



Conflict of Interest

** This policy is based off policies from Community Foundations of Canada and The Winnipeg Foundation.*

This document serves as a tool for your community foundation to build a relevant policy applicable to your foundation’s context. The function of each policy is listed in the footer on the left, and on the right is Endow Manitoba's numerical organizational structure, which needs to be modified to reflect the organizational structure of your community foundation’s policies.

Policy Template

Policy name: 1.04 Conflict of Interest	Effective date: (The date the policy became effective)
Policy type: Organizational	Monitoring frequency: (Suggested: 5 years)
Policy owner: (This is who is responsible for this policy. It can be the board of directors, the board chair, a specific staff person.)	Revision history: (History of revisions)
Who approves: Board of Directors	Next review date:

Background and purpose

(Explains relevant historical information and the purpose of the policy).

Sample: A Conflict of Interest policy ensures staff and volunteers act in the organization’s best interest, promoting transparency, ethical behavior, and trust. It provides guidelines for identifying, disclosing, and managing conflicts to prevent real or perceived impropriety and maintain public confidence in the organization.

Scope

The policy applies to all board members, staff, and volunteers of the foundation.



Policy Statement

(Outlines the community foundation's intent, principles, and expectations regarding a specific subject or area of operation. It is a guiding framework for the community foundation's decisions, actions, and behaviours.)

Sample: This policy safeguards the organization's reputation by requiring individuals to avoid situations that could compromise or appear to compromise their objectivity, ensuring decisions prioritize the organization's best interests over personal gain.

Things to Consider for Inclusion in the Policy

This is not a comprehensive list but rather a list of ideas to start a meaningful conversation about policy development. Each of the following could be a subheading in your policy.

General considerations

- What constitutes a conflict of interest? Is it when an individual's personal, financial, or other interests could compromise, or appear to compromise, their ability to act in the best interests of the organization.
- Board, volunteers and staff are prohibited from accepting personal gifts from current and prospective providers of services or goods and grantees with the exception of occasional hospitality or other benefits of a nominal value.
- Board members, volunteers and staff are prohibited from using privileged information gained in their role for personal or professional gain.

Procedures

- Do board members, staff, and key volunteers complete an annual conflict of interest disclosure form?
- Who is responsible for ensuring these forms are completed and up-to-date?
- Whose responsibility is it to raise concerns regarding conflict of interest? Where are potential conflicts of interests recorded?

Implementation

- What is the process when there is a conflict? For example, will the member will refrain from all discussion pertinent to the subject and abstain from voting? Or when there is a conflict of interest for a member of the grants committee, the committee member will temporarily remove themselves from the committee when the specific grant in conflict is being assessed?



Sample Conflict of Interest acknowledgement form

I, _____ hereby certify that I have read and understand the Conflict of Interest policy and agree to abide by its terms. In compliance with this policy, I would like to declare the following conflicts:

Employee/volunteer signature

Date

Policy Review

- Who is responsible to review this policy?
- Will the review be done every [2-3] years?