

Conflict of Interest Policy

Centre for Christian Studies

Preface

The Centre for Christian Studies (CCS) is a national theological school of the Anglican Church of Canada and the United Church of Canada. CCS is respected in both sponsoring denominations. To maintain the high-level of support and respect, it is essential that the affairs and businesses of CCS be conducted professionally, objectively and without interference or the perception of interference arising from the personal interests of individuals involved in the decision making process of CCS.

In order to achieve this goal, CCS requires that its elected members, staff, and volunteers refrain from placing themselves in a position that could foreseeably create a conflict of interest or the perception of a conflict of interest or which could potentially give rise to a conflict of interest between their own self-interest and the interests of CCS.

It is imperative that elected members, staff, and volunteers comply fully with the spirit and intent of the provisions of this policy.

1. Definition

- A. A conflict of interest occurs when the personal interests of a person (or a member of their immediate family) clash or has the potential to clash with his or her duties and responsibilities to CCS. Immediate family is defined as a married or unmarried spouse of the same or opposite sex, and their natural, adopted, step or foster children.
- B. For the purpose of this policy “personal interest” includes, but is not necessarily limited to, a business, commercial or financial interest. “Personal interest” may arise as a result of a family or marital relationship, friendships, or from former, existing or prospective business associations.
- C. A finding of conflict of interest does not depend upon willful wrongdoing by a person nor upon the issue of whether the judgment of a person has, in fact, been affected. A conflict of interest may exist whether or not a pecuniary advantage has been or may have been conferred upon the person.

2. Duty to Disclose

- A. Elected members, staff, and volunteers who:
 - i) are party to a contract or proposed contract with CCS; or
 - ii) have a personal interest in any person who or organization which is a party to a contract or a proposed contract with the CCS; or
 - iii) have any other interest in any person or organization which may give rise to a reasonable apprehension of bias in connection with the exercise of their official duties; shall immediately disclose to the Central Council of CCS, or the appropriate committee, the nature and extent of their interest. The Chairs of Council or of the appropriate committee shall maintain that information [during the time they are involved with CCS].
- B. When a person is unclear whether a conflict of interest exists, it is her or his responsibility to declare her or his interest and to seek a decision determining the matter from the Central Council.

- C. Any person who becomes aware or has reasonable cause to believe that a person is in a position of conflict of interest should discuss this concern with the person, and shall report the information to one of the Co-Chairs of Central Council or to the Chair of the appropriate committee.

3. Confidentiality

- A. Persons shall not disclose confidential or restricted information concerning the property, organization or affairs of CCS, unless a person's safety is at risk, nor shall any such information be used to benefit themselves or others.
- B. No persons shall seek to obtain personal gain for himself or herself, or for anyone with whom he or she is not dealing at arm's length, from the use of any information acquired in the course of his or her duties which is not generally available to the public.
- C. For the purposes of this policy, arm's length is defined as:
 - i) related persons shall be deemed not to deal with each other at arm's length; and
 - ii) it is a question of fact whether persons not related to each other were at a particular time dealing with each other at arm's length.
- D. No person, having attended or received minutes or other records of a "closed meeting" of Central Council or of a committee to which others have not been invited or allowed access, shall disclose to or discuss with anyone (other than a member of Central Council or of the same committee or as required in the discharge of appropriate duties) details of any discussions on matters coming before that meeting, or any decisions made by Central Council or the committee which are intended to remain confidential.
- E. The responsibility for maintaining the confidentiality of information or documents includes the responsibility to ensure that such information or documents are not directly or indirectly made available to unauthorized persons.

4. Where Conflict Exists

- A. If a person has a conflict of interest, she or he shall disclose such interest as stated above, and shall exclude herself or himself from any meeting or portion of a meeting and shall refrain from voting upon any matter where she or he may have a conflict of interest; she or he shall not receive any confidential documents, materials or minutes of any meeting relating to that matter. Nor shall she or he discuss the matter with any Central Council or committee member or staff.
- B. When a conflict of interest exists, the person in question may be relieved of certain responsibilities respecting the conflict of interest.

5. Breach Of This Policy

If any person breaches the provisions of this policy, whether by failing to declare a personal interest or a conflict of interest pursuant to Section 2 (A) or by failing to notify of a possible conflict of interest pursuant to Section 2 (B), the Central Council may take any action the Council deems appropriate.