



## **CONFLICT OF INTEREST POLICY**

### **INTRODUCTION / PURPOSE**

- To ensure that Councilors understand their obligation to avoid any activity, agreement, business interest or investment, or other situation that could create a real or perceived conflict of interest between the Councilors personal or financial interests and the best interests of the CDSS.

### **SCOPE**

- This policy applies to Councilors, Committee members and staff of CDSS

### **ROLES AND RESPONSIBILITIES**

- Each person is responsible to ensure that they exercise good judgment and observe ethical standards in their private activities outside of their involvement with CDSS that can affect the Organization.

### **PROCEDURE**

CDSS expects all Councilors to exercise good judgment and observe high ethical standards in their private activities outside their Council appointment that can affect the Organization in any way. Every Councilor has an obligation to avoid any activity, agreement, business interest or investment, or other situation that could create a real or perceived conflict of interest between the Councilor's personal or financial interests and the best interests of CDSS.

To that end, Councilors are required to:

a) have no business relationships or investments that might affect their judgment or influence their decisions concerning CDSS business.

b) not to receive or accept any bribes, secret commissions, kickbacks, personal favours, services or products as a result of or connected in any way to their work for CDSS that might affect their judgment or influence their decisions concerning CDSS business.

c) promptly and fully disclose to CDSS in advance for Council approval any financial or other interest that the Councilor or any member of the Councilor's family or household may have in a



business or venture (including but not limited to any supplier/vendor, insurance company or government agency) that currently or seeks to do business with the CDSS or vis versa.

d) obtain written approval from CDSS prior to accepting any employment or contract work elsewhere if it might interfere with the Councilors ability to serve impartially on the Council.

f) disclose to CDSS any nepotism that is prevalent between yourself and another Council member, CDSS employee, Public or Government agency doing, or seeking to do business with CDSS or vis versa.

g) No Council Member shall accept gifts, entertainment, or favours from an individual, his family, or

from an organization or entity who

- i. is an employee or contractor of CDSS;
- ii. does or is seeking to do business with CDSS;
- iii. has, or may have, a financial interest in the policies of CDSS;

except when such gifts:

- (a) are of a nominal value,
- (b) appear to be merely tokens of respect or friendship,
- (c) do not appear to be intended to influence the recipient with respect to a particular transaction or CDSS activity, and
- (d) are disclosed to President or Council Chair at the first available opportunity.

Any violation of this policy may result in a Council member being removed from Council.

Annually the President/Council Chair will circulate the Conflict-of-Interest form and evaluate any perceived or actual conflict of interest disclosed. This form must be returned to the Council Chair.

## **I. CONFLICT OF INTEREST**

- (a) A conflict of interest refers to personal, occupational or financial considerations that may affect, or appear to affect, a member of council, term committee member, or the registrar's objectivity, judgment or ability to act in the best interests of the College.
- (b) The personal interests of immediate family members or close personal or business associates of a member of council, term committee member, or the registrar are considered to also be the personal interests of the council member or registrar.



- (c) A perceived or apparent conflict of interest may exist when a reasonable, well-informed person has a reasonable belief that a member of council, term committee member, or the registrar has a conflict of interest, even if there is no real conflict.
- (d) Full disclosure, in itself, does not remove a conflict of interest.

## **II. DETERMINING WHETHER A CONFLICT OF INTEREST EXISTS**

- (a) Members of council and the registrar shall disclose a potential, real or perceived conflict of interest as soon as the issue arises and before the College or its committees are to deal with the matter at issue.
- (b) Other members of council who are aware of a potential, real or perceived conflict of interest on the part of a fellow member of council, term committee member, or the registrar should raise the issue for clarification first with a member of council, term committee member, or the registrar in question, and if the matter remains unresolved, then with a member of the Executive Committee.
- (c) In circumstances involving a conflict of interest, a member of council, term committee member, and the registrar are encouraged to consult informally with the Executive Committee to seek guidance.

The Executive Committee may engage legal counsel for clarification or assistance in the determining whether a matter constitutes a potential, real or perceived conflict of interest.