



COLLEGE & ASSOCIATION OF
Acupuncturists
OF ALBERTA

POLICY OF CONFLICT OF INTEREST

OBJECTIVE

The College & Association of Acupuncturists of Alberta (CAAA) must meet high ethical standards in order to merit the trust of its members, governments and the public. The integrity of CAAA depends on ethical behaviour throughout the organization, and in particular, on fair, well-informed decision-making. The ability to make a decision is sometimes affected by other interests (personal or professional) of individuals in the organization. Such conflict of interest situations are a regular part of organizational and personal life and cannot simply be eliminated. The objective of this policy is to permit CAAA to manage conflict of interest situations successfully and resolve them fairly.

SCOPE

This policy applies to all members of the CAAA Council and appointed members to all committees and ad hoc committees. It may apply to other volunteers, but formal procedures should take into account their particular circumstances.

DEFINITION OF CONFLICT OF INTEREST

A conflict of interest is a situation in which a person has a private or personal interest sufficient to appear to influence the objective exercise of his or her official duties as a member of the Council, Committee or Ad Hoc Committee with CAAA.

“Private or personal interest” refers to an individual’s self-interest (e.g. to achieve financial profit or avoid loss, or to gain another special advantage or avoid a disadvantage); the interests of the individual’s immediate family or business partners; or the interests of another organization in which the individual holds a position (voluntary or paid).

“Objective exercise of duties” refers to an individual’s ability to carry out her or his responsibilities in the best interest of CAAA.

TYPES OF CONFLICT

A Council member, Committee member or volunteer of CAAA may be in a conflict of interest situation that is:

1. Actual or real, where his/her official duties are or will be influenced by his/her private interests.
2. Perceived or apparent, where his/her official duties appear to be influenced by his/her private interests.
3. Foreseeable or potential, where his/her official duties may be influenced in the future by his/her private interests.

HANDLE OF CONFLICT OF INTEREST

Step 1. Prevention of Conflict of Interest

CAAA supports an organizational culture in which people freely take responsibility for both “self-declaring” possible conflicts of interest, and respectfully raising possible conflicts faced by others in the organization. This culture makes it possible to avoid many such situations from arising in the first place. Practical preventive measures include:

- Providing meeting agendas in advance to enable participants to foresee possible conflicts;
- Ensuring that people are clearly told when information must be protected from improper use;
- Declining involvement in an action (such as supporting a questionable outside activity).

Step 2. Management of Conflict of Interest

Where prevention is not the solution, conflict of interest situations must be managed. Those involved in such situations can take one or more of the following actions.

1. Declare it. A record of declaration of non-conflict of interest is maintained, such as required for participants of a disciplinary hearing.
2. Discuss it. In a doubtful situation, take a moment for a quick word with the chair of your committee, or undertake a full dialogue with the group, if the situation warrants it.
3. Deal with it. Measures to mitigate or eliminate a conflict of interest will depend on what is appropriate to the severity of the situation. Options include:
 - a. Relinquish the private interest. The individual may choose to drop the private interest, such as membership on the Board of another organization, which is causing the conflict.
 - b. Restrict the involvement of the individual. The individual may withdraw from discussion, decision-making, and voting. This would not be appropriate if the conflict of interest arises frequently, or if the individual cannot be separated from parts of the activity.
 - c. Remove the individual from affected duties. The individual with the conflict may be removed from duties related to the conflict and be transferred to other duties.
 - d. Resign from the official duties. In serious cases where other solutions are not possible, the individual may have to resign from the position creating the conflict.
4. Documentation. Meeting minutes, correspondence to interested parties, or other documentation will provide a record of steps taken.

POLICY APPLICATION

1. This policy must be explained to all Council members, Committee members and volunteers. All such affected persons must agree in writing, at the outset of taking a position or volunteering with CAAA, that they will abide by this policy.
2. At that time, Council members, Committee members and volunteers must disclose possible conflict situations to the Council or Committee Chair in confidence. Subsequent material changes must be disclosed when they first emerge.
3. The Council or Committee Chair will indicate to each individual whether any further action is necessary to manage the possible conflicts of interest disclosed. Actions might include the following, depending on the severity of the conflict:
 - a. Declaring the conflict to all concerned before discussion or decision-making;
 - b. Withdrawing from final decision-making only;
 - c. Withdrawing from all aspects of discussion and decision-making.
4. The Council Chair or Committee Chair is the final authority on resolving disputes, for example when an individual does not agree with the perception that he or she is facing a conflict of interest.
5. The Council Chair or Committee Chair is the authority on dealing with real conflicts of interest which are discovered “after the fact”. CAAA legal services will normally be involved in the final disposition.