



Conflict of Interest: Policy and Procedure

*Sistering's Policy and Procedure on Conflict of Interest – Human Resources Approved
November 2003*

Preamble: Sistering staff, students, and volunteers are expected to conduct themselves with personal integrity, ethics, honesty, and diligence in performing their duties for the organization. Staff, students, and volunteers are required to support and advance the interests of the organization and avoid placing themselves in situations where their personal interests actually or potentially conflict with the interests of Sistering.

Definition: A conflict of interest refers to a situation in which private interests or personal considerations may affect the judgement of a staff person, student, or volunteer in acting in the best interest of Sistering. It includes using their position, confidential information, or organizational time, materials, or facilities, for private gain or advancement, or the expectation of private gain or advancement. A conflict may also occur when an interest benefits any member of the staff person's, student's, or volunteer's family or friends.

Conditions: The rules and examples that follow do not exhaust the possibilities for conflict of interest, but they identify obvious situations covered by the policy:

- 1) *Special Treatment:* Staff, students, and volunteers are not allowed to use their positions to give anyone special treatment that would advance their own interests or that of any member of their family and/or friends.
- 2) *Receiving Fees or Gifts:* Staff, students, and volunteers may not accept gifts, money, discounts, or favours, including a benefit to their family members or

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friends, for doing work that Sistering pays them to do. The only exception to this are gifts of nominal value (e.g., coffee mug or small trinket from a program participant), although it is expected that the supervisor will be informed of such gifts.

Staff, students, and volunteers may not act as executor, or trustee, or be involved in directing a program participant's decision about the contents of their will as this could be a conflict of interest. Gifts of monetary value may only be accepted on behalf of Sistering as an organization and passed on to the organization.

Sistering has programs and projects that support program participants in productive activities to supplement their incomes. Staff, students, and volunteers are encouraged to support the participants through the purchase of products or through the contracting of services, but are expected to pay fair market value for such.

- 3) *Using Sistering Property:* Staff, students, and volunteers may not use, or permit the use of, items of Sistering property, facilities, equipment, supplies, or other resources, for activities not associated with their work. A manager must expressly approve any exceptions to this.
- 4) *Confidential Information:* Staff, students, and volunteers may not disclose confidential or privileged information about the program participants or use confidential information to advance personal or others' interests.

Requirement to Report Conflict of Interest: If staff, students, volunteers, or their family members or friends, have a personal or financial interest that might present a conflict or bias in connection with their duties at Sistering, they must report this conflict to their executive director / manager(s) in writing (on the Sistering provided form).

It is assumed that minor conflicts can be minimized or avoided through individual discretion / judgement and regular discussion or consultation with the

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supervisor. If, after disclosure of the relevant facts, the situation described reveals a real or apparent conflict, those involved should attempt to resolve the issue informally. In many cases, administrative adjustments will ensure that the opportunity to influence decisions is minimized or avoided.

If resolution is not reached through this process, the Executive Director will make a binding decision.

Failure to Comply With the Policy: Staff, students, and volunteers who fail to comply with this policy are subject to disciplinary action up to and including dismissal.

Implementation: Managers must make the policy available to all staff, students, and volunteers. They must discuss the entire policy with them and highlight any of the rules that have particular relevance, given the nature of the staff, student, or volunteer work. Managers who need assistance interpreting rules and how they apply to specific situations must talk to the Executive Director. Serious consequences may result from the contravention of this policy. Staff, students, and volunteers should check with management if they need assistance in interpreting whether a situation they have experienced or are confronting puts them in a conflict of interest situation.