



Policy

Policy Title:	Conflict of Interest	
Applies To:	IWK Health Team Members, Medical, Dental and Scientific Staff, Board of Directors, Learners, and Volunteers Excludes Vendors & Research Services	
Location Applicability:	IWK Health	
Approved: Executive Leadership Team 2025-SEP-15 IWK Board of Director 2026-FEB-03	Effective: 2026-May-06	Next Review: 2030-Feb-03
Sponsor:	Vice President, Clinical Care & Chief Nursing Executive Vice President, Medicine, Quality and Safety	
Approval Authority:	Executive Leadership Team IWK Board of Directors	
Number: 135 Related Procedure: IWK - 144 Conflict of Interest: Disclosure, Review and Management for Team Members IWK 141 - Conflict of Interest: Disclosure, Review and Management for IWK Board of Directors IWK-402.1 Procurement IWK-155 Interaction with Vendors	Manual: Administrative	

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PURPOSE

The purpose of this policy is to:

- Educate Team Members to recognize potential, actual and/or perceived Conflicts of Interest (COI), including but not limited to those arising from Personal, Professional, Business, or Financial Interest or from the Interests of a Closely Associated Person.

- Provide direction to prevent or reduce the incidence and/or impact of COI.

GUIDING PRINCIPLES AND VALUES

1. **Professional integrity:** IWK Health Team Members are required to act in the best interests of IWK Health and the people it serves above their personal interests. This requires a conscientious regard for the subtle ways in which Conflict of Interest can arise and unwittingly influence professional judgment or business decisions.
2. **Transparency and accountability:** Conflicts of Interest must be continuously disclosed, reviewed, and managed. Doing so enables us to live up to our expectations, and that of our community, of being open and honest.
3. **Promote trust:** Patients entrust professionals and IWK Health Team Members with their health and well-being, and their personal information. They do so, on the understanding that they will use their impartial and up-to-date knowledge, specialized skills, and access to resources, to help them. A commitment to continuous learning and critical thinking ensures and protects patients' trust in the professionals and staff at IWK Health.
4. **Fair process:** Conflicts of Interest will inevitably arise as Team Members interact with diverse individuals and families, as well as public and private organizations. This policy lays out a consistent process for identifying, declaring and managing different kinds of COI that may arise.
5. **Trauma Informed Approach:** Utilize the 5 principles of trauma informed care: Safety, Trustworthiness, Choice, Collaboration, and Empowerment as guiding principles during discussions, declarations, and review processes.

KEY DEFINITIONS

Conflict of Interest (COI)- A situation in which a Team Member, by virtue of their own interests or those of a Closely Associated Person, has, may have, or may be perceived to have Interests that could improperly influence the Team Member's ability to act impartially and in the best interests of IWK Health in the discharge of the Team Member's duties and responsibilities. Such competing Interests can make it difficult to fulfill one's duties in an impartial manner.

Even if there is no evidence of improper actions, a COI can create an appearance of impropriety that can undermine confidence in the ability of the Team Member to act properly or objectively. A Conflict of Interest is not, in and of itself, evidence of wrongdoing.

Most Responsible Person (MRP)- Supervisor to whom the Team member has accountability and who evaluates the COI, for example, Manager, Professional Practice Leader, Director, their Department Chief/Division Chief, or Chair of the IWK Board of Directors, as applicable.

Team Member- For this policy, includes IWK Health employees, medical, dental, and scientific staff, learners, volunteers, and other agents acting on behalf of the organization, including members of IWK Health's Board of Directors.

POLICY STATEMENTS

General

1. Team Members must adhere to this policy, as well as professional standards and code of ethical practice to mitigate and manage COI.
2. Willful non-compliance, with any provision of this policy or associated procedure, may result in corrective actions, up to and including education, suspension, termination of employment or clinical privileges, or removal from the Board of Directors, and/or other consequences.
3. Team Members must disclose COI as circumstances arise. This includes outside employment, academic appointments, or other activities, if such involvement:
 - 3.1. May give rise to COI between the Team Member's duties and responsibilities and their Personal, Professional, Business, or Financial Interest; or,
 - 3.2. May affect the Team Member's capacity to perform their duties and responsibilities objectively and impartially (see Disclosure, Review and Management of Conflicts of Interest Procedure).
4. This policy must be addressed annually by chairs of the Board of Directors (BOD), Executive Leadership Team (ELT), Medical Advisory Committee, Drugs and Therapeutics Committee, Ethics Committees, Directors' Council, Managers' Councils, Interprofessional Practice Council, and other groups or individuals as determined by the BOD and ELT to ensure:
 - 4.1. All members are informed of the policy and the requirement to disclose any Team Member's COI.
 - 4.2. Discussion of issues arising in the management of conflicts, to promote consistency in decision-making.
 - 4.3. Additionally, ELT members and Department Chiefs/Division Chiefs must annually complete and submit a 'Related Party Disclosure Form' (provided annually and managed by Finance Services) to meet Office of the Auditor General requirements.
5. Team Members must not participate in an activity or decision that involves a COI, unless approved in writing (Disclosure Form) by the MRP, for example, Manager, Professional Practice Leader, Director, Vice President, Department Chief/Division Chief, or the Chair of the IWK Board of Directors, as applicable.
 - 5.1. Any terms or conditions made by the MRP must be fulfilled, when approval has been granted.
 - 5.2. Team Members who make a disclosure or may potentially be in a COI, for example clinical decision or matter of business, must withdraw from the decision-making or business process, until a resolution has been reached.

Donations and Fundraising

Note: Acceptance of gifts for fulfilling a Team Member's role or position can create the perception that judgement is compromised, can be influenced, and/or create a sense of obligation.

6. Team Members must not accept gifts of more than Nominal Value (see Appendix A for definition), including travel and accommodations, conference registration, entertainment, or other special considerations, from any person or organization, when their services, role, or position has the potential to influence decisions at IWK Health.
 - 6.1. This includes personal or group gifts from industry representatives and includes payments, services, privileges or favors from equipment or service providers as well as pharmaceutical and device providers (see [Interaction with Vendor Representatives #155](#)).
 - 6.2. Industry-supplied food and meals are considered personal gifts. Exception may be made for modest meals and refreshments, provided in connection with accepted programming, such as an in-service related to a product acquired via proper procurement processes (refer to [Procurement Policy #402.1](#)).
7. Team Members approaching vendors or suppliers for donations, to fundraise, or other IWK related reasons, must ensure the vendor understands that a donation does not obligate IWK Health in any way.
8. The IWK Foundation must be made aware of any conditions attached to potential donations, when conditions create actual, potential, or perceived COIs. The donation must not be accepted until the IWK Foundation has agreed to those conditions.
9. It is recommended to reach out to the IWK Foundation to explore if they have a relationship with organizations/vendors and/or determine if there could be a conflict with their fundraising efforts.

Personal Interests

10. While working at IWK Health or acting on IWK Health's behalf, Team Members must refrain from promoting Personal Interests.
 - 10.1. Team Members must not use their position with IWK Health to offer, solicit, procure, or promote goods and services in which they, or a Closely Associated Person, have a Personal, Professional, Business, or Financial Interest (see Procurement Policy #402.1).

Professional Interest

11. Team Members must not use their position to generate referrals to, or promote the use of, services or facilities outside of the publicly funded health care system in which they, or a Closely Associated Person, holds a Personal, Professional, Business, or Financial Interest, unless such a referral is made with full disclosure of the Personal, Professional, Business, and Financial Interest to the patient.

Note: There may be exceptions to this provision for continuity of care, access to specialized services, or other clinical considerations. In such cases, full disclosure of the COI would be required, as part of any conditions identified by the MRP. Follow [IWK - 144 Conflict of Interest](#):

[Disclosure, Review and Management for Team Members & IWK 141 - Conflict of Interest: Disclosure, Review and Management for IWK Board of Directors](#) .

Product Samples

12. Distribution of samples must not involve a material gain for the prescriber/Team Member.
 - 12.1. Pharmaceutical samples must be distributed in accordance with the [Medication Management Policy 3.11](#)
 - 12.2. Before accepting or distributing product samples, the Team Member must consider any potential, actual, or perceived COI that may arise.

Disclosure of Information

13. Team Members must not disclose any information that is not available to the public for the purpose of furthering a Personal, Professional, Business, or Financial Interest, or those of a Closely Associated Person (See [IWK Policy #320.1 Confidentiality Pledge](#)).

Outside Activities or Secondary Employment

14. Unless disclosed to an MRP with an approved exception, Team Members involved in outside employment, professional or volunteer roles, or other activities, must not:
 - 14.1. Use IWK Health premises, equipment, or supplies.
 - 14.2. Use IWK Health internet applications that may appear as an official act, or to represent IWK Health.
15. Outside employment, professional or volunteer roles, or other activities, must not unduly interfere with regular duties, for example through telephone calls or online meetings.
 - 15.1. While acting on IWK Health's behalf, Team Members must avoid Conflicts of Commitment (see Definition in Appendix A).

Note: Exceptions may be made once the COI is disclosed and reviewed by one's immediate supervisor. Refer to Disclosure, Review and Management of Conflicts of Interest.

Use of Position/Relationships to Influence Access to Health Care Services

16. Team Members must not use their position/relationships to secure access to health care services for any person, including oneself, outside of normal procedures to the detriment of other patients (including increasing the waiting time for other patients in the system).

Reporting Perceived or Actual Conflict of Interest by Others

17. Refer to IWK [Code of Conduct](#), [IWK- 150 Disclosure of Wrongdoing](#) for further information or any concerns regarding Conflict of Interest.
18. For Team Members (except members of the Board of Directors), refer to [IWK - 144 Conflict of Interest: Disclosure, Review and Management for Team Members](#).

19. For members of the IWK Board of Directors, refer to [IWK 141 - Conflict of Interest: Disclosure, Review and Management for IWK Board of Directors](#).

PROCEDURE

1. For Team Members (except members of the Board of Directors), refer to [IWK - 144 Conflict of Interest: Disclosure, Review and Management for Team Members](#).
2. For members of the IWK Board of Directors, refer to [IWK 141 - Conflict of Interest: Disclosure, Review and Management for IWK Board of Directors](#).

Note: For research projects, please contact Research & Innovation Advancement for research specific procedures.

COMPLIANCE WITH IWK POLICIES

Compliance with this IWK document is required of all IWK Team Members, as applicable. Non-compliance may lead to corrective actions, up to and including education, suspension, or termination of employment or clinical privileges, and/or other consequences.

REFERENCES

Dalhousie University. (2002). [Policy on Conflict of Interest](#).

Hospital for Sick Children. (2020). Relationship disclosure and management. Retrieved from the Canadian Policy and Procedure Network.

Island Health. (2023). Conflict of Interest Disclosure. Retrieved from the Canadian Policy and Procedure Network.

IWK Health. (2024). [Code of Conduct](#).

IWK Health. (2021). [Purpose and Values](#).

Members and Public Employees Disclosure Act (1991), c 4, s, 1, as amended.

Nova Scotia Health. (2022). [Conflict of Interest - Policy and Procedure - NSHA AD-BOD-001](#).

Other

IWK Health [Ethics Framework](#)

[Working through ethically challenging decisions at IWK Health: A resource for health care staff](#)

RELATED DOCUMENTS

Policies/Procedures

[IWK- 320.1 Confidentiality Pledge](#)

[IWK- 150 Disclosure of Wrongdoing](#)

[IWK - 3.11 - Drug Samples](#)

[IWK - 155 Interaction with Vendor Representatives](#)

[IWK- 402.1 Procurement Policy](#)

Forms

[IWK Board Disclosure Form1 \(fillable\).pdf](#)

[IWK Team Member Disclosure Form \(Fillable\).pdf](#)

[IWK Team Member Documentation of Appeal Form1 \(fillable\).pdf](#)

Other

[Pulse - Policy Office - Conflict of Interest Disclosure Forms & Resources](#)

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APPENDIX A: DEFINITIONS

Term	Definition
Business Interest	<p>A Business Interest means any corporation, partnership, sole proprietorship, firm, franchise, association, organization, holding company, joint-style company, business or real estate trust or society of any other separate legal entity organized for profit or charitable purposes in which a person or Closely Associated Person:</p> <ul style="list-style-type: none"> • Has a Financial Interest • Acts as a trustee, director or officer • Acts in a position as an employee, agent or otherwise, which includes responsibilities for a segment of the operational management of a business; or • Acts in a position as an employee, agent or otherwise, which includes responsibilities for influencing or determining the direction of the corporation.
Closely Associated Person	<p>A person with whom a Team Member has a relationship such that the person’s interests, if relevant to a matter before the Team Member, could reasonably be expected to affect the Team Member’s objectivity or impartiality in carrying out official duties at IWK Health, and includes persons related by blood, adoption, marriage, or common law marriage, including a person with whom the Team Member has a personal or business relationship.</p>
Conflict of Commitment	<p>A situation in which an employee engages in an outside professional activity, paid or unpaid, that involves a commitment of time that may interfere, or appear to interfere, with fulfillment of the employee’s obligations to IWK Health, even if the outside activity is valuable to the IWK or contributes to the employee’s professional development and competence.</p>
Conflict of Interest	<p>A situation in which a Team Member, by virtue of their own Interests or those of a Closely Associated Person, has, may have, or may be perceived to have Interests that could improperly influence the Team Member’s ability to act impartially and in the best interests of IWK Health in the discharge of the Team Member’s duties and responsibilities. Such competing Interests can make it difficult to fulfill their duties in an impartial manner.</p> <p>Even if there is no evidence of improper actions, a COI can create an appearance of impropriety that can undermine confidence in the ability of</p>

	that person to act properly or objectively in their position. A COI is not, in and of itself, evidence of wrongdoing.
Financial Interest	<p>An Interest in a business consisting of:</p> <ul style="list-style-type: none"> • Any stock, stock options or similar ownership Interest but excluding any Interest arising solely by reason of an investment in such business by mutual fund, pension fund, or other institutional investment fund over which the affected person does not exercise control; or • Receipt of, or the right or expectation to receive, any income or benefit from such business whether in the form of a fee, salary, allowance, forbearance, forgiveness, Interest in real or personal property, dividend, royalty derived from the licensing of technology, rent, capital gain, real or personal property, or any other form of compensation, or any combination of the foregoing. See IWK Health Procurement Policy #402.1.
Interest	An Interest means a Personal, Professional, Business, or Financial Interest.
Most Responsible Person (MRP)	Supervisor to whom the Team member has accountability and who evaluates the COI, for example, Manager, Professional Practice Leader, Director, Vice President, Department Chief/Division Chief, or IWK Chair of the Board, as applicable.
Nominal Value	<p>Gifts of nominal value are those that:</p> <ul style="list-style-type: none"> • are of a value and frequency that is not excessive given prevailing business and social standards. • are of a nature that one could and would reciprocate. • would not reasonably jeopardize the reputation of the Team Member nor IWK Health, should the receipt of such a gift become public.
Personal Interest	Includes Professional Interests and means the personal or private Interest of a Team Member that are substantial and demanding of the Team Member's time and attention as to adversely affect the fulfillment of the person's responsibilities to IWK Health.
Professional Interest	Refers to any consideration, obligation, or opportunity relating to a person's profession, career advancement, or professional obligations, which could, or could be perceived to, influence their decisions or actions in the discharge of their duties at IWK Health, especially where those Interests may conflict with the best interests of IWK Health or its partners.

Team Members	For this policy, includes IWK Health employees, medical, dental, and scientific staff, learners, volunteers, and other agents acting on behalf of the organization, including members of IWK Health’s Board of Directors.
Vendor	A company that provides goods and services; also commonly referred to as a supplier or a service provider.

POLICY DOCUMENTS BEING REPLACED/REMOVED

Acceptance of Gifts and Gratuities (Policy 134.0)

VERSION HISTORY

Version	Date Approved	Approved by	What's changed?
Original Policy and Procedure	2008	Executive Leadership Team	N/A
Revision Policy and Procedure	May 03, 2019	Chief Executive Officer	Major Revision; enhanced guidance as to actual/potential/perceived conflicts of interest
Unpublished	Sep. 26, 2019		2008 version reposted
Major Revision	Sept. 15, 2025 Feb. 03, 2026	Executive Leadership Team IWK Health Board of Directors	Separate policy and procedural documents (a procedure for Team Members and one for members of the Board); updated terminology; enhanced clarity in definition of COI (actual, potential and perceived), when and how to declare, review and manage COI; significant partner review.