

Conflict of Interest		
1.	Purpose	The purpose of this policy is to establish a standard of conduct to ensure that Staff, Board Members, and Volunteers of Pride Toronto act in the best interests of the Organization and its Members.
2.	Values	These standards are intended to enhance public confidence in the integrity of Pride Toronto and its personnel. Pride Toronto benefits from the expertise of individuals with a multiplicity of interests; if those interests overlap or appear to conflict with the interests of Pride Toronto or could impair the public support and respect necessary for the operation of Pride Toronto then those interests must be brought to the attention of Pride Toronto. The individual whose interest conflicts with this policy must agree to abide by whatever decision is made by Pride Toronto in this regard.
3.	Scope	This is an organization wide policy.
4.	Definitions	<p><u>Conflict of interest:</u> is a situation where an individual, or the Organization he/she represents or has an interest in, has a direct or indirect competing interest with Pride Toronto's activities. This competing or overlapping interest may result in the individual being in a position to benefit from the situation or Pride Toronto as an organization not being able to achieve a result in its best interest.</p> <p>A conflict may also arise where an individual is a family member, friend or business associate to a person who is party to a contract with Pride Toronto or has an interest in an enterprise; or where an individual receives payment by Pride Toronto for services rendered to the organization other than reimbursement for reasonable out-of-pocket expenses measured according to Pride Toronto policies on expense reimbursement.</p> <p>Conflict of interest includes, but is not limited to situations</p> <ul style="list-style-type: none"> • Where an individuals personal or financial interests are in conflict or overlap with their work/volunteer duties, responsibilities and obligations, or result in a perception that a conflict exists; • Where the actions of an individual would compromise or undermine the trust that the public places in Pride Toronto.
5.	Policy Guidelines	<p>5.1 Performance</p> <p>All Pride Toronto Staff, Board Members, and Volunteers shall immediately disclose to their supervisor/ manager and/or Board of Directors, verbally or in writing, any personal, business, or financial interest where such interest might be construed as being in real or apparent conflict with their official duties.</p> <p>5.2 Gifts</p> <p>5.3 Consequences for breaching this policy</p> <p>In the performance of their duties, Pride Toronto Staff, Board Members, and Volunteers must not, without disclosing in advance:</p> <ol style="list-style-type: none"> i. Place themselves in a position of obligation to persons who might benefit or appear to benefit from special consideration with respect to Pride Toronto business. ii. Have a monetary interest that would conflict with the discharge of the duties owed to Pride Toronto (See the Purchasing and Procurement Policy section 5.8 for further information). iii. Assist private entities or persons in their dealings with Pride Toronto where this could result in preferential treatment to any person.

		<p>5.2 Gifts</p> <p>Pride Toronto Staff, Board Members, and Volunteers must avoid the appearance of favoritism in all of their dealings on behalf of the Organization and not accept personal gifts from those seeking to do business with the Organization during the tendering process.</p> <p>Pride Toronto Staff, Board Members, and Volunteers must never accept cash as a gift from a current or prospective contractor or supplier.</p> <p>Pride Toronto Volunteers must disclose any gifts they receive from an individual or group involved with Pride Toronto, they must obtain permission to receive gifts valued above \$50 from the Executive Director.</p> <p>Pride Toronto Staff (excluding the Executive Director) must disclose any gifts they receive from an individual or group involved with Pride Toronto, they must obtain permission, in a reasonable time, to receive gifts valued above \$50 from the Executive Director.</p> <p>Pride Toronto's Executive Director and members of the Board of Directors must disclose any gifts they receive from an individual or group involved with Pride Toronto, they must obtain permission, in a reasonable time, to receive gifts valued above \$50 from the Board of Directors (or a committee designed by them).</p> <p>Pride Toronto may offer honorariums to individual volunteers based on exceptional circumstances and / or performance at the discretion of the volunteer's supervisor in consultation with the Executive Director.</p> <p>5.4 Consequences for breaching this policy</p> <p>An employee or volunteer who is in breach of this policy can be subject to an investigation, at the discretion of the Board or Executive Director. Consequences of breaching this policy may result in one or more of the following actions:</p> <ul style="list-style-type: none"> i. a verbal or written warning; and/ or ii. dismissal; and / or iii. litigation and / or iv. Or other action as deemed appropriate by Organization
6.	References	i. Purchasing & Procurement Policy
7.	Appendices	None
8.	Approval & Responsibility	<ul style="list-style-type: none"> i. This policy shall be reviewed by the Human Resources and Compensation Committee every two years to assess the effectiveness of the policy in achieving the purpose set out in Section 1 as well as comply with municipal, provincial and federal laws and regulations, as may be amended from time to time. ii. Concerns and / or questions about this policy can be directed to the Executive Director. <p>This policy shall be amended only by resolution of the Board of Directors through review and recommendation of the Human Resources & Compensation Committee.</p>
9.	Approval Dates	<p>This policy was approved on: 11-Feb-13</p> <p>This version takes effect from: 12-Feb-13</p> <p>This policy will be reviewed by: 11-Feb-15</p>

Conflict of Interest Procedure:

1. A *Policy Checklist Agreement* confirming that the Conflict of Interest Policy has been read and discussed, will be signed by employees, volunteers and Board Members as part of the initial hiring or orientation.
2. A signed *Policy Checklist Agreement* will be placed in the employee's file and kept by the Executive Director, or in the or volunteer's file and kept by the Volunteer Program Manager, or in the Board Member's file and kept by the Secretary of the Board.

Procedure for staff & volunteers:

1. Pride Toronto staff and volunteers will inform their Liaison/Manager of the following:
2. outside interests/affiliations/employment/contracts which may place him/her in a conflict of interest during the course of his/her work at Pride Toronto
3. The individual receiving the information will document the details of the potential conflict, including the date, the individuals involved, and a decision made. The Executive Director will be informed of any decisions made by Pride Toronto staff members.
4. During each performance appraisal, personnel will update their supervisor on any outside interests or affiliations which may place him/her in a conflict of interest, and/or other employment or contracts.
5. Where personnel have questions or concerns about a potential conflict of interest, they are encouraged to discuss the situation with their direct Liaison/Manager.
6. Where there is reason to believe that a potential or existing conflict of interest exists, the direct Liaison/Manager of the Pride Toronto personnel involved will conduct a review of the situation.

Procedure for Board members:

1. Members of the board of directors shall disclose to the board Co-Chairs, prior to engaging in any activities that may be seen as conflict of interest, such as, but not limited to:
 - Having a vested interest in an external business that may provide materials or service to the Organization
 - Being offered services or materials as a result of employment or position with the Association
 - Making use of a position with the agency to solicit services or materials for personal gain
 - Utilizing association equipment, services or materials for an external business
 - Pursuing personal gain over the well-being or needs of people supported
2. Non-compliance of this policy and procedures and the By-Law pertaining to conflict of interest on the part of the board members shall constitute cause for removal from the board.

When a breach is identified the Executive Director or the direct Manager will appoint an appropriate person to investigate the complaint and to provide a report with recommendations of disciplinary actions.

Volunteer complaints will be directed to the Volunteer Program Manager, Staff complaints will be directed to the Executive Director, and Executive Director or Board Member complaints will be directed to the Board of Director Co-Chairs.