

Title: Conflict of Interest Policy
Category: Governance
Date Approved: June 2018
Date of required review: June 2021 (deferred to 2022)
College Contact: Director Governance & Strategic Planning
Status: In Effect

Conflict of Interest Policy:
Disclosure of potential, perceived or real Conflicts of Interest among
CFPC Members involved in (or wishing to be involved in)
College leadership activities

Decision makers are entrusted with the good of the Corporation and are obliged to conduct honest discussions in matters relating to their individual interest. Conflicts of interest, whether real, perceived, or potential, must be openly addressed. All College Board Directors and Committee Members must recognize and disclose conflicts of interest so that their influence on deliberations and decisions are appropriately considered.

CFPC's Commitment:

- **To understand** the relationships that individuals associated with (or interested in being associated with) the College have, in order to determine whether there is a potential, perceived or real conflict of interest, and how to manage this.
 - The CFPC is not interested in limiting member opportunities to participate in College activities, but in understanding the context in which they participate.
- **To require** that College members report and disclose any relationships in which they may be in a position of conflict of interest. This information will be available only to other CFPC members, allowing them to understand how potential conflicts of interest were managed when recommendations or decisions are made by College bodies.
- **To invite** College members to share anything else they are aware of that might have bearing on their ability to make decisions on behalf of the CFPC.

Conflict of interest (COI):

A conflict of interest occurs when competing or multiple interests, usually concerning a perceived benefit, arise for an individual responsible for decision-making. It is a set of conditions in which judgement/decisions concerning a primary interest (eg, patients' welfare, the validity of research, and/or organizational policy) tend to be unduly influenced by a secondary interest. The primary example of a secondary interest is likely financial gain, either personal or organizational, but can also extend to academic or career advancement and benefit to family, friends, or colleagues. Mere existence of a COI does not imply wrongdoing. When COIs do arise, however, they must be recognized, disclosed, and appropriately managed.

Declarations:

Upon joining the Board of Directors/a committee, all relationships that may lead to a conflict in decision making must be declared:

- Relevant potential conflicts will be those that are applicable to current relationships and those from the last three (3) years.
- The situations in which potential conflict of interest may arise cannot be exhaustively set out. Conflicts generally arise in the following situations:
 - Acting for an improper purpose: exercising powers related to the corporation motivated by self-interest rather than the best interest of the corporation.
 - Interest of a relative, friend or colleague: when the corporation conducts business with suppliers of goods or services or any other party of which a relative, friend or colleague of a director/committee member is employed.
 - Gifts: accepting a gift, payment, service or anything else of nominal value from a party with whom the corporation may transact business.
- Relationships with Healthcare/Pharmaceutical Industry (HPI): HPI is defined as for-profit entities that develop, produce, market, or distribute drugs, devices, products, services, or therapies that may be prescribed to patients or ordered by doctors to diagnose, treat, monitor, manage, and alleviate health conditions. Potential conflicts include but are not limited to the following:
 - Partnerships with the HPI
 - Direct financial interest or investment in the HPI
 - Share holdings in the HPI (excluding mutual funds)
 - Receipt of consultation fees from the HPI
 - Membership on HPI-associated advisory boards and speakers bureaus
 - HPI funding for research
 - HPI funding for educational activities
 - Participation in an HPI clinical trial or focus group
- Deriving financial gain or commercial benefit by virtue of their position as a Board Director or knowledge attained thereby.

Management of declarations:

Board Directors/committee members each declare their potential conflicts of interest upon joining the Board/committee, and propose a management strategy. The rest of the Board/committee reviews the proposed management strategy and determines appropriate management through discussion of the bearing of the declaration on decision-making.

The management strategy may range from the declaration having no impact and the Director/committee member being permitted to discuss and vote on the issue; to permission to discuss the issue with the Board/committee but not vote; to being absent for the discussion and vote; to the Director/committee member needing to dissociate from the entity or activity or needing to resign from the Board/committee.

In addition to this review process occurring upon a new Board Director/committee member joining the Board/committee, Board Directors/committee members are asked at regular intervals to update their declarations. Any new declarations and management strategies are reviewed by the rest of the Board/committee. If an agenda topic arises and a Director/committee member is in a potential position of conflict, he/she immediately discloses such conflict to the Board/committee and the Board/committee discusses the management strategy before proceeding with the discussion.

The management strategies determined by the Board/committee shall be adhered to by Directors/committee members. If a Director/committee member breaches the management strategy or has behaved or is likely to behave in a manner that is not consistent with the highest standards of public trust and integrity and such behaviour may have an adverse impact on the College, such Director/committee member may be subject to removal from the Board/committee, pursuant to the by-laws and policy, in particular the CFPC's Board Director Code of Conduct.

Board/committee meeting minutes will record notice and management strategies of any COIs related to the meeting discussion.

Applicants for Board Director Positions:

Applicants for Board Director positions will be asked to review this policy and complete the Conflict of Interest Declaration as part of the application process. Applicants will be asked to provide all potential, perceived or real conflicts and their proposed management strategy, should they be elected to the Board of Directors. Declarations and management strategies for applicants being recommended to the Board of Directors by the Nominating Committee as candidates for the members to consider electing, will be reviewed by the Board of Directors. The Board will be confirming that the proposed management strategy would permit the

individual to participate fully and effectively as a Board Director, if elected. Should the Board of Directors determine that the proposed management strategy would not fully permit this, the Chair of the Board will contact the candidate to discuss further. The Chair of the Board will share the Board's recommended management strategy. Sharing this prior to the election permits the candidate to be aware of the possible need to dissociate him/herself from a particular entity or activity, allowing him/her to confirm that he/she wishes to continue to stand for election.

Candidate conflicts of interest and proposed management strategies will be shared with members to review when voting.