# Conflict of Interest Policy

The degree of support and respect that the Society enjoys results not only from the recognition of its mission, but also from the high degree of integrity, objectivity, and professionalism of its employees, directors and volunteers. The purpose of this policy is to establish a standard of conduct to ensure that the Society personnel act in the best interests of the organization and its members and, in pursuing this goal, maintain standards relating to conflict of interest.

These standards are intended to enhance confidence in the integrity of the Society and its personnel, as well as fair, well-informed decision-making.

The Society benefits from the expertise and experiences of individuals, who must be aware of and avoid real or perceived conflict with the interest with the Society.

The application of this policy relies heavily on the good judgment and common sense of those affected.

## Scope

This policy applies to all Society employees, directors and volunteers. Every individual is responsible for his/her conflict of interest situation.

## Definition: Conflict of interest

Conflict of interest is a situation where an individual, or an organization that has an association with the individual, has a direct or indirect competing interest with the Society’s activities. This competing interest may result in the individual being in a position to benefit from the situation or in the Society not being able to achieve a result that is in its best interests.

Conflict of interest also includes conduct that is not in keeping with the principles of neutrality and impartiality.

Conflict of interest may be:

* Actual or real, where official duties are or will be influenced by private interests;
* Perceived or apparent, where official duties appear to be influenced by private interests;
* Foreseeable or potential, where duties may be influenced in the future by private interests.

Conflict of interest includes, but is not limited to situations:

* Where an individual’s private affairs or financial interests are in conflict with their work duties, responsibilities and obligations, or result in a public perception that a conflict exists;
* That could impair the individual’s ability to act in the best interests of the Society;
* Where the actions of an individual could compromise or undermine the trust that is placed in the Society.

## Responsibility

Individuals will take responsibility for “self-declaring” possible conflicts of interest, and respectfully raising possible conflicts faced by others.

The Executive Director and Chair of the Board of Directors are responsible for applying and implementing this policy in each of their respective areas. The Executive Director and Chair will also maintain, monitor and revise the policy, authorize exceptions, and communicate to affected individuals.

The Executive Director’s own conflict of interest is the responsibility of the Board Chair. The Chair’s own conflict of interest is the responsibility of the Board of Directors.

## Confidentiality

Information provided on possible conflicts of interest and related matters will be kept confidential. If it is considered appropriate to communicate information on a possible conflict, then a declaration of the conflict of interest situation will be made and recorded. The person involved should be consulted prior to the wider declaration.

## Prevention

The intent of the policy is to avoid conflicts of interest from arising. Practical, preventive measures include:

* Providing meeting agendas in advance to enable participants to foresee possible conflicts;
* Ensuring that people are clearly told when information must be protected from improper use;
* Declining involvement in an action.

When prevention is not possible, the following steps can be taken:

* Self-declare and record real or perceived conflicts of interest;
* Speak with the Chair or Executive Director;
* Take action, including:
  + Restrict involvement of individual and remove from affected duties
  + Recruit a third party to assist
  + Relinquish private (conflicting) interest
  + Resign from official duties
  + Document what has been done

## Conflict of interest agreement

Individuals will immediately disclose to the Executive Director or Chair, in writing, any professional, business, commercial or financial interest where such interest might be construed as being in real or perceived conflict with their duties.

## Performance of duties

An individual will not vote on, or participate in, any discussion about a resolution to approve a contract or agreement in which he/she has an interest, nor will an individual approve and/or sign off on such circumstances.

In the performance of their duties, individuals must:

* Avoid situations that would conflict with the discharge of the duties;
* Avoid disclosing information that was acquired through the Society and that would not be otherwise available;
* Avoid communicating on behalf of the Society, unless specific authorization has been provided;
* Avoid the possibility of any preferential treatment to any person or organization;
* Avoid using Society property or information for anything other than as approved.

# Financial

Staff, directors and volunteers must not commit the Society to any expenditure without the authorization of the Executive Director.

## Vendor relationships

Staff and volunteers in leadership roles will not perform fee-for-service responsibilities for the Society in addition to their responsibilities to the Society. Goods shall not be purchased from a volunteer or relative of an employee without consultation with the Executive Director (in the case of staff) or Chair of the Board of Directors (in the case of directors).

## Client relationships

Conflict of interest situations between employees/directors/volunteers and clients are investigated immediately and resolved as appropriate.

## Breach of conflict of interest

Individuals are required to consult with the Executive Director or Chair whenever they have any question as to whether a particular circumstance may place them in a conflict of interest.

Persons who fail to comply with these standards will be subject to such appropriate measures as may be determined by the Society.

## Reservation of rights

Where an individual fails to disclose a conflict or an interest according to this policy, or according to other laws or regulations in Canada, the Society reserves all rights it may have to deal with the contract, conflict and individual involved.