

PROCEDURE 1.03.PROC.1	Conflict of Interest Procedure	DOMAIN Governance and Ethics
Sponsor: Chief Executive Officer		Date Approved: April 15, 2025
Lead(s): Chief Mission & Ethics Officer		Date Effective: April 17, 2025
		Date of Next Review: April 2029

For further information please contact covenantpolicy@covenanthealth.ca

NOTE: The first appearance of terms in bold in the body of this document (except titles) are defined terms – please refer to the Definition section

Purpose Statement:

To provide direction for disclosing and managing conflicts of interest, whether actual, potential or perceived.

Parent Policy:

1.03 [Conflict of Interest](#)

Applicability:

This procedure applies to all Covenant Health facilities, staff, members of the medical staff, volunteers, students, board members, and to any other persons acting on behalf of Covenant Health (“personnel”).

Responsibility:

It is the responsibility of all Covenant Health personnel to disclose actual, potential or perceived conflicts of interest, and to take appropriate steps so as not to compromise the ethical integrity of the organization. Those who are also bound by professional standards of practice and/or codes of ethics regarding conflict of interest are expected to uphold their professional obligations while performing their duties for or on behalf of Covenant Health.

Procedure:

The following procedure applies to receiving and investigating complaints alleging a breach this policy and for responding to a finding that this policy has been breached.

- i) Personnel shall report actual or suspected breaches of this policy. A report alleging a breach of this policy shall be made to an immediate manager or supervisor. In the event the alleged breach concerns the personnel’s immediate manager or supervisor, the report can be provided to the immediate manager or supervisor of such manager or supervisor.
- ii) Upon receiving a report alleging a breach of this policy, the immediate manager or supervisor will review the situation and consult with their responsible Director, Executive Director, or Senior Operating Officer, who, if required or deemed necessary, will consult with either/or together with the Chief Officers of Finance, Human Resources, and Mission and Ethics to determine whether a breach of this policy has occurred. A party alleged to have breached this policy shall be given notice and provided the full details of the allegations

made against them as well as provided an opportunity to respond to the allegations and provide any other relevant information. Relevant considerations are as follows:

- the degree of personal benefit derived by the individual;
 - the frequency and value of the gift, item or favour;
 - whether or not the individual is in a position to effectively influence or make a decision which may result in a personal benefit;
 - the potential for the perception of conflict of interest and potential impact upon the individual and/or Covenant Health; and
 - the confidence and assurance that the person will manage the actual, potential or perceived conflict of interest, as reasonably would be concluded by an independent observer.
- iii) If there is no breach, no further action is required and the person will be advised in writing.
- iv) If reports of a breach escalate to the Senior Leadership level, the lead Chief Officer investigating the matter, either of Human Resources, Finance, or Mission and Ethics will, separately or in consultation with the other two, provide a report and recommendation to the CEO.
- v) The lead Chief Officer will then advise the immediate manager or supervisor and the individual alleged to have breached this policy of the action required to remove the conflict, if any, and will provide a copy of the report and recommendations. Actions required may include: (i) personnel removing themselves from matters in which a conflict exists or is perceived to exist (ii) personnel in conflict giving up a particular private interest causing the conflict (iii) personnel resigning their position with Covenant Health (iv) termination of employment with Covenant Health.
- vi) If the individual alleged to have breached this policy does not accept the action required as outlined in the report and recommendations provided by the lead Chief Officer, the individual will have the right to appeal the decision to the CEO. The CEO may initiate an independent third-party review as part of their review of the appeal.

Note that Alberta has also enacted public interest disclosure legislation which enables employees to disclose concerns about wrongdoing to the designated officer of Covenant Health or to the office of the Public Interest Commissioner (Alberta). Information about disclosures about wrongdoings can be found under the Covenant Health [Disclosure of Wrongdoings and Protection of Persons who Disclose Wrongdoings](#) policy and at the Public Interest Commissioner website at www.yourvoiceprotected.ca

Definitions:

Conflict of Interest means a divergence between a person's own and/or their family's personal, financial or business interests and the person's professional obligations to Covenant Health such that an independent observer might reasonably question whether the person's professional actions or decisions are determined by considerations of personal gain, financial or otherwise. This definition extends to actual, potential and perceived conflicts of interest.

Family means parent, spouse, adult interdependent partner, common-law spouse, child, siblings, mother-in-law, father-in-law, daughter-in-law, son-in-law, brother-in-law, sister-in-law, grandparent, grandchild, former guardian, fiancé, or any other relative who is or has been residing in the same household as well as step-relationships of the same degree. In addition, common-law relationships, same gender relationships and related persons.

Gifts mean any item of value, regardless of amount, provided free of charge and not part of a contracted purchase, including, but not limited to pens, notepads and other promotional items, stethoscopes, journals, textbooks, drug samples, honorariums, educational sponsorship, meals and hospitality, liquor, tickets to sporting or other events, etc.

Industry means any vendor conducting business with Covenant Health personnel including, but not limited to pharmaceutical, device, or other medically related companies; developers, construction and trade companies, benefit carriers, financial institutions, telecommunication and marketing vendor, etc.

Industry Support means the provision of support by industry to Covenant Health in the form of funds, goods, or services provided in kind for the purposes of education, training, quality improvement, research and other initiatives sponsored by Covenant Health.

Personal Benefit means a benefit beyond the normal terms of the relationship with Covenant Health, to the person, their family and/or any business interest of the person, or their family, or the granting of special considerations or advantages by Covenant Health personnel to selected individuals, groups or businesses.

Relevant Covenant Health Policy and Policy Support Documents:	
A.	Policies: II-70 Disclosure of Wrongdoings and Protection of Persons who Disclose Wrongdoings
B.	Procedures: III.70.PROC.1 Procedures for Wrongdoings and Protection of Persons who Disclose Wrongdoings
C.	Guidelines:
D.	Job aids: Health Ethics Guide - 3rd edition (chac.ca) Covenant Health's Code of Conduct – Our Commitment to Ethical Integrity Compliance and Business Ethics Program, Covenant Health learning program available on CLiC Summary Resource Document and Position Statement: Covenant Health Compliance under the Conflict of Interest Act (Alberta)
E.	Standards:

Keywords:**References:**

“Conflict of Interest Involving Financial or Personal Gain by Physicians,” Health Professions Act, Standards of Practice, *College of Physicians and Surgeons of Alberta*, April 3, 2014. See: <http://www.cpsa.ca/standardspractice/conflict-of-interest>

(Accessed April 8, 2019)

“Alberta Health Services Code of Conduct,” *Alberta Health Services*, (Jan, 2010).

See: <http://www.albertahealthservices.ca/assets/about/policies/ahs-pub-code-of-conduct.pdf>

(Accessed April 8, 2019).

“Alberta Health Services Conflict of Interest Bylaw,” *Alberta Health Services*, (April 2009).

See: <http://www.albertahealthservices.ca/Bylaws/ahs-by1-conflict-of-interest.pdf> (Accessed April 8, 2019).

Past Revisions:

April 30, 2019 – *previously numbered III-15*

September 10, 2012

June 1, 2011