Manual Part: Conduct (CO)	Policy Number: CO4PO	Alberta Policing Standards: PA 7.5, PA 8.3

Conflict of Interest Policy

Purpose:

To ensure all members of the Edmonton Police Service (EPS), including sworn and civilian members, contractors, authorized agents and volunteers uphold the highest standards of integrity by identifying and disclosing any actual, perceived, or potential conflicts of interest.

To prevent situations where personal interests interfere or appear to interfere with duties, responsibilities, or the interests of EPS, and to maintain public trust and confidence in the organization.

Statement of Principle:

The EPS is committed to maintaining the highest standards of integrity and impartiality in all actions and decisions. Members must act in the best interests of the organization, avoiding situations where personal interests could compromise, or appear to compromise, professional judgment. Transparency and accountability are essential to preserving public trust and confidence in the organization.

Definitions:

Cash-Like Gifts: Accepting items that can be easily converted to cash or function as cash equivalents, such as gift cards, prepaid cards, or gift certificates which could create a Conflict of Interest unless authorized in advance through the chain of command (e.g. Chief's Committee).

Conflict of Interest - A Conflict of Interest is any situation in which sworn or civilian members, contractors, authorized agents and volunteer's interests (e.g. personal, financial, business, relational) are contrary to, or could reasonably be perceived to be contrary to, the individual's duties and responsibilities or the interests of the EPS.

Conflicts of Interest can be:

- Actual - A real conflict exists between an individual's interests and their duties and responsibilities or the interests of the EPS.
- Perceived - It would appear to a reasonable observer that an Actual conflict exists, whether or not it does.

- Potential - It is reasonably foreseeable that a situation could give rise to an Actual or Perceived conflict.

Examples of Conflicts of Interest could include:

- Using one's EPS position to benefit oneself, family, or associates,
- Participating in decisions that benefit a business or organization in which the individual or their family has a financial interest,
- Accepting gifts, benefits, or favours that could influence, or appear to influence, decision-making,
- Engaging in unauthorized extra employment or activities that conflict with the individual's EPS duties and responsibilities,
- Failing to disclose relationships or interests that could affect, or could be reasonably perceived to affect, impartiality.

Conflict of Interest Relationship - Includes any relationship that could reasonably be perceived to influence professional judgment or create a Conflict of Interest. This may include:

Personal Relationships: Family (e.g., spouse, sibling, parent), romantic relationships between two employees of the EPS.

Other Close Relationships: Close friendships inside and outside EPS or working relationships with individuals or organizations outside EPS that could impact impartiality or decision-making.

Extra Employment Activities: Engaging in any employment, business, or ongoing volunteer activity outside of EPS duties, whether or not renumeration is received. Exceptions and approval requirements are outlined in existing policy.

Gifts: Accepting any item, benefit, gratuity, service, hospitality, favour, or advantage received at no cost or at a reduced cost which could create a Conflict of Interest unless authorized under applicable EPS policies and procedures. Exceptions and approval requirements are outlined in existing policy.

Policy Statement:

Members must identify and disclose any actual, perceived, or potential Conflicts of Interest or Conflict of Interest Relationships in all professional activities related to their role. Examples of this obligation includes:

- Not using EPS position or resources for personal gain.
- Not associating with individuals or groups known to engage in criminal activity, unless expressly authorized in accordance with existing policy.
- Not engaging in unauthorized Extra Employment that interferes with EPS duties or could present a Conflict of Interest.
- Not accepting Gifts or Cash-Like Gifts that could influence, or could be reasonably perceived to influence, decision-making.
- Not conducting investigations involving Personal Relationships.
- Not participating in a hiring process involving Other Close Relationships.

This Conflict of Interest Policy establishes foundational standards for all EPS Members. It is not intended to replace more specific policies or procedures. Where more detailed guidance exists in other EPS policies or procedures or in the City of Edmonton Code of Conduct, those documents should be consulted in conjunction with this policy.

A. Scope

This policy applies to all members including:

- Sworn and civilian employees
- Contractors
- Volunteers
- Authorized agents

B. Reporting and Managing Conflicts

1. Members must immediately disclose any potential Conflict of Interest to their supervisor or other appropriate individual (e.g. Respectful Workplace Section, Whistleblower line, Human Resources (HR) Advisor, etc.). Each of these listed areas has a responsibility to redirect complaints to a more appropriate area if necessary.
2. The recipient of a disclosure must assess and document any potential Conflict of Interest and determine appropriate actions in collaboration with their chain of command and the Human Resources Division (HRD). Actions may include reassignment or, where permitted by policy, mitigation plans.

Additional information can be found in **CO2-2PR Conflict of Interest and Members' Involvement in Criminal Activities Procedure**, **HR27PO Respectful Workplace Policy**, and **GO9PO Whistleblower Policy**.

C. Conflict of Interest Relationships

1. Members must not participate in or influence hiring, promotion, evaluation, discipline, or investigation matters involving Conflict of Interest Relationships.

2. If an individual becomes aware that the hiring, promotion, evaluation, discipline, or investigation matter involves Conflict of Interest Relationships, the individual must immediately advise their supervisor and recuse themselves.

    a. If the supervisor may be involved in the Conflict of Interest, the supervisor must recuse themselves from the matter and it must be reported up the chain of command.

3. Sworn or Civilian Members must not conduct or request unauthorized queries or searches of any individual, including those with whom they have a Personal Relationship or Other Close Relationship.

Additional information can be found in **CO2-2PR Conflict of Interest and Members' Involvement in Criminal Activities Procedure**, **HR41-1PR – Duties, Responsibilities, and Conduct Procedure**, **IS8-1PR Canadian Police Information Centre (CPIC) / Warrant Procedure**, and **OP10-3PR NicheUA Records Management System Procedure**.

D. Personal Relationships

1. Employees in Personal Relationships must not work in the same area or have a reporting relationship.

2. If a Personal Relationship arises within the same area or reporting relationship, employees must notify their supervisor immediately.

    a. If the supervisor is involved in the Personal Relationship, the supervisor must recuse themselves from the matter and it must be reported up the chain of command.

3. One employee in the Personal Relationship must be transferred to another area, with consultation and consideration of operational needs except for specific, temporary exceptions (e.g. callouts, special events).

Additional information can be found in **HR10-2PR Personal Relationships Procedure**.

E. Extra Employment

1. Members must provide written notification to their direct supervisor to request authorization for extra employment. If approved by their direct supervisor, the request will be sent to the appropriate Director in Human Resources for final review and approval, before the member may engage in Extra Employment.

2. Ongoing volunteer activities require the same notification and approval process outlined in Section E1. Subject to Section E3, short-term volunteer work (e.g. a one-day or weekend not-for-profit event) does not require notification and approval. does not require notification and approval.

3. All Extra Employment Activities must not interfere with EPS duties and responsibilities, create a Conflict of Interest, or use EPS resources.

Additional information can be found in **HR42PO Engagement in Extra Employment Policy**.

F. Gifts and Benefits

1. EPS members must not solicit or accept gifts, cash-like gifts, gratuities, discounts, or other benefits, except as permitted under applicable EPS policies and procedures. When in doubt, members must consult their immediate supervisor. Any gifts offered or received outside nominal limits or procedure must be reported through the chain of command.

Additional information can be found in **FI3-2PR Acceptance of Gifts by EPS Members Procedure**.

G. Procurement Conflicts

1. Employees involved in procurement must disclose to their immediate supervisor and the Director of Procurement and Contract Services Branch (PCSB) any personal, financial, or prior employment relationships, or a relationship which could otherwise represent a Conflict of Interest, with vendors.

2. PCSB will assess and manage Conflicts of Interest which may include suspending or terminating procurement processes if necessary.

Additional information can be found in **EF4-1PR Procurement Procedure.**

H. Enforcement

1. Violations of this policy may result in disciplinary action, including but not limited to, reassignment, termination of Extra Employment, formal investigation, or termination of employment.

2. Failure to report known Conflicts of Interest (including criminal associations) may also result in disciplinary action, up to and including termination of employment.

I. Review and Amendments

This policy may be reviewed within two years of its implementation to assess its effectiveness and identify any updates required due to changes in legislation, organizational structure, emerging best practices, or other identified needs.