

# **Chapter 5 – Conflict of Interest**

The distribution of funding by CWSPs and BWQCs must be conducted in a fair and transparent manner, without the presence of an actual conflict due to private, personal, or organizational gain. This chapter provides guidance on CWSP and BWQC conflicts of interest.

## **BWQC Voting**

A conflict of interest occurs when a BWQC member stands to receive a financial benefit from a matter under discussion/vote – for example, when the BWQC members’ organization has proposed a project for advancement/funding/approval by the BWQC, which will result in funding being given by the CWSP to that members’ organization (whether or not that member stands to personally receive funding for work on that project).

A conflict also exists when the BWQC member has a personal or familial interest that may be substantially affected by a project under discussion/vote by the BWQC or may benefit personally or privately from the outcome of a decision.

Any BWQC member so conflicted will recuse themselves from the relevant BWQC discussion and decision, although the BWQC member may answer questions about a project if so asked by the BWQC.

If a BWQC votes on a slate of projects, where a member is conflicted on one or more of the projects, the member shall be conflicted for the entire slate of projects that is voted on. If the BWQC takes separate votes on each project, such that the outcome of one vote is not contingent upon, or impacted by the outcome of other votes, then a conflict of interest held by a BWQC member shall only affect the vote or votes to which that conflict pertains.

No BWQC member shall share details of grant applications or project proposals prior to and through BWQC voting on the underlying project in a way that conveys an unfair advantage to any party.

## **CWSP Conflicts**

Staff of either the CWSP or of the CWSP host entity shall not respond to a CWSP RFP in an individual capacity (i.e. proposing a project that the staff member would manage outside of their employment working for the CWSP/CWSP host entity.) Projects funded by the CWSP shall not be located on property owned by individuals employed by the CWSP or CWSP host entity, unless the BWQC is specifically notified of this fact, and explicitly votes to approve the project at this location.

CWSPs that put forward projects to the BWQC that the CWSP plans to manage does not by itself raise a conflict of interest. When a CWSP proposes a project to the BWQC that will be managed by the CWSP, the CWSP shall request that the BWQC consider the potential for bias and determine how to handle scoring of the CWSP sponsored project.

## **Disclosure**

All conflicts must be disclosed as soon as the conflict is apparent. Disclosure of the conflict should be made on the record during a BWQC meeting and noted in the minutes. CWSPs and their BWQCs may

develop additional processes around disclosure as may be appropriate (e.g. discussion with CWSP staff, documentation of reasoning, etc.)

**Statute of Limitations**

BWQC members will have a conflict of interest if, within one year of a member's departure from a previous place of employment, said prior employee participates in a decision that affects the previous employer. If termination of employment occurred more than one-year prior, the member may choose to recuse him/herself if s/he feels his/her prior employment would cause them to be biased.