

## APPENDIX D – CONFLICT OF INTEREST GUIDELINES

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Where the Ministry determines that there is a real or perceived conflict of interest in the choice of a participant, training provider and/or training program, the Ministry reserves the right to deny an application or any reimbursement claim based on that conflict of interest. The Ministry may also revoke an Agreement in the event that a real conflict of interest becomes known.

The following are examples of situations where the Ministry may determine there is a real or perceived conflict of interest (there may be other situations where the Ministry determines there is a real or perceived conflict of interest):

- There are common directors, shareholders and/or owners of the employer’s business and the training provider.
- The employer stands to gain financially from the choice of training provider (e.g. the employer developed the training and receives a fee from the third-party training provider delivering the training).
- ETG funding will be used to train family members\*, including but not limited to, where a participant is a family member of:
  - the employer;
  - a person or persons in a position of authority or power with the employer, such as an Executive Director, Chief Executive Officer, Chief Operating Officer, Office Manager, Human Resources Manager, etc.;
  - a board member; or
  - shareholder(s) of a corporation (that is the applicant), where the Ministry determines that the position of the board member or shareholder has or could influence the selection of a family member (e.g. a majority shareholder).

\*The Ministry recognizes that many businesses are family owned and operated. However, as stewards of public funds, the Ministry must ensure there is no real or perceived conflict of interest between an employer and the choice of participant. To ensure an application is not denied due to conflict of interest, employers wishing to train family members must email [etg@gov.bc.ca](mailto:etg@gov.bc.ca) with a clear justification for their choice of participant following the submission of their application.

Family includes any member of the employer’s family, including but not limited to:

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| • Spouses and partners  | • Grandchild   |
| • Child or step-child of participant or their spouse or partner | • Grandparent  |
| • Parent/step-parent  | • Niece/nephew |
| • Guardian  | • Aunt/uncle   |
| • Sibling   | • Cousin       |