



CONFLICT OF INTEREST PROCEDURES: FAILURE TO DISCLOSE AND APPEALS

DISCLOSURE

What should be disclosed?

Any situations where there is an actual, potential, or perceived conflict of interest between an employee's private matters and the employee's responsibilities to Southern Health-Santé Sud, must be discussed with the Vice President Human Resources.

How to disclose?

Disclosure shall be made in writing, signed by the employee and forwarded to the Vice President Human Resources in an envelope clearly marked "Confidential". The disclosure should provide all relevant facts of the situation to enable a decision to be made, including mailing address and telephone/email addresses at home and place of work. Indicate which address correspondence should be forwarded.

Failure to disclose

Failure of an employee to disclose under this policy may result in disciplinary action up to and including termination of employment.

NON-COMPLIANCE

If an employee becomes aware of a situation involving a potential or actual conflict of interest on the part of another employee, he or she should report it in confidence to the Vice President Human Resources.

DECISION/RULING

The Vice President Human Resources will review the matter with the Manager (or others as determined necessary) and provide a ruling within sixty (60) calendar days of the receipt of the disclosure, or the employee will be provided with the reason(s) why a ruling is unable to be made within sixty (60) calendar days.

APPEALS

An employee who disputes the findings and/or instruction of the Vice President Human Resources following a conflict of interest disclosure, may appeal to the Chief Executive Officer.

The Chief Executive Officer may rule on the appeal, refer the matter to another agency or appoint an independent arbitrator to review the matter and the basis of the appeal. The employee at his/her option may have a representative present at the appeal.

RECORD KEEPING

A copy of the disclosure statement, and the ruling given, will be placed in a sealed envelope on the employee's personnel file. In addition, a central confidential file will be maintained by the Vice President Human Resources.