## Policy 228: Conflict of Interest

Category: Personnel

Covered Individuals: All CEI Employees

##### Approved: 5/24/2022 Formerly Approved: 10/26/18

##### **228.1 POLICY**

Maintenance of the public’s trust is critical to the mission and reputation of CEI. It is vital that employees and public servants of CEI demonstrate that they hold themselves to the highest ethical standards, including the disclosure of their participation in any activity that will result in their financial, professional, or personal benefit and may be construed as a conflict of interest. Conflicts of interest must be reported, evaluated and resolved to prevent improper actions.

#### 228.2 PROCEDURES

A conflict of interest arises when an employee, or public servant, may benefit personally from dealings with an entity or person conducting business with the College, including indirect benefits such as to family members or businesses with which the person is closely associated. A conflict of interest also arises when an employee’s or public servant’s personal interests or relationships may compromise his/her professional judgment in the discharge of his/her duties and responsibilities. Examples include:

* Recommending or awarding a contract for services to a company in which the individual has a financial or personal interest.
* Providing impartial instruction to a relative or friend
* Providing impartial evaluation of a relative or friend for hiring or promotion.

Under this policy, family member includes any person with whom an employee has a familial or guardianship relationship, including but not limited to a parent, guardian, step-parent, child, step-child, son-in-law or daughter-in-law, sibling, step-sibling, spouse, aunt, uncle, niece, nephew, cousin, grandparent, grandchild, mother-in-law, father-in-law, brother-in-law, sister-in-law, or any persons living in the same household.

A public servant includes any person participating as an advisor or consultant to the College, including volunteers.

Conflicts of interest are common, however, CEI 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, all employees and public servants must disclose any actual or potential conflicts that may exist. Neither employees nor public servants may review, approve, or make any decision relating to a College transaction that may financially benefit themselves or their family members.

An individual who recognizes a conflict of interest must report the situation to his or her immediate supervisor. This report does not need to be in writing. The existence of a conflict of interest generally does not result in any adverse action, but the failure to report a conflict of interest compromises the college’s integrity and could result in disciplinary action. The supervisor must evaluate the degree of risk associated with the conflict and take appropriate action. Possible resolutions might include:

* Accepting the risk and counseling the individual to provide an extra degree of objectivity in the decision-making process.
* Requiring an extra degree of verification in the decision-making process to document the validity of the decision.
* Establishing an independent review of the individual’s decisions on the matter in order to validate the results.
* Replacing the individual with someone else without the conflict of interest.

Supervisors determine whether their evaluation of the conflict of interest, and actions taken, need to be documented. If documentation is considered appropriate, the supervisor prepares a memo documenting:

* The reported conflict of interest
* The individual affected
* The potential consequences of the conflict of interest
* Actions taken, if any, to mitigate risks associated with the conflict of interest

Both the supervisor and the interested individual must sign this memo, which is filed in the individual’s personnel file in the human resources office. The supervisor should retain a copy of the memo until the conflict is resolved.