

## Muse Conflict of Interest Policy



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General	January 13, 2026	4-2026	1	5
Subsection	Repeals By-Law Number	Policy Number		
Conflict of Interest	N/A	MU-01-14		

### 1.0 Purpose and Scope

1.1 The purpose of this policy is to maintain public confidence in the integrity of The Muse: Lake of the Woods Museum and Douglas Family Art Centre ("The Muse"). This policy provides guidelines to identify, disclose, and manage conflicts of interest to ensure that all actions and decisions are made in the best interests of The Muse, and ultimately, the public.

1.2 This policy applies to all employees, Muse Board members, volunteers, contractors, and consultants engaged by The Muse. This policy is intended to comply with the *Ontario Municipal Conflict of Interest Act, R.S.O. 1990, c. M.50*, and augment all relevant City of Kenora governance policies, including: *City of Kenora Policy HR-2-01 Employee Conduct*.

### 2.0 Definitions

2.1. A conflict of interest arises when an individual's private interests, whether real, apparent, or potential, conflict or appear to conflict, with their official duties and responsibilities. These include:

- a) **Real conflict of interest:** When private interests influence, or could reasonably be perceived to influence, official duties.
- b) **Apparent conflict of interest:** When it appears that private interests may improperly influence official duties.
- c) **Potential conflict of interest:** When private interests could foreseeably create a conflict.
- d) **Perceived conflict of interest:** situations that may give the appearance of a conflict, as public perception impacts credibility

Examples Include:

- Receiving gifts or benefits from vendors or organizations with business dealings at The Muse.
- Influencing hiring or procurement decisions to benefit family members.
- Engaging in outside employment that conflicts with official duties.

**a) Private Interests:** Financial, personal, professional, political, or other interests that could influence judgment.

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- b) **Benefit:** Any item, gift, service, favour, opportunity, or advantage provided without equal consideration in return.
- c) **Improper Influence:** Improper influence occurs when an individual's private interests or relationships affect, or are perceived to affect, their impartiality in decision-making.
- d) **Family Members:** For the purposes of this policy, family members, or immediate relatives are defined as: spouse, children, siblings, parents, in-laws, common-law partners, dependents, or any other person residing in the same household.

### 3.0 Duties, Responsibilities, and Obligations

#### 3.1 Muse Director

The Muse Board shall review the Director's annual compliance report to ensure policy effectiveness. The Muse Director retains ultimate accountability for the implementation of this policy. They must:

- Ensure that all employees understand their obligations under this policy.
- Promote an ongoing dialogue about conflicts of interest.
- Provide mechanisms to raise, discuss, and resolve concerns related to conflicts of interest.
- Maintain confidentiality regarding protected disclosures.

#### 3.2 Muse Staff

All employees are responsible for adhering to this policy.

Specifically, they must:

- Report any real, apparent, or potential conflicts of interest.
- Review and acknowledge understanding of this policy annually.
- Comply with all disclosure and reporting requirements.
- Seek guidance if faced with an ethical dilemma.

#### 3.3 Muse Board

All Muse Board members are responsible for adhering to this policy. Specifically, they must:

- Report any real, apparent, or potential conflicts of interest.
- Recuse themselves from any decisions in which a real or apparent conflict exists.
- Review and acknowledge understanding of this policy annually.
- Comply with all disclosure and reporting requirements.
- Seek guidance if faced with an ethical dilemma.

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### 4.0 Disclosure and Reporting Process

To ensure transparency, all staff must disclose any conflicts of interest in writing to The Muse Director, The Muse Board, or City of Kenora Human Resources. If the Muse Director is the subject of a conflict, the matter shall be referred directly to the Board Chair for assessment.

### 5.0 Procedure:

5.1 Initial Disclosure: Report any conflicts in writing immediately to Muse Director, The Muse Board, or City of Kenora Human Resources

5.2 Ongoing Disclosure: Promptly disclose new conflicts.

5.3 Review: Human Resources, Risk, and Insurance staff with the City of Kenora, in consultation with The Muse Director and/or The Muse Board, will review and provide guidance.

Step	Responsible Party	Timeline	Documentation
Initial disclosure	Employee/Board Member	Immediate	Disclosure Form
Review	Director/HR/Board	10 Business Days	Review Report
Resolution/Action	Director/Board	As Needed	Action Log

### 6.0 Managing Conflicts of Interest

Upon receiving a disclosure, The Muse Director will:

- a) **Assess:** Evaluate the nature and severity of the conflict, and determine if other City staff or Muse Board members need to be engaged.
- b) **Recommend Actions:** Take appropriate steps to mitigate the conflict including duty reassignment, divestment, or recusal.
- c) **Document:** Record all actions taken, and maintain those records in the file of the employee or volunteer for the duration of their time at The Muse or for seven years.

If unresolved, further appeals may be directed to The Muse Board, General Manager of Recreation and Culture, or the City of Kenora Human Resources.

### 7.0 Annual Certification of Compliance

All staff are required to sign an Annual Conflict of Interest Declaration confirming that:

- a) They have reviewed the policy.
- b) They have disclosed relevant conflicts or confirmed no conflicts exist.

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### 8.0 Application to Board Members and Volunteers

This policy applies to Muse Board members and volunteers who engage in decision-making or represent The Muse.

They Must:

- a) Disclose conflicts in writing to The Muse Board.
- b) Recuse themselves from discussions where conflicts exist by formally declaring pecuniary interest at Board meetings or recusing themselves from board decisions related to their conflict. These recusals shall be recorded in the meeting minutes.
- c) Maintain confidentiality.

### 9.0 Training and Awareness

To ensure understanding, The Muse will:

- a) Provide mandatory conflict of interest training during onboarding.
- b) Attend and sign off on mandatory City of Kenora conflict of interest training

### 10.0 Protection for Reporting Misconduct

The Muse is committed to a safe environment where employees can report concerns.

Protection Measures Include:

- a) Confidentiality: All reports are treated confidentially.
- b) Non-Retaliation: Employees who report concerns in good faith are protected from retaliation.

### 11.0 Disciplinary Measures

Non-compliance may result in disciplinary action under the *City of Kenora HR- 2-03 Progressive Discipline Policy*

### 12.0 Acceptable and Unacceptable Gifts

All staff, Board members, and volunteers must not accept gifts or benefits that could influence, or appear to influence, their duties.

All gifts valued over \$25 must be reported and recorded in a gift log. The Muse Director will review the gift log annually.

Acceptable gifts include:

- nominal promotional items and work-related hospitality.

Unacceptable gifts include:

- Those exceeding \$50 in value or unrelated to official duties.

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### **13.0 Policy Review and Approval**

This policy shall be reviewed by the Board at least every three years, or sooner if legislative or organizational changes require.