



Policy Name:  <p style="text-align: center;"><b>CONFLICT OF INTEREST</b></p>	Policy Number:  <p style="text-align: center;"><b>0905</b></p>
Approved By: <p style="text-align: center;">Executive Team</p>	Effective Date: <p style="text-align: center;"><b>SEPTEMBER 1, 1996</b></p>
Reason for Revision: <span style="float: right;"><i>Click on item below and select item from list.</i></span>  <p style="text-align: center;"><b>CONTENT- Enter BELOW Reason for change Ex: Combined Policy ## and ##.</b></p> <p style="text-align: center;">New format being used.</p>	Date Revised: <p style="text-align: center;">April 21, 2021</p> Next Date for Review: <p style="text-align: center;">April 21, 2024</p>
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## Policy

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When engaged in Salvation Army (TSA) and Agape Hospice (AH) operations, officers, employees and volunteers are required to act in TSA & AH's best interests and to avoid becoming involved in situations of real or perceived conflicts of interest.

### OBJECTIVES

- The purpose of this policy is to provide individuals with guidance on how to identify potential or real conflicts of interest and disclose them in order to help minimize or eliminate the impact of such conflicts, both for themselves and for TSA & AH.

### ROLES AND RESPONSIBILITIES

- Employees, Auxiliary-Lieutenants, Auxiliary-Captains, and Officers  
Are responsible for adherence to the requirements of this policy
- Supervisors  
Are responsible for ensuring this policy is followed in their areas of responsibility and ensuring workers are aware of the policy's requirements.
- TSA & AH Executive Team  
Are responsible for ensuring its policies meet TSA's mission and operation requirements in a fair and reasonable manner.

### APPLICABILITY

This policy applies to employees, officers, ministry units, divisions, and territorial headquarters.



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## **POLICY ELEMENTS**

### **1. Identifying a Conflict of Interest**

1.1 Conflict of interest occur when officers, employees and volunteers have personal interests in decision-making that can reasonably appear to influence their actions, bias their judgment or prejudice the outcome of decisions. They can also occur when officers, employees, or volunteers are in situations where they can use or appear to use their position with TSA to benefit personally or to benefit someone else at TSA's expense.

Possible conflicts of interest can include but are not limited to the following:

- a) Holding a financial interest in or receiving/soliciting any personal benefit exceeding \$250 from a business which furnishes or wishes to furnish services, materials, or supplies to TSA. Officers should also refer to the orders & regulations for guidance on such matters.
- b) Being called upon to make decisions pertaining to a family, friend or business in which you have an interest.
- c) Using TSA's personnel, equipment, supplies or goodwill for other-than organization-approved activities, programs and purposes.
- d) Lending money to or accepting personal loans from clients and/or business partners.

### **2. Disclosing/Reporting a Conflict of Interest**

2.1 If an officer, employee or volunteer believes they have or could have a conflict of interest, they should immediately report it to their supervisor, who will determine whether or not a conflict exists and what actions should be taken. Appropriate actions can include, but are not limited to: waiving the conflict if it is nominal; putting in place protocols to minimize the conflict; having the individual refrain from voting and/or discussing a matter; having the individual remove themselves from the file, committee, board, etc. If the individual is not comfortable reporting it to their supervisor, then another member of leadership may be advised.

2.2 Individuals serving on boards, committees, and/or other councils, should report potential conflict of interest on proposed business at the beginning of each meeting, as a preliminary point of order. The member with the perceived conflict of interest would be asked to address the board, committee or council about the concern and be excused from the room to allow for proper deliberation. If the board, committee or council finds a conflict



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of interest, then they should take appropriate action to meet the circumstance. The name(s) of the person(s) who disclosed the real or potential conflict, the nature of the conflict and any decision regarding the conflict should be recorded in the minutes.

- 2.3 It is important to understand that just because a conflict of interest exists, it does not mean the individual has done something unethical, wrong or lacks integrity.
- 2.4 However, not reporting such a conflict can lead to a loss of trust and faith in TSA and therefore it is important to alert the appropriate people so that proper actions/protocols can be put in place to ensure the integrity of TSA is upheld. Individuals who knowingly fail to report a serious conflict of interest may be subject to discipline up to and including termination.
- 2.5 Where a supervisor, board, council, or committee is unsure on how to proceed, they may contact the chief secretary's office at territorial headquarters for advice.

**3. Policy Compliance**

3.1 For the individual

- Compliance with this policy is mandatory. Non-compliance may lead to disciplinary action as determined by TSA policy. All staff is responsible for reporting policy violations.

3.2 For the supervisor/department/DHQ

- The supervisor must periodically evaluate the implementation of this policy to ensure compliance.

3.3 For the organization

- Support supervisors in their duty to comply with policy requirements.
- Ensure policies are relevant and regularly reviewed.

**CROSS REFERENCES**

Policy 1023 Code of Ethics



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**Approval and Document Control**

**Approved by:**  
 TERRITORIAL MANAGEMENT BOARD  
 Canada Bermuda Territory  
**Only the online version of this operating policy is official and current**

Document Control Information			
<b>Category</b>	Governance: General		
<b>Office of Oversight</b>	Human Relations		
<b>Approved Date</b>	21 May 2014	<b>Next Review Date</b>	14 Nov 2023
Document History			
<b>Version</b>	<b>Date Revised</b>	<b>Summary of Changes</b>	
V-01	New		
V-02	14 Nov 2020	Format to new OPP template	