

<b>Policy Name</b>	<b>Conflict of Interest Policy</b>
<b>Source</b>	Oxfam Canada
<b>Responsibility</b>	Governance Committee of the Oxfam Canada Board of Directors
<b>First approved by the OCA Board of Directors</b>	2013
<b>Last update / revision</b>	February 2022
<b>Next review date</b>	2025

## **BACKGROUND**

In 2020, Oxfam International introduced a One Oxfam Conflict of Interest Policy, which was adopted by all affiliates, including Oxfam Canada. This policy provides minimum standards regarding conflict of interest and supersedes individual affiliates’ policies regarding conflict of interest, except where the affiliate’s own conflict of interest policies are more restrictive. Affiliates can implement the One Oxfam policy using their own procedures and forms.

To be accredited through the Imagine Canada Standards Program, we are required to have conflict of interest policies for Board members, staff and volunteers that provide for disclosure, review and decision on actual or perceived conflicts of interest. This policy is intended to address conflict of interest situations that arise with respect to staff and members of the Board of Directors, but it also sets out ethical principles that inform decisions with respect to potential conflicts of interest among supporters.

This document encompasses the One Oxfam Conflict of Interest Policy standards and Oxfam Canada’s Conflict of Interest policy and procedures. It also reflects best practice among Canadian NGOs working in the international cooperation sector.

## **PURPOSE**

Oxfam Canada must meet high ethical standards in order to safeguard its integrity and merit the confidence and trust of its partners, supporters, donors, institutional funders, the public and - most importantly - the people and communities we work to support. Oxfam Canada's Board of Directors, staff and volunteers are expected to make decisions and carry out their responsibilities with diligence, honesty, and personal integrity.

Organizations can take steps to prevent many conflict of interest situations from arising. However, in the course of organizational decision-making and action, certain conflict of interest situations may be unavoidable. Oxfam Canada's Conflict of Interest Policy thus has three objectives:

1. To reduce the occurrence of conflict of interest situations
2. To be transparent about conflicts or potential conflicts of interest
3. To manage successfully and resolve fairly those conflict of interest situations that do arise

## DEFINITION

A conflict of interest is a situation in which an individual has a private or personal interest<sup>1</sup> that is sufficient to either influence or appear to influence the objective performance of their responsibilities with Oxfam Canada. A conflict of interest situation may be:

- Actual or real, in which the individual's official duties definitely are or definitely will be influenced by their private or personal interest;
- Perceived or apparent, in which the individual's official duties appear to other people to be influenced by that individual's private or personal interest (regardless whether the conflict is actual or not); or
- Foreseeable or potential, in which the individual's official duties may be influenced in the future by their private or personal interest.

## SCOPE

This policy applies to Oxfam Canada's Board of Directors, staff and volunteers (“Oxfam Individuals”) given the authority of their decision-making and impact of their actions on the organization.

The ethical principles that underlie this policy include:

- Integrity (action in line with our policies and values)
- Transparency (including honesty in disclosing the issue)
- Respect (for communities, partners, supporters, donors, etc.)

## POLICY STATEMENT

Oxfam Canada will seek to reduce the occurrence of conflict of interest situations and will implement practical preventative measures accordingly. These measures are intended to provide clear direction and guidance to Oxfam Individuals in their work, promote timely communication that enables individuals to foresee possible conflicts, and support assessment of the opportunities and risks of Oxfam Canada involvement in new initiatives.

To reduce actual, perceived or potential conflict of interest, Oxfam Canada's Board of Directors, staff, and volunteers:

- May not use their positions to extend special treatment that would advance their own interests or those of any family member, friend, or associate.
- May not accept gifts, money, discounts, or favours (including a benefit to any family member, friend or associate) that create indebtedness on the part of the recipient. It is

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<sup>1</sup> "Private or personal interest" refers to an individual's self-interest (e.g. to achieve financial profit or avoid loss, or to gain another special advantage or avoid a disadvantage); the interests of the individual's immediate family, friends or work colleagues; or the interests of another organization in which the individual holds a paid or voluntary position.

important to distinguish such gifts and favours from those that represent good will and friendship.

- May not use, or permit the use of, Oxfam property, facilities, equipment, supplies or other resources for activities not associated with the individual's Oxfam work without the express permission of the Executive Director or delegate.
- May not use confidential information to advance personal or others' interests, and may not disclose confidential or privileged information about Oxfam Canada's affairs unless provided for under Oxfam Canada's Whistleblower Protection Policy;
- May not try to influence decisions or transactions regarding any financial or other interests that the individual or any family member, friend or associate may have in an Oxfam contract or other Oxfam business transaction.
- May not engage in any outside work or business activity that conflicts or potentially conflicts with the individual's duties with Oxfam Canada.

As serious consequences may result from a conflict of interest situation that does arise, the disclosure of a conflict of interest, whether actual, perceived or foreseeable, must take place as soon as the individual becomes aware of the conflict.

Oxfam Canada will work toward managing and resolving those conflict of interest situations that do arise. It will implement measures that:

- Encourage individuals to self-declare a conflict of interest
- Enable individuals to respectfully raise real, perceived or foreseeable conflicts faced by others in the organization
- Disclose and document all pertinent information related to the situation
- Deal fairly and effectively with the situation according to its nature and severity. Options include restricting the involvement of the individual in the issue, recruiting a third party to assist with managing the situation, having the individual relinquish the private interest that is causing the conflict, or removing the individual completely from duties affected by the conflict.
- Document the outcome and the steps taken to implement the outcome

In addition, as per the requirement in the One Oxfam Conflict of Interest policy, designated positions must complete the Conflict of Interest Disclosure Statement form (Annex A) on an annual basis. These designated positions include, but are not limited to, Oxfam Canada Board members and Oxfam Canada Senior Management. Please refer to clause 5-2 Annual Disclosure Statement of One Oxfam Conflict of Interest Policy for details.

## **POLICY IMPLEMENTATION**

### **1. Informing Oxfam individuals about the policy, and obtaining their written agreement**

The Conflict of Interest policy will be included in the orientation materials for Board members, staff and volunteers. Managers and supervisors will make a copy of the policy available to each employee and volunteer and discuss the policy with them, highlighting any provisions that have particular relevance to the nature of the employee's work. Board members, staff and volunteers

will be required to expressly acknowledge in writing their understanding of and agreement with the policy by signing the Conflict of Interest Disclosure Statement form.

The policy will be placed on Oxfam Canada's website.

## 2. Procedures to determine and disclose a conflict of interest situation

Members of the Board of Directors must report any conflict of interest situation to the Board Chair (or delegate) in writing, or publicly declare their interest or potential interest at a Board or Board committee meeting. Any such declaration in a meeting will be recorded in the minutes of that meeting. If the Board Chair has a conflict of interest, they must report it to the Vice Chair. Board Directors should consult with the Board Chair if they need assistance in interpreting whether a situation they have experienced or are confronting puts them in a conflict of interest.

All staff and volunteers must complete the Conflict of Interest Disclosure Statement form (Annex A) as part of their onboarding process. While working or volunteering for Oxfam Canada, employees and volunteers must report any perceived or possible conflict of interest to their direct supervisor. This can be done by completing the Conflict of Interest Disclosure Statement form. Further details on reporting requirements can be found in clause 7-2 Minimum Procedure for Addressing Conflict of Interest of the One Oxfam Conflict of Interest Policy. Staff and Oxfam Canada volunteers should consult with their direct supervisor if they need assistance in interpreting whether a situation they have experienced or are confronting puts them in a conflict of interest.

If the Executive Director has a conflict of interest, they must report to the Board Chair (or delegate).

## 3. Responsibility for addressing conflict of interest situations

- The Board Chair is specifically responsible for attending to any conflict of interest situation involving the Board as a whole, individual Board members or the Executive Director. The Board Vice-Chair will attend to any conflict of interest situation involving the Board Chair.
- The Executive Director is responsible for the ongoing application of the policy among staff and volunteers, and may consult the Board Chair as necessary.

## 4. Reporting on conflict of interest situations

- The Board Chair will report to the entire Board the nature and disposition of any conflict of interest situation involving the Board as a whole, individual Board member(s), or the Executive Director.
- The Board Vice-Chair will report to the entire Board the nature and the disposition of any conflict of interest situation involving the Board Chair.
- The Executive Director will report to the Board the number and general nature of conflict of interest situations having arisen among staff or volunteers.

5. Failure to comply

Member of the Board of Directors, staff and volunteers who fail to comply with this policy are subject to disciplinary action up to and including termination of employment/engagement.

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