



POLICY NO:	1-10-05
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DATE:	Mar.1992
REV. DATE:	Aug 2016

SUBJECT: CONFLICT OF INTEREST

1.0 POLICY:

The Policy provides guidance to employees, volunteers, contractors, and agents of Ongwanada concerning the avoidance of conflict of interest, and the process for declaring a conflict of interest. Employees, volunteers, contractors, and agents of Ongwanada:

- are expected to be free of interests or relationships which are actually, perceived or potentially detrimental to the interests of Ongwanada and the people supported;
- shall not engage or participate in any commercial transaction involving Ongwanada or the people supported, in which they have an undisclosed financial or personal interest.

Conflict of Interest guidelines for:

- Board members are contained in the Ongwanada Administrative By-Laws (March 2012), Section 18.
- Staff and contractors involved in Purchasing are contained in Policy # 1-10-04 Strategic Sourcing, Purchasing, and Procurement Policy and Procedure) and in Policy # 1-10-07 Doing Business with Ongwanada.

Failure to comply with this policy may lead to disciplinary actions up to and including termination of the employment, contract and/or relationship.

2.0 PROCEDURE:

2.1 In general, a conflict of interest exists when an individual (staff, volunteer, contractor) has a personal interest that could, or could be perceived to, be detrimental to the interests of Ongwanada or the people it supports. A myriad of situations could exist that would represent a real or perceived conflict of interest; which are too numerous to detail in the policy; therefore, examples will be described below. These are examples only and are not to be construed as all encompassing. Each situation will be reviewed by Senior Management and evaluated on its own merit. Examples are:

2.1.1 Participation of the employee in other business, organizations or activities that compromise the employment contract or disadvantage the organization

2.1.2 Individual has a direct or indirect interest or relationship with an outsider that

- is inherently unethical or that might be implied or construed to be, or
- make possible personal gain due to the individual's ability to influence dealings;
- render the individual partial toward the outsider for personal reasons or otherwise inhibit the impartiality of the individual's business judgment;
- place the individual or the organization in an equivocal, embarrassing or ethically questionable position; or reflect on the integrity of the organization.

2.1.3 The individual takes personal advantage of an opportunity that properly



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belongs to the organization (such as use of a points card, Air Miles, or other affinity program)

- 2.2 Employees must consult with their supervisor prior to engaging in any activities that could give rise to a real or perceived conflict of interest, such as, but not limited to:
 - 2.2.1 Having a vested interest in an external business which may provide materials or service to Ongwanada or the people it supports
 - 2.2.2 Being offered services or materials as a result of employment or position with Ongwanada
 - 2.2.3 Making use of a position with Ongwanada to solicit services or materials for personal gain
 - 2.2.4 Utilizing Ongwanada's equipment, services or materials for personal use without permission and/or for an external business
 - 2.2.5 Pursuing personal gain over the well-being or needs of the people supported
 - 2.2.6 Engaging in a financial transaction or business activity that may be perceived as a conflict of interest.

- 2.3 When a conflict of interest may exist, the employee must notify their immediate supervisor.
 - 2.3.1 The immediate supervisor will inform their Senior Manager of the conflict and the circumstances involved.
 - 2.3.2 The Senior Manager will advise the Chief Executive Officer, together with recommendations on what course of action should be taken
 - 2.3.3 The decision reached by the Senior Manager and Chief Executive Officer will be relayed to the line supervisor who will inform the employee.

- 2.4 In relation to dealings with persons supported by Ongwanada, employees, volunteers, Life Share providers, contractors or agents:
 - 2.4.1 will not accept cash gifts under any circumstances;
 - 2.4.2 will not participate in personal business transactions
 - 2.4.3 will not accept gifts of services or meals for their personal enjoyment



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2.4.4 may only accept gifts of a nominal value (less than \$25.00) to mark special occasions (such as a birthday or Christmas)

2.4.4.1 when such a gift is received, the recipient will notify their supervisor

3.0 RELATED POLICIES:

1-10-04 *Strategic Sourcing, Purchasing, and Procurement*

1-10-07 *Doing Business with Ongwanada*

Ongwanada Administrative By-laws (2012) Section 18

4.0 LEAD PERSON:

Chief Financial and Administration Officer

5.0 DELEGATED LEAD:

Coordinator, Support Services

6.0 REVIEW DATE:

August 2019