

POLICY TITLE: <b>Governance: Board/Committee - Conflict of Interest</b>	POLICY NUMBER: <b>GOV-010</b>
DATE APPROVED: <b>20/05/2025</b>	
DATE(s) REVIEWED:	DATE TO BE REVIEWED: <b>2027</b>
DATE(s) AMENDED:	
LEGISLATION: s.1.1 <i>Municipal Conflict of Interest Act</i> (1990) Ontario Regulation 401/23, <i>Community Safety and Policing Act</i> (2019) s. 11(1) <i>Community Safety and Policing Act</i> (2019)	
RELATED PROCEDURES/POLICY: Ethical Framework for the Thunder Bay Police Services Board	

## POLICY STATEMENT

The Thunder Bay Police Service Board (Board) is committed to maintaining the highest standards of integrity, accountability, and public trust in its governance of policing services. This policy establishes guidelines to identify, disclose, and manage conflicts of interest among Board and committee members to ensure impartial decision-making and prevent undue influence.

## PURPOSE

The purpose of this policy is to:

- Ensure Board/committee members act in the best interests of the public and the integrity of policing services.
- Provide clear guidance on identifying, disclosing, and addressing conflicts of interest.
- Prevent Board/Committee members from using their position for personal gain or advantage.
- Maintain public confidence in the decisions and operations of the Board/committees.

## SCOPE

This policy is applicable to all members of the Thunder Bay Police Service Board and its committees.

## DEFINITIONS

- **Conflict of Interest:** A situation where a member's personal, financial, or professional interests may present a real or perceived interference with their duties to the Board/committee.
- **Pecuniary Interest:** Any financial interest, direct or indirect, that may result in personal gain or loss.
- **Non-Pecuniary Interest:** Personal or professional relationships that may create a bias in decision-making.
- **Personal Conflict:** A situation in which a member of a committee or member of the Board's private interests or personal relationships place, or may reasonably be perceived to place the member in conflict with their duties with respect to the function of the Board.
- **Gifts and Benefits:** Includes any item as defined as a "Gift" under the Ethical Framework for the Thunder Bay Police Services Board, such as any item of value including money, services, or privileges, that could be perceived as influencing a Board member's decision-making.
- **Personal Relationship:** Includes, but is not limited to, a relationship with any of the following persons:
  - A current or former spouse, common-law partner, or other intimate partner of the member.
  - The member's children, including biological and adoptive children and stepchildren.
  - A legal dependent of the member.
  - A child in the member's care.
  - A grandparent, parent, or sibling, including grandparent-in-law, parent-in-law, or sibling-in-law of the member.

## POLICY

### a) Identifying a Conflict of Interest

- Members must proactively assess their activities and relationships for potential conflicts of interest.
- Conflicts may arise from financial interests, personal relationships, or external activities that could impair objective decision-making.
- Members must consider both pecuniary and non-pecuniary interests that may impact their ability to act impartially.

### b) Disclosure Process

- Members must disclose any conflict of interest as soon as they become aware.
- The disclosure shall be made verbally to the Board/committee chair and recorded in the meeting minutes.

- If a member is unsure whether a conflict exists, they should seek guidance from the Board/committee chair.
- Disclosure must occur prior to the meeting or as soon as possible before the matter is discussed.
- Any gift or benefit must be disclosed in accordance with the requirements under Chapter No. 4 of the *Ethical Framework for the Thunder Bay Police Services Board*.

**c) Managing Conflicts of Interest**

- The affected member shall recuse themselves from discussions and decision-making on the matter.
- The Board Chair/committee chair shall determine if further actions are necessary to mitigate the conflict.
- Persistent or unresolved conflicts may require an external review by the Inspectorate of Policing.
- In cases of significant conflict, the Board/committee member may be asked to step down from the discussion or, in severe cases, from their position.
- All decisions and actions taken regarding the conflict will be recorded in the meeting minutes including the member's departure and return time from the meeting if applicable.
- If a conflict is discovered after a meeting has commenced, the chair will immediately address the situation to ensure that it is properly managed.

**d) Gifts and Benefits**

- No Member shall accept any Gift unless expressly permitted under Chapter No. 4 of the *Ethical Framework for the Thunder Bay Police Services Board*.
- No Member shall accept any Gift involving the use of property or facilities, such as a vehicle, office, club membership or vacation property at less than reasonable market value or at no cost. Notwithstanding this prohibition, with specific approval provided by the Board, a Member may be sponsored to attend educational site visits connected with an identified project.
- Exceptions include gifts identified as acceptable under the *Ethical Framework for the Thunder Bay Police Services Board*.
- Gifts or benefits received must be disclosed in accordance with the requirements under the Chapter No. 4 of the *Ethical Framework for the Thunder Bay Police Services Board*.
- Members should avoid any situations where acceptance of gifts or benefits might reasonably be perceived as a conflict of interest.

**e) Confidentiality and Transparency**

- The Board and its committees shall strive for transparency in its governance while upholding privacy and security standards.

**f) Compliance and Enforcement**

- Violations of this policy will be investigated by the Inspectorate of Policing.
- If a breach is confirmed, disciplinary actions, including formal warnings, suspension, or removal from the Board/committee, may be taken.
- All violations will be thoroughly documented and handled with the utmost seriousness to protect the integrity of the Board.
- Members are expected to adhere to this policy to maintain public confidence in policing governance.