

Adopted: 2019-12-03

## POLICY EI

### RISK MANAGEMENT IN CORRUPTION & COLLUSION

#### 1. Objectives

- a. To ensure the existence of a structured and standardized process for identifying, analyzing, assessing, managing and monitoring the risks of corruption and collusion arising from the activities of contract management processes.
- b. To define the roles and responsibilities of the various stakeholders in managing corruption and collusion risks in contract management processes.
- c. To define the mechanisms of accountability.

#### 2. Application & Legal Framework

This policy applies to all employees involved in the contract management process of the New Frontiers School Board (NFSB). It applies to all stages of the contract management process, from the needs' assessment to the end of the contract. Since certain contracts must be approved by the Council of Commissioners, Commissioners are also covered by this policy. This policy considers the government's legal framework, the Public Agencies Contracts Act, and related regulations, policies and directives, including the Directive on Risk Management for Corruption and Collusion in Management Processes (Directive). It also considers the School Board's policies and organizational guides on purchasing and procurement.

#### 3. Definitions

- Collusion  
Any secret agreement between potential bidders who organize themselves to impede competition, in particular by setting prices or production, by sharing sales or territories, and/or bid-rigging.
- Corruption  
An exchange or attempted exchange where, directly or indirectly, an undue advantage is offered, promised or granted by a briber and/or requested, accepted or received by a public office holder, in return for an act by the holder public office for the benefit of the briber
- Stakeholder  
Stage of the organizational risk management framework, composed of the following elements: organizational context, assessment of the current situation (identification, analysis and risk assessment), desired situation (mitigation plan), and monitoring

#### 4. Guiding Principles

- a. The Policy :
  - Represents an effective method to counter corruption and collusion;
  - Allows for assessment of the control measures in place;
  - Protects the reputation and assets of the NFSB;
  - Supports the decision-making process.
- b. Risk Management Plan  
The NFSB undertakes to implement a plan for managing the risks of corruption and collusion in public contracts. This plan includes, but is not limited to:
  - Assessment of the risks of corruption and collusion as well as controls in place - this step includes identification, analysis and risk assessment;
  - A risk mitigation plan (planned actions, risk owner, indicators, target, schedule and end result);
  - Monitoring and reviewing by assessing the mitigation measures put in place by the school board and reviewing risks and controls.

## 5. Roles & Responsibilities

### a. The Council of Commissioners:

- Ensures that the school board meets the requirements of the Directive through this policy;
- Ensures that responsibilities and authorities of relevant roles are assigned to strategic stakeholders, including the Contract Rules Enforcement Authority (RARC), to identify, analyze and assess the risks of corruption and collusion in contract management processes;
- Ensures that these responsibilities are communicated to all levels of the school board;
- Adopts the Risk Management Plan;
- Ensures the implementation of corrective actions following the recommendations of the Treasury Board Secretariat or the Permanent Anti-Corruption Unit (UPAC) concerning the control of the risks of corruption and collusion of its organization.

### b. The Contract Rules Enforcement Authority (RARC)

- Ensures the establishment of a plan for managing the risks of corruption and collusion;
- Recommends to the organization head (the term "organization executive" is defined in the Regulation 1.06 on the delegation of functions and powers) the identified risks as well as the risk management approach;
- Ensures the improvement of the process of managing the risks of corruption and collusion in contract management processes.

### c. The administrator involved in a contract management process:

- Assumes the management of the risks of corruption and collusion;
- Ensures accountability and monitoring of risk mitigation measures under its responsibility;
- Informs the RARC of any vulnerable situation that may affect the achievement of the organization's objectives.

End.