incompatible with the proper discharge of their duties; or would impair or reasonably give the perception of impairing their independence of judgement or action in the performance of their duties.
- B. Employees shall conduct their duties in a fair, objective and unbiased manner. Employees shall not grant preferential treatment or advantages to friends, family members or other individuals with whom they have a Personal Relationship as defined in this policy. HRP recognizes that employees may develop romantic relationships in the workplace; however, relationships between supervisors or persons in a position of authority and subordinates raise concerns of preferential treatment, bias and/or abuse of power. To avoid actual, perceived and potential conflicts of interest:
 - i. Persons in a position of authority must not use their position to persuade a subordinate to enter a romantic Personal Relationship.
 - ii. Employees shall not occupy a position of authority over or be involved with the hiring, promotion, evaluation or transfer of anyone with whom they have, or have had, a Personal Relationship.
 - iii. Employees involved in a Personal Relationship shall not work directly with each other, except in circumstances as determined by the Chief of Police or designate, or in accordance with Section 3 F of this Policy.
- C. All sensitive and classified information shall remain confidential and shall be used for official work-related purposes only as per the policies and procedures in Chapter Fourteen Computers, 14.0 Information Security Management Framework Policy.
- D. Employees shall not accept gifts, hospitality or other benefits that may have an actual, perceived or potential influence on their objectivity in carrying out official duties and

responsibilities or that may, or may appear to, place them or another employee under any obligation to the donor.

- E. Employees must follow the policy concerning off-duty employment as outlined in Chapter 10, Section 12 (Administration). Employees may have personal assets and liabilities, including substantial shareholdings in publicly traded companies and private/family business interests. Employees must ensure off-duty employment and/or financial interests do not:
- i. Interfere, or appear to interfere, with the objective performance of their duties.
 - ii. Take advantage of, or benefit from, information obtained during the employee's official duties that is not available to the public.
- F. Members must follow the policy concerning extra-duty employment as outlined in Chapter 10, Section 13 (Administration). Requests for extra-duty employment must be directed to the Chief of Police.
- G. Employees may participate in non-remunerated secondary activities if these secondary activities do NOT:
- i. Interfere, or appear to interfere, with the objective performance of the employee's duties.
 - ii. Take advantage of, or benefit from, information obtained during the employee's official duties that is not available to the public.
 - iii. Conflict with HRP values or reflect negatively upon HRP.
- H. HRP respects and supports their employees' democratic right to engage in political activity. In response to an employee request for participation in a political activity or event, HRP will conduct an impact assessment to evaluate actual, perceived or potential conflicts of interest.
- i. Employees may engage political activity under the following conditions:
 1. The employee has submitted a written request to participate in writing to the Chief of Police.
 2. An impact assessment has been completed and approval/authorization has been granted by the Chief of Police.
 3. Employees participate while off duty only.
 4. Sworn members are not in uniform.

5. Employees do not represent themselves or their opinions as those of HRP.
 6. Employees do not use HRP resources or facilities for political purposes.
 7. The political activity does not impair, and is not perceived to impair, the employee's ability to perform their duties impartially.
 8. The political activity does not compromise ongoing investigations or other HRP efforts.
- ii. Acceptable political activity includes:
1. Voting in municipal, provincial and federal elections.
 2. Joining political parties.
 3. Participating in the internal affairs of a political party or organization.
 4. Contributing money to a political party or candidate.
 5. Soliciting financial or other contributions for a political party or candidate provided authorization has been granted by the Chief of Police or designate.

3. PROCEDURE

- A. HRP employees must avoid actual, perceived and potential conflicts of interest between their professional responsibilities and private interests. All conflicts of interest must be reported.
- B. To help employees avoid conflicts of interest, and to protect employees from allegations of preferential treatment, abuse of authority, privileged access to officials, and misuse of information not available to the public, the following procedures must be followed.
- C. Sensitive and Classified Information:
- i. Employees must abide by all federal and provincial legislation regarding the security and privacy of information. See Nova Scotia *Police Regulations* – Part 2 s. 24(5).
 - ii. Employees must not use sensitive and/or classified information for any purpose other than official work-related duties and must not use sensitive and classified information to benefit themselves or any other individual. This does not preclude an employee from using such information for the purpose of defending themselves against disciplinary complaints provided such information is shared only to the extent necessary to instruct counsel and respond to the complaint.

- iii. Employees must not disclose the contents of any sensitive information to anyone – including other HRP employees – who does not have authorization to view the material.
- iv. Employees must not alter, conceal or destroy a record.
- v. Supervisors must ensure all employees are aware of their responsibilities concerning sensitive and classified information and that all employees accessing sensitive and classified information have security clearance to do so.

D. Acceptance of Gifts:

- i. Employees are reminded that accepting or requesting a gift or valuable as consideration for cooperation, assistance, or exercise of influence in an employee's official duties may be a violation of section 120 or 121 of the Criminal Code.
- ii. Employees must use good judgement before accepting an offer of any gift, favour or hospitality.

E. Gifts may be accepted under the following conditions:

- i. If the gift, favour or hospitality is of nominal, less than \$50.00 in value and the supervisor has been informed. Some examples of acceptable gifts are:
 1. Gift/prize/promotional item i.e. gift basket, t-shirt, water bottle if it is offered to attendees at a conference or event.
 2. Tokens of appreciation for speaking engagements.
 3. Plaques or similar recognition awards.
 4. Perishable items, i.e. food items that have no monetary value. If by accepting the gift, the employee would not be placed in a situation where they may be perceived as influencing purchasing/procurement decisions related to the party offering the gift.
 5. Whether the offering or receipt of a gift or hospitality is a matter of cultural or diplomatic protocol i.e. received as a normal expression of courtesy or protocol or is within the customary standards for that situation.

F. Personal Relationships in the Workplace:

- i. Employees shall inform their supervisor and/or HR immediately if they are working directly with someone with whom they have a Personal Relationship.
- ii. Employees shall also inform their supervisor and/or HR immediately if they are working directly with someone with whom they have had a past Personal Relationship which they reasonably believe could give rise to an actual

perceived or possible conflict of interest. Otherwise, past Personal Relationships do not need to be reported.

- iii. Supervisors who are informed of a Personal Relationship in the workplace shall inform Human Resources (HR). To ensure objectivity, the supervisor shall not take action without the authorization of HR.
- iv. Human Resources will coordinate and facilitate a meeting with the affected individuals to identify the nature of the relationship and to evaluate the actual, perceived or possible conflict of interest the Personal Relationship might give rise to. Although the existence of a Personal Relationship does not automatically give rise to a conflict of interest, a review of the circumstances is necessary in each case to determine whether a conflict exists and whether a patrol zone or divisional separation, or other measures are required.
- v. The Employer will notify the Union if an employee has to be transferred as a result of a Personal Relationship with another employee. The Employer will attempt to use the least intrusive means available to adequately address an actual, perceived or possible conflict.
- vi. Notwithstanding (iv) and (v) above, employees in a Personal Relationship cannot be in a supervisor/subordinate relationship. (See 2 B ii) If two employees in a Personal Relationship are working on the same Watch/Division, they shall not be assigned to the same patrol car.
- vii. In the event a conflict can only be reasonably resolved by a divisional separation, the affected members will pick their preferred and available Division or Watch, with the more senior member picking first, unless otherwise agreed to by the affected members.
- viii. If no solution can be reached between HR and the affected individuals, HR will impose a solution, in accordance with the collective agreement.
- ix. Any disagreements over the application of the process outlined in this policy shall be grievable in accordance with the collective agreement between HRM and HRP.
- x. Employees are reminded of Article 59, "Watch Accommodation for Members," of the Halifax Regional Police Association Collective Agreement, which declares that, when operational requirements allow, all efforts will be made to place two individuals on the watches of their choice if they are married or have resided in a common-law relationship for a period of one year.

G. Off-Duty Employment:

- i. Employees shall obtain authorization from the Chief of Police before participating in a remunerated activity.
- ii. Employees shall immediately report any actual, perceived or potential conflicts of interest between their off-duty employment and their work with HRP to their supervisor for assessment and determination of appropriate measures.
- iii. Employees shall not engage in off-duty employment activities while on duty, unless authorized to do so.
- iv. Employees shall not use HRP assets for off-duty employment purposes.

H. Extra-Duty Employment:

- i. All members shall follow the policy concerning extra-duty employment as outlined in Chapter 10, Section 13 (Administration). Requests for extra-duty employment must be directed to the Chief of Police.

I. Non-Remunerated Secondary Activity:

- i. Employees shall obtain authorization for non-remunerated activity outside HRP if a conflict of interest exists or could exist. This includes volunteer activities that compete with services offered by HRP.
- ii. Employees shall not engage in non-remunerated secondary activities while on duty, unless authorized to do so.
- iii. Employees shall not use HRP assets for off-duty employment purposes.

J. Political Activity:

- i. Political involvement by an employee in municipal, provincial or federal levels of government is permitted, except as noted in sections 17B and 17C and clause 18(1)(d) of the *Municipal Elections Act*, providing that the employee makes it clear that they are acting as private citizens and not as representatives of the Municipality.
 1. Employees shall not express personal political views while on duty and/or in uniform.
 2. Employees who believe their political activity may present an actual, perceived or potential conflict of interest shall report it to their supervisor.
 3. Employees who wish to run for public office shall request a leave of absence without pay from the first day of their candidacy for the duration of their candidacy. Employees who are elected to public office shall resign from HRP.

- a. Employees who have resigned from HRP upon being elected to public office may apply for reappointment to their former position (or another position of equal status for which they are qualified) if they cease hold public office within five years of their resignation from HRP and apply for reinstatement within three months of leaving public office.

0. DEFINITIONS

- A. Conflict of Interest:** A situation in which an HRP employee's private interest conflicts or may be seen to conflict with their duties and responsibilities as an employee of HRP. Conflicts of interest include, but are not limited to, Personal Relationships, financial considerations, political associations, and other private or public connections. Conflicts of interest can be actual, perceived, or potential.
- B. Actual Conflict of Interest:** A conflict of interest that currently exists.
- C. Perceived Conflict of Interest:** A conflict of interest that could be perceived by a reasonable observer to exist.
- D. Potential Conflict of Interest:** A conflict of interest that could reasonably be foreseen in the future.
- E. Employee:** All civilian and sworn HRP employees.
- F. Extra-Duty Employment:** Means all police-related duty sanctioned by the Chief of Police other than that normally provided for by the Halifax Regional Municipality.
- G. Personal Relationship:** Personal relationship between employees is defined as a family relationship (e.g. spouse, partner, sibling, parent), an ongoing romantic and/or intimate relationship, or a past romantic and/or intimate relationship that at least one of the formerly involved employees reasonably believes may adversely affect an ongoing working relationship with the other formerly involved employee(s).
- H. Member:** all sworn HRP employees.
- I. Non-Remunerated Secondary Activity:** Community-related activities, volunteer activities and participation in clubs or organizations outside HRP for which the employee does not receive compensation, either directly or indirectly.
- J. Person in a Position of Authority:** A person who has the actual or perceived ability, authority or responsibility to direct, control, evaluate or influence the work, workplace, or career of an employee.
- K. Political Activity:** Activity in support of, or in opposition to, a political party or candidate. Political activity can include joining political parties, contributing funds, attending political events, displaying political materials or expressing personal political views and opinions.

- L. Off-Duty Employment:** Remunerated employment outside HRP, including any private business activities, participation in family-owned businesses, financial interests in public or private companies, substantial shareholdings in publicly-traded companies and any other activity that generates income.

- M. Remunerated Activity:** Any activity for which an employee receives direct or indirect compensation, including working in a family business.

Effective Date	December 13, 2024
Policy Owner	Deputy Chief Administration

By Order Of:



Don MacLean
Chief of Police

