



**POLICY: Conflict of Interest for Board members,
Foundation Staff and Community Volunteers**

POLICY NUMBER: 1.04

**ISSUING AUTHORITY: Community Foundation of
Portage and District Inc.**

APPROVED: November 18, 2014

LAST REVIEWED: ~~November 21, 2017~~ February 16 2021

NEXT REVIEW: ~~November 2020~~ February 2024

Purpose: ~~It is important that the practices and decisions must be made by this organization are without actual or perceived conflict of interest, influence or impropriety, suspicion or influence and avoid any appearance of impropriety, which may raise concerns within or outside the Foundation. This policy is designed to ensure the Foundation's reputation for integrity of decisions. As a result, this policy addresses conflicts of interest, real or perceived.~~

~~This policy will not address the issue of what constitutes an actual conflict of interest as a matter of law.~~

As a result, this policy is directed towards the source of most potential conflict. These include conflicts arising as a result of affiliation with:

1. An organization which has, or is negotiating, a business relationship with CFPD; where ~~the Foundation~~ CFPD has business or financial dealings with a Board member, volunteer or staff member individually or with a corporation, partnership or other business enterprise in which the Board member, volunteer or staff member, or a member of his/her family, is an officer, director, partner or substantial stockholder....and/or the primary purpose of a grant from ~~the Foundation~~ CFPD to a qualified grantee is made to support a transaction with such a business enterprise.
2. An organization seeking funding or other support; in a situation in which ~~the Foundation~~ CFPD is considering or makes a grant to a qualified donee of which ~~the Foundation, a CFPD~~ Board member, volunteer or staff member, or a member of his/her family, is an officer, director, trustee or employee of the applicant organization. This also includes situations where Board members, volunteers or staff members have an unofficial role with the applicant organization as a significant donor, volunteer, advocate or advisor.

Policy Statement: Conflict of Interest is a situation in which a person or Members of the Board, volunteers and staff is in a position to derive personal or professional benefit from actions or decisions made in their official capacity. Members of the Board, volunteers or staff shall disclose any real or perceived conflict, at any time, to the Chair; and also report to the Chair or Board if they have any concerns about potential conflicts not reported.

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 nominal value.~~ service providers, suppliers or grantees.

Board members, volunteers and staff are prohibited from using privileged information gained in their role at the Foundation, for personal or professional gain.

Definitions: ~~Volunteers include any person serving voluntarily on a committee with board delegated powers or in any capacity that might give rise to a conflict of interest. Family includes spouse or partner, children, grandchildren, parents or grandparents, siblings (and their immediate families), as well as any member of the extended family living under the same roof.~~

Procedures: ~~The conflict of interest should be brought to the attention of the Chair prior to the meeting date and in the least, prior to the start of the meeting. The Chair may rule there is no conflict and the Board member would then participate and vote as usual. The Chair may rule there is indeed a conflict, with the following consequences: a) the Board member may participate in discussion but recues themselves from voting...b) the Board member may be asked to not participate, nor vote and may or may not be requested to leave the room during discussion and voting. If a Board member is not clear whether a conflict exists, they should approach the chair for advice. This sequence of decision making includes community volunteers at committee level; and staff members in any Foundation activities.~~

~~In the event that the individual disagrees with the decision of the Chair or chair of the committee, the decision may be appealed to the Board as a whole. The subsequent vote and decision shall be final and binding.~~

~~Instances of conflict of interest must be recorded in the minutes as well as the disposition(s) described above. Instances that occur at committee level must be highlighted in the committee report at the next Board meeting.~~

~~An existing quorum will continue and not be lost if a member is excused due to a conflict of interest.~~ (move to procedure manual)

Board members, community volunteers and staff will be required to sign a declaration that they have read and will abide by the Foundation's conflict of interest policy upon the start of their tenure with CFPD and annually thereafter. Failure to report conflicts may result in discipline including possible expulsion or dismissal from the organization.

Responsibility: Review, and revision of this policy if required, with subsequent recommendation to the Board for approval, shall be the purview of the Governance Committee.