

**Policy Title:** Conflict of Interest Policy

**Approved by:** Campus Director

**Executive(s) Responsible:** Associate Director, Operations and External Engagement

**Revision Date:** January 02, 2026

**Effective Date:** January 05, 2026

**Next Review Date:** December 31, 2026

**Institution Number:** 4119

## Background & Scope

This policy applies to all employees (administrators, staff, faculty, contractors, and casual or sessional employees) and governs interactions with:

- Students (current or prospective, and alumni within one year of completion)
- Student clubs/organizations and student-run businesses
- Employers, agents, homestay providers, landlords, immigration consultants, and other third parties connected to students or programs
- Vendors and service providers engaged by the institution

This policy also applies where a close personal relationship (family, romantic, household, or financial) exists with a student or a third party who stands to benefit from institutional decisions.

## Purpose of the Policy

This policy protects the integrity of CCTB's academic and student-service decisions by preventing, disclosing, and managing conflicts of interest (COIs) involving employees, students, and external stakeholders. It ensures fairness, transparency, and trust in all relationships and transactions.

## Definitions

**Conflict of Interest (COI):** A situation in which personal interests (financial, relational, or other) may influence, appear to influence, or could reasonably be perceived to influence an individual's professional judgement or actions.

**Personal Benefit:** Any advantage, financial or otherwise (money, gifts, discounts, favours, services, referrals, jobs, internships, preferential treatment, or special access) that is gained because of COI.

**Close Personal Relationships:** Spouse/partner, family or household member, or comparable relationship.

**Student Transaction/Business Deal:** Any sale, purchase, lease, hire, referral, paid service, or endorsement involving a student.

**Outside Activity:** Any paid or unpaid activity not part of one's institutional role (e.g. tutoring, consulting, operating a business, board service, sales).

**Gift/Hospitality/Remuneration/Honorarium:** Any item or event of value, including gift cards, meals, or travel.

## Policy Statement

This policy is intended to embody these guiding principles:

- 1) To protect students from undue influence, coercion, or favouritism.
- 2) To separate academic decisions from personal or financial interests.
- 3) To disclose early, manage potential COIs transparently, and document decisions.
- 4) To prefer recusal where objectivity could be questioned.
- 5) To respect privacy laws when collecting and storing COI information.

### A. Business with One's Own Students

- i. Employees may not buy from, sell to, or enter into paid arrangements with any students they currently teach, supervise, advise, evaluate, place, or otherwise influence. This includes paid tutoring, editing, immigration, or services for a fee, commissioned product sales, or hiring the student into the employee's personal business where grades or access could be affected.

### B. Private Tutoring and Academic Services

- i. Employees may not charge or accept payment from current or prospective students for academic tutoring, assignment editing, resume assistance, portfolio review, exam preparation, or similar services related to courses or assessments.
- ii. Services for the wider public or students with no supervisory/assessment link may be delivered if:
  - a. approved in writing,
  - b. clearly advertised independent of institutional channels,
  - c. priced reasonably, and
  - d. not using institutional time or resources.

### C. Commissions, Kickbacks, or Referral Fees

- i. Employees may not accept any fee, gift, or other remuneration for referring students to employers, landlords, homestays, immigration consultants, insurance, travel, or similar agencies.

**D. Gifts, Hospitality, and Honoraria from Students**

- i. Employees may not receive cash or cash equivalent gifts/hospitality, or honoraria from students.
- ii. Non-cash tokens of appreciation may be received, provided they are valued at less than \$100 and there is no ongoing decision-making involving the student.
- iii. Gifts exceeding \$100 must be declined or disclosed and surrendered to CCTB Operations for appropriate disposition.

**E. Mandatory Purchases or Endorsements**

- i. Employees must not require or pressure students to buy goods/services from the employee or a related party, or to endorse the employee's outside business, social channels, or products.

**F. Hiring/Employing Students in Personal Businesses**

- i. Employees may not hire a student whom they are currently teaching, supervising, or evaluating or over whom one has institutional influence.
- ii. Employees may hire a student outside one's academic influence with prior disclosure and approval from their direct supervisor. Employment must not interfere with academic grading and evaluations, outside work placement opportunities, or other students' access to the same employment opportunity.

**G. Close Personal Relationships**

- i. Employees must not teach, supervise, evaluate, or make academic or service decisions about students with whom they have a close personal relationship.
- ii. If an alternative arrangement is unavailable, the Campus Director or designate may appoint a third party to assess fairness and equity of supervision and evaluation.

**H. Procurement and Vendor Selection**

- i. Employees must not participate in selecting or managing vendors where they or a close relation have a financial interest.

**I. Student Responsibilities**

- i. Students must not offer gifts, favours, or benefits aiming to secure preferential treatment. Students must not pressure employees to engage in transactions.
- ii. Students are not allowed to solicit other CCTB students to participate in their own business, unless prior written approval is obtained.

## Related Policies

| Policy Name               | Policy Number |
|---------------------------|---------------|
| Academic Integrity Policy |               |
| Student Code of Conduct   |               |
|                           |               |

## Document History

| Date        | Approval/Review/Key Change(s)                                |
|-------------|--|
| 02 Jan 2026 | Added non-solicitation clause under Student Responsibilities |
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