

WILLIAM JEANES MEMORIAL LIBRARY

Conflict of Interest Policy

The William Jeanes Memorial Library Board of Directors has adopted the following policy designed to avoid any possible conflict between the personal interests of the Board or Library Staff and the interest of the Library.

The purpose of this policy is to ensure that decisions about William Jeanes Memorial Library (hereafter Library) operations and the use or disposition of WJM assets are made solely in terms of the benefits to WJM, and are not influenced by any private profit or other personal benefit to the individuals affiliated with the WJM who take part in this decision. In addition to actual conflicts of interest, Board members and Staff are also obligated to avoid actions that could be perceived or interpreted to be in conflict with WJM's interest.

Definitions

Interested Person

Any Board member who has a direct or indirect financial interest, as defined below, is an interested person. Any Staff member regularly involved in the initiation, review, or approval of significant contracts or commitments who has a direct or indirect financial interest is an interested person.

Financial Interest

A person has a financial interest if the person has, directly or indirectly, through business, investment, or family:

- a. An ownership or investment interest in any entity with which WJM has a transaction or arrangement,
- b. A compensation arrangement with WJM or with any entity or individual with which WJM has a transaction or arrangement, or
- c. A potential ownership or investment interest in, or compensation arrangement with, any entity or individual with which WJM is negotiating a transaction or arrangement.

Compensation includes direct and indirect remuneration in cash or in kind as well as gifts or favors that exceed \$25.00.

A financial interest is not necessarily a conflict of interest. Under Section 2 below, a person who has a financial interest may have a conflict of interest only if the Board of Trustees decides that a conflict of interest exists.

Procedures for Conflict of Interest

1. Duty to Disclose

In connection with any actual or possible conflict of interest, an interested person must disclose the existence of the financial interest when WJM is considering purchasing or contracting with a party for goods or services valued over \$500. The interested person must be given the opportunity to disclose all material facts at a full meeting of the Board of Directors.

2. Determining Whether a Conflict of Interest Exists

After disclosure of the financial interest and all material facts, and after any discussion with the interested person, he/she shall leave the meeting while the determination of a conflict of interest is discussed and voted upon. The remaining members of the Board of Directors shall decide if a conflict of interest exists.

3. Procedure for Addressing the Conflict of Interest

- a.** In instances where the amount of the goods or services exceeds \$500 and it has been determined that a conflict of interest exists, the President of the Library Board of Directors may, if appropriate, designate a disinterested party or committee to determine whether, with reasonable efforts, a more advantageous transaction or arrangement can be made with another party or entity that would not give rise to a conflict of interest. This determination shall be made within the parameters of the WJM Bid and Procurement Policy or Financial Policy.
- b.** If a more advantageous transaction or arrangement is not reasonably possible under circumstances not producing a conflict of interest, the Board of Directors shall determine by a vote of the disinterested parties whether it is in the best interest of WJM to enter into the transaction or arrangement.

4. Recording of Procedures

An account of the disclosure, determination, and procedure to address the conflict of interest will be recorded in the official minutes of the Board of Directors' meeting.

Conduct

1. Political Activities

Trustees and staff may not use the Library's name, property or facilities in connection with any political activity. The Library may engage in lobbying activities in an attempt to influence legislation, but may not intervene directly or indirectly in any political campaign on behalf of, or in opposition to, any candidate for public office. Board members and Staff, when engaging in political activity as individuals, must scrupulously distinguish between their personal conduct and activity on behalf of the library.

2. Public Comment

Each Board member has an obligation to help donors, contributors, the media, and the general public to see the Library in the best possible light. Public comment, whether to a group or an individual, must be supportive of the Library's initiatives, activities and personnel. Disagreements are to be aired in confidence, in the board room. The President of the Board is the official spokesperson for the Board of Directors. Please refer media requests to either the Library Director or the President.

Compensation

1. Board Reimbursements

Board members receive no compensation for their services. With approval of the Financial Committee, Board members may request and receive budgeted reimbursements for materials used on behalf of the organization, including travel and meals, up to \$500. Expenses over \$500 must receive Board approval.

2. Gifts and Gratuities

Board members and Staff may accept personal gifts of token value, under \$25. Gratuities directed at Board members and Staff become the property of the Library.

3. Exceptions

Any exceptions must be pre-approved by the Board of Directors.

Violations

1. Board Members

Any Board member failing to disclose a conflict of interest or violating a standard of conduct may be asked to step down from the Board.

a. Violations are to be brought to the attention of the Executive Committee (Board officers.) If meriting serious action, the Executive Committee shall discuss these violations in person with the Board member. The Executive Committee may ask a Board member to resign in the best interests of the organization.

b. If a Board member wishes to further explore the issue, he/she and the Executive Committee may jointly appoint a 3-person fact-finding committee to review the issues and make a recommendation. The Board member and the Executive Committee should jointly agree on the statement concerning the resignation to be made to other Board members, staff, donors, volunteers, etc. Violations must be documented.

2. Staff

A failure to disclose a conflict of interest or any other violation of a standard of conduct by a staff member shall be handled according to procedures in the WJM Personnel Policy.

This policy statement shall be made available to each Board member and each Staff person appointed to a WJM position which regularly involves initiation, review, or approval of significant WJM contracts or commitments. Such people will be asked to sign the statement below.

I have read and understand WJM’s policy on Conflicts of Interest. I agree to report promptly any such interest which arises in my conduct of WJM business and, in other respects, to comply with the policy and its procedures.

Signature:

Date:

Approved by the Library Board–1/26/22