

# **Grinnell College Conflict of Interest Policy**

## **PURPOSE**

Grinnell College has an obligation to demonstrate and document good governance in order to protect the integrity and credibility of the College and to maintain the trust and confidence of our constituents.

The purpose of the Grinnell College Conflict of Interest Policy is to address potential conflicts occurring when an employee is in a position to influence a college decision that may result in direct or indirect personal gain and to ensure the transparency of related party relationships. The Policy is also intended to address conflicts that arise when an employee's personal interests or relationships conflict with the ability of such employee to act in a neutral manner with regard to a complaint against a faculty member, staff member or student.

The manner in which a conflict of interest is to be handled may also be addressed in other College policies. To the extent a policy on a particular matter provides for a process for handling a conflict of interest concern, such policy is to be followed with regard to such matter.

## **POLICY**

Grinnell College employees have an obligation to conduct college-related business transactions and other duties assigned to them without actual or potential conflicts of interest. In accordance with this policy, employees shall take all necessary precautions to avoid any actual or potential conflicts of interest and to disclose any actual or potential conflicts that may exist.

Employees must meet the highest standards of honesty, truthfulness and integrity in performing college duties and will act in the best interests of the college and not for their personal benefit

A conflict of interest arises when an employee may benefit personally from dealings with an entity or person conducting business with the college, including indirect benefits such as to family members<sup>(1)</sup> or organizations with which the person is closely associated. A conflict of interest also arises when an employee's personal interests or relationships may compromise the employee's professional judgment in the discharge of college duties and responsibilities.

Examples of potential conflicts include but are not limited to:

- Employment with, membership on a board of directors of, or significant ownership interest in an organization doing business with the College.
- Conducting business with an organization in which a family member is associated and may benefit from the transaction.
- Hiring or supervising an individual with whom an employee might have a relationship that may create the appearance of favoritism. Refer to the staff handbook regarding personal bias in personnel decisions for further information.

This policy is in addition to the Conflict of Interest policy for federal grants and the Conflict of Interest policy for Trustees and Officers of the College.

## **PROCEDURES**

### **Disclosure Statement**

All faculty and staff shall complete a Conflict of Interest Disclosure Statement annually within posted deadlines so that any potential conflict may be reviewed and resolved. Reported potential conflicts will be reviewed by a committee consisting of a representative from the Human Resources, Treasurer, and Dean's offices. The committee will determine any appropriate action that may be necessary including but not limited to annual disclosure or disqualification from participation in transactions creating the conflict.

Not all conflicts will be material enough to be of practicable importance or if material, upon full disclosure may not necessarily affect the College in an adverse way. In the interest of transparency, disclosure is still required.

### **Reporting of Conflict of Interest and Resolution**

If an individual believes that an employee has a conflict of interest, the individual is to promptly report the perceived conflict to the appropriate senior official described below:

- For reports involving a faculty member, the individual is to contact the Dean of the College.
- For reports involving a staff member, the individual is to contact the Vice President for Human Resources.
- For reports involving a student, the individual is to contact the Associate Vice President of Student Affairs & Dean of Students.

In the event that the conflict concerns the senior official designated above to receive such report, the individual is to submit the notification to the Treasurer or another senior official from the list above.

The notification is to be in writing and include a description of the perceived conflict of interest and the rationale for the belief that there is a conflict of interest. The senior official shall be responsible for reviewing the matter and taking appropriate actions to ensure that the conflict of interest concern is appropriately addressed.

Conflicts related to harassment or discrimination should be directed to the Title IX Coordinator.

## **POLICY REVIEW**

This policy will be reviewed every two years or as deemed necessary by the Treasurer's Office given a specific event or change in the college's environment. Any proposed changes to this policy will be submitted to the Audit and Assessment Committee of the Board of Trustees for approval.

Adopted by the Grinnell College Audit & Assessment Committee of the Board of Trustees on February 6, 2009. Reviewed and reaffirmed by the Grinnell College Audit & Assessment Committee of the Board of Trustees on September 28, 2023.

(1)The definition of family member includes spouse, domestic partner, romantic partner, ancestors, brothers and sisters, children, grandchildren, great grandchildren and spouses of brothers, sisters, children, grandchildren, and great grandchildren.