

Section: 7.02 STAFF RESPONSIBILITIES	Staff
Policy No: 7.02.4 Staff, Students and volunteers (non-board) Conflict of Interest	Pages: 3
Implementation Date: November 2010	Reviewed: June 2012, 2016 Next Review: June 2020
Cross Reference: Student and Volunteer Manuals; Board conflict of Interest Policy # 28	Approved By: Executive Director

POLICY:

Employees, students and volunteers (non-Board) of the Vaughan Community Health Centre (VCHC) must act with personal integrity, ethics, honesty and diligence in performing their duties for the organization. In addition, they must arrange their personal and private affairs in such a manner that the public confidence and trust in the integrity, objectivity and impartiality of VCHC is conserved and enhanced.

Definition:

A conflict of interest refers to a situation in which private/personal interests may affect an employee's judgment in acting in the best interest of the VCHC and/or its clients. It includes using an employee's position, confidential information or organization's time, material or facilities for private/personal benefit, gain or advancement. A conflict may occur when an interest benefits any member of the employee's family, as well as an employee's friends or business associates.

The following examples are set out to illustrate situations which the VCHC considers to be a conflict of interest:

- The use of jobs/positions to get any special treatment that would advance personal interest.
- Although in some instances a gift may be a cultural expression of appreciation and gratitude, the acceptance of tangible gifts of significant monetary value, such as money, jewellery or clothing is perceived as conflict of interest. The exceptions to this are gifts, customary hospitality or other benefits of nominal value.
- Accepting monetary donations. Money can only be accepted in the name of VCHC and must be in exchange for a charitable tax receipt.
- Lending money to clients.
- Soliciting clients that are registered to VCHC while working in an outside office e.g. your own business, private practice, or for private research, or personal benefit.
- Allowing your activities (employment, business, or other) outside of VCHC to compromise your capacity to perform your job responsibilities.

- Deriving direct or indirect benefits or interest from any of the Centre's contracts or transactions.
- Benefiting from the use of information acquired during the course of official duties, which is not generally available to the public.
- Being involved in the hiring process when a family member or friend has applied for a position with VCHC.
- Using or permitting the use of, items of VCHC property, facilities, equipment, supplies or other resources for activities not associated with their work unless otherwise permitted.
- Providing services to people who are not registered clients of VCHC (e.g., personal friends or clients from outside offices).
- Taking improper advantage of previous employment with VCHC by former employees.

The above is not an all inclusive list of situations of conflict of interest. Rather, it is just a sampling of situations which the VCHC considers to be more common situations of conflict of interest.

GUIDELINES:

1. All employees, students and volunteers (non-Board) are expected to disclose any possible conflict of interest to their immediate supervisors, who will discuss the matter with the Executive Director (also see Participation in Social Action Initiatives Risk Management Protocol).
2. Situations that are not covered directly by these guidelines shall be referred to the immediate supervisor or Executive Director.
3. Where an employee has any thought that a situation might possibly be considered a conflict of interest, the employee shall report the situation to VCHC management.
4. No staff member may be elected or appointed to the VCHC Board of Directors. Former staff members must not be employed by the Centre for at least 24 months before being elected or appointed to the Board.

Failure to Disclose:

Employees, students and volunteers who fail to disclose a conflict of interest are subject to disciplinary action, up to and including termination of employment.

Workplace Relationships:

Another separate area where conflict of interests may arise is within workplace relationships. Relationships outside of work between employees can sometimes lead to conflicts in the

workplace or the appearance of impropriety. For this reason, we ask employees to help us avoid these types of problems before they occur.

If a relationship develops outside of work between employees where one of the employees is in a position of employment above that of the other employee (supervisory relationship), the respective employees are required to promptly disclose the relationship to the direct supervisor of the employees.

To further avoid the appearance of impropriety, an employee is not allowed to supervise/manage their dating partners, relatives, or cohabitants.

No relative or person living in a family type situation may report directly to one another nor can they be directly involved in the hiring of one of their relatives. In the case of promotion, the situation will be reviewed on a case-by-case basis; however, the employer is committed to having a workplace free of conflict in hiring or promotions.

In all cases, the Centre reserves the right to take unilateral action to eliminate any actual or potential conflicts with this policy. An employee who fails to satisfy these notification requirements or fails to assist our effort to address these types of problems before they occur will be subjected to appropriate disciplinary action, up to and including termination.