

4.04 Conflict of Interest

POLICY

Catulpa has procedures in place to avoid conflict of interest of its employees or members of their family in relation to the agency and the programs, services and supports offered by the agency.

PROCEDURES




1. A conflict of interest is defined as a conflict between personal and/or business interests of an employee and/or their family and their responsibility as an employee.
2. At the beginning of services, persons served will be informed of this conflict of interest Policy during completion of the Service Delivery Checklist.
3. The agency shall not rent or donate space, services or equipment to any employee related to their income generating activity.
4. No employee will promote their affiliation with the agency as a means of enhancing or soliciting business for their income generating activity.
5. No employee will engage in income generating activities which would reflect unfavourably upon or bring discredit to the agency, its employees, persons served, Directors, or corporate members.
6. If an employee is engaging in additional income generating activities, these must only be carried out outside of regular business hours.
7. The agency shall not rent, lease, or in any way use or occupy a property or building that is owned in whole or in part by an employee in which an employee has a financial interest.
8. Where there is a competition of demand between an employee's responsibilities to the agency and their income generating activity, the employee's first obligation shall be to the agency.
9. Family members are eligible for employment at Catulpa. Persons served are eligible for employment once service has been completed. Areas that may be considered an exception to this are time limited programs designed for skill building (e.g. CAPC Team Assistants).

10. To avoid a "Conflict of Interest" Catulpa will not offer employment to:
 - the spouse of a member of the Board of Directors;
 - the direct relative of a member of the Board of Directors –child, parent, sibling;
11. An employee's spouse/partner or a direct family member will not be considered for employment within a program where a family member is employed but may be eligible for other agency positions.
12. Any employee engaged or contemplating involvement in income generating activities directly related to the work of the agency, such as respite care provider, paid care giver, special services at home worker, skills development facilitator, or private practice (therapy, training, consultation) will request permission from the Executive Director in writing, to proceed. Safeguards will be created to protect the agency and the employee in a situation where a conflict of interest exists.
13. Token gifts given to staff by persons served, or parents of persons served are not perceived to create a "conflict of interest" for purposes of this Policy and Procedure statement.
14. Should a person served have a complaint about the services or conduct of the staff member with whom they are working, they may communicate concerns directly to the Program Manager/Supervisor. The process for resolving the complaint will then follow the Stakeholder Feedback and Complaints Resolution Policy and Procedure.
15. Managers will ensure their employees are aware of this **Conflict of Interest** Policy and Procedure and will forward in writing to the Executive Director for approval any issue that may be in conflict with Catulpa's philosophy.

INDICATORS

1. Employees have conducted themselves in ways that do not bring conflict of interest into question.
2. Documentation confirms that conflict of interest concerns followed the Procedures outlined in this Policy.

Next Review	August 2023
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Date	Action (Approval, Revision, Review)	Signature
October 2022	Revision	
October 2017	Revision	
February 2018	Revision	

January 2019	Revision	<i>Karen Christensen</i>
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