



DENMARK
TECHNICAL COLLEGE

AREA COMMISSION POLICY #01.30.01.06 (2020)
AREA COMMISSION CONFLICT OF INTEREST POLICY

Policy Title: Area Commission Conflict of Interest Policy

Policy Type: Area Commission

Policy Number: AC Policy # 01.30.01.06 (2020)

Legal Authority: S.C. State Ethics, Government Accountability, and Campaign Reform Act

State Board Policy: 8-0-105

Approval Date: June 24, 2020

Responsible Office: Office of the President

Responsible Executive: President

Applies to: College Area Commission

POLICY STATEMENT

The Denmark Technical College Area Commission (Area Commission) is committed to maintaining the highest standards of integrity, and the Area Commission believes it is vital that the public understands and remains confident in the Area Commission's commitment to these standards. For this reason, any appearance of a conflict of interest at any level of governance, administration, or academia, must be avoided. Therefore, it is the policy of the Area Commission that no member of the Area Commission may have an economic or business interest in any transaction with the Area Commission or with Denmark Technical College unless such interest receives an opinion of the South Carolina State Ethics Commission indicating the matter does not violate the South Carolina State Ethics, Government Accountability, and Campaign Reform Act (State Ethics Act).

Further, it is the policy of the Area Commission that all Denmark Technical College Area Commission members perform and conduct themselves in an ethical and accountable manner in keeping with the provisions of the State Ethics Act and all related policies, procedures, regulations, or interpretations thereof. Failure to adhere to the provisions of the State Ethics Act may result in personal liability, other penalties as outlined in the law, and/or agency disciplinary action.

The integrity of the Area Commission’s processes and decisions depends on respecting the fact that conflicts of interest may exist and that they must be acknowledged and addressed. Area Commission members shall, at each public meeting, disclose any known conflict of interest. Any acknowledged conflict of interest shall be documented in the minutes of the meeting. In the case of a member who has a conflict of interest but has not disclosed it, then the member is in violation of this policy if they do not disclose it.

The Denmark Technical College Area Commission finds that no member of the Area Commission may hold the position of Chair or Vice Chair of the Area Commission at any time that a Commission member has a family member, as defined by the S.C. Ethics Act, employed by the College.

The Area Commission adopts this policy to eliminate any appearance of conflicts of interest or favoritism in the conduct of its business. This policy is intended to help members of the Denmark Technical College Area Commission avoid situations that present potential conflicts of interest.

TABLE OF CONTENTS	PAGE NUMBER
Policy Statement	1-2
Procedures.....	2-3
Definitions.....	4
Contacts.....	4
Publication	4
Review Schedule.....	4
Related Documents	4
Forms	5

PROCEDURES

Conflict of Interest Training

1. Conflict of interest training will be conducted annually at the March meeting of the Area Commission. If the March meeting is not held, the training will be conducted at the call of the Commission Chair. Individual training is permissible and must be documented.
2. Each Area Commission member and key employee will complete a Conflict of Interest Disclosure form annually. The Conflict of Interest form should include a statement that the individual has read the conflict of interest policy and completed the training.

3. Conflict of Interest Disclosure forms should be submitted to the Area Commission Chair (commission members and President) and to the President (key employees). Completed forms shall be maintained in the Office of the President.

Disclosure of a Conflict of Interest

1. In the event of an actual or potential conflict of interest, the matter should be disclosed on the Conflict of Interest Disclosure form.
2. The Conflict of Interest Disclosure form should be submitted within five (5) business days of a known or potential conflict.
3. Conflict of Interest Disclosure forms should be submitted as described below.

Disclosure Process

<i>If a conflict exists with:</i>	<i>Then submit disclosure form to:</i>
Commission Member	Commission Chair
Commission Chair	Commission Vice Chair
President	Commission Chair
Key Employee*	President

Violations of the Conflict of Interest Policy

1. If an Area Commission member or employee has reasonable cause to believe an interested person has failed to disclose actual or possible conflicts of interest, the Commission Chair and President shall be notified.
2. The Area Commission Chair and President shall inform the interested person of the basis for such belief and afford the interested person an opportunity to explain the alleged failure to disclose. Notification to the interested person should be made within five (5) business days of the report of the alleged conflict.
3. The Area Commission Chair shall investigate the conflict of interest. If, after hearing the interested person’s response and after making further investigation as warranted by circumstances, it is determined the interested person has failed to disclose an actual or possible conflict of interest, it shall take appropriate disciplinary and corrective action. The matter shall be brought forth to the full Commission for discussion by the Executive Committee.
4. In the event a conflict of interest is confirmed, a Corrective Action Plan shall be implemented within five (5) business days of the Commission’s decision.

DEFINITIONS

Family member - (a) the spouse, parent, brother, sister, child, mother-in-law, father-in-law, son-in-law, daughter-in-law, brother-in-law, sister-in-law, grandparent, or grandchild (b) a member of the individual's immediate family.

Key employee – an employee who has a reporting line directly to the College President.

CONTACT(S)

The President officially interprets this policy and is responsible for matters pertaining to this policy as it relates to Denmark Technical College.

PUBLICATION

The policy will be widely distributed to the College community. To ensure timely publication and distribution thereof, the Associate Vice President for Institutional Advancement and Effectiveness will make every effort to:

- Communicate the policy in writing, electronically, or otherwise to the College community, including current and prospective students within fourteen (14) days of approval;
- Submit this policy for inclusion in the Policy Library within fourteen (14) days of approval;
- Post the policy on the College's webpage and all other related webpages, in the student handbook, and in the College catalog; and
- Educate and train all stakeholders and appropriate audiences on the policy's content as necessary.

REVIEW SCHEDULE

- Next Scheduled Review: June 24, 2022
- Approved by Area Commission: June 24, 2020
- Revision History: None
- Supersedes: N/A

RELATED DOCUMENTS

There are no related documents associated with this policy.

FORMS

Conflict of Interest Disclosure form.