

HAMPSHIRE COLLEGE CONFLICT OF INTEREST POLICY

This policy is in addition to other College regulations, policies and guidelines relating directly or indirectly to the duty of loyalty that is owed by members of the College community. This policy applies to all members of the College community, including academic, administrative and support staff, and where appropriate, students (hereinafter referred to as “members”). Every member of the College community becomes involved in situations where their loyalties may be divided or where their personal interest may conflict with their duty. In general, conflicts of interest occur when members are in a position to influence decision on policy, purchases, or research data where they may directly or indirectly receive financial benefit or give improper advantage to an associate, spouse, child, sibling, parent, dependent, or member of his/her household. Conflicts of commitment arise when members are involved in outside activities (directly or financially in other businesses) that substantially interfere with their primary responsibility to the College.

Hampshire College expects all members to exercise good judgment, professional commitment, and the highest ethical standards in all activities that can in any way affect the College. Every member has an obligation to avoid any activity, agreement, business investment (corporation, partnership, proprietorship, firm, franchise, association, holding company, joint stock company, receivership, trust or any other legal entity organized for profit), or other situation that could be construed to be in conflict with the College’s interest or to interfere with the member’s duty to serve the College.

I. Policy

- No member shall have a direct or indirect interest in any business enterprise that is a competitor of the College or conducts business with the College as a supplier. A member in a position to influence a College business decision for which he/she may materially benefit should disclose the nature of the conflict to his/her immediate supervisor, and, where possible remove himself/herself from the situation. In the event that a conflict or potential conflict exists, the supervisor may refer the situation promptly to the Vice-President for Finance and Administration. The member and Vice-President for Finance and Administration will agree in writing to a course of action to eliminate, avoid, or monitor the conflict. Resolution should be achieved in a time period not to exceed three months. All information and disclosures made in accordance with this policy will remain confidential unless agreed to by the parties involved.
- No member shall seek or receive, for personal or any other person’s gain, any payment whether for services or otherwise, loan (except from a bank), gift or discount of more than nominal value, or entertainment that goes beyond common

courtesies usually associated with accepted business practice from any business enterprise that is a competitor of the College or has current or prospective dealings with the College as a supplier or could benefit from the member's submission of research data.

- No member shall, for personal or any other person's gain, make use of or disclose confidential information learned as a result of employment or Board membership at the College. Any information that has been acquired in connection with sponsored research by College employees cannot be withheld from the sponsoring organization(s) for personal benefit.
- No member shall participate in the appointment, employment, promotion supervision or evaluation of members of his/her family or a person to whom they owe a personal or legal obligation.
- A member considering outside employment or consulting activities, should discuss potential conflicts of commitment or interest with his/her supervisor. An employee regularly involved in consulting activities from which they profit financially, are not in conflict if:
 - College resources are not used more than incidentally without reimbursing the College
 - The activities do not interfere with the member's ability to perform his/her primary responsibilities at the College.
- No member shall act or be involved in any situation that potentially conflicts with the principle that this policy is intended to implement.

II. Disclosure and Review

Full disclosure of relevant information relating to conflicts of interest and the establishment of a public record are in the best interest of both the College and the member. Disclosure will not necessarily restrict or preclude a member's activities. In fact, activities that may at first appear questionable may be deemed acceptable and permissible when all facts regarding the activity are examined.

Members are responsible for disclosing potential conflicts of interest, and/or commitment. Each member shall complete the Conflict of Interest Disclosure Form (see Appendix A) at the time of hire and annually thereafter.

III. Appendix A

CONFLICT OF INTEREST DISCLOSURE STATEMENT

Name: _____
please print

Title: _____
please print

Department: _____
please print

After thoroughly reading the policy, if you identify a conflict of interest that relates to a situation in which your own personal interests interfere with assigned duties, describe conflict (please be specific).
If you do not have a conflict, we still ask that you sign and return the form to my attention.

I hereby certify that I have read and understand the Conflict of Interest Policy of Hampshire College. I further certify that, to the best of my knowledge, the contents of this disclosure statement are complete and accurate.

Signature of Member: _____

IV. Appendix B

Schedule of Substantive Policy and Implementation Changes

- May 2004 Voted to approve
Used paper form to exempt staff, and later included all staff. Records are archived in Treasurer's Office.
- June 1, 2009 Initiated electronic version of paper form. Policy posted to web page.
All staff required to sign upon entry of timesheet in Datatel.
- July 7, 2009 Removed reference to "members of the Board of Trustees" in first paragraph. All staff required to complete form annually upon timesheet entry for first pay period of fiscal year.