



CONFLICT OF INTEREST POLICY

Policy Statement

Each officer, regional director, and committee or task force member (“volunteer leader”) at the national and/or local chapter levels should avoid both actual and apparent conflicts of interest that would interfere with their ability to discharge their responsibilities to the Association of Occupational Health Professionals in Healthcare (AOHP.) AOHP encourages its volunteer leaders to follow ethical standards, to be in compliance with all laws, and to avoid any conflict of interest or appearance of such, including having their titles or affiliation used to publicize personal or company activities, programs or events (especially those conducted for private profit.) Not all conflicts of interest are financial in nature and these types of conflicts should also be avoided by the volunteer leader. An example of a non-financial conflict of interest is voting or making decisions that would advance personal or special interest group’s agenda as opposed to benefiting AOHP and its membership. This policy is intended to supplement but not replace any applicable state and federal laws governing conflict of interest applicable to nonprofit and charitable organizations.

Definitions

A volunteer leader has “financial interest” if the volunteer leader has, directly or indirectly, through business, investment or family:

- (a) An ownership, investment or other proprietary interest in any entity with which AOHP has a transaction or arrangement or entity seeking or negotiating a transaction or arrangement;
- (b) A potential ownership, investment or other proprietary interest in any entity with which AOHP has a transaction or arrangement or entity seeking or negotiating a transaction or arrangement;
- (c) Receives any substantial benefit from a third party on account of that party's past, present or future business relationship with AOHP;
- (d) Receives any substantial financial benefit from a pending decision of AOHP or from an organization or individual being evaluated by AOHP; or
- (e) Serves as an officer, director or committee member of any competing organization, i.e., any nonprofit or business enterprise whose purposes, products and/or services compete with those of AOHP.

A financial interest is not necessarily a conflict of interest. A volunteer leader may have a conflict of interest only if the Board or committee involved decides that a conflict of interest exists.

Avoiding Conflicts

- Serve the organization as a whole rather than any special interest group or constituency. Your first obligation is to avoid any preconception that you “represent” anything other than the overall organization’s best interests.
- Avoid even the appearance of a conflict of interest that could misrepresent the impartiality of the board or the organization; disclose any possible conflicts to the board in a timely fashion.
- Maintain independence and objectivity and do what a sense of fairness, ethics, and personal integrity dictate, even though not necessarily obliged to do so by law, regulation, or custom.
- Never accept (or offer) favors or gifts from (or to) anyone who does business with the organization. This excludes conference exhibitor novelties, drawings or meals that are available for all conference attendees or a specific user group.

Disclosure of the Existence of a Conflict

If any volunteer leader of AOHP knows, believes, or has reason to know or believe that a conflict of interest or potential conflict of interest exists, such person shall inform the Board or the committee, preferably in writing, of the existence of such interest and fully disclose all material facts of the financial or personal interest in the transaction, arrangement or benefit and in any entity involved in the transaction, arrangement or benefit prior to the meeting at which the Board or committee involved acts upon the transaction, arrangement or benefit.

Procedure

(a) The volunteer leader shall remove him or herself from the Board or committee involved during the discussion of, and vote on, the transaction, arrangement or benefit involving the possible conflict of interest.

(b) A disinterested volunteer leader or other disinterested party familiar with the transaction, arrangement or benefit may present evidence of the fairness of the proposed transaction, arrangement or benefit.

(c) The vote of a majority of the disinterested Board or committee involved and constituting a quorum, after reaching a decision regarding whether the proposed transaction, arrangement or benefit is fair to AOHP, will be required for approval of said transaction, arrangement or benefit. The minutes of the meeting will reflect that a disclosure of interest was made and that the interested volunteer leader abstained from voting and was not present during the Board's or committee's consideration of the transaction, arrangement or benefit.

(d) No individual who has an actual conflict of interest shall be required to resign his or her position with AOHP merely because of the existence of a conflict. However, the majority of the disinterested Board or committee involved and constituting a quorum may make a fair and full evaluation of all facts pertaining to the conflict of interest to determine its extent. If the majority of the disinterested Board or committee involved and constituting a quorum makes a determination in writing that the nature and extent of the conflict of interest is so substantial and of such a continuing nature that it would be impossible for the volunteer leader to discharge the duties of his or her office with the requisite degree of loyalty and integrity, then the Board may require the resignation of the volunteer leader who is subject to the conflict of interest.

Violation of Policy

(a) If the Board or committee involved has reasonable cause to believe a volunteer leader has failed to disclose actual or possible conflicts of interest, it shall inform the volunteer leader of the basis for such belief and afford the volunteer leader an opportunity to explain the alleged failure to disclose.

(b) If, after hearing the volunteer leader's response and after making further investigation as warranted by the circumstances, the Board or committee involved determines the member has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action.

Conflict Report

All volunteer leaders will be bound by this Conflict of Interest Policy. Any individual who may have a conflict of interest shall be required to complete the CONFLICT OF INTEREST DISCLOSURE FORM in connection with the selection process.

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