



Employee Conflict of Interest Policy

PURPOSE

The purpose of the following policy and procedures is to complement the *Bluefield University Trustee Bylaws* and the *Bluefield University Employee Handbook*, to prevent the personal interests of employees and Board members from interfering with the performance of their duties to, or resulting in personal financial, professional, or political gain on the part of such persons at the expense of Bluefield University or its trustees, supporters, and other stakeholders.

DEFINITIONS

- *Conflict of Interest* (also *Conflict*) means a conflict, or the appearance of a conflict, between the private interests and official responsibilities of a person in a position of trust. Persons in a position of trust include employees, officers, and Board members of Bluefield University.
- *Board* means the Board of Trustees.
- *Employee* means a person who receives all or part of her/his income from the payroll of Bluefield University.
- *Supporter* means corporations, foundations, individuals, 501(c)(3) nonprofits, and other nonprofit organizations who contribute to Bluefield University.

POLICY AND PRACTICES

1. Full disclosure, by notice in writing, shall be made by the interested parties to the full Board of Trustees in all conflicts of interest, including but not limited to the following:
 - a. A Board member is related to another Board member or employee by blood or marriage.
 - b. An employee in a supervisory capacity is related to another staff member whom she/he supervises.
 - c. A Board member or her/his organization stands to benefit from a transaction between her/him or her/his organization and Bluefield University, or an employee of such Board member's organization receives payment from Bluefield University for any subcontract, goods, or services other than as part of her/his regular job responsibilities or other than as reimbursement for reasonable expenses incurred as provided in the *Bluefield University Trustee Bylaws* and Board policy.
 - d. A Board member's organization receives grant funding from Bluefield University.
 - e. A Board member or employee is a member of the governing body of a contributor to Bluefield University.

2. Following full disclosure of a possible conflict of interest or any condition listed above, the Board of Trustees shall determine whether a conflict of interest exists and, if so, the Board shall vote to authorize or reject the transaction or take any other action deemed necessary to address the conflict and protect Bluefield University's best interests. Votes shall be by majority vote, without the vote of any interested trustee.
3. A Board member or Board Committee member who makes application for employment with Bluefield University shall resign from the Board.
4. An interested Board member or employee shall not participate in any discussion or debate of the Board of Trustees, or of any Board Committee or Subcommittee thereof in which the subject of discussion is a contract, transaction, or situation in which there may be a perceived or actual conflict of interest. However, the interested Board member or employee may be present to provide clarifying information in such a discussion or debate unless objected to by any present Board or Committee member.
5. Anyone in a position to make decisions about spending resources (ice., transactions such as purchase contracts) – who also stands to benefit from that decision – has a duty to disclose that conflict as soon as it arises (or becomes apparent); she/he shall not participate in any final decisions.
6. A copy of this policy shall be given to all Board members and employees upon commencement of such person's relationship with Bluefield University or at the official revision of this policy. Each Board member and employee shall sign and date the policy at the beginning her/his term of service or employment and each year thereafter. Failure to sign does not nullify the policy.
7. This policy and disclosure form must be filed annually by all specified parties.

This policy was approved by the Board of Trustees of Bluefield University on April 17, 2010.

Disclosure of conflicts:

Signature: _____ **Date:** _____

Print Name: _____