

# **BLOOMFIELD TOWNSHIP PUBLIC LIBRARY POLICY MANUAL APPENDICES**

## **Conflict of Interest Policy**

All Board trustees, employees, and volunteers of the Bloomfield Township Public Library (BTPL) are held to the highest standards of ethical conduct. Elected and appointed public office and public employment is a public trust. The intention of a Conflict of Interest Policy is to protect the transparency of the decision-making process of the Library and to enable the constituencies of the BTPL, as a public entity, to have confidence and trust in the Library.

The purpose of the Conflict of Interest Policy set forth below is to help inform trustees, employees, and volunteers about what constitutes a conflict of interest, assist them in identifying and disclosing actual and potential conflicts, and help ensure the avoidance of conflicts of interest where necessary.

### **Definitions:**

A conflict of interest may arise when the personal, professional, and business interests of a trustee, employee, or volunteer – or their immediate family - potentially or actually compete with the interests of the Bloomfield Township Public Library.

Conflict of Interest means a conflict, or the appearance of a conflict, between the private interests and official responsibilities of a person in a position of trust.

Interest means a direct or indirect pecuniary or material benefit accruing to a library trustee, employee, or volunteer as a result of a contract with the Library which such officer or employee or volunteer serves.

Persons in a position of trust include trustees, employees, and volunteers of the Bloomfield Township Public Library. Trustee means member of the Library Board. Employee means any person who receives all or part of his/her income from the payroll of the Bloomfield Township Public Library. Volunteer means a person – other than a board member – who works with the BTPL and does not receive compensation for services and expertise provided to the Bloomfield Township Public Library.

Immediate family means spouse, child, stepchild, parent, stepparent, parents-in-law, siblings and siblings-in-law, stepbrother, stepsister, or legal guardian.

All conflicts of interest are not necessarily prohibited or harmful to the Bloomfield Township Public Library. However, full disclosure of all actual and potential conflicts and a determination by the Library Board is required. Trustee conflicts proceed with the interested Trustee recused from participating in debates and voting on the matter.

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## **Financial Interests:**

To assist in understanding and to be in full compliance with the Conflict of Interest policy, the following is a list of potential areas where issues of ethical conduct most often arise:

- Investing in suppliers
- Borrowing or lending to supplier companies
- Accepting employment with entities that have a business relationship with BTPL
- Accepting substantial gifts or entertainment that might be intended to influence decisions and/or cause an appearance of impropriety
- Misusing privileged information
- Providing information to an outside party or business that gives that entity a competitive advantage
- Using position for personal gain
- Associating BTPL with outside business or political activity

This list is not all-inclusive. Other conflict situations may arise and will be treated on a case-by-case basis. If there are any doubts about whether an interest is covered by this policy, full disclosure should be made to the Library Director or the Library Board.

## **Procedures:**

All actual and potential conflicts of interests shall be disclosed by Trustees, employees, or volunteers to the Board through the annual disclosure form and/or to the Board whenever a conflict arises.

On an annual basis, all Trustees, employees, and volunteers shall be provided with a copy of this policy and required to complete and sign the acknowledgment and disclosure form below. All completed forms shall be provided to and reviewed by the Library Director, as well as all other conflict information, and provided to the Library Board where necessary. If the Library Director is a party to the Conflict of Interest issue, the matter will be reviewed by the Assistant Library Director and the Library Board.

It is required that the existence and resolution of the conflict be documented in the Bloomfield Township Public Library records, including in the minutes of any meeting at which the conflict was discussed or voted upon.

## **Violation of policy:**

If the Library Board has reasonable cause to believe a Library Trustee, employee, or volunteer has failed to disclose actual or possible conflicts of interest, it shall inform the member of the basis for such belief and, at a formal hearing, afford the member an opportunity to explain the alleged failure to disclose. Additionally, any person may file a

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signed written complaint to the Library Director or Assistant Library Director (see exception above) alleging a violation of policy.

After hearing a response, a proper investigation will be undertaken as warranted and, after consultation with the Library Attorney, a determination will be made if a violation has occurred. If the Library Board determines that a person has failed to disclose an actual or possible conflict of interest, appropriate disciplinary and corrective action will follow. The appropriate corrective action will be determined on a case-by-case basis and may include dismissal or a request for resignation from the Library Board or staff.

**Distribution:**

The Library Director shall include a copy of the Policy on Conflict of Interest in the Board of Trustees Operating Procedures Manual and in the Employee Handbook.

Approved: October 15, 2019