

Revision New	Prepared By Krystal McDowell, Jessica Meyer	Date Prepared March 24, 2022
Effective Date July 19, 2023	Reviewed By Olana Todoruk, Craig Hrynchuk, Sunny Kakar, Chris Crowle	Date Reviewed

Disclosure of Interest Policy

Scheduled Review Date: July 2026

Policy Statement

The high level of Interested Party support and respect that AMHSA enjoys results not only from recognition of its mission, vision and value statements, but from the high degree of integrity, objectivity, and professionalism of its employees, instructors, subject matter experts (SME's), and others acting on behalf of AMHSA as an AMHSA Representative. AMHSA benefits from the expertise of individuals with a multiplicity of interests; however, those interests must not conflict with the interests of the AMHSA nor impair the Interested Party support and respect necessary for the operation of AMHSA.

AMHSA is committed to ensuring the continuation of healthy and equitable relationships between the organization's clients, employees, instructors, SME's, and other providers working on behalf of AMHSA. There must be no undisclosed or unresolved conflict between the private interests and responsibilities of those working on behalf of AMHSA and AMHSA as an organization or AMHSA's clients and public. Such conflicts can place the company's reputation in jeopardy, and in certain cases, put an employee or AMHSA representative's safety at risk.

Purpose

The purpose of this policy is to outline AMHSA's requirements for the disclosure of interest, both to AMHSA and to learning event participants. In the event that an employee, instructor, SME, or other provider acting on behalf of AMHSA has a perceived conflict of interest involving products, devices, or materials, this disclosure must be provided to AMHSA.

Conflicts of Interest are not necessarily negative; however, for the continuation of healthy and equitable relationships, AMHSA commits to full disclosure.

Scope

This policy applies to all employees, instructors, SMEs, and others authorized to act on behalf of AMHSA as an AMHSA representative.

Responsibilities

All employees, instructors, SME's and other providers acting on behalf of AMHSA as an AMHSA representative, must review this policy, and sign the policy acknowledgement upon commencement of employment or contractual services.

Failure to comply with this policy may result in disciplinary action as per the AMHSA Discipline and Discharge Policy.

Executive Director

- Provide adequate resources and governance to support execution of this policy.

- Review and investigate any potential conflicts of interest brought forward for investigation by the AMHSA Ethics and Compliance Officer (ECO).

Director of Learning and Assurance

- Discuss Disclosure of Interest Policy content with employees, instructors, SME's, and/or other individuals acting on behalf of AMHSA as an AMHSA representative upon commencement of contracts.
- Ensure Disclosure of Interest Policy content summary is shared with learning event participants.
- Ensure that employees, instructors, SME's, and/or other individuals acting on behalf of AMHSA as an AMHSA representative are submitting Disclosure of Interest Reports when required by this policy.
- Review and investigate any potential conflicts of interest, either suspected or when brought forward by employees, instructors, SME's, and/or other individuals acting on behalf of AMHSA as an AMHSA representative, or learning event participants, then take the appropriate action as needed.

AMHSA Ethics and Compliance Officer (ECO)

- Review Disclosure of Interest Reports to determine if a conflict of interest exists.
- Ensure any perceived conflict is reviewed by the Senior Leadership Team (SLT) or Board of Directors (if required) who will review and make appropriate adjustments (if necessary).

Director of Corporate Services

- Ensure service and employment contracts include Disclosure of Interest Policy content.
- Review and investigate any potential conflicts of interest, either suspected or when brought forward by employees, instructors, SME's, and/or other individuals acting on behalf of AMHSA as an AMHSA Representative, or learning event participants, then take the appropriate action as needed.

Employees

- Act in AMHSA's and its Interested Parties best interests.
- Disclose to Functional Leader, any actions where there is any interest that could reasonably be construed as conflicting with AMHSA's interests.
- Disclose any proprietary interest, investment, or association that could create a conflict of interest or that interferes with your ability to perform your duties for AMHSA; and the creation of any personal direct or indirect interest or relationship with any company that competes with or provides products and/or services to AMHSA.
- Disclose to Functional Leader any situation in which a direct or indirect benefit would be gained, monetary or non-monetary, from a contract or transaction.
- Disclose any situation in which your affiliation with AMHSA or role with AMHSA could be perceived to be used for personal gain.
- Bring possible conflict of interest situations forward to your Functional Leader for discussion if you are unsure about whether the situation is a conflict of interest, or if you are unsure how to remove yourself from a conflict of interest situation.
- Complete the Disclosure of Interest Report when required by this policy.

Instructors

- Disclose any proprietary interest in products, instruments, technologies, or other materials discussed during AMHSA learning events, as well as the source of any third-party pay related to a learning event.
- When commencing a service agreement with AMHSA, all AMHSA instructors will sign a contract outlining their proprietary interests and the scope of their authority. The instructor and the Director of Learning & Assurance shall examine and discuss this agreement.
- Complete the Disclosure of Interest Report when required by this policy.
- Disclose to learning event participants, any proprietary interest associated with the presentation prior to the start of any training. Each course slide deck will include a slide explaining the Disclosure of Interest policy and who a participant may contact in case of violations or questions.
- Instructors having any proprietary interest are obliged to abstain from making any product or service endorsements and to agree not to advertise, promote, endorse, or market their interest at any time during educational instruction unless AMHSA has granted prior approval and their interests are disclosed at the beginning of the learning event and in all marketing materials.
- Instructors who are unsure about whether they have a conflict of interest, or who are unsure how to remove themselves from a conflict of interest, are directed to bring the possible conflict situation forward to Director of Learning & Assurance for discussion.

Subject Matter Experts (SMEs)

- Disclose to AMHSA any proprietary interest or conflict of interest associated with the subject prior to the start of any content creation or learning events.
- Abstain from making any product or service endorsements and agree not to advertise, promote, endorse, or market their interest at any time during educational instruction unless AMHSA has granted prior approval and their interests are disclosed at the beginning of the learning event and in all marketing materials.
- In instances where the instructor is the subject matter expert and their research or work is used as part of the course content, AMHSA's Director of Learning & Assurance will meet with the instructor/SME to confirm their understanding of the bounds of this policy and the level to which they can speak about their own content.
- Complete the Disclosure of Interest Report when required by this policy.

Others Acting on Behalf of AMHSA as an AMHSA Representative

- Other individuals, such as volunteers, practicum students, and any others not named but acting on behalf of AMHSA, must also avoid and/or disclose any proprietary interest, investment, or association that creates a conflict of interest or that interferes with their ability to perform their duties with AMHSA; and the creation of any personal direct or indirect interest or relationship with any company that competes with or provides products and/or services to AMHSA.
- Complete the Disclosure of Interest Report when required by this policy.

Learning Event Participants

- Learning event participants who feel that a conflict of interest exists or may exist, are directed to bring their concerns to the AMHSA Ethics and Compliance Officer (ECO). This information is provided to participants at the beginning of each course, via the standard slide deck.

Possible / Known Conflict of Interest Disclosure

All AMHSA employees are required to complete a [Disclosure of Interest Report](#) and submit it to their Functional Leader for consideration upon hire, on an annual basis thereafter, and at any time when an employee self-identifies a perceived conflict of interest.

Instructors, SME's and other individuals acting on behalf of AMHSA as an AMHSA representative are required to complete a Disclosure of Interest Report and submit it to the Director of Learning and Assurance upon commencement of their service agreement, at a frequency deemed appropriate by the Director of Learning and Assurance thereafter, and at any time when a perceived conflict of interest has been self-identified.

If a circumstance arises where an employee, instructor, SME, other provider acting on behalf of AMHSA as an AMHSA representative, or learning event participant perceives a conflict of interest exists between parties other than themselves, they are to report the situation to their Functional Leader or AMHSA's Ethics and Compliance Officer (ECO) to be investigated.

Employees, Instructors, SME's and other providers acting on behalf of AMHSA as an AMHSA representative will not be subject to discipline or reprisal for bringing forward, in good faith, allegations of conflict of interest situations.

Review and Decision on Possible Conflict of Interest

Completed Disclosure of Interest Reports will be reviewed by the employees' Functional Leader or by the Director of Learning and Assurance for disclosure reports submitted by Instructors, SME's and others acting on behalf of AMHSA as an AMHSA representative. The Senior Leadership team will consider the degree in which the perceived conflict impacts the employees' position or work activities. Should Senior Leadership determine that the conflict impacts the employees' position or work activities in a negative manner the disclosure report will be shared with AMHSA's Board of Directors for consideration.

Once a determination is made by AMHSA, the employee will be notified in writing of the decision and be advised of what steps they must take (if any) to resolve or mitigate the conflict.

Record Keeping and Disclosures

Human Resources will keep a record of all disclosures and declarations in accordance with AMHSA records management policies and any applicable legislation. The record shall be kept confidential and shall not be disclosed except where:

- the disclosure is for the purposes of assessing and managing potential, perceived, or real conflicts of interest;
- there is a legitimate reason for disclosure to an AMHSA Representative's new Functional Leader, such as following their move to another position within AMHSA;
- the disclosure is for the purposes of conducting investigative, disciplinary, administrative tribunal, quasi-judicial, or legal proceedings;
- there is legal or regulatory authority or obligation to disclose the information; or
- the AMHSA Representative has given permission to disclose the information.

Definitions

Advertise: A public *promotion* of a product or service. Advertising is the exercise of promoting a company and its products or services through paid channels. Advertising is a component of marketing.

Conflict of interest (COI): A COI may be potential, perceived, or real.

Potential COI - A potential COI occurs when an AMHSA Representative has knowledge that the performance of a duty or function or exercise of power may result in a personal gain, including a gain for their Private Interests and/or for Related Persons, but has not yet performed that duty or function.

Perceived COI - A perceived COI exists when there is a perception formed by a reasonably informed Person that a conflict of interest exists.

Real COI - A real COI occurs when an AMHSA Representative exercises a power or performs a function or duty with the knowledge that there may be a personal gain, including gain for their Private Interests and/or for the interests of Related Persons.

Employee: A person who carries out the service of work of AMHSA, receives remuneration and the work is carried out according to the direction and control of the employer.

Endorse: A public *approval* of a product or service. Endorsements are a form of advertising that uses individuals who command a high degree of recognition, trust, respect, or awareness.

Functional Leader: Functional Leader: is both a positional role (when required for organizational accountability and responsibility) and a leadership style dedicated to determining what actions and behaviors establish effective leadership and sharing that information with all interested parties - rather than empowering a single person to lead.

Instructor: An individual approved by AMHSA to instruct or facilitate on-site classroom courses, virtual instructor-led training, webinars, and other learning events.

Marketing: In basic terms, marketing is the process of identifying customer needs and determining how best to meet those needs.

Promote: Dissemination of positive information about a product, product line, brand, or company. To actively talk about how good something is.

Proprietary Interest: A vested interest in any product, instrument, device, or materials that may be used or referenced in a learning event.

Subject Matter Expert (SME): Provides knowledge and expertise in a specific subject, business area, or technical area for a project/program.

Related Documents

- [Disclosure of Interest Report](#)
- Employment agreement
- Service provider agreement
- Confidentiality Agreement
- AMHSA Discipline and Discharge Policy



Craig Hrynchuk, Executive Director

July 21, 2023

Date