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| <div>Policy</div> <div>Board and Committee Conflict of Interest</div> | <div>Replaces former policy:</div> <div><div><input type="checkbox"/></div>Title: Click or tap here to enter text.</div> <div><div><input checked="" type="checkbox"/></div>N/A</div> |  |
|                                                                       | <div>Date Effective:</div> 2026-04-02                                                                                                                                                 |  |
|                                                                       | <div>Last Update:</div> Select date                                                                                                                                                   |  |
|                                                                       | <div>Contact:</div> Kathy Davidson, ED – Strategy, Governance, Social Accountability                                                                                                  |  |

## Policy Statement

Board and committee members act in the best interests of the College and the public it serves. Board and committee members are presumed to act with honesty, integrity, and commitment to the College's mandate to protect the public from harm and discrimination.

Members disclose interests that reasonably relate to a specific matter or agenda item under consideration, or that relate to their participation as a member of the Board or committee in general, understanding that such disclosure does not immediately imply wrongdoing or impartiality.

Conflict of interest considerations are interpreted in context, including Indigenous governance, cultural, relational, and community realities. The *Board and Committee Member Conflict of Interest Guidelines* must be used to explore and address disclosure of perceived, potential or real conflicts. Conflicts of interest are addressed in a way that upholds integrity, equity, transparency, and public trust while valuing lived experiences, cultural knowledge, and meaningful community representation.

### 1. Policy Rationale and Purpose

The purpose of this policy is to articulate a shared understanding of conflict of interest and to affirm the College's commitment to ethical decision making, procedural fairness, public trust, equity, and inclusive, culturally safe participation.

This policy recognizes that inclusive governance and self-regulation create inherent conflict of interest when Board and committee members are making decisions which may impact their personal, professional, relational, cultural or community interests. The *Board and Committee Member Conflict of Interest Guidelines* support implementation of the policy by providing clear step-by-step guidance about when, how, and to whom to disclose a potential, real or perceived conflict, describe how to assess the disclosure in a way that could reveal assumptions and biases, and provide examples of the possible outcomes.

The policy supports the College's compliance with conflict of interest obligations under the *Health Professions and Occupations Act* and the CHCPBC bylaws.



## 2. Policy Scope

This policy applies to all CHCPBC Board and committee members, and the team members who support them.

## 3. Duties and Responsibilities

### **Team members who support the Board and committees**

Read, understand and implement the policy and the guidelines, act as a trusted person for a Board or committee member to ask advice of, recognize their own biases with respect to inherent conflict of interest, and invite/encourage conversation about a potential, perceived or real conflict when it is raised.

Monitor and report on conflict of interest disclosures and outcomes for patterns of Indigenous-specific or equity-based impact. (If we observe over time that conflicts are raised only or mostly about those who are Indigenous or who are part of an equity-denied group, this will inform education needs of the Board and committees.)

### **Committee Members/Chair**

Read, understand and follow the policy and the guidelines. Engage in non-judgmental open conversation when a potential, perceived or real conflict when it is raised by another. Disclose their own interests as soon as they are aware of them and engage in open conversation.

### **Board Members/Chair**

Read, understand and follow the policy and the guidelines. Disclose their own interests as soon as they are aware of them and engage in open conversation. Engage in non-judgmental open conversation when a potential, perceived or real conflict when it is raised by another.

## 4. Legal and Regulatory Authority

This policy is linked to the following legislation and regulatory documents:

- Health Professions and Occupations Act (HPOA) S351-S354
- CHCPBC Bylaw 2.38-2.42 and Bylaw 3.41

## 5. Other Relevant Policies and Documents

This policy is linked to the following other relevant policies and documents:

- Board and Committee Member Conflict of Interest Guidelines
- Declaration of Interests (signed annually; confirmed at each meeting)

## 6. Key Partnerships

None identified at this time.



## 7. Definitions

**Conflict of interest** exists when an individual's personal, professional, relational, cultural, or community interests intersect with their responsibilities to the College in a way that could reasonably be perceived to influence judgment or decision making. The existence of a conflict of interest is not inherently negative, unethical, or disqualifying. It is not uncommon for individuals—particularly those deeply embedded in their communities—to hold multiple, overlapping interests. Conflicts of interest may be:

- Episodic or ongoing
- Real, potential, or perceived
- Individual or shared within communities or families

**Equity-denied** is a term used to refer to communities and groups that experience significant collective barriers in participating in society. This could include attitudinal, historic, social and environmental barriers based on age, ethnicity, disability, economic status, Indigeneity, gender identity and gender expression, nationality, race, sexual orientation, etc. Equity-denied groups are those who identify barriers to equal access, opportunities and resources due to disadvantage and discrimination and actively seek social justice and reparation. Sometimes “equity-seeking” or “equity-deserving”.

**Perceived conflict of interest** can be said to exist where a reasonable person might conclude that a board or committee member's professional judgment has been improperly influenced because of their private interests or obligations, even if that is not the case.

**Potential conflict of interest** can be said to exist when a reasonable person would conclude that a board or committee member might, now or at a future time, fail to fulfil their professional obligation because of their private interests or obligations.

**Real conflict of interest** exists when a Board or committee member's obligations are compromised by their private interests or obligations. Used interchangeably with Actual conflict of interest.

## 8. Process Check

The following documents have been consulted and applied to this policy.

- ☒ Policy Development Framework (required)
- ☒ Anti-Discrimination Measures (S14/15 HPOA) (required if applicable)
- ☐ Health Standards Organization BC Cultural Safety and Humility Standard policy best practices (required if applicable)
- ☐ Safe Spaces Playbook (required if applicable)
- ☐ In Plain Sight Report and Recommendations (required if applicable)



## 9. Resources/References

“Partnering with BCCNM” (formerly code of conduct)

[https://www.bccnm.ca/Documents/governance/committees/code\\_of\\_conduct\\_board\\_committee\\_members.pdf](https://www.bccnm.ca/Documents/governance/committees/code_of_conduct_board_committee_members.pdf)

“When the expert is your cousin: Indigenous alternatives to ‘distrust by default’ conflict-of-interest rules” (2025) <https://thephilanthropist.ca/2025/01/when-the-expert-is-your-cousin-indigenous-alternatives-to-distrust-by-default-conflict-of-interest-rules/>

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| <b>Reviewed by the Board on:</b>                      |                                                                                                                                                                  | 2026-04-02              | <input type="checkbox"/> N/A |
| <b>Reviewed by the Registrar/Deputy Registrar on:</b> |                                                                                                                                                                  | Select date             | <input type="checkbox"/> N/A |
| <b>Date Approved</b><br>2026-04-02                    | <b>Approved By</b><br><input checked="" type="checkbox"/> Board<br><input type="checkbox"/> Committee (Name of Committee)<br>OR<br>Name Full Name<br>Title Title |                         |                              |
| <b>Date Effective</b><br>2026-04-02                   | <b>Revision history</b>                                                                                                                                          | <b>Last Updated:</b>    | Select date                  |
| <b>Next Review</b><br>2028-04-01                      |                                                                                                                                                                  | <b>Previous Update:</b> | Select date                  |
| <b>Drafted by:</b> Name Kathy Davidson                |                                                                                                                                                                  | Title ED SGSA           |                              |



## Declaration of Interests

### **Declaration of Interests**

Good governance requires a solid understanding of conflict of interest (potential, perceived or real) in order to govern in the best interest of the College and the public it serves. In statutory decision-making spaces, it is important for everyone to disclose interests that reasonably relate to a specific matter or agenda item under consideration, or that relate to their participation as a member of the Board or committee in general, understanding that such disclosure does not immediately imply wrongdoing or impartiality.

A decision-maker's personal, professional relational, cultural or community interests may intersect with their responsibilities to the organization in a way that could reasonably be perceived to influence judgment or decision-making.

Board and committee members and staff can use this declaration of interests to reflect on and disclose their interests or connections with others in positions of influence that could result in potential, perceived or real conflicts. The declaration of interests assists with self-reflection on biases and the identification of positions or relationships that could influence a person's judgment or decisions in a way that is determined to be a real conflict.

Please review the *Board and Committee Conflict of Interest Policy and Guidelines* and use the table on the next page to provide details as they relate to you and to any other connected person or organization. A connected person could be a group, employer, spouse, partner, family member, community member or anyone with whom you have a personal, professional, relational, cultural or financial interest or relationship.

Disclosing an interest is the first step. Disclosing such interests opens a conversation about the nature of the conflict and an opportunity to conduct a risk analysis to determine how to address the disclosure.



Name

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Position with the  
College

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Please review the *Board and Committee Conflict of Interest Policy* and the *Conflict of Interest Guidelines* and use this table to provide details as they relate to you and to any other connected person or organization.

This Declaration will be referenced when meeting agendas are being developed to flag anyone who may disclose a potential, perceived or real conflict related to an agenda item for further conversation and assessment.

| Relationship                                                                                                                                                                                         | Details relating to you | Details relating to a connected person |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|----------------------------------------|
| 1 Paid employment (or previous employment if applicable)<br><br><i>Give details of all paid employment including full/ part time, consultancies, contract and paid Board/Committee appointments.</i> |                         |                                        |
| 2 Ownership of any business or consultancy<br><br><i>Include any relevant details relating to a connected person.</i>                                                                                |                         |                                        |
| 3 Appointments, offices, and memberships of other bodies, voluntary or otherwise<br><br><i>Individuals can engage in political activities or</i>                                                     |                         |                                        |



| Relationship                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                         | Details relating to you | Details relating to a connected person |
|----------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|----------------------------------------|
| <p><i>maintain associations with professional organizations. A declaration of these positions helps open a conversation about potential, perceived or real conflicting interest with the College's statutory function. Identifying similar positions held by those connected closely to you also leads to opening an important conversation about conflict.</i></p> <p><i>Note that leadership positions within professional associations (committees, boards, staff etc.) are considered to be a real conflict of interest with the work of the College.</i></p> <p><i>Specifically include any involvement with professional associations/ groups. And also:</i></p> <ul style="list-style-type: none"><li><i>• Other Board/Committee appointments</i></li><li><i>• local authority membership</i></li><li><i>• tribunals</i></li><li><i>• special interest groups</i></li><li><i>• political groups</i></li></ul> |                         |                                        |
| 4 Close personal ties with other College advisors, Board/ committee members, or staff                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                                |                         |                                        |



| Relationship                                                                                                                                                                                                                                                                                                           | Details relating to you | Details relating to a connected person |
|------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------|-------------------------|----------------------------------------|
| <i>Individuals who have close ties with CHCPBC decision-makers may be perceived as having an undue influence on decisions or to be unduly influenced.</i>                                                                                                                                                              |                         |                                        |
| <p>5 Any other declarations</p> <p><i>Include any information that may be relevant such as:</i></p> <ul style="list-style-type: none"><li><i>• court of legal findings or published opinions</i></li><li><i>• whether you have been investigated or disciplined by any professional association or body.</i></li></ul> |                         |                                        |