

SWARTHMORE COLLEGE STAFF CONFLICT OF INTEREST POLICY *(From Employee Handbook)*

We know that staff members have lives outside the College and are involved with family, friends, and other commitments such as recreation, community service, and professional development activities. Swarthmore encourages activity that contributes to a high quality of life as long as such activity is not in conflict with the duties that staff members have to the College.

Simply put, we expect that staff members will not engage in activities that compromise the College's position or integrity through actions such as self-promotion, appropriation of the assets of the College, influence peddling, or abuses of confidence. Staff, who own or have an interest in an outside business, should ensure that business activities are kept entirely separate from their employment at the College. They should not solicit or conduct their business on College time or property.

Staff members may not engage in activities that interfere with fully performing their position duties and responsibilities at the College. You are expected to avoid situations in which your judgment in making decisions or taking actions on behalf of the College may be adversely affected by personal consideration or situations where your position performance, loyalty, or stewardship to the College is compromised.

For example, using College facilities or supplies for non-College purposes or holding a financial interest in a business that supplies goods or services to Swarthmore may both constitute conflicts of interest.

The following guidelines are intended to help ensure that Swarthmore receives from its staff the amount and quality of effort, judgment, and loyalty that are necessary for the College to accomplish its objectives in ways that are consistent with its standards of excellence.

You must inform your supervisor and receive written approval before engaging in any outside activities that pose the potential for conflict of interest, for example:

- Full-time employment outside of Swarthmore.
- Employment at the College as an outside vendor.
- Employment within the College in addition to your primary employment.
- Outside business, philanthropic, community, political, or other interests or activities that would significantly impact your work commitment or would involve the use of College facilities.
- The acceptance of gifts, gratuities, or favors in an amount in excess of \$100 from individuals or organizations with which the College conducts business or that are seeking association with the College or the extension of such gratuities or favors, which might reasonably be interpreted as an attempt to influence the recipients in the conduct of their duties.
- At no time should an employee of the College give or accept any gifts, gratuities, or favors from any federal, state or local government official.
- Outside business interests, your own or those of members of your family, related to suppliers of goods and services to the College.
- The use of information that the College considers privileged or confidential, for non-College purposes.
- Using the name of the College for monetary profit or acting as a private person in a way that could create the impression you are speaking for the College.

Any activities and interests that are potential conflicts of interest require advance supervisory approval. Failing to report such activity immediately, or continuing an activity if your supervisor has disapproved it, is grounds for disciplinary action, including termination of employment.

For specific requirements related to Research and Other Sponsored Projects, see [Financial Interest Disclosure Policy for Sponsored Projects at Swarthmore College](#).