

	Policy Name: Conflict of Interest		
	Section: Human Resources Policy #1200		
	Effective Date: 1/2014 Review: 10/16		
Statutes/ Standards	<input type="checkbox"/> HIPAA	<input type="checkbox"/> DBHDD	<input type="checkbox"/> CARF
	<input type="checkbox"/> HFR	<input type="checkbox"/> DCH	<input type="checkbox"/> Other:

POLICY

It is essential that a healthy, professional, non-threatening environment be maintained to promote recovery and allow each client's treatment process to reach its full potential. Staff are expected to protect the interests and well-being of the consumers of Unison Behavioral Health.

It may be perceived by Unison consumers that staff have the ability to exert power and authority over them. Staff are expected to understand how this perception may affect the treatment process and are expected to be mindful that Unison assists vulnerable individuals who are struggling to build healthy behaviors. In all dealings with consumers, the general public, and each other, staff are expected to respect the dignity of each individual and to advance the mission of Unison in an ethical and professional manner.

Conflicts of interest may affect, or have the appearance to affect, professional judgment adversely. Consequently, to avoid conflicts of interest, staff and volunteers of Unison are expected to refrain from establishing or maintaining personal relationships with current and former Unison clients with whom they have had a direct professional relationship. In the event conflicts of interest, or perceived conflicts of interest occur, they must be declared and managed to ensure integrity and transparency. Employees who are considered to have breached the requirements regarding conflicts of interest, as set out in this document, may be subject to disciplinary action, up to and including separation.

DEFINITIONS

1. **Conflict of interest:** A variance that occurs between Unison duties and private interests and/or personal relationships, where the private interests or personal relationships could improperly influence the way in which a person carries out their duties as a Unison employee.
2. **Perceived conflict of interest:** Where a reasonable person might perceive that such improper influence as described above could exist.
3. **Professional relationships:** Direct working relationships staff establish with consumers that arise in the course of consumer receiving services from Unison.

4. **Personal relationships:** Relationships with Unison consumer that extend outside Unison, where a reasonable person might perceive that there could be some bias, either positive or negative, extended to the consumer as a result of the relationship.

PROCEDURES

1. Staff are expected to:
 - a. Assure the confidentiality of all consumers of Unison.
 - b. Treat others with courtesy, respect, and dignity.
 - c. Provide services to consumers without discrimination on the basis of age, sex, race, color, national origin, religion, disability, sexual preference or veteran status.
2. Conflicts of interest can arise with consumers or former consumers of Unison in the following ways:
 - a. Personal friendships outside of Unison
 - b. Sexual relationships
 - c. Giving and accepting gifts
 - d. Financial transactions such as lending or borrowing money
 - e. Cohabitation
 - f. Employment matters
3. Staff are required to avoid conflicts of interest or perceived conflicts of interest with former or current consumers of Unison with whom they have had a professional relationship. Staff should not engage in any behavior in which there is a risk of exploitation or potential harm to the consumer.
4. Any sexual or romantic relationships between staff and consumers or former consumers, including dating, flirting, and sexual activity, is strictly prohibited whether on or off duty.
5. Unison employees may also receive Unison services and are entitled to the same rights as any other consumer. Staff with a direct professional relationship with an employee receiving services are required to avoid conflicts of interest or perceived conflicts of interest that may arise in the context of employees who are in the role of consumer receiving services.
6. Any staff member who believes they may be in a conflict of interest or perceived conflict of interest must notify their supervisor immediately to determine what actions should be taken.
7. Supervisors will review the circumstances and make a judgment regarding the matter.

Based on the facts and issues at hand, supervisors should contact Human Resources and/or Corporate Compliance Officer for assistance managing conflicts of interest.

8. Any staff member who observes or suspects any of the above prohibited behavior must report such behavior immediately to their director or supervisor. A staff member may report the behavior to a higher level than the immediate supervisor if the situation warrants such as unavailability of immediate supervisor.
9. Failure to abide by these standards may result in disciplinary action, up to and including termination of employment.

Reference: Unison Policy 1201, Standards of Conduct
Unison Policy 1201A, Code of Ethics for Direct Care Staff