NSRDDA | Nova Scotia Regulator of Dentistry and Dental Assisting

Conflict of Interest Policy

Policy Number: G-02.01.00	Next Review Date: 2027
Approved by: NSRDDA Board	Approval Date: October 10, 2025

1. Purpose

The purpose of this policy is to protect the integrity of the NSRDDA's decision-making and operations by ensuring that actual, potential and perceived conflicts of interest are appropriately disclosed and managed. It promotes ethical conduct, transparency, and accountability in the performance of duties by all individuals acting on behalf of the Regulator.

2. Scope

This policy applies to:

- Board members
- Statutory and Advisory Committee members
- The Registrar
- Staff and contractors
- Consultants and external advisors

All individuals covered by this policy are expected to understand and uphold their obligation to avoid conflicts of interest that could impact their NSRDDA responsibilities.

3. Definition of Conflict of Interest

Conflict of Interest: A situation where an individual's personal, financial, professional, or other interests may interfere, or appear to interfere, with their duty to act in the best interests of the Regulator and the public it serves.

Actual Conflict: A real and existing conflict between a person's private interest and their regulatory duty.

Perceived (or Apparent) Conflict: A situation where it could reasonably appear that a person's interest may improperly influence their duty.

Potential Conflict: A situation that could evolve into an actual or perceived conflict.

Indirect Conflict: A conflict arising due to a close relationship (e.g., spouse, family member, friend, business associate) whose interests could reasonably be seen to affect the person's judgment.

A conflict of interest does not exist where:

- the interest is so remote or insignificant that it cannot reasonably be regarded as likely to influence a Board member, Committee member or Registrar, or where a financial interest is in common with a broad group of which a Board member, Committee member or Registrar is a member.

4. Principles

All individuals subject to this policy must:

- Perform their duties with integrity, impartiality, and in the public interest.
- Avoid placing themselves in situations where their judgment may be, or appear to be, compromised.
- Disclose conflicts promptly and fully.
- Comply with all decisions or directions given for managing or mitigating a conflict.
- Not use their position or access to information for personal benefit or to benefit others inappropriately.

5. Policy Statement

(a) Disclosure Obligations

All individuals subject to this policy must:

i. Disclose any actual, potential, or perceived conflicts of interest (direct or indirect) as soon as they arise.
ii. Disclosure must be made in writing:
    a. To the Chair (for Board members or the Registrar), or
    b. To the Registrar (for Statutory or Advisory Committee members or employees).
iii. Board members, Committee members, and senior staff must complete annual conflict of interest declarations.
iv. Declarations will be retained in accordance with the NSRDDA's records policy.

A Board member, Committee member or Registrar who feels that they have or may have a conflict of interest should declare the conflict and the general nature of the conflict at a Board meeting (and/or Committee meeting as the case may be) at the earliest opportunity. This declaration will be recorded in the minutes of the meeting.

If a Board member, Committee member or Registrar is unsure of whether they are in a conflict of interest, they should raise the matter with the Board Chair (or Committee Chair, as the case may be) at the earliest opportunity.

Similarly, if any Board member, Committee member or Registrar considers that another Board member, Committee member or Registrar has or may have a conflict of interest, they should raise the matter with the Board Chair or Registrar, as the case may be. If the Board member, Committee member or Registrar with the alleged conflict and the Board Chair (or Registrar, as the case may be) are unable to resolve the issue, the Chair of the Board (or Registrar) will bring the situation to the Board (or Committee) as a whole. The Board (or Committee) should determine by majority vote whether a conflict of interest exists. Of course, the Board member, Committee member or Registrar involved should refrain from voting on the existence of a conflict.

(b) Procedures for Managing Conflicts

The general rule is that when a person declares a conflict they must recuse themselves from any discussion or decision-making regarding the matter giving rise to the conflict of interest. This means leaving the room when such matters are being addressed.

However, upon disclosure, the Chair, Registrar, or other designated authority will assess the conflict and determine if there is a more appropriate management strategy, which may include:

- Permitting involvement with conditions (e.g., participation in discussion but not decision-making and with appropriate transparency and oversight)
- Reassignment of responsibilities or withdrawal from the matter
- Resignation from a particular role, Committee or position
- Other steps as required to protect the integrity of the process.

Any recusal or mitigation measures will be recorded in the minutes of relevant meetings or in internal records.

6. Chair, Registrar and Staff Responsibilities

The Chair is responsible for ensuring that conflict of interest declarations are made and appropriately addressed at Board and Committee levels.

The Registrar is responsible for managing conflict disclosures among staff and providing training and guidance.

Staff are responsible for consulting with the Registrar if uncertain about a potential conflict.

Where the Chair or Registrar is the subject of a conflict, the Vice-Chair of the Board (in the case of the Chair), or the Board Chair (in the case of the Registrar) will assume responsibility for assessing and managing the conflict.

7. Confidentiality

Conflict disclosures and any related deliberations will be treated as confidential and handled in accordance with applicable privacy and records laws. Public transparency may require disclosure of recusals in meeting minutes.

8. Non-Compliance

Failure to comply with this policy may result in corrective action which, depending on the degree or severity of the non-compliance, may include:

- Removal from a Board or Committee role in accordance with the Act, regulations or bylaws.
- Disciplinary action for employees, up to and including termination.
- Termination of contract for any contractors or external advisors.
- Reporting to appointing authorities or oversight bodies as required by law.

The Registrar will determine the corrective action for any employees, contractors or external advisors. The Board Chair, in consultation with the Governance and Human Resources (GHR) Committee will determine the corrective action for Board or Committee members. The Board Chair and the Registrar will jointly determine the need for any external reporting. They may also consult with legal counsel as required.

9. Monitoring and Policy Review

The Chair of the GHR Committee will ensure that this policy is reviewed in accordance with the Board's policy review cycle or as required by significant operational or environmental changes.

10. Accountability

The Board Chair and the Registrar are accountable for ensuring compliance with this policy.