



DRAFT

## Conflict of Interest Disclosure

As described in your letter of offer, you must review the [VRAB Code of Conduct](#) and the [TBS Directive on Conflict of Interest](#), and complete a Conflict of Interest Disclosure within 60 days of hire to disclose any real, apparent, or potential conflict of interest with your VRAB employment.

**IMPORTANT:** Every time a major change occurs in your personal affairs or official duties that might give rise to a real, apparent, or potential conflict of interest, you must complete a new Conflict of Interest Disclosure within 60 days.

According to Chapter II of the [VRAB Code of Conduct](#), a conflict of interest is a situation in which you have private interests that could improperly influence the performance of your official duties and responsibilities or in which you could use your office for personal gain. A real conflict of interest exists at the present time. An apparent conflict of interest could be perceived by a reasonable observer to exist, whether or not it is the case. A potential conflict of interest could reasonably be foreseen to exist in the future. Regardless of intention, the perception of a conflict of interest may be just as serious as a real conflict of interest.

When in doubt, declare.

Should a real, apparent, or potential conflict of interest be determined to exist by the VRAB [Delegated Authority](#) between your private interests and your official duties and responsibilities, mitigating measures including termination of the activity giving rise to the conflict may be directed. This authority is delegated pursuant to the [VRAB Code of Conduct and section 4.1.12 of the TBS Directive on Conflict of Interest](#)

To submit a Conflict of Interest Disclosure, please complete this electronic form and submit it to [vac.valuesandethics-valeursetethique.acc@canada.ca](mailto:vac.valuesandethics-valeursetethique.acc@canada.ca). For any questions or inquiries please contact [vac.valuesandethics-valeursetethique.acc@canada.ca](mailto:vac.valuesandethics-valeursetethique.acc@canada.ca).

## Part A - Employee Information

Last Name:	First Name:	Pronouns:
Email:		
Work Location:	Phone:	
Position Title:	Classification (Group and Level):	
Directorate:	Supervisor / manager's name:	
Supervisor / manager's email (your manager and your Director – lowest Executive level - will be contacted):		

## Part B – Screening for Conflict of Interest

The various types of conflict of interest involve the questions included below. If you are in doubt as to whether a type of conflict of interest applies, or if you do not know, please select “**Yes**” and complete the Employee Declaration in Part C.

### Veteran or client benefits or services

1. Under the [VRAB Code of Conduct](#) (section 3.1 on integrity), employees cannot have direct access to their own records unless in accordance with the *Privacy Act*. Employees also cannot make decisions on their own benefits nor access the files of a relative, a friend, a neighbour or a co-worker.
  - a. Are you a VRAB employee receiving Veteran or client benefits or services from VAC?  
If Yes, you must inform your manager and submit a disclosure.  
Have you informed your manager?
  - b. Do you have a relative, a friend or a neighbour receiving Veteran or client benefits or services from VAC?

If Yes, you must inform your manager and submit a disclosure.  
Have you informed your manager?

## Preferential Treatment

2. Sometimes working with relatives can create a conflict of interest, especially if there is a direct supervisory relationship, you work on similar files, or you might see their personal information. The VRAB Code of Conduct Chapter I (sections 3.1 and 3.2 on integrity) and [Chapter II](#) (Avoidance of preferential treatment) offers more details in this area. Is a relative a VRAB employee?  
If Yes, please declare the circumstances.

3. Under Chapter I (section 3.2 on integrity) of the VRAB Code of Conduct, when participating in any decision-making related to a staffing process or contracting of services, public servants shall ensure that they do not grant preferential treatment or assistance to any family or friends. Are you in a situation which could violate, or appear to violate this requirement?

If Yes, please declare the circumstances.

4. Also, under Chapter II (Avoidance of preferential treatment) of the VRAB Code of Conduct, when making decisions that will result in a financial award to an external party, public servants shall not grant preferential treatment or assistance to family or friends. Are you in a situation which could violate or appear to violate this requirement?  
If Yes, please declare the circumstances.

## Contracts

5. In Chapter II (Outside Activities) of the VRAB Code of Conduct, the VRAB [Delegated Authority](#) must be made aware of any contracts or subcontracts you have directly or indirectly with the Government of Canada, including those you may receive a benefit or income from

indirectly. Do you, or a company or proprietorship you are affiliated with, or does a family member or close acquaintance, have a contract or subcontract with the federal Government of Canada, including VRAB?

Please provide more details on the contract.

If the arrangement presents a real, apparent or potential conflict of interest, the contract may need to be modified or terminated. See also paragraph 4.2.9. of the [Directive on Conflict of Interest](#).

Note: The [VRAB Code of Conduct \(Chapter 1, section 3.1\)](#) prohibits employees from acting as a supplier of goods or services to VRAB when such activities are related to the employee's primary duties.

## Outside activities

6. You may be engaged in employment outside of VRAB, and/or take part in outside activities. The employment or activities must not conflict with your VRAB duties or obligations under the VRAB [Code of Conduct \(Chapter II – Outside Activities\)](#) and [paragraphs 4.2.3 and 4.2.5 of the Directive on Conflict of Interest](#). If there is a conflict of interest, mitigating measures may be required or the Delegated Authority may request that you cease the outside activity.

Do you participate in paid or unpaid employment or activities outside of VRAB (not including sporting, school, personal hobbies)? This includes, but is not limited to self-employment, part-time employment, volunteer positions, and seasonal work.

If Yes, please describe in the text box below: the outside activity; the organization; your role or position title; and a description of your responsibilities. Specify if the outside activity involves VRAB, VAC, Veterans, VRAB clients, or VAC clients.

## Political Activities

7. (a) Under Part 7 of the [Public Service Employment Act \(PSEA\)](#), you can be involved in political activity as long as it does not impair, or is not perceived as impairing, your ability to perform your work duties in a politically impartial manner.

Are you planning on being a candidate in a federal, provincial, territorial or municipal election?

If Yes, you must obtain permission in advance from the Public Service Commission. Please visit the [Public Service Commission of Canada](#) website for its guidance document. Also, please provide information on your candidacy in the text box below (e.g. riding, election dates).

- (b) Are you considering taking part in non-candidacy political activities (e.g. providing financial support; displaying an electoral sign on your lawn, etc.) before, during or after an election period?

If Yes, please visit the [Public Service Commission of Canada](#) (PSC) website and its [Political Activities Self-Assessment Tool](#) for more information on your risk levels of impairing your impartiality as a public servant during these political activities. Please note that even if you are on a leave of absence, or other absence without pay, you must still obtain permission from the PSC to participate in political activities.

Please note that political activities, including non-candidacy political activities, must also be disclosed to the Designated Political Activities Representative (DPAR) at VRAB as the activities may create a situation of real, apparent or potential conflict of interest under the

[VRAB Code of Conduct](#) (Chapter II - Political Activities and also paragraph 4.2.6. of the [Directive on Conflict of Interest](#).

## Social media

8. If you engage in social media, you are expected to adhere to the [VRAB Code of Conduct](#) (Chapter II – Social Media) guidelines including not disclosing confidential information, respecting your [duty of loyalty](#), impartiality and integrity to the Board (e.g. not engaging in anti-government comments, promoting a particular party, not making disparaging comments about VRAB or other government departments). VAC, etc.). Are you engaged, or will you engage, in social media activities that could be or could be seen as a breach to the [VRAB Code of Conduct](#)?

## Assets and Liabilities

9. The [Directive on Conflict of Interest](#), paragraphs 4.1.3 and 4.1.4, require that the Board create a list of assets and liabilities that public servants need to disclose to examine if they pose a real, apparent or potential conflict of interest. Chapter II of the [VRAB Code of Conduct](#) (Personal Assets) requires that these assets and liabilities be disclosed. As a VRAB employee, you must declare certain assets and liabilities: Assets **not to** declare are those in [Appendix A](#). Assets **to declare** are those in [Appendix B](#). Do you have any declarable assets or liabilities?

If Yes, please describe the assets or liabilities in the text box below.

## Gifts, hospitality and other benefits

10. The [VRAB Code of Conduct](#) (Chapter II – Gifts) stipulates that, as a [VRAB employee](#), you cannot accept any gifts, hospitality or other benefits that could influence your objectivity in carrying out your official duties. This includes gifts from Veterans, other VAC and VRAB clients, their families, and suppliers with whom VRAB and VAC do business. A list of the type of gifts that can be accepted and those to declare is found in [Appendix C](#). Please refer as well to paragraphs 4.2.13 – 4.2.15 in the [Directive on Conflict of Interest](#). Have you received any such gifts, hospitality or other benefits that you did not already declare through a Conflict of Interest disclosure?

If Yes, describe the gift/hospitality/benefit, and the dates and circumstances it was offered or received.

## Solicitation

11. You also may not solicit gifts, hospitality, other benefits or transfers of economic value from a person, group or organization in the private sector who has dealings with the government under the [VRAB Code of Conduct](#) (Chapter II – Solicitation) as well as under paragraph 4.2.17 of the [Directive on Conflict of Interest](#). Do you plan any solicitation activity as described?

If Yes, please describe the solicitation activity and the organization involved in the text box below.

## Fund-raising

12. Under the [VRAB Code of Conduct](#), Chapter II (Fundraising) you must obtain permission from the VRAB Delegated Authority prior to conducting unapproved fundraising at work. Approved fundraising includes the Government of Canada Workplace Charitable Campaign



(GCWCC), the Royal Canadian Legion Poppy Fund, and Canadian Blood Services/Héma Québec campaigns. Are you requesting or will you be requesting permission to conduct unapproved fundraising at work?

If Yes, please describe the fund-raising activities planned in the text box below.

## Post-employment

13. Chapter III on Post-employment of the [VRAB Code of Conduct](#) and paragraphs 4.1.5 and 4.1.6 of the [Directive on Conflict of Interest](#) establish that members of the VRAB executive group, as well as EX minus 1 and EX minus 2 positions or their equivalent, are subject to a one-year limitation period on post-employment after leaving the Public Service ([List of Designated Positions](#)). Another resource to consider is the [Application Guide for Post-Employment under the “Policy on Conflict of Interest and Post-Employment”](#). Real, apparent and potential conflicts of interest with VRAB for these executives and managers must be avoided in this period. If you are in one of these positions, are you considering outside offers of employment after leaving VRAB, including self-employment, that may pose a risk of real, apparent or potential conflict of interest?

If Yes, please describe the post-employment activities in the text box below.

14. According to Chapter 4 of the [Application Guide for Post-Employment under the “Policy on Conflict of Interest and Post-Employment”](#) and paragraphs 4.2.19 and 4.2.20 of the [Directive on Conflict of Interest](#), before leaving the public service, employees must be reporting in writing to their deputy head all intended future employment and



activities that might give rise to a real, apparent or potential conflict of interest in relation to their most recent duties and responsibilities. Are you a [VRAB employee](#) (of any classification group or level) who is leaving VRAB and believes that your new employment or new activity might create a real, apparent or potential conflict of interest with your current responsibilities?

If Yes, please describe the possible conflict of interest in the text box below.

## Other

15. Are you involved in litigation or class action involving VRAB or the federal government which could create a real, potential or apparent conflict of interest considering your work duties?

If Yes, please describe the litigation in the text box below:

16. Do you have any other real, apparent or potential conflict of interest that you believe should be declared according to the [VRAB Code of Conduct or the \*Directive on Conflict of Interest\*](#)?

If Yes, please describe in the text box below.

## Part C – Employee Declaration

If you responded **Yes** to any of the above questions, please complete this electronic form and submit your Conflict of Interest Disclosure to Safe Workplace Center of Expertise within VAC's Human Resources Division via [vac.valuesandethics-valeursetethique.acc@canada.ca](mailto:vac.valuesandethics-valeursetethique.acc@canada.ca). Please provide a brief description of work duties (in your own words) in the text box below. An advisor will contact you to obtain additional information.

The completed Conflict of Interest Disclosure is treated as Protected B under the *Privacy Act*.

### Declaration

I declare that I have reviewed this form and the [VRAB Code of Conduct](#) and to the best of my knowledge, my information submitted on this Conflict of Interest Disclosure is accurate and complete, and any real, apparent or potential conflict of interest (s) are accurately described herein.

Signature of Employee:	Date: (yyyy-mm-dd)
------------------------	-----------------------

### Employee of VRAB

The [VRAB Code of Conduct](#) contains conditions of employment for all persons employed with VRAB, regardless of your level or position. This includes indeterminate and term employees, individuals on leave without pay, students participating in student employment programs, as well as casual, seasonal, and part-time workers.

## Part D- Privacy Statement

VRAB takes your privacy seriously. The information provided on this form is collected under the authority of the *Financial Administration Act* and is Protected “B” when completed. The process for VRAB’s Conflict of Interest reporting is undertaken in collaboration with VAC’s Human Resources Division. VAC’s Human Resources Division will use the information provided in this form to ensure compliance and maintain information about real, apparent, and potential conflict of interest situations for employees of a government institution. Your personal information is managed based on the *Privacy Act*. The *Privacy Act* provides you with a right of access to your personal information, and to request changes to that personal information if it contains errors. If you are unhappy with how the Department handles your personal information, you can file a complaint with the Privacy Commissioner of Canada at 30 Victoria Street, Gatineau, QC, K1A 1H3. More details on the collection, use and disclosure of personal information are described in VAC’s Standard Personal Information Bank, [Values and Ethics Code for the Public Sector](#) and [VRAB Code of Conduct](#) linked above and found on our website.

## Appendix A - Assets not to declare

The following is a list of examples of assets and liabilities that should not be reported in a Conflict of Interest disclosure:

- a) residences, recreational property and farms used for yourself or your families;
- b) household goods and personal effects;
- c) works of art, antiques and collectibles;
- d) automobiles and other personal means of transportation;
- e) cash and deposits;
- f) savings bonds and other similar investments in securities of fixed value issued or guaranteed by any level of government in Canada or agencies of those governments;
- g) Registered Retirement Savings Plans (RRSPs) and Registered Education Saving Plans (RESPs) that are not self-administered; self-administered funds;

- h) investments in open-end mutual funds;
- i) guaranteed investment certificates and similar financial instruments;
- j) annuities and life insurance policies;
- k) pension rights;
- l) money owed by a previous employer, client or partnership; and
- m) personal loans receivable from members of the public servant's immediate family and small personal loans receivable from other persons where the public servant has loaned the monies receivable.

## **Appendix B - Assets and Liabilities to declare**

The following is a list of assets and liabilities that should be reported if they do, or could, constitute a real, apparent or potential conflict of interest with VRAB or your duties at VRAB. This list is not exhaustive.

- a. interests in partnerships, proprietorships, joint ventures, private companies, family businesses (including ones that own or control shares of public companies, and including assets placed in trust or resulting from an estate of which the public servant is a beneficiary), publicly traded securities, self-administered Registered Retirement Savings Plans (RRSPs), and self-administered Registered Education Savings Plans (RESPs) [where these securities are held directly and not through units in mutual funds] if any of the above interests and investments do business with the federal government, Veterans Affairs Canada (VAC), the Department of National Defense or provide services or goods for any VAC program. VAC programs include but are not exclusively: Treatment Benefits including Cannabis for Medical Purposes, prescription drugs, and Health Related Travel; Rehabilitation Services; Veteran Independence Program; Long Term Care; Career Transition Services. Registered providers for Medavie; private Long-term care and VAC IT providers should also be disclosed;
- b. all assets or liabilities that could give rise to a real, apparent or potential conflict of interest due to the particular nature of the public servant's official duties; and,

- c. direct and contingent liabilities in respect of any of the assets described in this section.

### **Appendix C - Gifts, Hospitality and other benefits to declare:**

The acceptance of gifts, hospitality and other benefits is permissible if they are infrequent and of minimal value, within the normal standards of courtesy or protocol, arise out of activities or events related to your official duties, and do not compromise or appear to compromise your integrity or the integrity of VRABVAC.

You may usually accept incidental gifts such as:

- mugs, pens, or similar items (under \$25 value);
- normal VRABVAC-related business hospitality (e.g., a coffee or a light lunch valued under \$50);
- nominal benefits such as a speaker's honorarium or a gift from a delegation of foreign visitors (under \$50 value).

You may not accept:

- cash or cash equivalents (e.g., gift cards, lottery tickets or cheques);
- free and discounted admission to major entertainment or sporting events, travel or conferences (e.g., theatre, ballet, CFL, NHL); or
- cigarettes, alcohol and related goods, or anything prohibited by Canadian law.

## List of Designated Positions for post-employment Conflict of Interest.

Table of Positions Classified as EX, EX Minus 1, EX Minus 2 and their Equivalents		
EX Equivalent	EX Minus 1 Equivalent	EX Minus 2 Equivalent
	AS-08, AS-07	AS-06
IT-05	IT-04	IT-03
EC-08	EC-07	EC-06
	ED-EDS-05	ED-EDS-04
	FI-04	FI-03
	GT-08	GT-07
	IS-06	IS-05
LC-01 -02 -03 LP-02, 03		LP-01
	LS-06	LS-05
MD-MOF-02, 03, 04, 05 MD-MSP-01, 02, 03	MD-MOF-01	
	NU-CON-01, NU-HOS-08, NU-CHN-08	NU-CHN-07, NU-HOS-07
	OP-04	OP-03

	PE-06	PE-05
	PG-06	PG-05
	PH-04	PH-03
PM-07	PM-06	PM-05
	PS-05	PS-04
	SW-SCW-05	
	WP-07, WP-06	WP-05

DRAFT