

**GADSDEN STATE COMMUNITY COLLEGE
Procedure for Managing Potential Conflicts of Interests**

General Provision

Full disclosure and consultation regarding potential conflicts of interest is in the best interest of Gadsden State Community College and its employees. However, Gadsden State Community College respects the privacy of its employees and does not wish them to disclose financial or personal information that does not relate to a potential conflict of interest. Any employee who receives such financial or personal information in the process of disclosure is responsible to take reasonable steps to maintain the confidentiality of such information.

Evaluating Disclosures

Those evaluating disclosures at each level of review need a framework for determining the permissibility of activities and for assessing the degree to which disclosed activities may pose risk to Gadsden State Community College. Below is a list of suggested questions for the initial determination. Other questions related to special circumstances should be added as appropriate.

- a. Is the employee involved in a situation and/or circumstance that are not in compliance with the policies of the State Board of Education, the Department of Postsecondary Education, the College, and State and Federal laws?
- b. Is the employee involved in a situation that might raise questions of bias, inappropriate use of College assets or other impropriety?
- c. Is there any indication that the employees' obligations to the College are not being met?
- d. Does the employee appear to be subject to incentives that might lead to conflicts or bias?
- e. Has the employee inappropriately represented the College to outside entities?
- f. Is there any indication that the employee has improperly favored any outside entity or appears to have incentive to do so?
- g. Could the employee's circumstances represent any possible federal or state violation(s)?
- h. Could the proposed activity withstand public scrutiny?
- i. Has all relevant information concerning the employee's activities been acquired?
Has there been full disclosure of information?

Management of Conflict

Many conflicts can be managed after an appropriate evaluation. Situations will be found to be:

- a. Permitted as is, because the disclosed information does not represent a conflict of interest or other possible source of unreasonable bias or inappropriate activity, or
- b. Unacceptable, and thus prohibited because the disclosed information represents a conflict of interest and/or is a possible source of unreasonable bias or inappropriate activity. The employee's conflict of interest must be immediately resolved and reported on the disclosure form. If the employee objects to the evaluation or decision made by the Supervisor and/or Executive Staff member, the employee shall complete the appeal form for evaluation by the President.

**Conflicts of Interest and Ethics
Disclosure Form**

To: _____
Supervisor

From: _____
Employee

Date: _____

Description of Conflict or Potential Conflict of Interest:

Proposed Resolution:

Signature: _____
Employee

Date: _____

Signature: _____
Supervisor

Date: _____

Signature: _____
Executive Staff Member

Date: _____

**Conflicts of Interest and Ethics
Appeal Form**

To: _____, President
Gadsden State Community College

From: _____, Employee

Date: _____

Appeal Statement(s):

Signature: _____
Employee

Response to Appeal:

Signature: _____
President

Date: _____