

## **DISCLOSURE OF POTENTIAL CONFLICTS OF INTEREST**

As an addendum to its Circular Document 1973-183 of December 31, 1973, the Treasury Board issued guidelines concerning conflict of interest situations. They noted that given the special nature of employment in the public service, "there is an obligation not simply to obey the law but to act in a manner so scrupulous that it will bear the closest public scrutiny". Furthermore, no conflict should exist or appear to exist between the private interests of public servants and their official duties. Singled out for particular attention was the question of public servants' business, commercial and financial holdings which might be or could be construed to be in conflict with their responsibilities and functions. To avoid such a possibility, the Treasury Board enjoined departments to seek disclosures from their employees under procedures to be developed by each department.

During the first half of 1974 steps were therefore established whereby all employees were to declare whether, in their view, they might have business, commercial or financial holdings which could be deemed to be in actual or potential conflict with their current responsibilities. Further, arrangements were made to obtain nil declarations or disclosures on initial entry into the Department and to remind employees, in connection with a posting or reassignment, of their obligations under the conflict of interest guidelines. Equally, whenever any possibility arises of an actual or potential conflict between an employee's financial and commercial or business holdings and his current responsibilities, it is the responsibility of the employee concerned to submit a disclosure.

An employee's declaration should be based on one of the following models:

- (a) On the basis of my reading of the Code of Conduct, to the best of my knowledge I have no business, commercial or financial holdings or other connections that are or might be interpreted as being in actual or potential conflict with my current duties and functions; or