



PERSONAL ATTENDANT CARE INC.
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DEPARTMENT		Human Resources
SUBJECT		Conflict of Interest
APPROVED BY (Signature)	CHIEF EXECUTIVE OFFICER	<i>N. Carter</i>
EFFECTIVE DATE		
REVIEWED BY (Title & Signature)		Pamela DeRaaf CHRP, Human Resource Manager
REVIEW DATE		September 2009

OPERATIONAL PROCEDURES

Preamble

Employees are expected to diligently carry out their position duties and responsibilities in a manner that does not conflict with the interests of Personal Attendant Care Inc.

The company recognizes and respects the individual employee's right to engage in activities outside of his or her employment that are private in nature and do not in any way conflict with or negatively impact the company. Management reserves the right, however, to determine when an employee's activities represent a conflict with the company's interests and to take whatever action is necessary to resolve the situation.

It is not possible to define all the various circumstances and relationships that would be considered a conflict of interest. The list below includes some of the types of activities that could be considered a conflict of interest and limit an employee's ability to discharge his or her job duties and responsibilities.

1. Using one's position in the company or knowledge of its affairs for outside personal gain.
2. Misusing privileged information or revealing confidential data to outsiders.
3. Soliciting or accepting substantial gifts or excessive entertainment from a client and/or members of their family, staff, an outside organization or agency while being in a position to obtain favoured treatment for or provide an unfair advantage to that person or entity.
4. Soliciting, selling or buying any products or services to or from clients and / or their family member, or staff for direct or indirect personal gain by the employee.

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5. Managing Personal Attendant Care Inc. client's property or finances.
6. Influencing a client to change his or her will or other testamentary instrument.
7. Ensuring that their professional judgement is not influenced by, or seen to be influenced by any commercial consideration.
8. Simultaneously holding multiple positions within the organization where one role can benefit or can be seen to benefit the other.
9. Borrowing money from clients or subordinates.
10. Accepting gifts, gratuities, or rewards from our clients and their family members, significant other, staff members or any other third party.
11. Providing services to the client which are not specified in the Service Plan such as, but not limited to; driving the client in your own and/or their vehicle, grocery shopping, picking up prescriptions, pet care etc.
12. Using company equipment or materials for personal use, unless such use is authorized by the Chief Executive Officer.
13. Inappropriate boundary is the point at which the employee relationship changes from professional and therapeutic to non-professional and personal. Crossing this boundary is a misuse of power in the relationship to meet the employee's own personal needs rather than the needs of the client, or behaves in an unprofessional manner with the client and or family member.

Remember: Employment by the company carries with it a responsibility to be constantly aware of the importance of ethical conduct. Employees must refrain from taking part, or exerting influence in any transaction in which their own interest may conflict with the best interests of the clients, staff or Personal Attendant Care Inc.

Procedures

1. The employee must declare to the Human Resource Manager any financial, other interest or affiliation with any organizations that provide goods and services that may put them in situations where their relationship with their client/staff may be used to influence or may be perceived as an advantage to the employee to gain some benefit.
2. The employee must declare any knowledge of an employee with a conflict of interest to the Human Resource Manager.

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3. If the employee is uncertain whether a situation is a conflict of interest, he/she should direct his/her questions to their Supervisor/Manager or to the Human Resource Manager.
4. The Supervisor/Manager or Human Resource Manager reviews the circumstances with the Chief Executive Officer and provides direction to the employee.
5. If an employee's behaviour is found to be in conflict of interest, he or she may be subject to progressive discipline.