

CVS POLICY & PROCEDURE MANUAL

Policy Area: **Operational Policies - Service Delivery**

Policy # & Name: **5.5 Conflict of Interest**

Group: Consumers; All Staff; Volunteers; Contracted Caregivers; Families; Visitors; Board Directors and Board Committee members

Purpose:

To ensure that deliberations and decisions affecting the individuals served by CVS are made in their best interests; and to protect the interests of CVS when it is entering into a contract, or arrangement that might benefit a private interest.

Policy Statement:

CVS staff members, volunteers and Board Directors must abstain from involvement and discussion in matters in which they have a material, personal and/or financial interest.

Staff, contracted caregivers, volunteers, committee members and Board Directors must submit a statement identifying business and other affiliations, which relate in any way to the business of CVS and other affiliations of CVS.

Practice Standards:

Board Directors, contracted caregivers, volunteers, committee members and staff members have a fiduciary responsibility to CVS to administer the organization's affairs honestly and prudently, exercising their best care, skill and judgment for the organization's sole benefit.

Newly elected or appointed members of the Board of Directors, contracted caregivers, volunteers, committee members and staff members must arrange their private affairs in a manner that will prevent conflicts of interest, or the perception of conflicts of interest, from arising.

A Board Director, committee member or Executive Director, who finds him/herself in an actual, perceived or potential conflict of interest, must disclose the matter to the President of the Board. Board Directors who fail to disclose such conflict may be asked to relinquish specific responsibilities or to resign their positions.

A staff member, volunteer or contracted caregiver who finds him/herself in an actual, perceived or potential conflict of interest, must disclose the matter to the Executive Director. Staff members who fail to disclose such conflict may be asked to relinquish specific responsibilities or to resign their positions.

CVS encourages staff members to be involved in activities as citizens of the community. However, staff members must keep their role as private citizens separate and distinct from their responsibilities as staff members.

Conflict of interest includes situations:

- ? where a staff member's private affairs or financial interests are in conflict with their work duties, responsibilities and obligations or may result in a public perception that a conflict exists;
 - ? which could impair the staff member's ability to act in the public interest;
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or,

- ? where an employee's actions would compromise or undermine the trust which the public places in the organization.

Staff members should not place themselves in a situation where they are under obligation to any person who might benefit from or seek to gain special consideration or favour. The honesty and impartiality of employees must be above suspicion.

A conflict of interest, either real or perceived, may include the following:

- ? An ownership interest in a business from which CVS buys goods and services;
- ? An interest in real estate, securities or property that CVS is buying or leasing– or considering buying or leasing;
- ? The possibility of personally gaining at CVS's expense;
- ? Doing CVS business with a family member or business partner;
- ? Receiving compensation directly from a consumer for services provided outside the CVS relationship;
- ? Using CVS resources– including personnel, equipment and supplies– for other than CVS-sponsored activities, programs and purposes;
- ? Receiving anything that could be deemed a kickback from any third party dealing with CVS– including personal gifts or favorable-term loans; or
- ? Spending staff time during normal business hours on personal business or working for other entities to the detriment of CVS.

A staff member, volunteer or contracted caregiver should not become involved in the personal affairs of residents, clients, or families, relating to legal, financial or property matters. Do not do any of the following:

- ? Sign "Consent for Treatment" forms on behalf of participants / residents
- ? Sign legal documents (i.e., wills), on behalf of participants / residents
- ? Handle or manage a participant's / resident's money, assets or personal needs funds, outside the realm of your job duties
- ? Make recommendations to legal counsel or in court

A staff member, volunteer or contracted caregiver may witness the signature of a consumer.

A possible conflict does not preclude CVS from doing business with a related party. But at a minimum, the affected Officer, Director or management staff should not participate in any decisions made about transactions involving their interests.

Policy Audit: March Annually

Date Issued: March 2004

Date Revised:

Position

Responsible: Executive Director or designate

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- References:**
- ✍ This policy replaces and encompasses: PER/SEC 012
Conflict of Interest
 - ✍ 9.2 - CVS Board Code of Ethical Conduct
 - ✍ HR 6.11.A – Staff Code of Ethical Conduct
 - ✍ HR 6.11.B - Conflict of Interest Form
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