

MISSISSAUGA ONTARIO HEALTH TEAM CONFLICT OF INTEREST POLICY

1. PURPOSE

The purpose of this policy is to assist partners of the Mississauga Ontario Health Team (MOHT) in identifying, addressing, and mitigating conflict of interest to ensure the integrity, transparency, and equity of all activities undertaken by the OHT.

The MOHT has articulated the following shared vision for its work:

Together, our vision is to improve the health of people in our community by creating an interconnected system of care across the continuum, from prenatal care to birth to end of life and bereavement.

Care will address physical, mental, social and emotional well-being, and will be reliable, high quality and grounded in exceptional experiences and sustainability, delivering on the Quadruple Aim.

This policy guides MOHT Team Members in evaluating partnership opportunities to ensure that all relationships are undertaken with the goal of advancing the shared vision above.

This policy also guides MOHT Team Members, Affiliate Members, and all other partners with real, potential, or perceived conflict of interest, on how to declare conflicts and manage conflicting situations.

2. IDENTIFYING CONFLICT OF INTEREST

The MOHT will require partnerships across a range of community organizations, groups, sectors, and individuals to provide health care services and address the social determinants of health for its attributed populations. Given the diverse accountabilities and responsibilities of partners involved, conflicts of interest will arise and must be managed.

Two types of conflict of interest can be anticipated as part of MOHT activities: organizational conflict of interest and personal conflict of interest.

Organizational conflicts of interest can arise when certain entities have access to information or influence that might advantage them unfairly over others in decisions that impact financial, regulatory, or other interests. For example, preferential treatment to one organization over others impacting a competitive bid for a contract. These conflicts can also arise when a partner of the MOHT has activities or interests that are directly in conflict with the MOHT's vision.

Personal conflicts of interest arise in situations where financial, professional, or other personal considerations may compromise, or have the appearance of compromising, the judgment of an individual involved in decision-making for the MOHT. Examples include where an individual has a financial or imputed financial stake in a particular decision or where an individual has conflicting "duties" to the MOHT and another organization or entity.

Below are a few examples of circumstances that could result in real, potential, or perceived conflicts:

- An individual participating in a procurement process on behalf of the MOHT is related to someone employed by one of the entities submitting a bid.
- An individual sitting at a decision-making table for the MOHT receives confidential information that is of importance to another entity for which they sit on the board, creating a conflict between their duty to keep the information confidential and their duty to disclose that information as a board member.
- A representative of an entity is invited to attend an MOHT meeting that is not open to other similar organizations; at this meeting, they receive information about the MOHT's strategic plans, placing them at a competitive advantage for a subsequent procurement process.
- A representative of an entity joins an MOHT engagement session that is not open to other similar organizations and where participant input will be used to inform decision-making; this results in a perception of favouritism or influence over the process that could affect the MOHT's credibility.

The definitions and examples shared above will not exhaustively capture all conflicts that could arise as a result of MOHT activities. The principles set out in this policy are intended to be illustrative. All MOHT Team Members, individuals working on behalf of the MOHT Management Office, and MOHT partners have a responsibility to monitor for conflicts on an ongoing basis and to report them as they arise in accordance with both the letter and the spirit of this policy.

3. MANAGING AND DISCLOSING ORGANIZATIONAL CONFLICT OF INTEREST

To guard against organizational conflicts, potential partnerships will be vetted through a due diligence process that includes assessment of conflict of interest. Affiliate Members will be asked to declare potential conflicts via an attestation process and will also be asked to declare any conflicts annually.

To avoid perception of preferential treatment, the MOHT Management Office will work to ensure transparency in engagement opportunities and will avoid approaching or holding individual meetings with entities where those interactions could have a real, potential, or perceived impact on future decision-making for the profit or benefit of those entities. Entities attempting to leverage MOHT partnership or engagement opportunities to gain preferential treatment or financial or other benefit will be excluded from consideration for partnership.

Once a partnership has been entered, both the MOHT Management Office and the partner entity will be responsible for monitoring for potential conflicts and reporting them as they arise. Disclosures of conflict should be made immediately so that the resolution process detailed below can be undertaken. Disclosures should be made to the OHT Management Office or, if they arise over the course of a meeting, should first be raised for all meeting attendees and subsequently raised to the MOHT Management Office.

4. MANAGING AND DISCLOSING PERSONAL CONFLICT OF INTEREST

All individuals working on behalf of the MOHT and participating in leadership and decision-making for the MOHT must understand their duties when a conflict of interest arises. Team Members and others in the MOHT Management Office will be asked to review and sign off on this conflict of interest policy annually to ensure ongoing awareness.

If an individual has a real, potential, or perceived conflict, that individual must disclose the conflict at the earliest opportunity and describe its nature and extent. If an individual is uncertain whether a conflict exists, they must err on the side of disclosure. The individual and the MOHT Management Office and/or Team Members will then follow the process for resolution outlined below.

If an individual knowingly fails to disclose a conflict of interest as required by this policy, they may be asked to resign from their role with the MOHT or may be subject to removal.

5. RESOLUTION PROCESS

Below is the high-level process to be undertaken when a real, potential, or perceived conflict is identified and/or disclosed.

- The conflict must be documented and a record of the nature and extent of the conflict kept. This could include documentation of a personal conflict of interest as part of meeting minutes or filing detailed documentation of an organizational conflict.

- The individual or organization in conflict must immediately recuse themselves from discussion and decision-making related to the matter. Recusal could include an individual stepping out of a meeting or an organizational representative stepping down from a decision-making body (e.g. procurement committee). The individual or organization shall not attempt in any way to influence decision-making related to the matter.
- Where recusal is not sufficient to resolve the conflict, the matter shall be referred to the chair of the Governance & Human Resources Subcommittee (or to another member of the committee who is not in conflict).
- The chair of the Governance & Human Resources Subcommittee (or other Subcommittee member) will table the matter and the Subcommittee will make a recommendation to Collaboration Council for resolution of the matter.
- If the matter cannot be resolved by the Collaboration Council, it will then be forwarded for dispute resolution according to processes laid out in the MOHT's Collaborative Decision-Making Agreement.