



COMMISSION SCOLAIRE CENTRAL QUÉBEC
CENTRAL QUÉBEC SCHOOL BOARD

**CORRUPTION AND COLLUSION RISK
MANAGEMENT POLICY**

(Adopted February 19, 2020)

POLICY

Note: The masculine gender is used throughout this document for the sake of conciseness and is meant to be inclusive of both genders.

Table of Contents

POLICY	1
1.0 OBJECTIVES	3
2.0 SCOPE AND LEGAL FRAMEWORK.....	3
3.0 DEFINITIONS	3
4.0 GUIDELINES.....	4
5.0 ROLES AND RESPONSIBILITIES.....	4
6.0 REVISION OF THE POLICY	5
7.0 ACCOUNTABILITY REPORTING.....	5
8.0 EFFECTIVE DATE	5



1.0 OBJECTIVES

To ensure the existence of a structured and standardized process to detect, analyze, evaluate, manage and monitor the risks of corruption and collusion arising from the activities of contract management processes.

To define the roles and responsibilities of various stakeholders in corruption and collusion risk management with respect to contract management processes.

To define applicable reporting mechanisms.

2.0 SCOPE AND LEGAL FRAMEWORK

This policy is intended for all employees of the Central Québec School Board (referred to as the "School Board") involved in contract management processes. It applies to all stages of the contract management process, from the assessment of needs until the end of the contract. As some contracts must be approved by the Council of Commissioners, this policy also applies to the Commissioners.

This policy is based on the Government's legal framework, which includes the Act respecting contracting by public bodies as well as the applicable regulations, policies and guidelines, namely the *Directive concernant la gestion des risques en matière de corruption et de collusion dans les processus de gestion contractuelle* (French only; referred to as the "Directive"). It is also in conformity with the School Board's Policy on Supply, Services and Construction Contracts.

3.0 DEFINITIONS

3.1 COLLUSION

Secret agreement between potential bidders who organize themselves by impeding the competition, notably by fixing prices or production, by sharing sales, or territories or by rigging the bid.

3.2 CORRUPTION

Exchange or an attempt to exchange where, directly or indirectly, an undue advantage is offered, promised or granted via a bribe or requested, accepted or received by a public office holder, in return for an action by the public office holder for the benefit of the briber.

3.3 RISK MANAGEMENT

Activities carried out for the purpose of steering and guiding an entity with respect to risk.

3.4 STAKEHOLDER

A person or entity that can either influence a decision or an activity, or that can be or presume to be influenced by a decision or activity.

3.5 RISK MANAGEMENT PLAN

A risk management framework is comprised of the following elements: organizational context, assessment of the current situation (identification, analysis and risk assessment), desired situation (mitigation measures) and monitoring.



4.0 GUIDELINES

4.1 THE POLICY

- Meets the needs of the School Board and the requirements of the Directive;
- Represents an effective method in countering corruption and collusion for the School Board;
- Allows for assessing the control measures in place;
- Is an integral part of management and takes into account other organizational processes (strategic planning, internal rules of conduct, internal policies, etc.);
- Protects the reputation and assets of the School Board;
- Assists in decision-making.

4.2 RISK MANAGEMENT PLAN

The School Board is committed to implement a plan to manage the risks of corruption and collusion pertaining to public contracts. The successful implementation of the plan depends on effective communication and stakeholder consultation. This plan includes, but is not limited to:

- The assessment of the risks of corruption and collusion as well as the controls in place. This step includes the identification, analysis and evaluation of risks;
- A plan of risk mitigation measures is comprised of planned actions, risk ownership, indicators, targets, timeline and final outcome;
- The follow-up: monitoring and review by assessing the mitigation measures implemented by the School Board and reviewing risks and controls.

5.0 ROLES AND RESPONSIBILITIES

5.1 THE COUNCIL OF COMMISSIONERS

Approves this policy and requests updates when pertinent.

5.2 THE CHIEF EXECUTIVE OFFICER

Approves the Risk Management Plan mentioned in clause 4.2 of this policy;

Ensures that the School Board complies with the requirements of the Directive through this policy;

Ensures that the responsibilities and authorities of the relevant roles are assigned to strategic stakeholders, including the Contract Rules Compliance Monitors (CRCM), in order 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;

Ensures the implementation of corrective actions following the recommendations of the Secrétariat du Conseil du trésor (treasury board) or of the Unité permanente anticorruption (UPAC, i.e. the permanent anticorruption unit) concerning the control of the risks of corruption and collusion of the organization.



5.3 DIRECTOR GENERAL

Assumes an advisory role and provides support;

Supports the Chief Executive Officer and the Contract Rules Compliance Monitor (CRCM) in accountability reporting, including monitoring the action plan for new mitigation measures.

5.4 THE CONTRACT RULES COMPLIANCE MONITOR (CRCM)

Ensures that a plan is in place to manage the risks of corruption and collusion;

Reports to the Chief Executive Officer regarding the risks identified and the risk management approach;

Ensures the improvement of the process for managing the risks of corruption and collusion in contract management processes.

5.5 THE MANAGER (SENIOR MANAGER) INVOLVED IN A CONTRACT MANAGEMENT PROCESS

Manages the risks of corruption and collusion;

Ensures accountability and follow-up of risk mitigation measures under his or her responsibility;

Informs the CRCM of any vulnerable situation that may affect the achievement of the organization's objectives.

6.0 REVISION OF THE POLICY

This policy is revised as needed.

7.0 ACCOUNTABILITY REPORTING

The School Board's reporting process consists of carrying out an annual reassessment of risks as well as monitoring the effectiveness of the actions taken to ensure that such risks are dealt with in a timely manner. The Secrétariat du Conseil du trésor may request a copy of the accountability report.

8.0 EFFECTIVE DATE

This policy comes into effect on the date of its approval by the Council of Commissioners on February 19, 2020.

