

Grinnell College Employee 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 a College 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.

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(1) or businesses with which the person is closely associated. A conflict of interest also arises when a College 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 a company doing business with the College.
- An employee serving on a Hearing Board when the employee has a personal interest with regard to the complaint.

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 employees with an actual or potential conflict of interest shall complete a Conflict of Interest Disclosure Statement at the earliest practicable time so that the conflict may be reviewed and resolved. All statements should be forwarded to the Human Resources department. Disclosure statements will be reviewed by a committee consisting of a representative from the Human Resources, Treasurer, and

Dean's offices, respectively. 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.

Employees who are members of the President's staff will be required to complete a statement confirming any conflicts of interest or the lack thereof on an annual basis.

Reporting of Conflict and Resolution

If an individual believes that a College employee has a conflict, the individual is to promptly report the perceived conflict to the appropriate Senior Official described below:

- For complaints against a faculty member, the individual is to contact the Dean of the College.
- For complaints against a staff member, the individual is to contact the Director of Human Resources.
- For complaints against a student, the individual is to contact the Dean of Students.

For conflicts involving harassment/discrimination complaints, the report of the perceived conflict also may be directed to the Title IX Coordinator.

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 Title IX Coordinator 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.

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 May 4, 2019.

Attachment I: Conflict of Interest Disclosure Statement

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