

## Administrative Policies and Procedures Manual

Section: Administration/Organization		Index #: I-267
Subject: <b>Conflict of Interest (Employees)</b>		Effective: Nov-1990
Issued By: Finance Department	Approved By: Senior Management Committee	Revised: May-2003 Reviewed: May-2003

### **POLICY**

Individuals shall avoid situations where their personal interests (including those of spouses, parents by birth or marriage, siblings and children), financial or otherwise, conflict or appear to conflict with those of Baycrest Centre.

Individuals shall not place themselves in a position where they are under obligation to any person who might benefit from special consideration or favour on their part or seek in any way to gain special treatment from them.

Policy guidelines are given below. They do not limit the generality of the policy.

#### Category A

The following shall be disclosed to the Vice-President, Human Resources and Organizational Effectiveness and the President and Chief Executive Officer and may be subject to review by the Finance and Audit Committee:

- involvement (e.g., through ownership, investment in or service as a director, officer, employee, member or consultant) with an enterprise which does business or competes with Baycrest;
- involvement in an enterprise under circumstances where an individual could use his/her influence or position with Baycrest to benefit the enterprise or him/herself.

#### Category B

The following shall be avoided:

- requesting or accepting money, gifts, gratuities, loans or services for personal or family benefit without full payment for value received, from an enterprise which does business with Baycrest, clients, or families.
- accepting outside employment or other unauthorized activities which deprive Baycrest of services expected from employees or medical staff, or involve unauthorized use of Centre time, personnel or facilities;
- solicitation of gifts for use as prizes for sporting or social events for Baycrest Centre from enterprises with which Baycrest does business, without permission from the President and Chief Executive Officer;
- disclosure of information which is confidential and/or damaging to the Centre, to which an individual is privy because of his/her function at Baycrest;
- use for personal gain of information acquired through association with Baycrest;
- use of the Centre's name or one's position with Baycrest to lend prestige or weight to sponsorship of a political party or cause, or to endorse, without proper authorization, another organization's product or service.

## PROCEDURE

1. The following departments are accountable for disseminating this policy to the groups identified below for their information. Only those managers and employees listed in # 2 below are required to return the signed form (Appendix A) to Human Resources

Human Resources Department - all employees other than Research division  
Education and Organizational Effectiveness Department - all students  
Volunteer Department - all volunteers  
Medical Administration - all medical staff  
Research Division - all staff who are not part of the Rotman Research Institute (RRI) or Kunin-Lunenfeld Applied Research Unit (KLARU)  
RRI - all staff  
KLARU - all staff

2. All Cost Centre Managers, Supervisors, and employees in Purchasing, Information Technology, Executive Offices, Finance and Administration, Public Affairs, Human Resources and Organizational Effectiveness, and the Foundation shall sign and return to the Human Resources department, within thirty (30) days, one of the attached declarations on compliance with the conflict of interest provisions (Appendix A).

3. Declarations of interests which may be or appear to be in actual or potential conflict shall be reviewed by the Vice-President, Human Resources and Organizational Effectiveness, and the President and Chief Executive Officer who shall as appropriate:

- review with the person concerned the nature of the interests which create or may create conflict or the appearance of conflict;
- refer cases to the Audit Committee for review, and
- advise the person concerned as to what actions, if any, are required for full compliance with this policy.

4. Recipients of the policy shall be responsible for reporting, in a similar fashion, subsequent changes in their interests which may be or appear to be in breach of the policy.

5. Individuals placing themselves in a position of conflict of interest, or failing to disclose or resolve a conflict, may be subject to request for resignation or disciplinary action up to and including discharge from employment or service.

6. The Vice-President, Human Resources and Organizational Effectiveness shall ensure that signed declarations and any correspondence from the Audit Committee or the President and Chief Executive Officer are placed in the appropriate personnel files and that recommendations are carried out.

7. The Vice-President, Human Resources and Organizational Effectiveness is responsible for monitoring implementation of this policy and for making recommendations to the President and Chief Executive Officer as appropriate.

**Baycrest Centre for Geriatric Care**

**ANNUAL DECLARATION FORM**

**Introduction:**

All Cost Centre Managers, and employees in Purchasing, Information Technology, Executive Office, Finance and Administration, Public Affairs, Human Resources and Organizational Effectiveness, and the Foundation are required to sign and return this declaration to the Human Resource Department within thirty (30 days). Reference is made to the attached Policy # I-267 (*Conflict of Interest - Employees*).

If you have any questions concerning this Form or the Policy, please contact your Manager or Human Resources.

I declare that:

(a) I have read the attached Policy.

(b) I acknowledge that I am bound by the Policy, including the disclosure requirements that apply to me.

(c) At the present time, [Check the appropriate box]:

I am not in a Conflict of Interest situation, nor am I aware of any situation which could  
give rise to a Conflict of Interest.

**OR**

I am in a Conflict of Interest situation or a potential Conflict of Interest situation. A listing  
of my interests requiring disclosure is attached.

(d) Individuals placing themselves in a position of conflict of interest, or failing to disclose or resolve a conflict, may be subject to request for resignation or disciplinary action up to and including discharge from employment or service.

\_\_\_\_\_  
Date Signature

\_\_\_\_\_  
Print Name