

Conflict of Interest

Reviewed Date		Number	<i>HR0102</i>
Revised Date	<i>September 9, 2020</i>	Approved Date	<i>April 28, 1993</i>

Introduction

A conflict of interest exists when there is a divergence between an employee’s personal interests and their professional obligations to the Simcoe Muskoka District Health Unit (SMDHU) as an employee and/or the services they provide on behalf of SMDHU.

Purpose

It is the intent of the health unit to provide a public service without staff placing themselves in a position of a conflict or even a perceived potential conflict of interest thereby ensuring the public’s trust and confidence in the services provided by the health Unit.

Legislative Authority

N/A

Policy Definitions and Interpretation

A conflict of interest is defined as: A conflict of interest occurs when SMDHU staff have personal interests that may or may be perceived to improperly influence their professional judgment.

A personal interest is defined as: When SMDHU staff receive any personal benefit from an action or decision made with respect to services they provide on behalf of the health unit or the health unit may provide to members of the public either on health unit time or not. Benefits can include, but are not limited to payment for services rendered, receiving consultation fees, gifts, advantages, discounts, status, rebates, credit and preferential treatment. The interest may be monetary or of a moral nature, and could be direct (to the staff person) or indirect (to someone associated with the staff person such as a family member or close friend).

Policy

Staff will avoid being in a conflict of interest (real or perceived) with their position at SMDHU, and will immediately report any real or perceived conflicts of interest to their direct supervisor to be managed accordingly.

Procedures

1. Staff must always consider whether personal interests are or have the potential to influence their professional objectivity for or against an action, or a decision about a program, product and/or treatment recommendation.

2. Staff must identify and disclose any real or potential conflict of interest to client and/or employers.
3. Should staff feel there may be a conflict or a potential conflict they should first discuss the situation with their immediate supervisor who will advise them on the proper course of action in a given situation.
4. Staff will not promote an individual firm or business where such promotion may be or could be perceived to be a conflict of interest by the health unit.
5. Staff will not conduct or promote their own, family or friend personal business for profit while on health unit time.
6. Staff are responsible for avoiding and/or managing conflicts of interest for the benefit of members of the public served by SMDHU.
7. Staff will not reference their employment with the health unit for business promotion or personal gain.
8. Staff will not reference any other staff employment with the health unit for business promotion or personal gain for either party.
9. Staff must not be in a position to carry out an approval function involving an enterprise in which he/she has an interest or in an enterprise after work hours as a contracted service/consulting arrangement that they would normally deal with during work hours
10. Staff will not give particular preference to any private enterprise but will support the principle of choice for clients choosing private goods and/or services.
11. Staff are also required to adhere to their individual governing body/regulated health profession's respective policies regarding conflict of interest and ethical practice.
12. The existence of an actual or potential conflict of interest does not preclude the involvement of the employee in the situation where the conflict has arisen or may arise, but it does mean that the conflict must be disclosed and resolved in advance with their supervisor.
13. In order to properly manage conflicts of interest managerial staff should consult with their supervisor and with Human Resources as needed in the management of such conflicts.

Related Policies

HR0102 Acceptance of Gifts and Honoraria

Related Forms

N/A

Final Approval Signature: _____

Review/Revision History:

September 2010 Policy Number Change – previous number A1.050

July 15, 1998 – Revised

September 9, 2020 – clarification on conflicts of interest