CONFLICT OF INTEREST

[Organization Name] is committed to ensuring the continuation of healthy and equitable relationships between the organization's clients and staff. There must be no conflict between an employee's private interests and their responsibilities to the organization and the public. Such conflicts can place the company’s reputation in jeopardy and, in certain cases, put an employee’s safety at risk.

DEFINITIONS

Conflict of interest:

* a situation in which an employee's interest or the interest of their close friend, family member, business associate, corporation, or partnership has a significant stake,
* a person to whom the employee owes an obligation could influence their decisions and impair their ability to act in the organization's best interests or to represent the organization fairly, impartially, and without bias.

A "conflict of interest" exists if a decision could be influenced. The influence does not necessarily have to take place. The conflict can be real or perceived.

*“Gift or other advantage* means

* (a) an amount of money if there is no obligation to repay it; and
* (b) a service or property, or the use of property or money that is provided without charge or at less than its commercial value. (*cadeau ou autre avantage*)” Source: [*Conflict of Interest Act*](https://laws-lois.justice.gc.ca/eng/acts/c-36.65/page-1.html#h-92024)

A "relative" is defined in this policy as the following: parents, siblings, children, married or common-law partners, and the partner's parents, siblings, and children.

Private practice refers to any services provided for compensation to a client, whether an individual or an organization.

POLICY

All employees are required to act in the organization's and its stakeholders’ best interests.

All employees must ensure that any actions and decisions taken within their area of responsibility are free of any interest that could reasonably be construed as conflicting with the organization's interests.

No employee may gain a direct or indirect benefit, monetary or non-monetary, from a contract or transaction, nor may they use their affiliation with the organization or their position in the organization for their own personal gain.

When an employee or their immediate family enters into a contract with [Organization Name] for goods and/or services, the organization's established contract award procedures will be followed.

Alternate Work or Engagements

An employee is permitted to maintain a secondary source of employment provided it will not interfere with their duties at [Organization Name]. They must fully disclose the secondary employment or relationships with competing organizations, suppliers, or vendors.

If an employee agrees on speaking engagements, workshops, consultation, or other services in areas or topics related to the [Organization Name]’s mandate, the employee will consult with the [Insert Position]. When determining whether an outside engagement will be with an organization or a private business, the following considerations will be made:

* the degree to which the work relates to the organization,
* whether the contract is planned and executed in the organization's name and during the employee's regular working hours
* If an external contract is determined to be [Organization Name]’s business, the employee will be compensated for all expenses incurred and access to equipment such as photocopiers.

Relatives or Partners

Relatives or partners of an [Organization Name] employee will not be hired or placed in positions of direct supervisory/subordinate responsibility to that employee. Management must consider the following factors:

* Distance of relationship between the employee and the relative in question
* Employment type: permanent vs. temporary
* No employee will be directly involved in their relative's hiring process, but they may consult the hiring committee.

External Gifts

Accepting gifts, honours and favours in connection with official duties may give rise to an apparent conflict of interest, as it may be seen to create an obligation.

Employees of [Organization Name] are prohibited from accepting gifts (item, product or service offered by any current or potential customer or vendor), money, discounts, meals, tickets to events, or favours including a benefit to family members, friends or business associates in return for completing any work that we pay them to do, with the exception of promotional gifts (i.e. promotional coffee mug, t-shirt, etc.) or gifts with a monetary value of less than (Insert amount).

Employees are directed to report any customer attempt to create bias or offer of a gift with a monetary value in excess of (Insert amount) to management. In the event that any employee receives a gift that carries a monetary value in excess of (Insert amount), they are directed to notify management and return it to the sender with written acknowledgement of the gift and politely decline the acceptance of the gift by making reference to our Conflict of Interest Policy.

Board of Directors [Remove if Not Applicable]

Before taking a paid position, a board member or director must resign from the Board of Directors. If the former director is unsuccessful in the competition, they must wait a minimum of one year before applying to volunteer as a director again, and their suitability to continue on the Board will be evaluated by the [Board Chair and Executive Director].

Responsibilities

Employees are responsible for reporting conflicts of interest, real or perceived to management. Employees who find themselves in a conflict of interest, or possible conflict, must immediately inform management about the conflict.

Employees who are unsure about whether they have a conflict of interest, or who are unsure how to remove themselves from a conflict of interest, are directed to bring the possible conflict situation forward to management for discussion.

Managers are responsible for investigating conflict then taking the appropriate action as needed. This might include corrective action, investigation, or working with the employees in question to find a resolution to the conflict.

Failure to comply with this policy may result in disciplinary action, up to and including termination.