



WORLD FEDERATION OF | FÉDÉRATION MONDIALE DE | FEDERACIÓN MUNDIAL DE
CHIROPRACTIC | CHIROPRACTIQUE | QUIROPRÁCTICA

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Conflict of Interest Policy

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A non-governmental organisation in official relations with the World Health Organization
Organisation non gouvernementale en relations officielles avec l'Organisation mondiale de la Santé
Organización no gubernamental en relaciones oficiales con la Organización Mundial de la Salud

Introduction

The World Federation of Chiropractic must meet high ethical standards in order to merit the trust of the chiropractic profession, its stakeholders and the wider public. The integrity of the WFC depends on ethical behaviour throughout the organization and, in particular, on fair, informed decision-making. The ability to make a decision is sometimes affected by other interests (personal or professional) of individuals in the organisation. Such conflict of interest situations are a regular part of organizational or personal life and cannot simply be eliminated. The objective of this policy is to permit the WFC to manage conflict of interest situations successfully and resolve them fairly.

Scope

This policy applies to all members of the WFC Board, its committees, volunteers and employed staff. Collectively, these groups shall be referred to throughout this document as 'relevant persons'.

Definition of Conflict of Interest

A conflict of interest is a situation in which a person has a private or personal interest sufficient to influence, or appear to influence, or potentially influence the objective exercise of their official duties at WFC.

'Private or personal interest' refers to an individual's self-interest (e.g. to achieve financial profit or avoid loss, or to gain another special advantage or avoid a disadvantage); the interests of the individual's immediate family, friends or close professional colleagues; or the interests of another organization in which the individual holds a position (voluntary or paid).

'Objective exercise of duties' refers to an individual's ability to carry out their respective duties and responsibilities in the best interests of the WFC.

The test that is often applied in conflict of interest situations is whether a reasonable person, unconnected with the matters under consideration, would consider there to exist sufficient proximity between parties for a conflict of interest to be actual or perceived.

Types of conflict

A Council or Committee member, employee or volunteer of WFC may be in a conflict of interest situation that is:

1. Actual or real, where their official duties are or will be influenced by their private interests;
2. Perceived or apparent, where their official duties appear to be influenced by their private interests.
3. Foreseeable or potential, where their official duties may be influenced in the future by their private interests.

Responsibilities

Members of the WFC Board, committee members, staff and volunteers are responsible for managing conflict of interest situations in order to ensure that workplace behaviour and decision-making throughout WFC are not influenced by conflicting interests.

The WFC supports an organizational culture in which people freely take responsibility for both self-declaring possible conflicts of interest and respectfully raising possible conflicts faced by others in the organization. This culture makes it possible to avoid many such situations arising

in the first place. Board and committee members, staff and volunteers have the responsibility to implement practical preventative measures, such as:

- Providing education about what to do when gifts or hospitality are offered;
- Providing meeting agendas in advance to enable participants to foresee possible conflicts;
- Ensuring that people are clearly told when information must be protected from improper use;
- Declining involvement in key decision-making and actions (such as supporting a questionable outside activity).

Responsibility for managing

Where prevention is not the solution, conflict of interest situations must be managed. Here are the steps to be taken by those involved in such situations, working together and supporting one another's ethical responsibilities.

1. Declare it. Ensure transparency by self-declaration, and by making sure that a record of the declaration is made.
2. Discuss it. In a doubtful situation, take a moment for a quick word with the chair of your meeting, or undertake a full dialogue with the group, if the situation warrants it.
3. Deal with it. Measures to mitigate or eliminate a conflict of interest will depend on what is appropriate to the severity of the situation. Options include:
 - a. Restrict the involvement of the individual. For example, withdraw from decision-making. This would not be appropriate if the conflict of interest arises frequently or if the individual cannot be separated from parts of the activity.
 - b. Recruit a third party to assist. For example, ask a disinterested party to sit on an employment panel. There will be situations where no appropriate third party is available.

- c. Remove the individual from affected duties. When restrict and recruit are no suitable options, the individual with the conflict may be removed from duties related to the conflict. The individual could transfer to other duties.
- d. Relinquish the private interest. In cases of serious conflict, the individual may choose to drop the private interest, such as membership of the Board of another organization which is causing the conflict.
- e. Resign from official duties. In serious cases where other solutions are not possible, the individual may have to resign from the position creating the conflict.
- f. Document what has been done. Board minutes, correspondence to internal parties, or other documentation will provide a record of steps taken.

Policy Application

This policy must be explained to all new Board and committee members, volunteers and staff. All such affected persons must agree in writing at the outset of taking a position or volunteering with WFC that they will abide by this policy.

At that time, all Board, committee members, volunteers and staff must disclose possible conflict situations to the Secretary-General in confidence. Subsequent material changes must be disclosed when they first emerge.

The Secretary-General will indicate to each individual whether any further action is necessary to manage the possible conflicts of interest disclosed. Actions might include the following, depending on the severity of the conflict:

- Declaring the conflict to all concerned before discussion or decision-making
- Withdrawing from final decision-making only
- Withdrawing from all aspects of discussion and decision-making.

The Secretary-General is also the final authority on resolving disputes, for example when an individual does not agree with the perception that they are facing a conflict of interest.

The Secretary-General is the authority on dealing with real conflicts of interests which are discovered 'after the fact'. A variety of serious measures, such as cancelling a contract or post appointment, may have to be considered, case by case, in such situations. An independent legal opinion may be involved in the final disposition.

For the purposes of this policy, the President is the appropriate authority in all matters relating to the affairs of the Board and to any issues involving the Secretary-General's own affairs. Any issues involving the President's own affairs will be dealt with by the WFC First Vice-President and the Executive Committee. The Secretary-General is the authority in all other matters.

Transparency

The application of this policy involves two types of transparency:

1. Confidential disclosure: Affected persons must provide information on possible conflicts of interest and related matters to the Secretary-General (or President if appropriate). This information will be kept strictly confidential.
2. Declaration to concerned parties: If the Secretary-General (or President if appropriate) deems that a particular element of information on a possible conflict of interest must be provided to a wider audience of concerned parties (such as the members of a committee or the Board, or the public) then a declaration of the conflict interest situation will be made and recorded. The person involved should be consulted prior to the wider declaration.

Good judgement

The application of this policy relies heavily on the good judgement and common sense of those affected, following the ethical principles outlined in the WFC's Principles of Governance for Office Holders.

Accountability

Every Board and committee member, volunteer and staff member is responsible for his or her own conflict of interest situation:

1. Awareness of the policy;
2. Self-declaring potential conflicts;
3. Respectfully identifying potential problems of other people;
4. Undertaking follow-up action determined by Secretary-General; and
5. Making disclosures when circumstances change significantly.

The Secretary-General is responsible for the ongoing application of the policy and procedures to staff. The Secretary-General will:

1. Provide a point of contact for advice about conflict of interest matters;
2. Determine the actions required as a result of confidential disclosures by staff;
3. Receive complaints about possible breaches of the policy;
4. Determine the actions required by breaches of the policy; and
5. Make annual reports on the overall situation of conflict of interest of all WFC personnel.

The Secretary-General's own conflict of interest situation is the responsibility of the President.

The President is the key person to establish the ethical climate of the WFC and its Board. The President is also responsible for the resolution of conflict of interest situations and related disputes among the members of the WFC Board.

The WFC Vice-President will work with the Secretary-General to deal with any conflict of interest situation regarding the President.

The WFC Board bears great responsibility for the good name of the organization and as such has a special responsibility for ethical matters. The WFC Board is ultimately responsible for policy and should review the conflict of interest policy every 5 years or when the nature of the organisation changes significantly.

APPENDIX I: Categories of conflict of interest situations

- Self-interested funding, contracting or hiring: when an affected person uses a position in WFC to influence a decision to provide funding or contracts to another organization in which he or she has an interest, or to go outside normal hiring processes to give a job to a friend or family member.
- Improper influence: when an affected person solicits or accepts some form of benefit in return for influencing WFC's activities or promoting someone else's interests in WFC.
- Misuse of information or property: when an affected person uses information or property to which the person has access at work, and to which others would not have access, for some personal benefit.
- Inappropriate outside activity: when an affected person's activities outside WFC are in conflict with the interests of WFC.
- Accepting undue benefits such as significant gifts which place an affected person under obligation to the donor.