

Conflict of Interest Policy for Administrative Officers and Administrative Staff Gettysburg College

Policy Owner: Ethics and Integrity Officer
Contact Information: Kristin Stuempfle, Chief of Staff and Strategic Advisor to the President, Ethics and Integrity Officer
Approval Authority: Board of Trustees
Approved By: NAME, Secretary of the Board of Trustees
Approval Signature:
Approval Date:
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Related Policies: Conflict of Interest Policy for the Board of Trustees of Gettysburg College

Conflict of Interest Policy for Administrative Officers and Administrative Staff of Gettysburg College

Purpose of Policy

The purposes of this policy are to ensure that any potential or actual conflict of interest involving Administrative Officers or Administrative Staff of Gettysburg College (the “College”) are disclosed to the Board of Trustees of the College (the “Board”) and to define when conflicts of interest restrain Administrative Officers or Administrative Staff from participating in consideration of a proposed transaction involving the College. The Administrative Officers and Administrative Staff are expected to comply with the spirit of full disclosure and not to rely upon a strict interpretation of the language of the policy to limit disclosure. Accordingly, Administrative Officers or Administrative Staff should err on the side of disclosing relationships that may be covered by this policy.

Scope of Policy

The following statement of policy applies to each Administrative Officer and each member of the Administrative Staff of Gettysburg College.

Definitions

The following definitions are provided to help the Administrative Officers and Administrative Staff decide whether a relationship should be listed on the Annual Statement of Disclosure (“Disclosure Statement”):

Conflict of Interest: A “conflict of interest” shall mean any situation where an individual’s personal interest or an interest arising from a Business Relationship or a relationship with a

Covered Family Member may compromise, or may have the appearance of compromising the individual's judgment in exercising his or her responsibilities as an Administrative Officer or a member of the Administrative Staff of the College.

Administrative Officer: An "Administrative Officer" shall include those individuals identified in the Bylaws of the College as officers of the College, as well as such other administrative officers as may be appointed by the President of the College to assist in the effective administration of the College.

Administrative Staff: "Administrative Staff" shall include those individuals as identified in the Human Resources system as Director, Department Chairperson, Dean, or Program Coordinator, as well as such other employees with delegated purchasing authority of \$25,000 or higher.

Business Relationship: A Business Relationship exists when an Administrative Officer or a member of the Administrative Staff or his/her Covered Family Member has:

1. An ownership interest or investment interest in any entity with which the College has a transaction or arrangement;
2. A compensation arrangement with the College or with any entity or individual with which the College has a transaction or arrangement; or
3. A potential ownership interest or investment interest in, or a compensation arrangement with, any entity or individual with which the College is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration as well as gifts or favors that are not insubstantial.

Covered Family Member: A spouse, parents, children, or siblings, and the spouses of children, grandchildren and siblings, any member of the same household as an Administrative Officer or a member of Administrative Staff or any person with whom the Administrative Officer or member of the Administrative Staff has a romantic or intimate relationship.

Family Relationship: A relationship between an Administrative Officer or a member of the Administrative Staff and a Covered Family Member.

Policy Description

Responsibilities

The Administrative Officers and Administrative Staff serve the College and have a clear obligation to fulfill their responsibilities in a manner consistent with this fact. All decisions of the Administrative Officers and the Administrative Staff are to be made solely on the basis of a desire to promote the best interests of the College and to place such interests above their own personal interests and Business or Family Relationships in executing their duties as Administrative Officers or Administrative Staff. The College's integrity must be protected and advanced at all times.

It is understood that people who serve as Administrative Officers or Administrative Staff are inevitably involved in the affairs of other institutions and organizations. An effective administration cannot consist of individuals entirely free from at least perceived conflicts of interest. Although most such potential conflicts are and will be deemed to be inconsequential, everyone has the responsibility to ensure that the Board is made aware of situations that constitute potential or actual conflicts with the College's interests. Thus, the Board requires the Administrative Officers and Administrative Staff annually (1) to review this policy; (2) to disclose any possible personal interests, Business Relationship or Family Relationship that reasonably could give rise to a Conflict of Interest; and (3) to acknowledge by his or her signature that he or she agrees to abide by the letter and spirit of this policy.

Disclosure

Each Administrative Officer and each member of the Administrative Staff is required to list, annually, on the Disclosure Statement any personal interest, Business Relationship or Family Relationship that he or she maintains with organizations or persons that do business with the College and any other situations that otherwise could be construed as compromising his or her independence in exercising their responsibilities as an Administrative Officer or as a member of the Administrative Staff. Each Administrative Officer and member of the Administrative Staff is also expected to disclose any actual or potential Conflict of Interest that arises between the annual Disclosure Statements. If an Administrative Officer or a member of the Administrative Staff is uncertain as to the appropriateness of disclosing a specific relationship, the Ethics and Integrity Officer of the College should be consulted. The Ethics and Integrity Officer may, in turn, elect to consult with the President, Chair of the Board, legal counsel, the Executive Committee, or the Board in executive session. All Disclosure Statements shall be available to the Administrative Officers and the Administrative Staff and shall be reviewed by the Ethics and Integrity Officer and the Audit, Compliance, and Risk Committee. Such information, including information provided on the Disclosure Statements, shall otherwise be held in confidence except when, after consultation with the Administrative Officer or Administrative Staff member, the College's best interests would be served by disclosure.

Restraints on Participation

An Administrative Officer or a member of the Administrative Staff who has a Conflict of Interest (as determined by the Board or Board committee if the person does not recuse him or herself voluntarily) in a proposed transaction shall refrain from participating in consideration of the transaction, unless for special reasons the Board requests information or interpretation. The meeting minutes shall document the Conflict of Interest.

Policy Management

The Ethics and Integrity Officer in the Office of the President is responsible for implementing and enforcing this policy with assistance from the College Controller and the appropriate committees of the Board of Trustees (e.g. Audit, Compliance, and Risk Committee, Executive Committee, Governance and Nominating Committee).

Related Materials

- Annual Disclosure Statement for the Administrative Officers and Administrative Staff of Gettysburg College
- Gettysburg College Family and Business Relationship Disclosure – Listing of Trustees, Administrative Officers, Independent Contractors and Businesses with Retrained Participation