



**THE MULTIFAITH HOUSING INITIATIVE**

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# CONFLICT OF INTEREST POLICY

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Passed by the Board of Directors on: 27 June, 2013

## **APPLICATION**

This policy applies to all Multifaith Housing Initiative members of the Board of Directors, volunteers, and employees. The standards outlined in this policy are particularly relevant to Members of the Board and employees who are in a position to make or influence decisions of the organization

## **DEFINITION:**

We define a conflict of interest as a situation that occurs when a person has a private or personal interest sufficient to appear to influence the objective exercise of his or her official duties as a Multifaith Housing Initiative member of the Board of Directors, employee, volunteer, or someone who is engaged in a professional association with the organization.<sup>1</sup>

A conflict of interest exists wherever an individual could benefit, disproportionately from others, directly or indirectly, from access to information, or from a decision over which they might have influence, or, where someone might reasonably perceive there to be such a benefit and influence. Members of the Board of Directors, volunteers, and staff are expected to reveal any personal, family or business interests that they have, that, by creating a divided loyalty, could influence their judgment and hence the wisdom of their decisions.

Potential conflicts of interest (real and perceived) are unavoidable and should not prevent an individual from serving on the Board of Directors, as a volunteer, or as a staff member unless the extent of the interest is so significant that the potential for divided loyalty is present in a large number of situations.

## **EXAMPLES OF POSSIBLE CONFLICTS OF INTERESTS:**

The examples that follow do not exhaust the possibilities for conflict of interest, but they identify some of the more obvious situations that are covered by the policy.

### *Special Treatment*

Employees, volunteers, and Board members should not use their positions to give anyone special treatment that would advance their own interests or that of any member of the employee, volunteer, or Board member's family, friends or business associates.

### *Receiving Gifts or Fees:*

Employees, volunteers, and Board members should not accept gifts, money, discounts or favours including a benefit to family members, friends or business associates in exchange for MHI business.

### *Confidential Information:*

Employees, volunteers, and Board members may not disclose confidential or privileged information about the property, or affairs of the organization, or use confidential information to advance personal or others' interests. Employees, volunteers, and members of the Board cannot divulge confidential or privileged information about MHI employees, volunteers, or tenants without the subjects' written authorisation.

#### *Using Property*

Employees, volunteers, and Board members should not use, or permit the use of MHI property, facilities, equipment, supplies or other resources for activities not associated with MHI. Any exceptions to this must be expressly approved by either the President of the Board of Directors or the Executive Director.

#### *Financial Interest*

Employees, volunteers, and Board members who knowingly have financial interests in a MHI contract, sale or other business transaction, or have family members, friends or business associates with such interests, should not represent or advise the organization in such transactions

#### *Requirement to Report Conflict of Interest*

If employees, volunteers, and Board members, or their family members, friends or business associates have a personal or financial interest that might present a conflict or bias in connection with an MHI matter, they must report this conflict to the President of the Board of Directors, or the Executive Director.

#### *Implementation*

This policy will be made available to all employees, volunteers, and Board members at MHI. Employees, volunteers, and Board members should check with the President of the Board, or the Executive Director if they need assistance in interpreting whether a situation they have experienced or a situation that they are confronting puts them in a position of a conflict of interest.

### **FORMAL BOARD PROCEDURES**

- 1.1 Conflict of Interest – The Board and MHI Committees shall have Conflict of Interest as a regular agenda item at the beginning of each meeting of the Board. Any member of the Board, volunteer, or staff person who has a Conflict of Interest must submit their Declaration at, or in advance, of that time.

- 1.2 Declaration of Conflict of Interest – Members of the Board, volunteers, or staff persons must notify the President of the Board of Directors of every potential or actual conflict of interest no later than the first meeting of the Board after the Any member of the Board, volunteer, or staff person becomes aware that he or she has entered into a situation, arrangement or agreement that results in, or may result in a conflict of interest. The form of such declaration is attached as SCHEDULE A.
- 1.3 Potential Conflict of Interest – When a potential Conflict of Interest is raised before or during a board meeting, then:
- a) the party to the potential conflict must leave the meeting; and
  - b) the Board shall decide if there is a Conflict of Interest.
- 1.4 Consideration of Notice – The Board of Directors shall consider any declaration given under subsection 1.2 no later than the second meeting of the Board after the notice is given. The consideration of the notice must be reflected in the minutes of the meeting.
- 1.5 Record-keeping – The Multifaith Housing Initiative shall maintain a Conflict of Interest file containing all declarations, reports and minutes pertaining to Conflict of Interest and Perceived Conflict situations.

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<sup>i</sup> Chris MacDonald, Michael McDonald, and Wayne Norman, “Charitable Conflicts of Interest,” *Journal of Business Ethics* 39:1-2, 67-74, Aug. 2002. p.68)