

Number:	RHR-210
Title:	Hiring of Relatives and Prevention of Conflict of Interest
Person responsible for enforcement:	Vice-Rector of Administration
Entered into force:	May 30, 2018
Approved:	May 30, 2018 by the Board of Governors
Reviewed:	October 22th, 2025 by the Board of Governors <i>This document replaces all previous regulations on this subject.</i>
Exception:	No exception to this regulation without prior written authorization from the Board of Governors

In this document, the masculine form is used without prejudice and for conciseness purposes only.

1. Policy statement

In order to promote integrity, Saint Paul University has adopted this policy to prevent conflicts of interest and, where necessary, to manage such situations in order to protect both the reputation of individuals who may be affected by such situations and that of the University. The policy therefore requires all persons covered by this policy to disclose situations that could place them in actual, potential, or apparent conflicts of interest.

2. Definitions

2.1 Relative

In the present regulation, relatives refer to a person related by blood or marriage and this to the second degree inclusively, that is, to spouse/partner, father, mother, brother, sister, son, daughter, nephew, niece, grandson, granddaughter, uncle and aunt.

2.2 Conflict of Interest

A situation, whether real, potential, or apparent, in which the person concerned has personal interests that could influence the performance of their official duties and responsibilities, or in which the person concerned uses their official position for personal gain. A conflict of interest may arise when activities or situations place an individual or an organization to which they are connected in a position with interests (personal, institutional, or other) that conflict with the interests inherent in the duties and responsibilities associated with their status or position at the University, thereby risking the integrity of decisions made and compromising trust in the University.

These interests include, but are not limited to, pecuniary (commercial, financial) or non-pecuniary interests.

The concept of conflict of interest also covers situations where an educational or authority relationship could coexist with an intimate relationship, such as a romantic or sexual relationship.

2.3 Actual conflict of interest

An actual conflict of interest may compromise the integrity of decisions made and thus cause harm, undermining public confidence in the University and its members.

2.4 Potential conflict of interest

A potential conflict of interest arises when personal interests are significant enough that a person may be tempted to prioritize them over their professional obligations.

2.5 Apparent conflict of interest

An apparent conflict of interest arises when a reasonably informed person could reasonably fear the presence of a conflict of interest.

2.6 Conflict of commitments

A conflict of obligations that occurs, in particular, when outside activities conflict with professional activities, for example when a researcher uses university equipment or staff for personal projects.

2.7 Role conflict

When a remunerated person must perform more than one role and these roles or their purposes are in conflict (for example: entrepreneur or researcher). In such cases, the person must clarify the purposes of each of their roles and their implications to the persons concerned. They must also ensure that they take the necessary measures to avoid causing harm to a third party.

2.8 Institutional conflict

When the party involved in the conflict of interest is an organization. This type of conflict arises, for example, when a university compromises its commitments to established standards such as academic freedom for financial gain.

2.9 Disclosure

The act of a person covered by this policy disclosing to an authorized representative of the University a real, potential, or apparent conflict of interest concerning that person.

2.10 Financial and non-financial interests

Receiving or seeking to receive, on a personal basis, remuneration of a monetary value that may take the form of, but is not limited to, salary, fees, or other payments, property titles, shares, intellectual property rights (copyright, royalties on such rights). On the other hand, if the interest does not in itself have monetary value, such as that related to honor and reputation or the protection of privacy, it will be classified as a non-monetary interest.

2.11 Obligations and responsibilities to the University

Responsibilities and obligations related to administrative, teaching, or research activities, regardless of their funding sources.

2.12 Spouse/Partner

Is the person with whom one is married or with whom one lives since at least a year in a relationship resembling that of marriage, and that you have declared to the University as a partner. The definition of relative includes the parents of the spouse/partner.

2.13 Research

All activities related to creation or development that involve a rigorous and systematic approach aimed at increasing knowledge and that can be carried out in a context of training or knowledge transfer.

2.14 Reporting

Notifying a person authorized by the University of an actual, potential, or apparent conflict of interest involving a member of the university community with respect to the application of this policy.

3. Regulation

- 3.1 No person shall be hired, transferred or promoted to a position reporting directly to a relative of that person.
- 3.2 An employee must not take part in the hiring process or placement of a relative (includes the evaluation process) nor may he or she try to influence these procedures in any way whatsoever.
- 3.3 The hiring of a relative within the same department is not recommended, even if there does not exist a direct relation of authority among the persons concerned.
- 3.4 When an employee marries or becomes the de facto partner of his or her supervisor, the supervisor must inform the University of this fact in writing. In such circumstances, all reasonable steps must be taken to eliminate any real or apparent conflict of interest without, however, penalizing one or the other of the spouses/partners.
- 3.5 The persons covered by this policy shall ensure that they distinguish at all times between the different roles they may occupy within the University and, depending on the purposes of these roles and the circumstances, shall act to avoid or manage any conflict of interest that may arise.

4. Disclosure and management of conflict of interest

- 4.1 In order to ensure proper management, it is important that any actual, potential, or apparent conflict of interest be disclosed, reviewed, and resolved as objectively as possible in order to protect the interests and reputation of the University and its members.
- 4.2 As soon as a real, potential, or apparent conflict of interest may influence their actions or decisions, anyone covered by this policy must disclose all facts relating to such a situation. The same applies to any update to a conflict-of-interest disclosure or any declaration of absence of conflict of interest in a specific case.
- 4.3 The University and the persons covered by this policy are responsible for taking all necessary measures to properly manage actual, potential, or apparent conflicts of interest.
- 4.4 Anyone covered by this policy, as well as any client, supplier, partner, or other third party with knowledge of an actual, potential, or apparent conflict of interest, has a moral duty to report it, as the consequences of remaining silent could be very serious for the University or for the person named in the report, particularly in terms of their reputation.
- 4.5 All statements and reports made in accordance with this policy are treated confidentially. However, the person making the report may authorize the disclosure of their identity.

5. Area of application

This policy also applies to all members of the University community, including all staff members, faculty members, students, individuals paid through grants or research contracts, and postdoctoral fellows. This policy applies to all activities carried out by the individuals concerned, regardless of where they take place.