

CCGSD CONFLICT OF INTEREST POLICY

Approved by Board of Directors: May 29, 2020

Updated by Board of Directors: April 28, 2022

Review period: 3 years

PURPOSE:

To avoid conflicts of interest or their appearance from interfering with CCGSD operations, and to promote fairness in the workplace.

SCOPE:

This policy applies to all directors (board members), volunteers and staff of CCGSD.

DEFINITIONS:

When used in this policy, the following terms have the following meanings:

Conflict of Interest or **COI** means a situation in which a person has a private, personal, or professional interest sufficient to influence, or appear to influence, the objective exercise of their official duties to CCGSD.

Reporter means any individual who provides a verbal and/or written report about a Conflict of Interest situation to a Disclosure Officer.

Disclosure Officer means any individual to whom disclosures of Conflicts of Interests may be made.

Executive Committee means the Secretary, Treasurer, Vice-President, or President of the Board of Directors of CCGSD.

UNDERSTANDING CONFLICTS OF INTEREST

Identifying and disclosing a Conflict of Interest does not mean the person involved is corrupt.; rather, it identifies the presence of factors that a reasonable person might think is likely to bias a decision maker's judgment.

Conflicts of interest may be: (i) **Actual conflicts of interest** which arise where there is a real conflict between the public duties and private interests of an individual; (ii) **Potential conflicts of interest** which arise when an individual has private interests that could conflict with their public duties (this refers to circumstances where it is foreseeable that a conflict may arise in future and steps should be taken now to mitigate that future risk); And (iii) **Perceived conflicts of interest** which arise when a third party could reasonably view the private interests of an individual as improperly influencing their decisions or actions, now or in the future.

A Conflict of Interest arises in any situation where the duty of an individual to act in the best interests of CCGSD and, in the case of Directors, to adhere to the Director's fiduciary duties, is compromised or impeded by any other interest, relationship, or duty of the Director. A Conflict of Interest also includes circumstances where the Director's duties to the organization are in conflict with other duties owed by the Director, such that the Director is not able to fully discharge the fiduciary duties owed to the organization.

EXAMPLES OF CONFLICTS OF INTEREST:

The following are examples of conflict of interest situations for illustration purposes only and are not intended to be a complete or exhaustive list:

1. A manager supervises an employee, to whom they also rent an apartment.
2. A manager hires a fellow congregant from a small, close-knit church that is their primary social and spiritual circle.
3. A manager supervises an employee whose family employs the manager's wife.
4. A consensual romantic and/or sexual relationship between two (or more) individuals covered under this policy.
5. CCGSD is looking to hire a new web development company to revamp their website. The board is scheduled to vote on hiring RainbowCoderz, which is also the employer of one of the board members.

PUBLIC CONFIDENCE AND ACTING WITH INTEGRITY

All individuals covered under this policy shall perform their duties in a manner that promotes public confidence and trust in integrity, objectivity, and impartiality. To that end:

- a) Individuals shall not use their position to influence CCGSD hiring decisions that involve themselves, family members, or close associates. A board member must resign from their position before applying for employment at CCGSD.

- b) Individuals shall not directly or indirectly accept cash payments, gifts, gratuities, or privileges that are intended to influence the activities of CCGSD. Individuals may give or receive modest gifts in appreciation for their service, provided all gifts are disclosed and properly accounted for.
- c) Individuals shall freely disclose any potential, real or perceived conflict of interest, both at the beginning of their working relationship with CCGSD, and during their term, as soon as a conflict of interest arises.
- d) In the event that the Board of Directors is considering a vote on a matter, and a director has a Conflict of Interest related to the matter, the director in conflict shall abstain from any discussion and vote on the matter.

DISCLOSURE OF A CONFLICT OF INTEREST

Disclosures of competing interests must be made immediately to the appropriate Disclosure Officer. Reporters may initially make such disclosures verbally.

Within one week of an initial verbal disclosure, the disclosure must be made in writing, via email, by the Reporter to that same Disclosure Officer. That email should include:

1. The full name of the individual with a potential Conflict of Interest;
2. The entity to whom the verbal disclosure was made (if applicable);
3. Description of the Conflict of Interest; and
4. How that Conflict of Interest might affect CCGSD and/or their CCGSD work.

Once written disclosure is made, the Reporter will receive a confirmation of receipt from the Disclosure Officer who received the disclosure along with guidance and/or regulations on how that particular Conflict of Interest should be handled. Examples of such guidance and/or regulations include, but are not limited to:

1. Do not participate in the final decision making process for any decisions relating to the Conflict of Interest situation.
2. Remove yourself from all discussions relating to the Conflict of Interest.
3. Do not participate in committee meetings related to the Conflict of Interest.
4. In the case of directors and members of CCGSD, do not vote on matters related to the Conflict of Interest.

If you disagree with the guidance and/or regulations you have received and would like to request a review, please email the Executive Committee of the Board of Directors with the following information:

1. The initial email sent by you;

2. The response you received; and
3. An explanation as to why you believe that the policy has been incorrectly applied.

The Executive Committee will review the conflict of interest situation and guidance, and issue a decision in writing.

CONSENSUAL PERSONAL (ROMANTIC AND/OR SEXUAL) RELATIONSHIP CONFLICTS OF INTEREST:

In all types of organizations, it is recognized that personal relationships occur. Individuals in relationships with colleagues, whether that colleague is in a subordinate position to them or not, will not face disciplinary action as a result of such relationships. Disclosures of consensual personal (romantic and/or sexual) relationships are necessary in order to manage Conflicts of Interest and potential sexual harassment complaints.

DISCLOSURE OF CONSENSUAL PERSONAL (ROMANTIC AND/OR SEXUAL) RELATIONSHIP BETWEEN INDIVIDUALS

Disclosure of such relationships are unnecessary unless and until one of the following situations is true:

1. The relationship has been ongoing for a period of two months (whether casual or serious);
2. There exists a hierarchical professional relationship between the individuals.
3. One of the individuals is offered a change in position within the organization, and by virtue of that change, a hierarchical professional relationship develops between them; or
4. The individuals share a dwelling.

Initial disclosure may be made verbally; Within one week of such disclosure, written disclosure must be completed by all parties to the relationship and must be submitted to the appropriate Disclosure Officer.

DISCLOSURE OFFICERS

Disclosures should be made to the direct manager(s) of the individuals involved in the potential Conflict of Interest. If there is unease about disclosing to that direct manager, or if that direct manager is one of the individuals involved in the conflict of interest situation being disclosed, one level of management may be skipped (i.e. your Disclosure Officer could be your manager's manager). The Executive Committee of the Board of Directors is considered to be the manager of the Executive Director, and disclosures may be made to a member of the Executive Committee of the Board of Directors if that is the next level of management. When the reporter

is a director or a member of CCGSD, disclosure should be made to the entire Board of Directors.

PRIVACY

Declarations of conflicts of interest can be made in confidence. Disclosure of personal information will be limited to a strict need-to-know basis.

All efforts will be made to keep the details of conflicts of interest private and confidential. However, due to the small number of management staff, sharing the disclosure and management of Conflict of Interest declarations among management staff and Board of Directors may be necessary.

CCGSD CONFLICT OF INTEREST POLICY: SIGNATURE PAGE

I acknowledge that I have read and understand the CCGSD Conflict of Interest Policy. I agree to adhere to the provisions and understand that any violation of the Conflict of Interest Policy may result in disciplinary action, up to and including termination of employment or contract.

Below is a list containing any actual, potential, and/or perceived Conflicts of Interest for myself as well as those of my immediate family, including employment relationships. Further, I agree to disclose any new Conflicts of Interest that arise, following the reporting requirements and timelines set out in the CCGSD Conflict of Interest Policy.

FIRST NAME:

LAST NAME:

POSITION AT CCGSD:

DESCRIBE ANY CURRENT ACTUAL, PERCEIVED, OR POTENTIAL CONFLICT(S) OF INTEREST (ATTACH ADDITIONAL SHEET IF NECESSARY):

SIGNATURE:

DATE:
