

# Conflict Of Interest Policy

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## APPLICATION

1. This policy applies to all Staff of the Non-Public Funds, Canadian Forces (NPF) who are employed supporting Morale and Welfare activities whether operating within the Public or the Non-Public Property (NPP) framework.

## APPROVAL AUTHORITY

2. This policy is issued under the authority of the Chief Executive Officer (CEO), Staff of the Non Public Funds, CF.

## ENQUIRIES

3. Enquiries should be directed to the Senior Advisor Conflict Management (SACM).

## DEFINITIONS

4. The following definitions are relevant to the policy:
  - a. Conflict of Interest (COi): a situation in which a NPF employee has private interests that could improperly influence the performance of his or her official duties and responsibilities or in which the NPF employee uses his or her position for personal gain. A real conflict of interest exists at the present time, an apparent conflict of interest could be perceived by a reasonable observer to exist, whether or not it is the case, and a potential conflict of interest could reasonably be foreseen to exist in the future
  - b. Conflict of Duties: a conflict that arises, not because of a NPF employee's private interests, but as a result of one or more concurrent or competing official responsibilities. For example, these roles could include his or her primary employment and his or her responsibilities in an outside role that form part of his or her official duties, such as an appointment to a board of directors, or other outside function;

## POLICY PURPOSE

5. The purpose of this policy is to:
  - a. ensure that in situations of real, apparent or potential conflict of interest and in situations where there is a conflict of duties, decisions are made in a manner which upholds the NPP and Public interest;
  - b. facilitate ethical decision-making within organizations and for NPF employees dealing with potential conflict of interest situations; and
  - c. establish measures to assist NPF employees to prevent, manage and resolve conflict of interest that could impair either the integrity of NPP or the Public Service or the public's perception of its integrity.

## GENERAL POLICY

6. NPF employees contribute in a fundamental way to good government, democracy and

Canadian society through the loyal, impartial, and non-partisan support they provide to Canadian Armed Forces members, serving and retired, and their families. As dedicated professionals, they serve the public interest and uphold the public trust.

7. This policy is aligned with and further elaborates on the NPF Values and Ethics Policy as well as the Values and Ethics Code for the Public Sector. It provides direction to assist organizations and NPF employees to effectively deal with real, potential, and apparent conflict of interest situations which may arise during their employment. Preventing, managing or resolving conflict of interest situations is one of the principal means of maintaining public trust and confidence in the impartiality and integrity of NPP and the Public Service.
8. This policy must be read in conjunction with the NPF Values and Ethics Policy and the Values and Ethics Code for the Public Sector. The NPF Values and Ethics Policy and the Values and Ethics Code for the Public Sector, as well as the requirements for NPF employees in Annex A of this policy, form part of the conditions of employment for every NPF employee.

## AUTHORITIES

### EDUCATION AND OVERSIGHT

9. Division Heads are responsible for the proper education and oversight of this policy in their organization, as follows:
  - a. ensuring that their NPF employees are informed and understand that adherence to/compliance with the requirements listed in Annex A is a condition of their employment. This obligation is fulfilled by having individuals acknowledge these requirements in writing, as part of their initial acceptance of an offer of employment;
  - b. ensuring that their NPF employees are reminded on a regular basis of the requirements of this policy;
  - c. ensuring that the operational risks of conflicts of interest related to their organization's specific mandate are identified and managed; and
  - d. ensuring that the responsibilities and authorities for the implementation of this policy are clearly communicated to all of their employees

### RESOLUTION PROCEDURES

10. Division Heads are responsible for the effective application of resolution procedures in their organization with respect to this policy, as follows:
  - a. ensuring that NPF employees have access to advice and assistance when they are unsure of whether they may be in a conflict of interest, and when they are considering undertaking any political activity;
  - b. ensuring that NPF employees file a Declaration of COi for all situations, assets, or interests that might give rise to a real, apparent or potential conflict of interest with respect to their official duties;
  - c. ensuring that any conflict arising between the private interests and the official duties of a NPF employee is resolved in favour of NPP and the public interest, by considering the nature and risk of the conflict of interest in relation to the feasibility, the practicality of the measures required to resolve the conflict, and communicating the decision, and the reasons for the decision, to the employee. While the submission of a Declaration of COi to the Division Head may often be sufficient, additional requirements may be necessary, as outlined in [Annex A](#);
  - d. ensuring that benefits provided or offered to the organization by outside entities or individuals with whom the organization has past, present or potential official dealings

- are managed appropriately and that any resulting organizational conflict of interest is resolved in the public interest;
- e. ensuring that concurrent outside appointments that are part of a NPF employee's official duties, such as to a board of directors, are managed appropriately and that any resulting conflicts of duties are resolved in the favour of NPP and the public interest; and
  - f. ensuring that decisions taken to resolve conflicts of interest are, where practicable, made in mutual agreement with the NPF employee in question, using fair and effective means to resolve disagreements regarding the decisions.
11. The Conflict of Interest Guide provides guidance on the identification and resolution of conflict of interests.

## MONITORING AND REPORTING REQUIREMENTS

12. Division Heads are responsible for monitoring the performance of their organization with respect to the application and administration of this policy, as follows:
- a. assessing the organization's service delivery structure, resource allocation, human resources competencies, and performance indicators, as well as the systems, processes and procedures to prevent and effectively manage real, apparent or potential conflicts of interest in favour of the public interest;
  - b. informing the SACM of any major concerns or problems regarding the administration of this policy in a timely manner; and
  - c. providing the SACM with information that is considered necessary for assessing compliance with this policy and other policy instruments, as required.

## REFERENCES

[NPF Values and Ethics Policy](#)

[Conflict of Interest Guide](#)

[Values and Ethics Code for the Public Service](#)

[NPP Sponsorship and Donation Policy](#)