Policy

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

These standards are intended to enhance public confidence in the integrity of the Society and its personnel. The Society benefits from the expertise of individuals with a multiplicity of interests; however, those interests must not conflict with the interests of the Society nor impair the public support and respect necessary for the operation of the Society.

In addition to the forgoing, employees and volunteers in all their endeavours are to remain cognizant of the Fundamental Principles of the Society of neutrality and impartiality.

Scope

This policy applies to all employees and volunteers of the Society.

Definitions

Conflict of interest
A situation where an individual, or the organization he/she represents or has an interest in, 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 in the best interest of the Society.

A conflict may arise where an individual is a party to a contract with the Society or has an interest in an enterprise, or is related to a person who is party to such a contract; or where an individual receives payment by the Society for services rendered to the Society other than reimbursement for reasonable out-of-pocket expenses measured according to the Society’s policies on expense reimbursement.

Conflict of interest for the Society also includes conduct which is not in keeping with the Fundamental Principles. In particular, the principles of neutrality and impartiality cannot be comprised.

Conflict of interest includes, but is not limited to situations
- Where an employee or volunteer’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
- Which could impair the employee or volunteer’s ability to act in the public interest
- Where the actions of an employee or volunteer would compromise or undermine the trust that the public places in the Society.

Policy application

Conflict of interest agreement
Before or upon assuming their official duties, employees and volunteers shall sign a document certifying that they have read and agree to abide by these standards. Refer to Appendix A – Conflict of Interest Agreement. Employees have a responsibility to review their obligations yearly. For volunteers, they should review when appropriate or subject to their assignment.
All employees and volunteers shall immediately disclose to their supervisor/manager, in writing, any business, commercial or financial interest where such interest might be construed as being in real, potential or apparent conflict with their official duties.

**Performance of duties**
An employee or volunteer will not vote on, or participate in, any discussion about a resolution to approve a contract in which he/she has an interest, nor will an employee or volunteer approve and/or sign off on such circumstances.

In the performance of their duties, employees and volunteers must not:
- Place themselves in a position of obligation to persons who might benefit or appear to benefit from special consideration with respect to Society business
- Have a monetary interest that would conflict with the discharge of the duties owed to the Society
- Disclose, discuss, use, take advantage of, benefit or appear to benefit from the use of information not generally available to the public and which has been acquired during their official Society duties
- Communicate with any level of government, or with any elected or appointed government official in relation to the business of the Society, unless they have specific Society authorization
- Assist private entities or persons in their dealings with the Society where this could result in preferential treatment to any person
- Directly or indirectly use, or allow the use of, Society property or information for anything other than officially approved activities

**Outside employment**
Staff members may engage in remunerative employment with another employer, volunteer activity, carry on a business, or receive remuneration from public funds for activities outside their position provided that:
- It does not interfere with the performance of their duties
- It does not bring the Society into disrepute
- They do not have an advantage derived from their employment as a Society employee
- It is not performed in such a way as to appear to be an official act or to represent the organization’s public positions or policies, including the Fundamental Principles
- It does not involve the use of Society premises, services, equipment or supplies to which the staff member has access by virtue of their employment, unless official authorization is secured.

**Gifts**
Staff and volunteers must avoid the appearance of favouritism in all of their dealings on behalf of the Society and not accept personal gifts from those doing business or seeking to do business with the Society.

**Financial**
Staff and volunteers must not commit the Society to any unauthorized expenditure or other liability and must ensure that all commitments are approved in accordance with the appropriate by-laws, regulations and policies including all appropriate consultations and approvals.

**Vendor relationships**
Staff and volunteers in leadership roles will not perform fee for service responsibilities for the Society in addition to their responsibilities as an employee or leadership volunteer of the Society. Nor will employees sell goods to the Society, unless by specific approval of the general counsel.
Goods shall not be purchased from a volunteer or relative of an employee without consultation with applicable General Manager or National Office department head and a determination made as to whether the correct processes were undertaken and the impact of the decision. Where there is doubt on the subject, the issue is to be referred to the general counsel.

Client relationships
All employees and volunteers are to understand the client’s vulnerability and dependence on the employee/volunteer to provide assistance, and to act accordingly. This includes recognition that personal relationships outside the scope of their professional roles are not in the best interest of either party or the Society. For more information, refer to Section 7, Duty of Care/Client Protection, or more detailed administrative procedures relating to the applicable program.

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

Breach of conflict of interest
Employees and volunteers are required to consult with their supervisor/manager 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 during the course of their employment will be subject to such appropriate measures as may be determined by the Society including dismissal from employment.

Persons who fail to comply with these standards following termination of employment with the Society hereby acknowledge that the disclosure of confidential information will result in irreparable harm to the Society and the Society shall have the right to enforce its lawful rights and remedies against any offending person.

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.

Responsibility
The National Director, Human Resources, is responsible for advising stakeholders, maintaining, monitoring, and revising this policy; and for authorizing exceptions. Members of the Society Management Team are responsible for applying and implementing this policy in each of their respective areas.