

TORONTO SENIORS HOUSING CORPORATION (TSHC) Conflict of Interest Policy Questions and Answers

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Why do we have a Conflict of Interest Policy?

The [Conflict of Interest Policy \(PDF\)](#) is important to us as a public sector organization. Promoting public confidence in Toronto Seniors Housing Corporation is the responsibility of every employee. We are all expected to promote Toronto Seniors Housing Corporation's core values and to follow a high standard of honesty, integrity, accountability and ethics. The Conflict of Interest Policy makes these expectations clear and consistent across the organization.

This policy is also intended to protect you by setting out steps that you can take to protect yourself against allegations of a conflict of interest. Most conflicts can be reasonably resolved to the satisfaction of both the employee and Toronto Seniors Housing Corporation.

What is a conflict of interest?

A conflict of interest is any situation where an employee's personal or business interests compete or appear to compete against their duties as an employee and against the best interests of Toronto Seniors Housing Corporation. A conflict of interest can be one or more of the following types:

- **Actual conflict:** a conflict of interest that the employee has at the present time.
- **Potential conflict:** any situation which may lead to or have the potential to lead to a conflict of interest in the future.
- **Apparent conflict:** any situation which could reasonably be perceived as a conflict of interest by others, regardless as to whether or not there is an actual conflict of interest.

Example of a business interest conflict

Employee A works at Toronto Seniors Housing Corporation in the Strategic Procurement department. Employee A's brother is a co-owner of XYZ Roofing Company Ltd. and sometimes does work repairing Toronto Seniors Housing Corporation roofs. Employee A oversaw the procurement process through which XYZ Roofing Company Ltd. was hired to complete a roofing contract.

This is a conflict of interest because Employee A's brother (a family member) stands to benefit personally from a decision of Toronto Seniors Housing Corporation that Employee A was able to influence.

Example of a personal relationship conflict

Employee B is a manager at Toronto Seniors Housing Corporation. Employee B is hiring a new team member and recommends that her niece apply. Employee B interviews her niece in the hiring process.

This is a conflict of interest because Employee B is involved in the hiring process for her niece.

How do I declare a conflict of interest?

You must complete the [Declaration of Interest Form \(PDF\)](#) and send it to the General Counsel (or his designate) or your divisional head. Instructions on how to submit the form confidentially are set out on the form.

If you are unsure who your divisional head is, please ask your director or a member of the [Human Resources team](#).

When should I report that I have a conflict of interest?

You must declare all conflicts of interest when you become aware of them. If you have any doubt about whether you have a conflict of interest, you should declare the conflict immediately. Every year, Toronto Seniors Housing Corporation will review with employees their obligations under the policy, including requirements to declare any conflicts of interest and to complete the [Declaration of Interest Form \(PDF\)](#).

Do I have to tell my manager?

You do not have to declare your conflict of interest to your manager, but you must declare it to your divisional head or the General Counsel (or his designate) in writing. You are expected to ask your manager, divisional head

or the General Counsel (or his designate) any questions you may have about the Conflict of Interest Policy.

Who does this policy apply to?

The Conflict of Interest Policy applies to every employee of Toronto Seniors Housing Corporation. The policy is especially important to employees who are in a position to make or influence decisions of the organization.

Who is not covered by this policy?

Third-party contractors and vendors, Tenant Representatives and Toronto Seniors Housing Corporation Board members are not covered by this policy. Contractors and vendors must follow any conflict of interest guidelines in their contracts. Tenant Representatives must follow the [Tenant Representative Code of Conduct \(PDF\)](#). Board members must follow the [Conflict of Interest Policy for Directors of the Board \(PDF\)](#).

Can I work at another job outside of Toronto Seniors Housing Corporation?

Employees may engage in outside work or be appointed to a board (paid or volunteer) as long as the work is not in conflict with their duties at Toronto Seniors Housing Corporation. Starting **June 1 2022**, if you plan to work a second job or join a board of directors, you must first complete the Declaration of Conflict of Interest Form and receive approval before you accept the position.

What if I already have another job outside of Toronto Seniors Housing Corporation?

If you already have another job, you don't need approval, but you must still avoid any conflicts of interest and declare any potential conflicts of interest. You must still consider whether the second job places you in a conflict of interest with your job at Toronto Seniors Housing Corporation.

Example of a conflict of interest that could exist when you work at a second job:

- Employee C** works at a second job outside of Toronto Seniors Housing Corporation. Her shift at Toronto Seniors Housing Corporation ends at 4 p.m., but her second job starts at 4:15 p.m. To make it to her second job on time, Employee C leaves her Toronto Seniors Housing Corporation job at 3:30 p.m.

This is a conflict of interest because the work demands of Employee C's second job conflict with her responsibilities at Toronto Seniors Housing Corporation.

What will happen when I declare a conflict of interest?

Your situation will be reviewed to determine if there is a conflict of interest under the policy. The purpose of the Conflict of Interest Policy is not to punish employees for declaring a conflict of interest. The policy is meant to help employees resolve conflicts of interest by encouraging them to declare any situation that may be an actual, potential or apparent conflict of interest.

Can I declare a conflict of interest on behalf of someone else?

No, but if you think there is wrongdoing that needs to be reported, we encourage you to make a report under the [Whistleblower Policy \(PDF\)](#) or our [Fraud Prevention Policy \(PDF\)](#).

Does the Conflict of Interest Policy apply to how I use Toronto Seniors Housing Corporation property?

The Conflict of Interest Policy has some guidelines for the use of Toronto Seniors Housing Corporation property, but the [Code of Conduct \(PDF\)](#) covers the use of Toronto Seniors Housing Corporation property in more detail. If you use Toronto Seniors Housing Corporation property for anything other than its intended use as a Toronto Seniors Housing Corporation employee, or you use or try to access information that is unrelated to your duties and responsibilities, the Conflict of Interest Policy may apply.

If you are unsure if you have a conflict of interest, please reach out to your manager or director for guidance, or make a declaration in writing to your divisional head or the General Counsel (or his designate). Employees must always follow the [Acceptable Use of Information Technology Policy \(PDF\)](#) when using Toronto Seniors Housing Corporation cell phones, computers, email, Internet and other information technology.

Example of a conflict of interest that could exist if you try to access information that is unrelated to your duties and responsibilities as an employee:

- **Employee D** knows someone who lives in a Toronto Seniors Housing Corporation owned or operated building. Employee D uses his position at Toronto Seniors Housing Corporation to access the information of tenants in the company database, and uses this information for personal reasons. Employee D does not need to access this information for a purpose associated with his duties and responsibilities while at work.

This is a conflict of interest because Employee D has accessed or used information that he learned while working at Toronto Seniors Housing Corporation for his own personal benefit and not his job.

As an employee and a tenant of TSHC who is living in an RGI unit, do I have to declare my TSHC income and report any changes to my salary, and am I required to report if someone else is living in my unit?

Yes. Under the RGI program, you are required to report who is living in your unit and you must also accurately report your income at all times. This includes your salary as a TSHC employee and any changes to your salary during the year (i.e. if you are promoted or receive a pay increase). This information is used to determine if you are eligible to be an RGI tenant and in the calculation of your rent. There could be an impact on your tenancy if you do not accurately report this information, and you may be required to repay amounts if your rent is recalculated. As a TSHC employee, you would actually be in violation of both the Code of Conduct and Conflict of Interest Policy if you do not accurately report your income and who is living in your RGI unit. Starting on June 1, 2022, TSHC will start confirming the income being reported by TSHC employees who are also tenants under the RGI program.