

# Board and Committee Member Conflict of Interest

## Guidelines

April 1, 2026



College of

**HEALTH AND CARE PROFESSIONALS OF BC**



# Table of Contents

Table of Contents .....	2
Purpose .....	3
Background.....	3
Understanding conflict of interest .....	3
Equity and Indigenous perspectives.....	4
Cultural and community context.....	4
Conflict of perspectives and ethical dissent.....	4
Distinct conflict conversations .....	5
Settler-colonial assumptions and norms related to conflict.....	5
Key patterns to avoid: Indigenous members .....	5
Key patterns to avoid: Members from equity-denied communities.....	5
Patterns to avoid across high-level governance spaces.....	6
General Guidance for Chairs and members.....	6
Conflicts of Interest .....	6
Disclosure .....	6
Examples of conflict scenarios .....	7
Assessment .....	7
Possible Outcomes.....	8
Documentation .....	9
Definitions.....	9



## Purpose

These Guidelines support the implementation of the *Board and Committee Member Conflict of Interest policy*, approved in accordance with Sections 351-354 of the Health Professions and Occupations Act (HPOA) and CHCPBC Bylaws 2.38-2.42 and 3.41. They also assist the College in upholding the expectations within the Safe Spaces Playbook to Eliminate Indigenous-Specific Racism and White Supremacy in Governance. The purpose of the Guidelines is to

- outline clear step-by-step guidance for Board and committee members about when, how, and to whom to disclose a potential, real or perceived conflict
- describe for the Board, committees and staff how to assess the disclosure, including considerations to assess in a way that could reveal assumptions and biases
- provide examples of the possible outcomes

## Background

### Understanding conflict of interest

All individuals have varying interests, including those that are:

- personal
- professional
- relational
- cultural and/or
- community based.

A conflict of interest exists when an individual's interests intersect with their responsibilities to the organization in a way that could reasonably be perceived to influence judgment or decision-making.

Conflicts of interest may be:

- episodic or ongoing
- real, potential, or perceived
- individual or shared within communities or families

The existence of a conflict of interest is not inherently negative, unethical, or disqualifying. It is common for individuals—particularly those deeply embedded in their communities—to hold multiple, overlapping interests. Historically, individuals may feel their own or another person's identity, connections or advocacy automatically count as a conflict that must be avoided; this can result in lack of participation in key discussions and decisions, and results in decreased diversity in decision-making.

Holding multiple interests should not always be seen as a barrier to participation. Diverse interests and relationships contribute to the knowledge that Board and committee members bring to regulatory work and may reveal opportunities for new approaches and understanding.



This is not to minimize the caution that must be applied when there is a real or reasonable possibility that private or financial interests might affect, influence, or compromise a member's ability to meet their stated responsibilities. Even when there is no real conflict of interest, the mere perception of one may undermine the public's confidence in the College's ability to regulate.

### **Equity and Indigenous perspectives**

We recognize that conflict of interest frameworks have not always been applied equitably. For Indigenous and equity-denied individuals, policies like this one have sometimes been used — intentionally or not — to question or limit their participation in work that directly affects their communities, treating community accountability and relationships as liabilities rather than strengths.

Conflict of interest processes should never be used to silence Indigenous Board or committee members, dismiss Indigenous-specific concerns, or push aside uncomfortable truths about racism, colonial systems, or inequitable impacts.

The policy and these guidelines affirm that holding multiple interests does not automatically require recusal. Rather, the situation reflects the reality of inclusive and collective approaches to governance. There is a path to identify settler-colonial assumptions and norms, including ones that are ableist or cisheteronormative, and to consider ways to address or mitigate conflicts which allow for diversity of perspectives in decision making.

### **Cultural and community context**

The College recognizes that interpretations of conflict may vary across cultures and communities. For example:

- Family, kinship, or community connections may be viewed by some as conflicts of interest, while others understand them as expressions of mutual support, responsibility, and accountability.
- The exchange of gifts may be discouraged in some contexts, while in others it is a respected and meaningful cultural practice that serves as a form of acknowledgement, an expression of gratitude, reciprocity, or relationship-building.

Conflict of interest considerations must therefore be understood within their specific social, cultural, and relational contexts.

### **Conflict of perspectives and ethical dissent**

Conflict of interest should not be confused with conflict of perspective. A Board or committee member may bring a perspective that challenges dominant norms or raises concerns others have not considered. This diversity of perspective is critical to good governance. Rather than viewing this as an interest in conflict with the work of the Board or committee, further exploration through safe and respectful discussion is required.

Conflict of interest should not be confused with ethical dissent. A Board or committee member may raise concerns about racism, exclusion, procedural unfairness, or harm which should not be framed as disloyalty or conflict. Ethical dissent can be critical to acting in the public interest.



## **Distinct conflict conversations**

Conflict conversations must be approached as distinct questions, each with its own risk assessment and resolution. The College is committed to approaching these conversations:

- thoughtfully and respectfully
- with attention to personal, cultural, and community realities
- with an awareness of power dynamics and historical exclusion
- with consideration of potential impact on the public

The goal is not to eliminate conflicts of interest, but to acknowledge and navigate them in ways that uphold trust, fairness, and inclusive participation. The College is committed to a governance culture where:

- conflicts of interest can be discussed without stigma or fear
- participation is not limited by rigid or culturally narrow interpretations of conflict
- diverse ways of knowing and being are understood and respected

The approach is intended to support responsible, transparent governance while affirming that meaningful community representation and lived experience are strengths, not liabilities.

## **Settler-colonial assumptions and norms related to conflict**

These *Guidelines* do not rely on settler-colonial expectations and norms and they reduce barriers to participation for Indigenous or equity-denied individuals. They also aim to ensure diverse perspectives are valued and individuals can contribute to meaningful partnerships, collective action, and regulatory work. They contribute to the eradication of Indigenous-specific racism within the College by ensuring that conflict of interest processes do not exclude Indigenous Peoples based on colonial assumptions about neutrality, objectivity, or relational accountability.

### **Key patterns to avoid: Indigenous members**

1. Bias assumption from community or kinship ties → leads to automatic recusal, even when participation is needed for culturally safe regulation.
2. Equating community benefit with personal gain → overlooks collective responsibility in First Nations governance.
3. Rigid Western “objective” standards → marginalize Indigenous members’ expertise and reduce equity in decision-making.
4. Focus on form over context → disclosure becomes performative rather than contextual and meaningful.

### **Key patterns to avoid: Members from equity-denied communities**

1. Lived experience mistaken for personal gain → Input rooted in identity or disability is often incorrectly framed as a conflict.



2. Exclusion as enforcement of objectivity → Automatic recusal or sidelining of equity-denied members reinforces ableist corporate structures and decreases equity and representation.
3. Overemphasis on formal neutrality → Western norms undervalue experiential knowledge and relational accountability.
4. Disclosure misunderstood as misconduct → Members may feel “tainted” by disclosure, even when their participation benefits public and community health outcomes.

### **Patterns to avoid across high-level governance spaces**

1. Subtle bias against lived experience — contributions are sometimes misinterpreted as conflicts when they reflect expertise.
2. Western individualistic lens — equity-denied members are expected to be “neutral” in ways that ignore collective, relational, or inclusive governance.
3. Barrier creation through procedural norms — rigid meeting procedures, documentation requirements, or budget rules may exclude participation from those requiring accommodations or representing marginalized communities.
4. Disclosure anxiety — members may feel their identity or advocacy automatically counts as a conflict; this reduces participation and diversity in decision-making.

### **General Guidance for Chairs and members**

1. Disclosure is transparency, not misconduct — receiving, recording, sharing and collectively discussing disclosures ensures accountability.
2. Do not presume conflict based on identity or lived experience — avoid assumptions rooted in settler-colonial, ableist, or cis-normative norms.
3. Participation is often beneficial — lived experience, cultural knowledge, and equity focused insights broaden perspectives and strengthen decision making.
4. Document context and rationale — include the disclosure and the conversation in minutes or conflict of interest record, especially where equity considerations are relevant.
5. Accommodate appropriately — procedural or accessibility adjustments do not create bias; they support inclusive and culturally safe governance.
6. Separate an agenda-specific conflict from role or identity — focus on specific matter being discussed, not broader characteristics.

## **Conflicts of Interest**

### **Disclosure**

Circumstances that give rise to a real, potential, or perceived conflict of interest must be disclosed as soon as they become evident. This may be at the time that an agenda and materials for an upcoming meeting are circulated, at the time that declarations of



conflict of interest are called for at a meeting, at the time discussion begins or evolves on a particular agenda item, or unrelated to a specific meeting.

A Board or committee member may seek advice by either speaking privately with a trusted member of staff or identifying the conflict during a Board or committee meeting. When disclosing, the member should outline the specific nature of the concern and relationship and explain why they believe their interests are conflicted. This will begin a conversation to assess whether a conflict exists, the related risks, and the steps needed to address it.

There is significant value in holding discussions about conflicts of interest during a meeting itself. This helps to remove the stigma that conflicts of interest are wrong, supports mutual learning and a positive organizational culture, and signals how processes should evolve.

### Examples of conflict scenarios

1. In the following scenarios, it can be reasonably surmised a conflict of interest **does** exist on the basis of the disclosure made. Conversations will focus on outcomes that manage the conflict, not least to limit its impact on the public.
  - I am a Board member responsible for approving procurement services and am also employed by the company seeking a contract to provide services to CHCPBC.
  - I am a licensee committee member and have recently been appointed or elected to a leadership job/role with my profession's association.
  - I am serving on a panel to decide whether to recognize an education program and am employed by that program.
  - I am a member of the Finance and Audit Committee and work for an investment company that is currently advising the College on its financial management.
  - I am a licensee Board member who has had a complaint filed against me.
2. In the following scenarios, **it is uncertain** if a conflict of interest exists on the basis of the disclosure made. Conversations will focus on assessing if there is a conflict, its severity, the risk to the public if the conflict is left unaddressed.
  - I am reviewing the potential appointment of a new committee member and have relevant and specific knowledge about them, learned outside of my role here.
  - We are discussing a matter that will have a deep impact on people I care for. I'm torn between supporting the decision or advocating for my profession/community.
  - I serve on a committee, as does the person to whom I report in my full-time employment.
  - I am a licensee committee member and have been approached to be on an external advisory committee with my professional association.
  - I am actively campaigning for a candidate seeking election in provincial government.

## Assessment

Upon disclosure of a possible conflict of interest, an assessment will begin which will consider:



- the requirement under Bylaw 2.41 not to presume conflict of interest solely on a member's identity and lived experiences (including Indigenous identity or other protected characteristics)
- the requirement under Bylaw 2.42 not to presume conflict of interest for an Indigenous Board or committee member relating to an Indigenous matter
- the scope of the member's responsibilities and authority to act (related to fiduciary duty)
- real extent of the member's power or influence in context of the decision(s) required
- worldview and lived experiences relevant to the interest
- impact on, or value to, public interest and perception
- likelihood the member's participation will result in undue influence, interference, or harm
- measures or safeguards needed to mitigate effects of the conflict
- whether a temporary or permanent solution is necessary
- whether more advice or guidance should be sought (e.g. from legal counsel or Elders)
- any other information pertinent to addressing the conflict of interest

The assessment will be conducted collaboratively. In the case of a Board member, assessment may include staff, the Board chair/Board members. In the case of a committee member, assessment may include staff, the committee/panel chair and committee/panel members. Open and non-judgmental conversations will be encouraged to build understanding about the implementation of the policy.

## Possible Outcomes

Most conflicts of interest can be resolved easily with minimal or no intervention, and often the member may continue to participate in a meeting once a conflict is disclosed.

If on completing a risk analysis, there remains concern about bias, managing the conflict may include suggesting that access to information be restricted, that the member abstain from taking part in discussions, or that the member not vote on decisions where they have a conflict. They may also be asked to leave the room when discussions are taking place.

In rare cases (depending on the nature of conflict and risk analysis), the member may be asked to consider divesting the interest causing a conflict, transfer to another role where there is no conflict, or resign from the Board or committee.

If consensus on how to address a conflict cannot be reached, the Board chair or committee chair will make the decision, in consultation with the supporting senior staff liaison and advisors (e.g. legal counsel or Elders).

If a conflict of interest is disclosed after a decision has been made, the member must inform staff without delay. The Board or committee may need to be recalled to re-review the matter in which the member was involved while a conflict of interest was present.



## Documentation

All disclosures of conflicts of interest are documented in the meeting minutes and added to the register of conflicts held by the CHCPBC Strategy, Governance and Social Accountability team in accordance with the *Health Professions and Occupations Act*.

## Definitions

**Ableist** is a way of thinking or a set of behaviours that devalue, exclude, and/or are averse to disability, neurodivergence, and chronic health conditions, which is embedded in social structures and systems. Ableism excludes disabled people, neurodiverse people, and people with chronic health conditions from societal engagement and perpetuates inequitable distribution of resources, opportunities, and power.

**Conflict of interest** exists when an individual’s personal, professional, relational, cultural, or community interests intersect with their responsibilities to the College in a way that could reasonably be perceived to influence judgment or decision making. The existence of a conflict of interest is not inherently negative, unethical, or disqualifying. It is not uncommon for individuals—particularly those deeply embedded in their communities—to hold multiple, overlapping interests. Conflicts of interest may be:

- Episodic or ongoing
- Real, potential, or perceived
- Individual or shared within communities or families

**Cisheteronormative** is a system of attitudes, bias, and discrimination that considers being cisgender and heterosexual a social norm, which marginalizes 2SLGBTQIA+ people and treats their needs and identities as less important.

**Equity-denied** is a term used to refer to communities and groups that experience significant collective barriers in participating in society. This could include attitudinal, historic, social and environmental barriers based on age, ethnicity, disability, economic status, Indigeneity, gender identity and gender expression, nationality, race, sexual orientation, etc. Equity-denied groups are those who identify barriers to equal access, opportunities and resources due to disadvantage and discrimination and actively seek social justice and reparation. Sometimes “equity-seeking” or “equity-deserving”.

**Perceived conflict of interest** can be said to exist where a reasonable person might conclude that a Board or committee member’s professional judgment has been improperly influenced because of their private interests or obligations, even if that is not the case.

**Potential conflict of interest** can be said to exist when a reasonable person would conclude that a Board or committee member might, now or at a future time, fail to fulfil their professional obligation because of their private interests or obligations.

**Real conflict of interest** exists when a Board or committee member’s obligations are compromised by their private interests or obligations.

**Settler-colonial** is a system of attitudes, beliefs, bias and discrimination that normalize structures of the colonial state. It stems from colonialism, which develops a set of laws and public processes designed to violate the human rights of the Indigenous peoples,



violently suppress the governance, legal, social, and cultural structures of Indigenous peoples, and force Indigenous peoples to conform with the structures of the colonial state.

<b>Reviewed by</b> Board		2026-04-02	<input type="checkbox"/> N/A
<b>Reviewed by</b> <i>Full Name Title</i>		Select date	<input type="checkbox"/> N/A
<b>Date Approved</b> 2026-04-02	<b>Approved By</b> <input checked="" type="checkbox"/> Board <input type="checkbox"/> Committee ( <i>Name of Committee</i> ) OR Name <i>Full Name</i> Title <i>Title</i>		
<b>Date Effective</b> 2026-04-02	<b>Revision history</b>	<b>Last Updated:</b>	2026-04-01
<b>Next Review</b> 2028-04-01		<b>Previous Update:</b>	Select date
<b>Drafted by:</b> Kathy Davidson		Executive Director, Strategy, Governance and Social Accountability	