

Conflict of Interest Policy Amendments

Updates and Discussion

Why This Presentation?

- The HR Department has been working on amendments to change the Conflict of Interest policy
- These proposed amendments were submitted to the BoD but the Executives asked for further context on the changes being made
- This short presentation is an opportunity to learn about the proposed changes and ask questions

Why These Amendments?

- The Conflict of Interest Policy was outdated
- The Policy's implementation had numerous feasibility concerns
- The Policy had no clear avenue for investigating third-party disclosures

What Kind of Changes have been Made?

Primarily the changes fall under these umbrellas:

- 1. Improving the clarity and norms of the investigation process for conflicts
 - 2. Allowing for more employee follow-up
 - 3. Creating avenue for third-party disclosures of conflicts of interest
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Change 1: Disclosure Process

Old System:

- All disclosures of conflict of interest made in 1 form (written only) to HR Committee for all staff
 - Form is generic
 - Form is written with assumption that a conflict must exist

New System:

- Regular Full-time staff disclosures made to HRD to bring to Committee
- Regular part-time staff can disclose to HRM as delegate of HRD
- Disclosures can be made verbally
 - The discloser and HRD review the form together in set meeting time
 - Opportunity to discuss nuance
- Disclosure forms include more instructions

Change 2: Who can Disclose?

Old System:

- All disclosures of conflict of interest made in written form can only be submitted as a self-disclosure of a possible conflict

New System:

- Two types of disclosure forms each with specific instructions depending on context:
 - 1. Self Disclosure Form
 - Written from self disclosure perspective
 - Simple and preemptive
 - 2. Third-Party Disclosure form
 - Questions are more based on evidence
 - Larger burden to prove conflict is affecting the working environment of employees

Change 3: Interim Measures/Accommodations

Old System:

- HR Committee receives a disclosure of a conflict of interest via form and makes a decision whether it is founded from forms contents
- No interim measures
- Individuals were removed from committees without fair assessment of conflict

New System:

- After a written disclosure is received the HRD will meet with the disclosee to discuss the conflict
 - Is it impacting the workplace and if so how?
- The HRD has the ability to implement interim measures while the conflict is being assessed
 - E.g. Work location changes, delegates for committees or interviews related to conflict etc.

Change 4: Investigating Third-Party Disclosures

Old System:

- No clear process to receive or investigate third-party disclosures of conflicts of interest

New System:

- Third-party disclosures of conflicts are accepted
- Any implicated party of a third-party disclosure has the right to respond to all evidence, supply their own evidence as relevant and make a full defence

Change 5: Remedies to Conflicts

Old System:

- Remedies were focused on proactive management and the affairs of the society
- Non-specific and vague
- At the discretion of the BoD
- Lacking transparency with any implicated parties
- Came across as solely punitive

New System:

- Greater focus on wellbeing and safety of all employees as well as the society's affairs
- Greater transparency with the implicated parties via a work-plan
 - New possible remedies in work-plan:
 - Possible limitations on workplace communication between parties
 - Limitations on access to certain information or files etc.
- Opportunity for employees and supervisors to be included in discussions on work-plan implementation
- Separate work-plans for separate parties as needed

What Remains the Same:

- Major definitions of types of conflicts
- Role of the HR Committee
- Appeal Process
- What constitutes a breach of policy (separate from a remedy)
- Confidentiality Standards

AND MUCH MORE

Discussion!

Questions?