



CONFLICT OF INTEREST POLICY

PREAMBLE

Individually, each member organization of the Health Care Network of Southeastern Ontario is charged with the responsibility of allocating and managing community health resources including the spending of public tax dollars. Indeed, each member organization already follows stringent conflict of interest policies.

However, when dealing with Network business, it is acknowledged that members are representing the best interests of their organization and their stakeholders. Therefore member organizations do not have a conflict of interest when they discuss, decide, or vote on Network business or issues that affect their organization. In fact members are required and expected to advocate in the best interest of their organization. At the same time, members collectively are expected to make decisions and take actions that represent the greater good of all the citizens of Southeastern Ontario. Therefore the aim of the Network is to obtain a “confluence of interest” whereby the needs of each individual member and its stakeholders is balanced against the needs of the people of Southeastern Ontario.

Therefore conflict of interest is only applicable to staff and representatives of members, collectively referred to as representatives who must comply with this Conflict of Interest Policy.

Representatives are expected to maintain high standards of integrity, impartiality and ethical conduct when addressing Network issues. Representatives must be vigilant to prevent any actual or perceived misconduct, predisposition or conflict of interest. Further, representatives should conduct their personal business affairs so as to avoid an obligation to any person who might benefit from special consideration or favour on their part.

DEFINITIONS

1. “Representative” is a staff member or a representative of a member
2. “Actual or perceived conflict of interest” means a situation in which a representative has an employment, business or personal interest which results or appears to result in an interference with the objective exercise of his/her duties.
3. “Person” includes individuals, bodies corporate, corporations, companies, partnerships, syndicates or any number or aggregate of persons.
4. A representative is said to have a “pecuniary interest” in a decision when the representative stands to gain by that decision, either in the form of money, gifts, favours, gratuities or other special consideration.

TERMS

1. Representatives should conduct their personal business affairs so as to avoid an obligation to any person involved in HCNSEO business who might benefit from special consideration or favour on their part. If a Representative finds themselves in a conflict of interest position regarding an item of HCNSEO business then they must declare that conflict and not participate in any discussion or decision on that business.
2. Representatives of the Network are responsible for disclosing any situation where they may have an actual or perceived conflict of interest. In relation to matters which are discussed and voted on by the Network (e.g., contracts and transactions and/or proposed contracts and

transactions, disclosure of actual, potential or perceived conflicts of interest shall be made by a Representative.

- a. At the Network meeting at which the matter involving the actual, potential or perceived conflicts is first considered; or
 - b. if a Representative is not in an actual potential or perceived conflict of interest situation at the time described in:
 - i. at the first Network meeting which is held after he or she becomes aware of the actual, potential or perceived conflict; or
 - ii. where an actual potential or perceived conflict of interest arises with respect to a contract or transaction after it is made, at the first Network meeting held after the situation arises; or
 - iii. if an individual who is not a Representative but who would have an actual, potential or perceived conflict of interest if he or she were a Representative later becomes a Representative, at the first meeting he or she becomes a Representative.
3. All potential, actual or perceived conflicts of interest which do not pertain to matters which would be the subject of any discussion or vote by the Network (e.g., a Representative who has used his or her office in a manner which compromises the integrity of the Network) shall be reported in writing by the Representative or other Network Representative to the Chair as soon as he or she becomes aware of it, or, shall be acted on by the Network as soon as the Network becomes aware of it.
 4. Where a Representative is unsure if there is an actual, potential or perceived conflict of interest, it is his or her responsibility to seek clarification by submitting the matter to the Network for review.
 5. Disclosures of conflict of interest situations must be reviewed and updated once annually at a Network meeting and, must be updated immediately by an affected Representative where a change occurs which alters the nature or degree of the conflict, subsequent to a declaration being made.
 6. In dealing with an actual, potential or perceived conflict of interest reported by a Representative, the Network (with the exception of the reporting Representative) shall decide by majority vote whether an actual or perceived conflict of interest exists.
 7. If the Network finds that an actual or perceived conflict of interest exists in relation to a matter that is to be the subject of discussion and vote by the Network, the Network (with the exception of the reporting Representative) shall vote on whether the conflict is a nature that would require the exclusion of the Representative from any discussion and vote on the matter to maintain the integrity of the Network. In order for the Representative to be allowed to participate in the discussion and vote on the matter, the Network, by a two-thirds vote must find the actual or perceived conflict of interest does not require the exclusion of the representative.
 8. Where by reason of withdrawals from a meeting for an actual or perceived conflict of interest, the number of remaining Representatives of Members is not sufficient to constitute a quorum of interest, the number of Representatives remaining, if not fewer than seven other than the Chair, shall be deemed to constitute a quorum for the purposes of discussing and voting on the issues.
 9. Where the withdrawals from a meeting results in fewer than seven Representatives of Members other than the Chair present at the meeting, the meeting shall be adjourned, and notice of the adjournment shall be sent to all Members not present at the original meeting in

order to ensure that there will be at least two Members other than the Chair to discuss and vote on the issues.

10. Where the Network finds that an actual or perceived conflict exists in relation to a matter which would not be the subject of any discussion and vote by the Network, the Network (with the exception of the affected Representative) shall decide what action should be taken to maintain the integrity of the Network.
11. All actual, potential or perceived conflicts shall be recorded in the minutes of the meeting at which they are reported and addressed. A Representative, who disputes the findings and/or instruction of the Network following a conflict of Conflict of Interest disclosure, may appeal to the Network.
12. Departure from any constituents of this policy by a Representative, without the specific prior approval of the Network, may be cause for removal of the Representative from the Network.

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