

<b>West Neighbourhood House</b>	
Policy Title:	<b>Conflict of Interest</b>
Approved by:	West Neighbourhood House Board of Directors
Approval date:	February 2006
Revision dates:	December 2011 / September 2015 / April 2019 / /

## **Policy Statement**

A conflict of interest exists in any decision-making situation where personal or business interests of a Board member, staff or volunteer conflict, or could be perceived to conflict, with the best interests of West Neighbourhood House.

Any actual or potential conflicts of interest which may currently exist or may occur in the future must be declared. Individuals covered by this policy will not seek to receive or give any benefit, advantage, gain or privilege for themselves, for any business in which they have an interest or for any family members or businesses in which they have an interest or a perceived interest.

Should someone become aware of such a conflict of interest, it must be immediately reported to the appropriate Unit Director/Manager. For conflict of interest situations involving a Unit Director/Manager it should be reported to the Executive Director. For a conflict of interest situation involving the Executive Director or a Board member it should be reported to the President of the Board.

## **Applicability**

- All Staff
- Students
- Volunteers
- Donors

## **General Principles**

A higher standard of due diligence is required for non-profit organizations where even the perception of a conflict of interest can be as damaging to its reputation and credibility as an actual conflict. For this reason, the zone of personal responsibility of the individual is extended to include friends and immediate family members by birth, adoption and marriage (spouse or common law partner, parent, siblings, children and in-laws) when judging whether a conflict exists or could exist.

This can involve the individual, friends or immediate family members, directly or indirectly giving and/or receiving a personal benefit, gain, privilege or advantage through an insider relationship. The individual is, or can be seen, to be serving competing interests – their own interests and that of the organization. In this case, independent judgment and objectivity are threatened, or could be perceived to be threatened.

Volunteers serving on non-profit Boards of Directors must use their good judgment and experience for the best interest of the organization and the proper use of public and donor funds, uncompromised by personal, business, friendship or family interests.

Management, staff, and volunteers must make organizational and business decisions based solely on the organization's requirements. The expectation is for all inside parties to operate at arm's length with all outside parties with which West Neighbourhood House does business. West Neighbourhood House must treat and be seen to be treating everyone equally, fairly and objectively.

West Neighbourhood House will adopt and enforce all reasonable measures to ensure that business, organizational and employment decisions are not tainted by conflicts of interest.

## **Procedures**

### **Declarations**

All Board members, staff, students or volunteers will acknowledge that they have received and read the Conflict of Interest Policy and will have it explained. All individuals will be advised to avoid all actual or potential conflicts of interests in their business dealings for West Neighbourhood House and to immediately report any instances that do occur. Conflict of interest requirements will be clearly set out in the Board Manual and be part of an annual Board orientation as well as in orientation for new staff.

### **Board or Committee Meetings**

At Board or committee meetings, any Board member, staff, student or volunteer upon becoming aware of a personal, friend or family interest in an item must immediately declare this. If it is determined that a conflict actually does or could exist, the individual will abstain from any further discussion or voting on the item in question at this or any future meeting until a decision is made. At Board meetings, the individual may be asked to leave the meeting while the item is under discussion. Quorum is not affected by this temporary absence. Minutes of Board and committee meetings must record that a declaration was made and the actions that were taken to contain and avoid it.

### **Employment Decisions**

Board members must resign their positions or take a leave of absence before they intend to compete for any permanent or contract position at West Neighbourhood House.

To ensure the Board benefits from the full and focused judgment of all of its members, no two immediate family members may sit on the Board at the same time. Nor may a Board Member be an immediate family member of the Executive Director, senior manager or any other staff normally reporting to or advising the Board on significant business decisions. Should such a situation occur, one of the parties must resign.

### **Board Member Expenses**

Board members shall serve without profit or remuneration of any kind whether direct or indirect. A Board Member may be reimbursed for reasonable expenses (out-of-pocket) incurred while conducting business for the organization, as approved by the Board.

### **Due Diligence**

Anyone who believes another individual has or might have an interest that could result in a conflict of interest has a duty to report this as soon as reasonably possible. The Board or management, as appropriate, shall determine if a conflict exists or could exist and will take the required steps to address it.

### **Management Due Diligence**

Management and all staff with the authority to make decisions or advise on contracts, purchases and hiring/promotion must equally avoid conflicts of interest.

As the Executive Director is responsible for the proper and ethical operation of the organization, they must ensure that effective safeguards are in place and enforced.

All staff with a conflict of interest shall absent themselves from discussions or decisions on the contract, purchase or hiring in question.

### **Objective Business Practices**

Procedures for all contracts (goods, services, employment) should be based on a standard set of job specifications or a current job description as appropriate. Reviews of submissions or applications/interviews shall treat all bidders/applicants equally and objectively. Contracts for goods and services shall be awarded as outlined in the Procurement Policy. Offers of employment shall be made to the most suitable applicant, consistent with the collective agreement, other relevant organizational policies and labour practices.

Appropriate to the amount of the contract, and periodically for recurring supply or service contracts, a process of competitive tendering or invitational bidding should be initiated to avoid any appearance of bias or favouritism as outlined in the Procurement Policy

### **Failure to Declare**

Any Board member, staff, student or volunteer who fails to declare a conflict of interest that is subsequently discovered will be investigated which may lead to disciplinary action including termination, depending on the severity of the breach.

## **Acknowledgement of Policy**

I acknowledge that I have received and read the Conflict of Interest Policy and have had it explained to me.

I understand that it is my responsibility to abide by this policy and related policies of West Neighbourhood House as a condition of my employment and participation in West Neighbourhood House.

Date: \_\_\_\_\_

Name of Employee/Volunteer: \_\_\_\_\_

Signature: \_\_\_\_\_