


<b>Policy Name:</b>	<b>CONFLICT OF INTEREST POLICY</b>		
<b>Policy Number:</b>	<b>GOV-209</b>	<b>Formerly</b>	<b>BG-212</b>
 West Elgin Community Health Centre	<b>Creation Date:</b> <b>February 2000</b>	<b>Reviewed Date:</b> <b>April 2021</b>	<b>Approved by:</b> <b>Board of Directors</b>

## SUMMARY

It is of critical importance to the reputation and success of the West Elgin Community Health Centre (the “Centre”) that the Board of Directors (the “Board”) conduct themselves so as to avoid any actual or potential conflict of interest. However, should a conflict of interest arise, it is imperative that the proper procedures be followed in a timely manner.

The provisions of this Policy are in addition to the fiduciary and statutory obligations of the Directors imposed by law.

## EXAMPLES OF CONFLICTS OF INTEREST

A conflict of interest includes not only an actual conflict, but also circumstances in which a reasonable person would perceive there to be a conflict.

The following are examples of when a conflict of interest will be deemed to have arisen. It is important to note that this list is not exhaustive and other circumstances may create or reasonably lead to a conflict of interest on the part of a Director.

- Instances where there is personal financial benefit to the Director, a person related to the Director, or for whom the Director is responsible, will or may result in the decision being considered.
- Having personal or professional interests which conflict with the best interests of the Centre.
- Instances where the Director receives care or services from a provider or other staff member who is the subject of Board business.
- Soliciting, obtaining, accepting or retaining any personal benefit, or attempting to do any of the foregoing, from a supplier, vendor, or any individual or organization doing or seeking to do business with the Centre.
- Acting as a Director or otherwise involved with any other entity whose objectives or activities may conflict with those of the Centre.
- Involvement in the hiring of a related party or close friend.
- Voting on any matter on the basis of any improper motive.
- Application for employment with the Centre.

## PROCEDURE

When there is a potential for a real or perceived conflict of interest, the following steps shall be taken:

- The Director shall declare the conflict of interest as soon as they become aware of it or that it may arise. If a Director is uncertain if they are in a conflict of

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interest position, the Board shall discuss the matter and decide, by vote with such Director abstaining, as to whether or not a conflict exists.

- Once a conflict of interest has been identified and declared, it shall be recorded in the minutes of the meeting.
- The Director in the conflict of interest shall abstain from participating in the discussion relating to the matter and from voting on the issue.
- In appropriate circumstances, including those where issues of confidentiality arise, the Director shall excuse themselves from the meeting until such time as the matter has been completed. In such circumstances, the Board meeting may continue in-camera upon the approval of a majority of the remaining Directors.
- In the event that the Director who is in the conflict of interest fails to abide by the provisions of this Policy, the Board may decide, if feasible, to table the matter until appropriate disciplinary action can be taken.
- If the Directors are unable to resolve any dispute arising from this Policy, the matter may be referred to arbitration by an impartial tribunal at the request of the Board or the individual Director. The results of the arbitration shall be binding on all parties.