

POLICY 1.03	Conflict of Interest	DOMAIN Governance and Ethics
SLT Sponsor: Chief Executive Officer Policy Lead(s): Chief Mission & Ethics Officer		Date Approved: April 15, 2025
		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

Policy Statement:

As a Catholic, faith-based organization, Covenant Health is committed to upholding the highest ethical standards in all clinical and business dealings as model corporate citizens. This requires refraining from any real or perceived behaviour or relationships in the course of one's work or association with Covenant Health that could be construed as advancing one's personal, financial or business interests over the interests of the organization. (See Definitions section below regarding the scope of interests that could apply.)

While conflicts of interest may be unavoidable and can arise and evolve unintentionally given the complex array of relationships with others in the organization or the community, these relationships must nevertheless be disclosed, and appropriately managed with sufficient confidence to ensure consistent ethical integrity

Purpose Statement:

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

Applicability:

This policy 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 in the course of performing their duties for or on behalf of Covenant Health.

Principles:

1. Personnel shall act impartially and in the best interests of patients and Covenant Health at all times and will not use their position for personal benefit, financial gain or other external business interests.
2. As a ministry of service in which therapeutic relationships with patients, residents, family, visitors

and staff are celebrated and acknowledged as a foundational element of the healing process, this policy in turn recognizes that relationships generally are good in and of themselves and are promoted in keeping with the culture of Covenant Health. The issue is when relationships affect, or reasonably appear to affect, a decision taken by Covenant Health and in so doing compromise the reputation and ethical integrity of the organization.

- a. Therefore, personnel shall disclose all interests and relationships which may impact the impartiality of carrying out their duties for Covenant Health. This disclosure shall include all relationships which are actually, potentially, or could be perceived to be in conflict with the interests of Covenant Health:
 - i. as part of their employment commencement process; and,
 - ii. at any time a potential conflict may arise or which impacts the impartiality of Covenant Health personnel.
3. Personnel shall not use the organization's resources to engage in activities which are of personal benefit or financial gain. A conflict of interest will be viewed to exist where personnel:
 - a. have an outside interest or personal relationship, that an independent observer might reasonably conclude to be a factor, which impedes or has the potential to impede the proper performance of their Covenant Health work;
 - b. have an actual, potential or perceived conflict of interest that puts into question their objectivity or Covenant Health's integrity when making decisions;
 - c. use Covenant Health property, including, but not limited to equipment, premises, material, name and information technology, for personal benefit or gain;
 - d. accept gifts that compromise or are perceived to compromise professional or clinical judgment (i.e., receiving cash or gift certificates from patients, residents or families), or accept personal loans, bequests or other favours from an individual or organization which are a consequence of their position with Covenant Health. This does not preclude the acceptance of gift as described and in alignment with this policy, noted below.
 - e. are involved in the financial affairs of patient or residents, including matters relating to powers of attorney, wills and estate planning or the witnessing of such documents (with the exception of those whose defined roles require providing appropriate assistance to patients or residents in financial matters, i.e., Social Work and/or designate);
 - f. are involved in the non-financial affairs of patients or residents including matters relating to personal directives decision-making and guardianship or the witnessing of such documents (with the exception of those whose defined roles require providing appropriate assistance to patients or residents in non-financial matters, i.e., Social Work and/or designate);
 - g. provide direct care to a patient, resident or family member where a close familial, romantic or sexual relationship exists;
 - h. disclose information to any individual or organization which would afford an advantage not generally available to others, including those related by family or personal relationships outside of a need-to-know basis, or such disclosure on a post-employment basis;
 - i. place themselves in a position where they are under obligation to any person who might benefit from special consideration or favour on their part, or who might seek in any way

preferential treatment or service.

4. Personnel shall report actual or suspected breaches of this policy in situations where they reasonably believe that an individual is acting in self-interested manner or is furthering their own private interests by virtue of their position or through the carrying out of their duties at Covenant Health. A report alleging a breach of this nature shall be made to an immediate manager or supervisor as further described in this policy.
5. Covenant Health personnel shall not accept fees, gifts or other benefits that are connected directly or indirectly with the performance of their office or duties, from any individual or organization other than:
 - a. The normal exchange of gifts between friends;
 - b. The normal exchange of hospitality between persons doing business together;
 - c. Tokens exchange as part of protocol, or;
 - d. The normal presentation of gifts to persons participating in public functions, awards, speeches, lecture, presentations or seminars.
6. Acceptance of cash or cash equivalents as a gift is strictly prohibited.
 - a. The value of a single tangible gift permitted shall not exceed \$150. The cumulative maximum cash value limit for tangible gifts permitted from a single source vendor in a calendar year is \$300.
 - b. The value of a single event invitation permitted shall not exceed \$750. The cumulative maximum cash value limit for event invitations permitted from a single source in a calendar year is \$1500.
 - c. The following are examples of situations where the above restrictions on gifting will not apply:
 - i. Items offered pursuant to value-added provisions of vendor contracts awarded pursuant to Covenant Health's procurement policies. For example, professional development sessions for IT or insurance education by contracted vendors if set out explicitly in the contract.
 - ii. Scholarships or bursaries for the purposes of continuing education.
 - d. Regardless, all gifts received should nevertheless be disclosed and appropriately managed. For example, pooling all honoraria in a staff education fund, trust or foundation account that benefits the entire team and organization, versus individual personnel, especially when personnel may have already been compensated by the organization for their time preparing for, or actually providing the service (see III-20 [Relationships with Industry](#)).
7. Attendance at community partner events
 - a. The CEO or Board Chair may approve attendance at a community partner's event valued in excess of the above threshold where such attendance is considered essential to the management of the relationship with the community partner. This provision shall only be utilized with respect to community service partners such as municipalities, police services, educational institutions and other health service partners whom it is essential to establish working service relationships with to achieve service delivery. Industry Support, or other

events provided by Industry, shall not be approved pursuant to this section.

8. Other roles/employment

- a. Covenant Health personnel may accept appointment to other offices or hold employment, including self-employment, unless such appointments or employment:
 - i. causes an actual or apparent conflict of interest;
 - ii. is performed in such a way as to appear to be an official act of Covenant Health, or to represent Covenant Health's opinion or policy;
 - iii. materially interferes with regular duties; or
 - iv. involve the use of Covenant Health's premises, equipment, supplies, or assets, unless such use is otherwise authorized.
- b. Prior to accepting any supplementary employment or appointment, personnel must notify their immediate manager or supervisor in writing about the nature of supplementary employment or appointment. The immediate manager or supervisor shall review the proposed employment or appointment for real or apparent conflicts of interest. If there is no real or apparent conflict of interest, the manager or supervisor may approve the employment or appointment in writing. If there is a real or apparent conflict of interest, the manager or supervisor shall in writing, deny the employment or appointment and provide reasons to the individual, or allow the employment or appointment and put procedures in place to manage the real or apparent conflict of interest. Should the individual disagree with the manager or supervisor's reasons for denying the employment or appointment, the individual will have the right to appeal the decision to the CEO.

9. The responsibility to avoid conflicts of interest lies with the individual. Any person who finds themselves in a situation that could constitute a conflict of interest, suspects that undue favouritism is being sought from them, is solicited with gifts or inducements, perceives that a situation has the potential to create a conflict of interest or the perception of a conflict of interest as would reasonably be concluded by an independent observer, must take appropriate steps to either withdraw or lessen the risk of exposure, while at the same time, make a full and frank disclosure of the conflict to their immediate manager or supervisor.
10. Personnel in breach of this policy will be dealt with in accordance with applicable policies and procedures including but not limited to termination or withdrawal of privileges.

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 a 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: III-20 Relationships with Industry I-30 Ethical Decision-making Framework III-70 Disclosure of Wrongdoings and Protection of Persons who Disclose Wrongdoings III-50 Intellectual Property X-10 Confidentiality Agreement and Privacy Training
B.	Procedures: 1.06.PROC.1 Accommodating Special Requests 1.03.PROC.1 Conflict of Interest Procedure
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)

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E.	Standards:
Keywords:	
References: <p>“Conflict of Interest Involving Financial or Personal Gain by Physicians,” Health Professions Act, Standards of Practice, <i>College of Physicians and Surgeons of Alberta</i>, April 3, 2014. See: http://www.cpsa.ca/standardspractice/conflict-of-interest (Accessed April 8, 2019)</p> <p>“Alberta Health Services Code of Conduct,” <i>Alberta Health Services</i>, (Jan, 2010). See: http://www.albertahealthservices.ca/assets/about/policies/ahs-pub-code-of-conduct.pdf (Accessed April 8, 2019).</p> <p>“Alberta Health Services Conflict of Interest Bylaw,” <i>Alberta Health Services</i>, (April 2009). See: http://www.albertahealthservices.ca/Bylaws/ahs-by-l-conflict-of-interest.pdf (Accessed April 8, 2019).</p>	
Past Revisions: <p>April 30, 2019 – <i>previously numbered III-15</i></p> <p>September 10, 2012</p> <p>June 1, 2011</p>	