



Name of Manual:	Human Resources	Policy # 18.0	Page 1 of 3
Policy Title:	CONFLICT OF INTEREST GUIDELINES FOR NORTH LAMBTON CHC STAFF & VOLUNTEERS	Original Date:	November 2000
Prepared by:	Resources Committee	Reviewed Date:	January 2020
Approved by:	Board of Directors	Approved Date:	May 2020

1. PURPOSE

Employees and Volunteers of the North Lambton CHC are encouraged to avoid involvement in any situation, activity, or issue which could present a real or potential/perceived conflict of interest, either for the employee or the North Lambton CHC or for/to the people who utilize the services provided by the North Lambton CHC.

2. SCOPE

This policy applies to all North Lambton CHC employees, students, and volunteers.

3. POLICY

3.1 A North Lambton CHC employee shall not engage in any private work, business undertaking, or volunteer or community services:

- That is likely to result in a real, perceived, or potential conflict of interest.
- That interferes with the individual's ability to perform his or her duties and responsibilities.
- In which an advantage is derived from his or her employment as a North Lambton CHC employee.
- In a professional capacity that will, or is likely to, influence or affect the carrying out of his or her duties as a North Lambton CHC employee.
- That involves the use of the North Lambton CHC premises, equipment, or supplies

3.2 Confidential Information is any information (client, contract, technology or innovation) that is not available to the public and that, if disclosed, could result in loss or damages to the North Lambton CHC or could give the person to whom it is disclosed an advantage.

3.3 Relative or family member is defined at the employee's: spouse or same sex partner, child, step child, parent, brother, sister, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, grandparent, grandparent of spouse or grandchild, aunt, uncle, niece, nephew or cousin.

4. EXAMPLES OF POTENTIAL CONFLICT OF INTEREST SITUATIONS

A Conflict of Interest situation may occur under the following circumstances:

- a) An employee or volunteer becomes a member of a public or private board or committee and in the course of participating in its activities, becomes involved in an issue which could conflict with the values, goals, and objectives of the North Lambton CHC.

- b) An employee or volunteer who is in a position to influence a decision of the North Lambton CHC Board or administration, in dealing with a company in which the employee or volunteer, or member of the employee's immediate family or a member of the volunteer's immediate family, has a pecuniary interest, or which employs a member of the employee's or volunteer's immediate family or close friend of the employee.
- c) An employee or volunteer provides a service or operates a business, such as a health-related private practice, which is in direct competition with activities offered at the North Lambton CHC.
- d) An employee or volunteer provides a service or operates a business and uses her/his position at the Health Centre to solicit, or otherwise attract, clients of the North Lambton CHC, utilizes North Lambton CHC property for business purposes and/or performs work related to the service or business on North Lambton CHC time.
- e) An employee or volunteer engages in outside employment, or related activities, which otherwise creates a conflict of interest.

Where such circumstances occur, an employee or volunteer is required to declare a potential conflict of interest using the following procedure.

5. PROCEDURE

5.1 To Deal with Potential Conflict of Interest Declarations

- Whenever an employee or volunteer considers that she/he may be in a conflict of interest situation, the employee/volunteer is required to declare the potential conflict in a written submission to the Executive Director, or their Team Lead (outlining the details of the situation).
- The Team Lead, with direction from the Executive Director, will assess the written submission within seven business days and may meet with the employee or volunteer to seek clarification or additional information; a written response will be prepared clarifying whether or not the circumstances place the employee in a conflict of interest position.
- If the employee or volunteer is in a conflict of interest situation, the Executive Director's response will outline the North Lambton CHC expectations and time frames for the employee/volunteer to ensure she/he is no longer in this conflict of interest position(s).

5.2 Avoidance of Preferential Treatment

- A North Lambton CHC employee or volunteer shall not grant preferential treatment in relation to any official matter to any person, organization, relative or friend, or to any organization in which the employee, relative or friend has an interest.
- A North Lambton CHC employee shall not hire or contract with relatives or friends or occupy a position where one relative or friend reports directly to another.

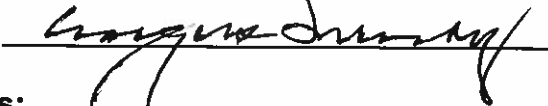
- A North Lambton CHC employee shall recuse themselves from any discussions regarding the awarding of any contracts to any person or organization where there is an actual or perceived conflict of interest.

5.3 Failure to Comply

If an employee/volunteer fails to take the steps set out by the Executive Director to resolve a conflict of interest situation or neglects to declare a potential conflict of interest, and is later found to have violated the North Lambton CHC policy in this regard, disciplinary action up to, and including, termination of employment or service may be taken by the North Lambton CHC. Refer to Policy #10.0.

Policy Reviewed and Adopted by Resources Committee:

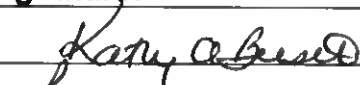
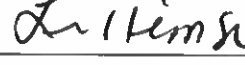
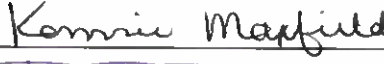

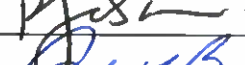



Date: 12 May 2020

Resources Representative: 

Policy Reviewed and Adopted by Board of Directors:

Date: 26 May 2020

Board of Directors Representative: 

Policy Approved by:	Signature:	Date:
Executive Director		7-13-20
Quality & Chronic Disease Team Lead		7-3-20
Data Management Team Lead		June 30/20
Finance Team Lead		June 23/20
Health Promotion Team Lead		July 8/20
Risk Management Team Lead		July 17/20
Primary Care Team Lead - North		July 15, 2020
Primary Care Team Lead - West		July 24, 2020