



## Conflict of Interest Policy

**Effective Date**                      November 19, 2015

**Approval Date**                     November 19, 2015

**Review Date**                        November 2020

<b>Policy Statement</b>	Ottawa Community Housing (OCH) is committed to preventing, managing and resolving Conflicts of Interest involving OCH Employees and Board Directors as a matter of good business practice contributing to public trust in the integrity and impartiality of OCH.
<b>Policy Objectives</b>	<p>The objectives of this policy are to:</p> <ul style="list-style-type: none"> <li>• Help Employees and Board Directors recognize, disclose and mitigate Conflicts of Interest</li> <li>• Ensure that in situations of real, potential or perceived Conflict of Interest, decisions are made, and are seen to be made, with integrity and that uphold the best interests of OCH</li> <li>• Ensure that Conflict of Interest situations are disclosed promptly and addressed in accordance with this policy and established procedures</li> <li>• Establish the principles for the development of a process for the disclosure, management and mitigation of Conflicts of Interest</li> </ul>
<b>Policy Principles</b>	<p>Accountability, responsible stewardship and transparency in decision-making are fundamental to OCH business practices</p> <p>Prompt response to real, potential and perceived Conflicts of Interest is critical to maintaining and enhancing public trust in the integrity and impartiality of OCH</p> <p>Employees and Board Directors shall serve, and be seen to serve, honestly, in good faith, and with transparency related to matters of Conflict of Interest</p>

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<b>Application</b>	This policy applies to all OCH Employees regardless of employment status, including Employees on leave with or without pay, Board Directors, and Committee Members and Volunteers
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### Roles & Responsibilities

Key Roles	Key Responsibilities
All	<ul style="list-style-type: none"> <li>Many individuals will have multiple roles and responsibilities</li> </ul> <p>For example, an individual may have responsibilities flowing from their role as a Manager and also an Employee</p>
Board Directors and Committee Members	<ul style="list-style-type: none"> <li>Read, understand and comply with this policy, the Board Conflict of Interest Procedure and applicable directives</li> <li>Review official duties and responsibilities and private interests on a regular basis for possible Conflicts of Interest</li> <li>Promptly disclose any real, potential or perceived Conflicts of Interest in accordance with Board Conflict of Interest Procedures</li> <li>Promptly report, in accordance with the Board Conflict of Interest Procedure, any Board Director or Employee activity that you become aware of that violates this Policy</li> <li>Cooperate fully in any investigation of a possible Conflict of Interest</li> <li>Adhere to decisions related to Conflict of Interest matters</li> </ul>

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<p><b>Board Chair</b></p>	<p>In the case of Board Directors and Committee Members:</p> <ul style="list-style-type: none"> <li>• Receive and ensure that Conflicts of Interest are addressed in accordance with the Board Conflict of Interest Procedure</li> <li>• Seek the support and advice of the Executive Director, Organizational Effectiveness, as required, to address Conflicts of Interest</li> <li>• Ensure appropriate action is taken to resolve or mitigate Conflicts of Interest</li> <li>• Ensure that all actions taken with respect to addressing Conflicts of Interest are documented</li> </ul> <p>In the case of the Chief Executive Officer:</p> <ul style="list-style-type: none"> <li>• Receive and ensure that Conflicts of Interest are addressed in accordance with the Employee Conflict of Interest Procedure</li> <li>• Seek the support and advice of the Executive Director, Organizational Effectiveness, as required, to address Conflicts of Interest</li> <li>• Ensure appropriate action is taken to resolve or mitigate Conflicts of Interest</li> <li>• Ensure that all actions taken with respect to addressing Conflicts of Interest are documented</li> </ul>
<p><b>Board Vice Chair</b></p>	<p>In the case of Board Chair:</p> <ul style="list-style-type: none"> <li>• Receive and ensure that Conflicts of Interest are addressed in accordance with the Board Conflict of Interest Procedure</li> <li>• Seek the support and advice of the Executive Director, Organizational Effectiveness, as required, to address Conflicts of Interest</li> <li>• Ensure appropriate action is taken to resolve or mitigate Conflicts of Interest</li> <li>• Ensure that all actions taken with respect to addressing Conflicts of Interest are documented</li> </ul>

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Chief Executive Officer	<p>In all cases:</p> <ul style="list-style-type: none"> <li>Provide oversight and ensure that Employee Conflicts of Interest are addressed in accordance with the Employee Conflict of Interest Procedure</li> </ul> <p>In the case of Executive Directors:</p> <ul style="list-style-type: none"> <li>Receive and ensure that Conflicts of Interest are addressed in accordance with the Employee Conflict of Interest Procedure</li> <li>Seek the support and advice of Human Resources, or an appropriate external resource, as required, to address Conflicts of Interest</li> <li>Ensure appropriate action is taken to resolve or mitigate Conflicts of Interest</li> <li>Ensure that all actions taken with respect to addressing Conflicts of Interest are documented</li> </ul>
Executive Director, Organizational Effectiveness	<p>In the case of Board Directors and Committee Members:</p> <ul style="list-style-type: none"> <li>Provide support and advice to the Board Chair or Board Vice Chair regarding the interpretation, application and administration of this policy</li> <li>Retain documentation regarding all actions taken to address Board Conflicts of Interest</li> <li>Ensure the development and implementation of Board training on this policy</li> </ul>

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Executive Directors	<ul style="list-style-type: none"> <li>Ensure that Employee Conflicts of Interest are addressed in accordance with the Employee Conflict of Interest Procedure</li> <li>Promptly inform Human Resources of all Conflicts of Interest within respective department</li> <li>Seek the support and advice of Human Resources, as required, to address Conflicts of Interest</li> <li>Ensure that appropriate action is taken to resolve or mitigate Conflicts of Interest</li> <li>Ensure that all actions taken with respect to addressing Conflicts of Interest are documented</li> </ul>
Human Resources	<ul style="list-style-type: none"> <li>Provide support and advice to the Chief Executive Officer, Managers, and Employees on the interpretation, application, and administration of this Policy</li> <li>Work with appropriate resources, internal and/or external, to address Conflicts of Interest</li> <li>Enable oversight of Conflicts of Interest by the Chief Executive Officer</li> <li>Retain documentation regarding all actions taken to address Employee Conflicts of Interest</li> <li>Develop and implement Employee training on this policy</li> </ul>
Manager	<ul style="list-style-type: none"> <li>Review this Policy with all Employees and highlight areas and examples that are relevant to the Employee's work</li> <li>Receive and promptly inform the next level Manager and/or Executive Director of any Conflicts of Interest</li> <li>Work with appropriate resources, internal and/or external, to address Conflicts of Interest</li> </ul>

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Employee	<ul style="list-style-type: none"> <li>Read, understand and comply with this policy, the Employee Conflict of Interest Procedure and applicable directives</li> <li>Review official duties and responsibilities and private interests on a regular basis for possible Conflicts of Interest</li> <li>Promptly disclose any real, potential or perceived Conflicts of Interest, in accordance with the Employee Conflict of Interest Procedure</li> <li>Promptly report, in accordance with the Employee Conflict of Interest Procedure, any Employee or Board Director activity that you become aware of that violates this Policy</li> <li>Cooperate fully in any investigation of a possible Conflict of Interest</li> <li>Adhere to decisions related to Conflict of Interest matters</li> </ul>
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<b>Related OCH Policies and Procedures</b>	<ul style="list-style-type: none"> <li>Board of Directors Conflict of Interest Procedure</li> <li>Employee Conflict Interest Procedure</li> <li>Hiring Policy</li> <li>Procurement Policy and Procedures</li> <li>Code of Conduct</li> </ul>
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<b>Other Supporting References</b>	<ul style="list-style-type: none"> <li>OCH Articles of Incorporation</li> <li>OCH By-Law 9, as amended</li> <li><i>Business Corporations Act</i>, R.S.O. 1990, c. B-16 ("OBCA"), section 132</li> <li><i>Housing Services Act</i> (HSA) and its regulations. (Note that these rules can be modified by agreement between the Service Manager/ Shareholder and the housing provider)</li> <li>Terms and Conditions – Exempt Employees</li> <li>Terms and Conditions – General Management Group</li> <li>Senior Manager Employment Contracts</li> <li>Collective Agreement with Ottawa-Carleton Public Employees Union, Local 503 (CUPE)</li> <li>Collective Agreement with the Civic Institute of Professional Personnel (CIPP)</li> </ul>
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<b>Questions / Contact</b>	<p>For further information or clarification please contact:</p> <p>For Employees – Director, Human Resources</p> <p>For Board and Committee Members - Executive Director, Organizational Effectiveness</p>
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<b>Appendices</b>	<p><b>Appendix 1</b> – Definitions</p> <p><b>Appendix 2</b> – Document History</p>
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### Appendix 1 – Definitions

Term	Acronym	Definition
<i>Board Director</i>		For the purposes of this policy, Board Director includes members of the OCH Board of Directors and all Community and Tenant Committee Members
<i>Business Corporations Act, Ontario</i>	OBCA	The OBCA includes specific provisions regarding Conflicts of Interest for Board Directors.
<i>Business associate</i>		Includes a relationship with a vendor, contractor and other providers of goods and services to OCH. Community organizations that have a relationship with OCH are also considered business associates.
<i>Child</i>		A child means the issue of the Employee, Board Director or Committee Member or his or her spouse, or one formally adopted by the Employee or his or her spouse, or a legal ward of the Employee, Board Director or Committee Member or his or her spouse.
<i>Conflict of interest</i>		<p>Any situation where an Employee, Board Director, or Committee Member's personal interests could influence his or her ability to make decisions with integrity, impartiality and in the best interests of OCH.</p> <p>Conflict of Interest includes a <i>real</i> Conflict of Interest, which exists at the present time, a perceived Conflict of Interest, which could appear by an outside observer to exist, whether or not it is the case, and a <i>potential</i> Conflict of Interest, which could reasonably be expected to occur in the future.</p>

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<i>Employees</i>		For the purpose of this policy, Employees means all OCH Employees regardless of employment or leave status, including full-time, part-time, casual, temporary, permanent, students, and Volunteers
<i>Personal Interests</i>		<p>Refers to having a self-interest, and includes the interests of related persons, friends and business associates</p> <p>Personal interests can be of a personal, financial, or professional nature and can include a personal gain, benefit, advantage or privilege</p> <p>Personal interests include participating in outside activities or employment outside of OCH, whether paid or unpaid</p>
<i>Related Persons</i>		A related person includes, but is not limited to, a father, mother, brother, sister, spouse, child, aunt, uncle, niece, nephew, father-in-law, mother-in-law, step father-in-law, step-mother-in-law, grandparent, grandchild, step-grandparent, step-grandchild, step-child or ward
<i>Spouse</i>		A spouse means a legally married spouse of the Employee, Board Director or Committee Member or a person of either sex who is and has been cohabitating with the Employee in a common-law relationship for more than one (1) year
<i>Manager</i>		An Employee's direct supervisor including a Manager, Director, Executive Director or Chief Executive Officer
<i>Volunteer</i>		For the purpose of this policy refers to individuals who do unpaid work for OCH where their duties or responsibilities may result in, or could reasonably be seen to give rise to, a Conflict of Interest

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### Appendix 2 – Document History

Revision Number	Date	Author(s)	Brief Description of Change
0.1	August 21, 2015	Hastings, Kelly; Winson, Devin	Revised and merged Employee and Board Policies

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