**National Operating Policy # 13**

*Subject: Conflict of Interest*
*Approved: July 16, 2011*
*Revised: December 2019*
*Reviewed: August 2026*

## *Objective and Rationale*

This policy applies to the executive members of all national boards established by the Canadian Institute of Public Health Inspectors (CIPHI).

The objective of this policy is to assist executive members in avoiding or resolving conflicts of interest with their board or the corporation (CIPHI) at large.

Conflicts of interest are unwanted as they may have serious implications on the executive member's judgement and commitment to the organization and by extension to the realization of the organization's goals.

CIPHI recognizes that when a conflict of interest does occur it is not usually intentional and can often be addressed and resolved before any actual or perceived damage is done. Therefore, it is important for both the executive member and the board to act on any potential conflicts in accordance with this policy as expediently as possible .

This policy is not intended to be punitive or disciplinary in nature. It should be used as guide to prevent or mitigate conflicts of interest that may arise from time to time and identify potential corrective actions that will lead to a satisfactory outcome for all concerned.

*Definitions*

**Chair** is the duly appointed Chair of the CIPHI Board of Directors (Board), Board of Certification, Council of Professional Experience and Environmental Health Foundation of Canada.

**Executive Member** includes any person who has been appointed to a national board in accordance with the corporation By-Laws and Regulations. This includes any duly appointed officers of the board and may, at the discretion of a board, include a person appointed by that board to a national volunteer position.

**National Board** includes:

- Board of Directors (Board)
- Board of Certification (BOC)
- Council of Professional Experience (CoPE)
- Environmental Health Foundation of Canada (EHFC)

**Perceived conflict of interest** occurs where it could reasonably be perceived, or give the appearance, that private interests conflict with board duties even though an actual conflict does not exist

**Personal Benefit** is a personal gain, including any gains for the families and/or any business interest of an individual and their families or the granting of special considerations or advantages to selected individuals, groups or businesses.

**Potential conflict of interest** arises where certain interests or obligations, whether personal or involving a third-party, could conflict with official duties in the future (and become a "real conflict of interest).

**Real conflict of interest** involves the existence of a direct conflict between official duties and/or board responsibilities and a competing interest or obligation, whether personal or involving a third-party.

**Review Panel** consists of the Board Vice President or Past-President, the Chair of the BOC and Chair of CoPE whose sole purpose is to follow up conflict of interest complaints against the Board Chair

*1.0 Specific Operations*

**1.1**

**Conflict of Interest (CoI) - Declaration and Disclosure**

- Upon acceptance of an appointment to a CIPHI board the executive member must sign the CoI Declaration and Disclosure Statement ( Attachment # 1) and submit it to the board Chair. The Chair will submit a copy to CIPHI office for filing.
- A Chair who was not an executive member prior to taking office must sign a CoI Declaration and Disclosure Statement and submit to the Board for processing.
- Upon request of the board Chair a signed CoI Declaration and Disclosure Statement must be submitted by any individual accepting a CIPHI national volunteer position (e.g. AEC committee participants, webmaster, social media manager).
- Executive members who at any time find themselves in a situation that may constitute a conflict of interest must withdraw from the situation and disclose the conflict to the Chair of their board. The Chair will lead the board in a review of the disclosure.
- A board Chair who at any time find themselves in a situation that may constitute a conflict of interest must withdraw from the situation and disclose the conflict to their board. The board will assign a member to lead the board in a review of the disclosure.
- The executive member must remain withdrawn until the board has determined that no conflict of interest exists.
- Any executive member who has disclosed a real, potential or perceived conflict of interest will not be permitted to participate in discussions of their case by the board other than to provide personal information to the board that will assist in the board's deliberations.

**1.2**

**Complaint Procedures**

- A complaint regarding a conflict of interest involving an executive member may be submitted by any person to the Chair of the board on which the executive member sits. The Chair will lead the board in a review of the complaint. (**NOTE:** Where the complaint is regarding the Chair of a board see **Section 1.3** ).
- In the event the Chair is unavailable or unable to perform the duties named in this policy they may delegate an executive member of the board to act in their place.
- Every effort should be made to validate a conflict of interest complaint prior to a review being initiated. This includes requesting a written complaint and advising the complainant that the executive member will be provided the details of the complaint against them which may include the identity of the complainant.
- An executive member will be notified when a complaint against them is under review and be provided an opportunity to respond to the allegations.
- The details of a complaint, any follow up action and the outcome should be documented, and a copy provided to both the executive member and the complainant(s).
- All persons involved in a review of an alleged code of conduct violation are responsible for the protection of personal and sensitive information and the fair handling of it at all times in accordance with National Operating Policy #2.

- A complaint may be impossible to substantiate if the complainant and the executive member have differing opinions as to what has transpired and there is no reliable evidence of a conflict of interest. Unsubstantiated complaints will be dismissed with no further action taken.
- Corrective action (Sec.1.5) against an executive member may be recommended by the Chair and must be approved by a confidential simple majority vote of the appropriate board.
- The executive member subject to corrective action will be given an opportunity to make explanation and provide evidence to the board regarding the allegations against them prior to the vote. They may not vote or be present for the vote.
- Notice of corrective action required will be sent to the executive member from the CIPHI office by registered letter or e-mail.
- Where an executive member subject to corrective action was elected or appointed to their position as a representative of a Branch of CIPHI then the respective branch executive should be notified of the issue and the action taken. The branch executive cannot overturn any board's decision.

**1.3**

**Complaint Against a Chair**

Complaints against a Chair are to be processed in the same manner as complaints against any other executive member with the following exceptions:

- Where the Chair of the BOC, CoPE, or EHFC is the subject of conflict of interest complaint the complaint should be submitted to the Board Chair who shall lead the Board in a review of the complaint in accordance with this policy.
- Where the Board Chair is the subject of a conflict of interest complaint the complaint should be submitted to the National Vice President or, if unavailable, the National Past-President.
- The Vice President or Past-President will form a **review panel** consisting of themselves, and the Chairs of BOC and CoPE. This panel shall lead the Board in a review of the complaint in accordance with this policy.
- A recommendation from the review panel for corrective action must be established by consensus or a simple majority vote by the review panel.
- In the event corrective action against the Chair Board, BOC, CoPE or EHFC is recommended it must be approved by a confidential simple majority vote of the Board.

**1.4**

**Cause for Corrective Action**

When there is evidence of a conflict of interest corrective action is required. A conflict of interest will be considered to exist where an executive member:

- benefits privately or personally during their terms of office by receiving any remuneration from CIPHI for any services provided;
- has a personal interest in a subject that may lead them to actions, activities or relationships that contradict the interest of the board or places the board or the corporation (CIPHI) at a disadvantage;
- has a real or perceived interest that puts into question their objectivity or CIPHI's integrity when making decisions;

- uses CIPHI property (equipment, materials) or information for personal benefit or non-CIPHI purposes;
- discloses information to any individual or organization which would afford an advantage not generally available to others, including such disclosure after leaving a board position;
- places themselves in a position where they are under obligation to any person who might benefit from special consideration or favor on their part, or who might seek in any way preferential treatment, advice, service or consultation.

An executive member shall not accept a gift from any of the following persons or entities if a reasonable person might conclude that the gift could influence the executive member when performing his or her duties to CIPHI:

- a person, group or entity that has dealings with CIPHI.
- a person, group or entity to which the Board Member provides services in the course of his or her duties to CIPHI.
- a person, group or entity that seeks to do business with CIPHI.

This shall not operate to prevent an executive member from accepting a gift of nominal value (i.e. mug, cap, t-shirt), given as an expression of courtesy or hospitality, if doing so is reasonable in the circumstances.

**1.5**

**Corrective Action**
If the board is satisfied that a real, potential or perceived conflict exists, the board must implement one or more of the following options:

- Direct the executive member to take steps to resolve or mitigate the conflict such as withdrawing from activities causing the conflict or resigning from the board
- Request the member provide evidence to the board that they have resolved or mitigated the conflict
- Vary the responsibilities of the individual so they are not in a position of conflict
- Prohibit the individual from participating on a CIPHI committee or working group causing the conflict
- Terminate the appointment of the executive member to the board

**1.6**

**Appeal Process**

An executive member subject to corrective action may appeal this decision by submitting a written appeal to the Board who will refer the matter to an appeal review panel established for this purpose.

The Appellant must submit the appeal to the CIPHI Office no more than 30 calendar days after the confirmed delivery date of the notice of corrective action sent by registered letter or delivery by email.

| *Accountability* |
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| The Board of Directors shall administer and ensure compliance with this policy. |

| *Attachments / Appendices* |
| --- |
| Declaration of Conflict of Interest: page 7 |

| *Document Change History* |
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| Approved – July 16, 2011<br>Revised – December 2019<br>Revised – June 2025<br>Revised – August 2026 |

Canadian Institute of Public Health Inspectors
National Operating Policy #13
Attachment #1

**Conflict of Interest Declaration and Disclosure Statement**

I hereby acknowledge that, as a CIPHI Executive member or Volunteer, I occupy a position of trust and am expected to act at all times in such a manner as to avoid even the appearance of using my position to advance any private interest of mine or of any individuals or entity with whom I have a relationship in a way inconsistent with the purposes and interests of CIPHI.

I hereby certify that, to the best of my knowledge, no aspect of my current personal or professional circumstances places me in the position of having a private interest which is in conflict with any interest of CIPHI or with my obligation to CIPHI, except as disclosed below:

Describe any exception(s). Use additional page(s) if needed.

I acknowledge my continuing obligation to disclose to the Chair _____ (*name of board*) promptly and in writing, on any change in the nature or setting of my professional activities or any possible conflict of interest (i.e. conflict between the interests of CIPHI and personal interests or those of a related party) which comes to my attention in the future.

_____
Name of Executive Member

_____ _____
Signature Date