

Conflict of Interest Policy – for Board members/ Committee Volunteers and Employees



I. PREAMBLE:

Firstly, a unique quality of the Britannia neighbourhood is the symbiotic relationship that exists amongst its people in their roles as residents, as local workers and as community volunteers. With a particular concern for bettering the quality of life in their community; combined with the many skills and talents they have to offer, countless individuals assume more than one of these roles concurrently. At times the interests associated with the various roles at Briannia may be at cross-purposes.

Secondly, many employees, board members and committee volunteers who are involved in the management of Britannia Community Services Centre Society and in the delivery of its programs are also highly dedicated to other pursuits. It is common that individuals have a personal stake in issues ranging from the immediate neighbourhood to the global level. With such a broad scope of concerns there are bound to be instances when priorities may be at odds with one another.

Thirdly, the public holds a high expectation for the impartiality and trustworthiness of those involved in the management of Britannia Community Services Centre Society and in the delivery of its programs. The confidence of the public, whether they be participants or observers, is essential to the effectiveness of the organization in achieving the goal of meeting the needs and interests of local citizens. Given that Britannia employees, board members and committee volunteers all act as stewards of publicly owned and publicly supported assets it is clearly expected that decisions need to be enacted in the best interest of the overall community; rather than for personal gain.

This policy aims to guide actions of employees, board members and committee volunteers involved with Britannia Community Services Centre Society and will shall ensure the maintenance of public trust at the highest of standards.

II. CONFLICT OF INTEREST GUIDELINES

1. Definition

- 1.1 A "conflict of interest" is any situation where
- a) your personal interests, or
 - b) the interests of a close friend, family member, business associate, corporation or partnership in which you hold a significant interest, or a person to whom you owe an obligation may prevent you from acting:
 - i) in the Society's best interests, and
 - ii) on behalf of the Society fairly, impartially and without bias.

General Duties

- 1.2 You must arrange your private affairs and conduct yourself in a manner to avoid
- a) a conflict of interest, or
 - b) the appearance of a conflict of interest.
- 1.3 Unless authorized to do so, you may not

- a) act on behalf of the Society, or deal with the Society, in any matter where you are in a conflict of interest or appear to be in a conflict of interest, nor
- b) use your position, office or affiliation with the Society to pursue or advance your personal interests or those of a close friend, family member, business associate, corporation or partnership in which you hold a significant interest, or a person to whom you owe an obligation.

- 1.4 You must immediately disclose a conflict of interest in writing to the Board of Directors or a person the board designates. It is important to make the disclosure when the conflict first becomes known. If you do not become aware of it until after a transaction is concluded, nevertheless you must still make disclosure immediately.
- 1.5 If you are in doubt about whether you are or may be in a conflict of interest, you must request the advice of the Board of Directors.
- 1.6 If there is a perceived conflict of interest, and it is challenged by an individual member the Board of Directors will then vote.
- 1.7 Unless otherwise directed, you must immediately take steps to resolve the conflict or remove the suspicion that it exists.

2. **More about Avoiding a Conflict of Interest**

- 2.1 You must not personally benefit from any transaction involving the Society except in unique situations, authorized in accordance with these rules.
- 2.2 You must not indirectly benefit from any transaction involving the Society except in unique situations, authorized in accordance with these rules.
- 2.3 An "indirect benefit" is
 - a) a benefit derived by a close friend, family member, business associate, or corporation or partnership in which you hold a significant interest, or
 - b) a benefit which advances or protects your interests although it may not be measurable in money.
- 2.4 You must not use your relationship with the Society to confer an advantage on yourself or on a close friend, family member, business associate, corporation or partnership in which you hold a significant interest, or a person to whom you owe an obligation.

3. **Using Society Property and Society Information**

- 3.1 You must have authorization to:
 - a) use property owned by the Society for personal purposes, or
 - b) purchase Society property unless it is through usual channels of disposition equally available to the public. Even then, you may not purchase the property if you are involved in some aspect of the sale.
- 3.2 You may not take personal advantage of an opportunity available to the Society unless
 - a) it is clear that the Society has irrevocably decided against pursuing the opportunity, and
 - b) the opportunity is equally available to members of the public.

- 3.3 You may not use your position with the Society to solicit clients for a personal business or one operated by a close friend, family member, business associate or a corporation or partnership in which you have a significant interest. This duty does not prevent you or anyone else from transacting business with other people connected with the Society.
- 3.4 "Society information" is information which is acquired solely by reason of involvement with the Society and which the Society is under an obligation to keep confidential.
- 3.5 You may have access to Society information only for Society purposes.
- 3.6 You must not use Society information for your personal benefit.
- 3.7 You must protect Society information from improper disclosure.
- 3.8 You must report any incident of abuse of Society information.
- 3.9 You may divulge Society information if:
 - (a) you are authorized to release it; and
 - (b) it is to a person who has a lawful right to the information.
- 3.10 If you are in doubt about whether Society information may be released, you must request advice from the Board of Directors or a person the board designates.

4. Transactions That Cannot Be Authorized

- 4.1 You may not directly or indirectly benefit from a transaction with the Society over which you are in a position to influence decisions made on behalf of the Society.

5. Rules About Gifts

- 5.1 You may accept a gift in the following circumstances:
 - (a) the gift has no more than token value,
 - (b) it is the normal exchange of hospitality or a customary gesture of courtesy between persons doing business together,
 - (c) the exchange is lawful and in accordance with local ethical practice and standards; and
 - (d) could not be construed by an impartial observer as a bribe, pay off or improper or illegal payment
- 5.2 You personally may not use Society property to make a gift, charitable or political contribution to anyone on behalf of the Society. Any gift must have the authorization of the Board of Directors or a person the Board designates.

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