

Conflict of Interest Policy

The John Paul II Pastoral Centre (Pastoral Centre) exists to assist the Archbishop in the exercise of his ministry of governance. Pastoral Centre personnel, comprised of clergy and laity who are either employees or volunteers, carry out important responsibilities on behalf of the Archdiocese of Vancouver. At all times they must act in its best interests and in a manner consistent with their duties, which include, but are not limited to, carefully stewarding its resources. They are to exercise particular care in conducting their affairs, so as to avoid conflicts (or the appearance of conflicts) between their own interests (including the interests of their family members and other related parties) and the interests of the Archdiocese.

For the purposes of this Policy, **a conflict of interest is a circumstance in which the personal interests of an individual, or group of individuals, may potentially or actually be opposed to (or be perceived to be opposed to) the interests of the Archdiocese.**

The Policy applies to all Pastoral Centre personnel. For greater clarity this includes all clergy, laity, employees and volunteers serving any of the offices and entities delineated on the following John Paul II Pastoral Centre organizational chart:

<https://rcav.org/about/administration/organizational-chart>

This Policy identifies key areas in which conflicts of interest most often arise and outlines certain actions which, due to the potential for conflict, are to be avoided. It delineates procedures for addressing potential and real conflicts of interests. The guidelines and examples provided are not intended to be definitive or all-inclusive and do not purport to cover every situation that could give rise to a conflict of interest.

A. Areas of Potential Conflict of Interest

Personal Gain

A conflict of interest may occur when Pastoral Centre personnel receive a personal benefit from a business relationship with the Archdiocese or from an outside business with which the Archdiocese has a relationship.

Pastoral Centre personnel may not be involved in any negotiation or transaction on behalf of the Archdiocese where the individual has a personal or financial interest in the outcome of the negotiation or transaction unrelated to their role with the Pastoral Centre.

Family Members and Personal Relationships

A conflict of interest may occur when Pastoral Centre personnel have the ability to enhance or promote the interest of a family member.



Pastoral Centre personnel may *not*:

- participate in a decision to hire, re-assign or promote a family member or a close friend;
- supervise a family member nor have direct or indirect authority over employment or contract-related decisions pertaining to a family member or a close friend.

For the purposes of this part of the Policy, “family member” is defined as a spouse, child, parent, sibling, niece or nephew, aunt or uncle, cousin, grandparent, grandchild or in-law.

Situations may arise where broader familial relationships, friendships, dating a co-worker, or other close personal associations can cause real or perceived conflicts of interest. Pastoral Centre personnel should be sensitive to these concerns and demonstrate good judgement in the best interest of the Archdiocese and in keeping with the spirit and intent of this Policy. Any uncertainty should be discussed with the individual’s direct supervisor, with the Director of Human Resources or with the Delegate for Operations.

Outside Employment and other non-RCAV Activities

Pastoral Centre personnel are free to engage in outside business activities on their own time. However, these activities must not conflict, or have the potential to conflict, with the best interests of the Archdiocese or with an individual’s ability to fulfill properly their role with the Archdiocese.

As a general guideline, Pastoral Centre personnel may not work for, or be engaged in business activities for, businesses that supply goods or services to the Archdiocese.

It is a conflict of interest to have an outside interest that demands so much time and energy that it interferes with one’s ability to complete their Pastoral Centre work. This includes any personal, community, and charitable activities that require time and effort during normal working hours, except for situations where the individual is acting as a representative of the Pastoral Centre and with the explicit written permission of their direct supervisor.

Any uncertainty should be discussed with the personnel member’s director supervisor, with the Director of Human Resources or with the Delegate for Operations.

Information

Pastoral Centre personnel may not disclose or use for any personal reason, including personal gain, any confidential information gained through their working relationship with the Archdiocese.

Gifts and Benefits

For the purpose of this Policy, a “gift” may be any tangible item of value such as cash, gift certificates, artwork, etc. A “benefit” includes intangible items such as discounts, services, special privileges, etc. that are not available to the general public. Gifts and benefits can also include things that benefit the recipient’s family and friends. While the value of gifts and benefits may be difficult to quantify monetarily, they are often highly valued by the intended recipient and therefore have the potential to create undue influence and distort objectivity in



making decisions that are in the best interest of the Archdiocese. Because of this, accepting gifts from contractors, suppliers, service providers, community partners etc. can be highly problematic.

Under no circumstances may a gift or benefit be offered or received that serves to influence the judgement or conduct of a person in a position of power, authority, or trust to try and obtain an advantage.

Gifts of cash or cash equivalent should not be authorized, offered or accepted, regardless of the amount.

Independent of the problems associated with gifts and benefits, it is natural to accept and receive gratitude, and to demonstrate good will. Because of this, there are limited circumstances where small gifts and benefits may be acceptable.

Acceptable gifts and benefits, offered or accepted in the normal course of business, should be less than \$50 CAD in value and might typically include:

- attendance at local sporting, cultural, or entertainment events
- business lunches or dinners
- hospitality at special events
- small tokens of appreciation.

Such expressions of gratitude and good will must be unsolicited, infrequent with any particular business or person, in good taste, and undertaken for legitimate business reasons.

Pastoral Centre personnel may not authorize, offer or accept, directly or indirectly, gifts or benefits to or from any organization or person having business dealings with the Archdiocese other than those in accordance with this Policy.

Because of the importance of not confusing appropriate expressions of gratitude and good will with inappropriate attempts to gain advantage and influence, reflecting upon the following questions is helpful:

- Would the gift be considered normal and customary given the nature of your role with the Archdiocese?
- If the gift or benefit was made widely known, would it be viewed by others as reasonable and appropriate?
- Would you be completely comfortable disclosing the details of the gift or benefit to your colleagues and supervisor(s)?

When faced with the prospect of offering or accepting a gift or benefit, it is advisable for all Pastoral Centre personnel to discuss the issue with your supervisor, the Director of Human Resources or the Delegate for Operations.

Directors and managers with supplier selection, negotiation, purchasing or contract management roles within the Archdiocese are often subject to a higher level of scrutiny and accountability regarding gifts and benefits. They may be subject to more stringent purchasing requirements and/or may face additional challenges in maintaining appropriate relationships with suppliers, service providers and other entities. Directors and managers must, therefore,



keep accurate records of all gifts and benefits received. When faced with the prospect of a gift or benefit of value greater than \$50, that gift or benefit may not be offered or received without the explicit and written permission of the individual's direct supervisor.

B. Procedures for Addressing Conflict of Interest

Duty to Disclose

A key element in successfully addressing potential conflicts of interest involves timely and accurate disclosure. This is the duty and responsibility of all Pastoral Centre personnel.

At times, Pastoral Centre personnel may be faced with a potential conflict of interest that does not appear to be related to their specific work. In such cases, the person(s) involved should disclose the existence and nature of the potential conflict of interest to their direct supervisor, the Director of Human Resources or the Delegate for Operations.

Disclosure shall be made promptly any time an actual, apparent, or potential conflict of interest arises and before the consummation of any contract, transaction or arrangement that is the subject of the conflict of interest.

Responding to Disclosures

Any supervisor receiving disclosure of conflict of interest from personnel will inform and raise the issue with the Director of Human Resources or the Delegate for Operations.

These three parties, hereafter referred to as the Conflict of Interest Committee ("COIC"), will meet to consider the issue diligently and systematically. Personnel with the potential or real conflict of interest may be asked to make a presentation, provide information, and answer questions at the meeting, but will leave the meeting during any subsequent discussion and/or voting on the transaction or arrangement in question.

If, following disclosure and initial consideration, the COIC determines that a conflict exists or that the perception of a conflict is material, a recommended remedy will be proposed and, if necessary, reviewed by legal counsel.

An accurate record of all disclosures of conflict of interest and the subsequent actions and decisions will be maintained by the COIC.

In some circumstances, a possible conflict of interest may not prohibit the Archdiocese's agencies from allowing the transaction or activity. For example, the real or perceived conflict may not be material enough or be of sufficient practical importance to impede the employee's proposed work, contract or relationship in question. In some situations, the COIC may deem it sufficient that personnel involved should not participate in any decision made about certain transactions.

In all circumstances, a careful examination of each potential conflict of interest and the application of appropriate procedures in accordance with policy are required.



C. Annual Statement of Compliance

Annually, employees in a senior role in the Archdiocese and any of its agencies will complete and sign a statement which affirms that they:

- 1) have received a copy of the *Conflict of Interest Policy*,
- 2) have read and understood the Policy, and
- 3) are in compliance with the Policy.

The statement will also elaborate on any instances where a conflict of interest was evident and will clearly outline the procedures followed and action taken to resolve the conflict.

Annual statements of compliance will be distributed and returned to the Director of Human Resources who will review all submissions and prepare an annual summative report to the Archbishop. The annual statements and summative report will be maintained for a minimum of seven years by the Director of Human Resources.

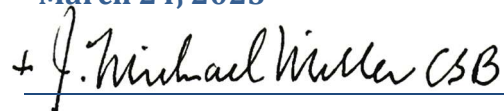
Violations of the Policy

If the appropriate supervisor finds that a member of Pastoral Centre personnel has failed to fulfill their obligations under the *Conflict of Interest Policy*, the supervisor will inform the member of this finding and will give the individual an opportunity to respond.

After hearing the response of the individual and making further investigations as necessary, the supervisor, and, if necessary, the Delegate for Operations or the Archbishop, will conclude whether the individual has failed to fulfill their obligations under this Policy.

In cases of a breach of this Policy, the appropriate disciplinary and/or corrective action will be taken.

Approved: Memorial of Saint Oscar Romero
March 24, 2023

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✠ J. Michael Miller, CSB
Archbishop of Vancouver

**The following policy is hereby superseded:
Employment of Relatives (JPII), issued on December 12, 2016.**

John Paul II Pastoral Centre

Conflict of Interest Annual Affirmation of Compliance and Disclosure Statement

Introduction

On March 24, 2023, Archbishop J. Michael Miller promulgated a *Conflict of Interest Policy* that applies to all clergy, laity, employees, and volunteers working at the John Paul II Pastoral Centre.

This accompanying *Disclosure Statement* is intended to facilitate awareness of, and compliance with, the Policy and to provide a further opportunity for addressing any related questions or concerns.

Prior to completing this disclosure, please ensure that you have carefully read and reviewed the Policy. You are also encouraged to discuss any questions or concerns you may have about the Policy and disclosure with your direct supervisor, the Director of Human Resources or the Delegate for Operations.

Please return your completed disclosure to the Human Resources Office.

Disclosure

	YES	NO
Have you been involved in any negotiations or transactions on behalf of the Archdiocese in which you had a personal or financial interest in the outcome of the negotiations or transactions unrelated to your role with the Pastoral Centre?		
Have you participated in a decision to hire, re-assign or promote a family member?		
Have you supervised a family member or had direct or indirect authority over employment or contract-related decisions pertaining to a family member?		
Have you personally worked for businesses that supply goods or services to the Archdiocese?		
Have you disclosed for any personal reason, including personal gain, any confidential information gained through your working relationship with the RCAF?		



	YES	NO
Have you authorized, offered or accepted, directly or indirectly, gifts or benefits to or from any organization or person having business dealings with the Archdiocese other than in accordance with the limits of this Policy?		
Have you had any actual, apparent, or potential conflicts of interest arise that would require disclosure in accordance with the terms of this Policy?	*	
*If YES, have you promptly disclosed any actual, apparent, or potential conflict of interest arising in accordance with the terms outlined in this Policy?		
Do you have any further questions, comments or concerns relating to the <i>Conflict of Interest Policy</i> that you would like to discuss?		

- ☐ I have no conflict of interest to report.
- ☐ I have the following conflict of interest (or perceived conflict) to report. (Attach any additional sheets as required)
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I hereby confirm that my answers and the information provided above are true and accurate to the best of my knowledge. I further affirm my continuing duty to inform my supervisor, the Human Resources Director or the Delegate for Operations of any conflict or perceived conflict of interest.

I have received and carefully reviewed the *Conflict of Interest Policy* and have considered not only the literal expression of the Policy, but also its intent. By signing this Annual Affirmation of Compliance and Disclosure Statement, I hereby affirm that I understand and agree to comply with the *Conflict of Interest Policy*.

If any situation should arise in the future which I think may involve an actual or perceived conflict of interest, I will promptly and fully disclose the circumstances to the appropriate individual.

Name (Please Print): _____

Signature: _____

Date: _____



John Paul II Pastoral Centre Conflict of Interest Scenarios

Scenario 1

A vendor has offered me tickets to a local hockey game. Can I accept them?

Response: Possibly. This may be acceptable business entertainment provided that it is undertaken for appropriate reasons (including engendering good will), infrequent, without intent of influencing business decisions, and consistent with the values of the Archdiocese.

Scenario 2

I hold a professional role at the JPII Pastoral Centre and also operate my own business after hours. Though I depend on the skills and experience gained through my employment, the business in no way competes with Archdiocesan interests and does not affect my ability to perform my duties at the Pastoral Centre. I started small, working out of my basement, but my business is gradually generating more and more revenue. I am considering hiring a part-time manager as I am not ready to leave my full-time employment at the Pastoral Centre. Once my own business can pay me enough, I will devote my full attention to it. At the moment, I have the best of both worlds; a dependable salary from the Archdiocese, and a growing business for future security. Is this a conflict of interest?

Response: No. As long as your personal business venture does not compete or conflict with the business interests of the Archdiocese and your business remains an after hours pursuit and does not interfere with your ability to perform your job for RCAV to the best of your abilities. If, at some point in the future, you were unable to maintain these conditions, then you would be in a conflict of interest. You would then need to decide which of your two interests – your own or your employer's – would receive your full attention. Maintaining both would not be possible.

Scenario 3

I am an Administrative Assistant at the Pastoral Centre and recently married the owner of a local business that supplies office products to the Pastoral Centre and several parishes in the Archdiocese. We have agreed not to talk about any work matters that pertain to our overlapping work interests. Recently, my supervisor advised me that I could be in a conflict-of-interest position. What should I do?

Response: You are in a situation that may leave the impression of a conflict of interest. Even though you and your spouse have agreed not to talk about the overlapping aspects of your work lives, others (including your employer) may perceive you to be in a conflict of interest. You should discuss the situation further with your direct supervisor, Director of

Human Resources and/or Delegate for Operations to identify the extent to which your access to RCAV information could benefit your spouse. You will also need to develop a plan to limit your access to information (if possible) and to avoid any appearance of a conflict of interest.

Scenario 4

Part of my job involves the selection of technology suppliers. One day, a technology supplier phoned me and offered me and my family free use of his luxury vacation condominium. He says he is not using it and it would be a shame to have it sit empty. Can I accept the offer to use the supplier's condominium.

Response: No. The supplier has made a very generous offer which could appear to be offered in exchange for future special treatment from you in your position with the Archdiocese. You should decline the offer.

Scenario 5

Scenario: In my management role with the Archdiocese, I have significant influence over the selection of suppliers of products and services to the Archdiocese. I have known the owner of one of these suppliers since we were kids and we have always maintained a close personal relationship. I have no personal commercial or financial interest in the supplier's business. Is there still a conflict of interest?

Response: Yes. Although you may not have a personal commercial or financial interest in the outcome of the business relationship with this person, there may still be an appearance of bias or preferential treatment stemming from your personal relationship. You must eliminate the perception of conflict of interest by removing yourself from any selection process involving the supplier or by having a superior (to whom you have disclosed the possibility of conflict) approve the supplier selection decision in your stead.

Scenario 6

Scenario: I am employed at the Pastoral Centre and my niece wants to apply to one of our job postings. Am I able to recommend her for employment and advocate on her behalf?

Response: It would be reasonable to make the Human Resource Office aware of her interest and even offer verbal support for her application. You should stop short of providing any formal professional reference for your niece and you may not be involved in the hiring process in any way.

Scenario 7

Scenario: I am leading a foreign mission trip in the summer and need to make travel and lodging arrangements quickly and cheaply. A person processing my request in the country

we are visiting has said that they can speed up the process if I pay a small fee in cash. Is this OK?

Response: It depends. If it is an official fee that the organization would charge for published services, payment of this fee would be acceptable. However, if it is a payment to the person processing the request, then it may be construed as a bribe and is therefore prohibited. You must ask for a receipt or other official documentation as proof that the fee is legitimate. If the person will not provide an official documentation for the payment and you are uncertain whether it is legitimate, you should not offer or agree to pay the fee.

Scenario 8

Scenario: I am in full-time leadership at the Pastoral Centre in one of its key ministries. I have an opportunity to also take on paid work at my parish in a similar and related ministry. This would help facilitate effective working relationships between parish and Archdiocesan arms of this ministry and help to ensure seamless uptake of initiatives. A colleague suggested I may be in a conflict of interest if I accept the job in my parish. How should I respond?

Response: You should heed your colleague's advice. Despite the goodwill and opportunities for advancing the ministry, it would be very difficult to avoid real conflicts of interest. You would, for example, be answerable to two different supervisors that may have differing views on how, and to what degree, various initiatives should be implemented at the parish level. Because you would be working for two entities on similar programs with similar objectives, it would be difficult to distinguish between your parish and Archdiocesan work time. The potential for your work at either the parish or Pastoral Centre being compromised by this proposed dual role is high. You will need to make a decision as to how you can best serve the Archdiocese with your ministry; through employment at the parish or at the Pastoral Centre.

Scenario 9

Scenario: I work part-time at the Pastoral Centre and am also very involved in my volunteer work for a global charitable organization that requires me to take calls and respond to issues at all hours. I often need to take calls from this charitable organization during the workday but I am good at juggling my work and volunteer time, and "multi-tasking" when necessary. If my volunteer work cuts into my workday, then I attempt to make up the hours at other times. Is there a problem with this?

Response: It is a conflict of interest to have an outside commitment that demands so much time and energy that it interferes with one's ability to complete their Pastoral Centre work. This includes any personal, community, and charitable activities that require time and effort during normal working hours. It may be possible, in consultation with your direct supervisor, Director of Human Resources and/or Delegate for Operations, to formalize a



plan that resolves and addresses this conflict of interest. Because of the potential for real or perceived conflict of interest, formal disclosure and supervisor intervention is necessary and in the best interest of all parties.

Scenario 10

Scenario: In my role at the Pastoral Centre, I am often called on to speak at parishes, conferences, and faith-based gatherings. I am being increasingly sought out as a speaker and, in some instances, am being offered payment for my efforts. I am concerned about blurring the distinction between my worktime, personal volunteer time, and alternate employment. What should I do?

Response: You are right to raise this as an area of potential conflict of interest. You should discuss the issue with your direct supervisor and/or delegate and come up with a workable plan. Potential speaking engagements are significantly varied and should be considered in advance and on a case-by-case basis. In some cases, you may be representing your employer and “on work time” when you speak. In other cases, your speaking engagement may be considered paid or volunteer time outside of your work at the Pastoral Centre. When speaking as part of your work, you cannot receive additional pay from another entity and any gift or stipend must be within the bounds prescribed in the *Conflict of Interest Policy*. When speaking as a volunteer or as outside employment, you will need to ensure that this in no way interferes with your work and that any requests for time away from work are formally submitted for approval in advance.