

Title:	Policy Number:	Pages
Staff Conflict of Interest	CP700-2014	2
Approved by:	Approval Date:	Sept 25, 2014
Chief Executive Officer Board of Directors	Review Date:	September 2015
Policy Owner:		
VP, Strategy, Quality and Risk Management		
Relevant or Related Policies/Legislation/Guidelines:		
N/A		

STAFF CONFLICT OF INTEREST

PURPOSE STATEMENT

The purpose of the policy is to:

- Establish clear standards for dealing with real, perceived or potential conflicts of interest;
- Reduce the possible appearance of conflict of interest; and
- Provide the means to identify and resolve real, perceived or potential conflicts of interest.

SCOPE

This policy applies to all eHealth employees, student learners and consultants.

POLICY STATEMENT

eHealth employees, student learners and consultants should not engage in activities that could result in a conflict of interest or be perceived as a conflict of interest.

POLICY REQUIREMENTS

Employees, student learners and consultants should not engage in activities which could give rise to, or could be perceived as a conflict of interest. A conflict of interest arises when the personal interests of an individual could actually, potentially or be perceived to interfere with the interests of the company. Any conflicts of interest or perceived conflicts of interests must be disclosed and reported to a Designated Officer.

Situations where a conflict of interest may arise include:

- Dealings with family, friends, business associates, former business associates;
- Outside employment;
- The employment of relatives;
- Giving or receiving gifts or entertainment;
- Use of corporate information for personal gain; and
- Future employment.

This is not an exhaustive list of all potential conflict of interests. Employees should exercise good judgment and common sense in anticipating situations that may give rise to a conflict of interest. If at any time an employee is questioning whether a conflict of interest exists the best policy is to immediately cease the activity and disclose the activity to a Designated Officer.

The general guidelines (Appendix A & B) provide employees further information on what could be or perceived to be a conflict of interest.

RESPONSIBILITIES

- Designated Officers are responsible to support and provide advice to the employees considering making a disclosure and also to assess, potentially investigate, if appropriate, and manage reports of a conflict of interest. eHealth’s Designated Officers include:
 - Designated Officer – Vice-President, Strategy, Quality and Risk Management
 - Designated Officer – Vice-President, Finance and Administration
- If an employee becomes aware of, or hears of an alleged conflict of interest they are encouraged to report the concern promptly a Designated Officer.

LINKED POLICIES/PROCEDURES/RESOURCES

N/A

FORMS AND APPENDICES

Appendix A – Guidelines

Appendix B – Approval for Outside Employment/Activities

The purpose of these guidelines is to clarify those activities which may constitute conflict of interest situations; they are not designed to be exhaustive.

If questions arise that are not specifically dealt with by the guidelines, they should be referred to a Designated Officer.

Guidelines Concerning Employee Disclosure Requirements

1. Dealings with family, friends, business associates, former business associates

Employees who exercise financial, contractual or discretionary control over others must not give or appear to give preferential treatment to family members, friends, business associates and/or former business associates.

Employees, volunteers or students who exercise financial, contractual or discretionary control over others must not give or appear to give preferential treatment to any private or public body such as other ministries, regional health authorities or volunteer organization of which they are a member.

2. Outside Employment

eHealth's employees may engage in outside employment, directorship or volunteer positions provided they do not:

- Place the employee in a real, potential or apparent conflict of interest;
- Appear to represent eHealth;
- Intrude on the time, attention and energies normally applied to eHealth;
- Interfere with the employees regular duties; or
- Are forbidden by law or involve any unethical or immoral conduct.

To determine whether an activity constitutes outside employment the following criteria can be applied:

- Self-employment;
- Activities from which there is a monetary reward; or
- Activities where a service or advice is provided an honorarium received.

If one or more of the above criteria are characteristic of the activity, then such an activity is characterized as outside employment.

An eHealth employee who wishes to undertake outside employment must inform his/her Director, who will determine whether outside employment will be permissible. The employee must have written authorization on the approved form from the CEO prior to engaging in outside employment (form). A Director may also revoke the approval if s/he determines that the outside employment is interfering with the employee's duties at eHealth.

Examples of activities which are considered to be outside employment:

- farming

- freelance journalism
- rental of machinery or equipment
- consulting work
- accounting services
- computer sales or repairs
- the sales of goods or services (i.e. Mary Kay, Arbonne, Epicure etc.)
- employment in service industries, that is, bars, restaurants, resorts, etc.

3. Employment of Relatives

In some situations, hiring, transferring or managing family members can lead to conflicts of interest, unethical employment practices and the appearance of special treatment. Family members must not be employed in the same business unit where:

- An immediate supervisory relationship would exist such that the supervisor has influence, input or decision-making power over an employee's performance evaluation, salary, premiums, special permissions, potential for promotion, conditions of work or similar matters; or
- The working relationship affords an opportunity for collusion which could have a detrimental effect on the employer.

For the purpose of the policy, family members would include spouse, parent, grandparent, grandchild, brother, sister, son or daughter, aunts, uncles, cousins and common-law relatives. For further information on the employment of relatives please contact Human Resources.

4. Giving and Receiving Gifts or Entertainment

An employee, student, consultant or family member of the aforementioned should never give or accept any gift or service which could be viewed as a payment for services rendered through his/her employment with eHealth. The timing and nature of the gift or entertainment, as well as the circumstances under which it is offered are important and should be considered.

The giving and receiving of gifts and entertainment must be:

- Reasonable and modest;
- In compliance with all laws and regulations; and
- Considered an accepted business practice.

When participating in a community, charitable or business event on behalf of eHealth, employees may be eligible for prizes of modest value if they meet the guidelines.

Examples of gifts that should be declined:

- Gifts or entertainment that could influence, or appear to influence, business decisions;
- Flights and/or registration to events;
- All-expense paid trips; and
- Cash gifts.

Some examples of appropriate gifts:

- Promotional material (e.g. mugs, hats, golf shirts, pens);
- Small gifts of gratitude (e.g. chocolates, coffee, gift certificates);
- Tickets to local sporting or cultural events to be attended with the representative of the organization who provided them; and
- Tickets to local charitable or social events hosted or sponsored by the individual or organization providing the tickets or attended with representatives of the organization providing the tickets.

5. Use of Corporate Information for Personal Gain

Employees, volunteers or students are not prevented from using eHealth Saskatchewan information which is available to the public in the management of their private affairs, e.g. Annual Report.

However, where such information is not available to the public, employees, volunteers or students must manage their private affairs so that neither they nor their relatives, friends, business associates, or former business associates benefit or appear to benefit from the use of such information. An employee, volunteer or student must not reveal eHealth information to any unauthorized Individual prior to its public release date (e.g. budget information).

6. Future Employment

An employee should not themselves be influenced in the carrying out of his or her responsibilities by the prospect of employment elsewhere.

Approval for Outside Employment/Activity and/or Disclosure of Other Outside Activity/Interest which may Create a Real or Perceived Conflict of Interest

To seek approval to engage in outside employment and/or to disclose other outside activities/interests as required by the Conflict of Interest Guidelines in Policy:

- 1) Approval is required prior to engaging in outside employment.
- 2) Approval is required prior to engaging in other activities/interests/roles that may result or appear to result in a conflict of interest.

Name: _____
(please print)

Unit: _____

Position: _____

Type of Employment:

Permanent Full-time:

Permanent Part-time:

Term:

Other:

If you are currently full time at eHealth please fill out section 1 below.

1. a) Type of outside employment/activity:

- Self-employment.
 Employment/Activities from which there is a monetary reward.
 Employment/Activities where a service or advice is provided and an honorarium received.

b) Type of outside activity/interest/role, which may create a real or perceived conflict:

- Volunteer activity.
 Family ownership of private asset(s) or business interest.
 Other: _____

2. Identify and explain the outside employment/activity/interest/role identified in 1(a) and 1(b) above:

3. The outside employment/activity/interest identified in 1(a) and 1(b) above:

(a) May interfere with the performance of my regular duties.

Yes No

(b) May use advantages derived from employment in eHealth Saskatchewan.

Yes No

(c) May involve the use of eHealth Saskatchewan premises, supplies, equipment, employees, etc.

Yes No

(d) May be performed in a manner as to appear to be an official act or policy of eHealth Saskatchewan.

Yes No

(e) May be done during my normal working hours.

Yes No

Signature of Employee

Date

Supervisor

Date

CEO Signature

Date

*Please provide a copy of the form to Human Resources once complete.