

# CONFLICT OF INTEREST PROCESS DIAGRAM

## DISCLOSURE OF CONFLICT OF INTEREST BY EMPLOYEE TO THE EMPLOYER

### Identification of possible conflict by employee:

- 1 Employees who believe they are, or may be, in a real, perceived or potential conflict of interest must bring the matter forward to their manager or ethics advisor. This step should be completed by the employee within **30 days** of the employee becoming aware of the possible conflict.

### Confirmation of possible conflict by employee's manager:

- 2 Where the issue is straightforward, the manager may direct the employee to take steps required to resolve or mitigate the conflict. Where the issue is complex and/or not easily resolved or mitigated, the manager may require the employee to complete the **Conflict of Interest Employee Disclosure Form**.

### Completion of Employee Disclosure Form by employee:

- 3 The form ensures all applicable information related to the conflict is gathered and disclosed in writing, and establishes the basis for additional review by the employee's manager, ethics advisor or deputy minister.

## ASSESSMENT AND RESOLUTION BY THE EMPLOYER

### Review of employee disclosure by manager, ethics advisor or deputy minister:

- 4 Following disclosure of a possible conflict by an employee, it is the employer's responsibility to address the possible conflict in a way that assesses the employee's interests against the need to serve the public interest.

### Identify work duties and relevant interests:

- 5 Identify the work duties, government interests and private interests of the employee that are relevant to the circumstances.

### Analyze and assess:

- 6 Analyze whether the employee's private interests conflict, or could be perceived to conflict, with their ability to discharge their work duties or serve the public interest, and assess the severity of the harm that could result from the conflict. This step may involve consultation with the BC Public Service Agency as deemed necessary in the circumstances.

### Decide and resolve/mitigate:

- 7 Decide whether the circumstances give rise to a real, perceived or potential conflict that must be addressed in some way by the employer; consider what steps could be taken to resolve or mitigate the conflict so it does not pose unacceptable risks to government or the public interest; communicate the final decision and direction to the employee in writing.

### Document:

- 8 Document on the employee's personnel file, and elsewhere as may be required, the reasons for the conclusion reached and steps taken (if any).

### Communicate:

- 9 To the extent reasonable and necessary, communicate transparently within the organization regarding the conflict and how it was addressed.