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| Team Name: Human Resources | Reference Number: ORG.1510.PL.010 |
| Team Lead: VP - Human Resources | Program Area: Human Resources |
| Approved by: VP - Human Resources | Policy Section: General |
| Issue Date: February 8, 2016 | Subject: Conflict of Interest |
| Review Date: | |
| Revision Date: March 1, 2017 | |

POLICY SUBJECT:

Conflict of Interest

PURPOSE:

Southern Health-Santé Sud supports the rights of staff to be involved in community projects and activities as citizens of the community. Employees, as private citizens, shall not participate in projects or activities that are in conflict, real or reasonably perceived, with their specific duties with Southern Health-Santé Sud. All employees shall perform their duties and arrange their private affairs in such a manner that maintains confidence and trust with Southern Health-Santé Sud.

When a staff member believes they may be in a conflict of interest situation, this situation shall be reported to immediately to their Manager/Senior Leader or designate with the intent to resolve the conflict.

This policy applies to all full time, part time and casual staff, volunteers and physicians of Southern Health-Santé Sud.

BOARD POLICY REFERENCE:

Executive Limitations (EL3) Treatment of Staff

POLICY:

Staff must not directly or indirectly:

- Place themselves in a situation in any official matter where there is a private or personal interest where they cannot be objective in their actions or decisions.
- Undertake outside employment, a business transaction or other private arrangement for personal profit or have any financial or other personal interest that is in conflict with the performance of their duties.
- Seek or receive personal or private gain by granting preferential treatment to any persons while performing their duties.
- Seek or accept personal or private gain from the use of information acquired during the course of their duties that is based upon confidential or non-public information.
- Use or permit the use of Southern Health-Santé Sud property to promote or serve their personal or private interests, unless they are authorized to do so.

- Solicit or accept fees, gifts or other benefits, that are connected directly or indirectly with the performance of their duties, from any client, family of a client, individual, organization or corporation, other than:
 - The normal exchange of gifts among friends;
 - The normal exchange of hospitality between persons doing business together;
 - Tokens exchanged as part of protocol;
 - The normal presentation of gifts to persons participating in public functions.

Any gift or benefit accepted must be of nominal value and must not create an obligation or perceived obligation.

For each of the above conflict of interest situations, an employee must consider if their private or personal interest:

- Improperly influences the performance of their official duties and responsibilities, or;
- Could be reasonably perceived to improperly influence the performance of their official duties and responsibilities, or;
- Could reasonably be foreseen to improperly influence the performance of their official duties and responsibilities

DEFINITIONS:

Conflict(s) of Interest: A situation in which a Southern Health-Santé Sud Representative has a Private Interest or a relationship with a Related Person that creates, either in appearance or in reality, a perceived or real opportunity for improper influence in the performance of their duties and responsibilities to Southern Health-Santé Sud. This would include all situations which would cause an independent observer to reasonably question whether the professional actions or decisions of the Southern Health-Santé Sud Representative are compromised by considerations of personal gain, financial or otherwise.

Related Person: Any person or entity associated with a Southern Health-Santé Sud Representative, including a family member, personal friend, business associate or partner, or any corporation, joint venture, partnership or business entity owned or operated wholly or in part by the Southern Health-Santé Sud Representative.

For the purposes of this policy, a family member includes parent, spouse, common-law-spouse, child, siblings, mother-in-law, father-in-law, daughter-in-law, son-in-law, brother-in-law, sister-in-law, grandparent, grandchild, former guardian, fiancé as well as step-relationships of the same degree. It also includes any other relative who is or has been residing in the same household.

Staff: For the purposes of this policy, refers to full time, part time, casual employees; volunteers; physicians

PROCEDURE:

Should a staff suspect they are, may be reasonably perceived to be, or may reasonably foresee being in a conflict of interest situation, they must immediately initiate the disclosure process.

Disclosure is a confidential procedure to protect both the staff and the employer from unfair or improper allegations of conflict of interest. It requires an employee who suspects he or she is, might be reasonably perceived to be, or might reasonably foresee being, in a conflict of interest to complete the Conflict of Interest Disclosure Form (ORG.1510.PL.010.FORM.01). Completed Conflict of Interest Disclosure Forms should be filed in the employee's personnel file.

The employee may be asked to provide additional information to determine if a conflict of interest exists. Once the Manager/Senior Leader or designate reaches a decision, an employee is advised if a conflict of interest exists and if so, is given direction on how to resolve the conflict of interest.

SUPPORTING DOCUMENTS:

[ORG.1510.PL.010.FORM.01](#)

Conflict of Interest Disclosure Form

[ORG.1510.PL.010.SD.01](#)

Conflict of Interest Procedures Failure to Disclose and Appeals

REFERENCES:

Southern Health-Santé Sud Medical by Laws, May 30, 2012

Manitoba Government Principles & Policies for Managing Human Resources 3.2.1 Conflict of Interest